

2017 Analysis of Impediments to Fair Housing Choice



City of Fort Wayne
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Table of Contents

I. Executive Summary	3	VI. Fair Housing Issues.....	46
Introduction	3	Racially or Ethnically Concentrated	
General Findings	3	Areas of Poverty (R/ECAPs)	46
Fair Housing Goals and Priorities	4	Disparities in Access to Opportunity	48
II. Introduction.....	7	Disproportionate Housing Needs	63
Analysis of Impediments to		VII. Publicly Supported Housing	70
Fair Housing Choice	7	Overview.....	70
Fair Housing Choice	8	Demographics.....	70
HUD Regulations	8	Location	73
Methodology	9	Housing Authority Initiatives	78
III. Community Participation Process.....	10	VIII. Disability and Access	79
Overview.....	10	Population Profile	79
IV. Assessment of Past Goals and Strategies	21	Housing Accessibility.....	84
Past Goals.....	21	Disparities in Access to Opportunity	89
Progress Made.....	24	IX. Policy Analysis.....	90
V. Demographic Summary.....	25	Public Policies.....	90
Population Trends	25	Private Sector	97
Segregation/Integration	31	Fair Housing Enforcement,	
		Outreach Capacity, and Resources	102

X. Fair Housing Goals and Priorities	104
Impediments to Fair Housing	104
Fair Housing Action Plan	108

I. Executive Summary

Introduction

The preparation of this Analysis of Impediments to Fair Housing Choice (AI) serves as a component for the efforts of the City of Fort Wayne to satisfy the requirements of the Housing and Community Development Act of 1974.

This act requires that any community receiving Community Development Block Grant (CDBG) funds affirmatively further fair housing. The AI is a review of local regulations and administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing. It also assesses the conditions, both public and private, that affect fair housing choice.

Aided by an extensive stakeholder consultation and community engagement process, the City built the context for analysis by examining demographic, economic, and housing market trends within the framework of access to housing opportunities.

General Findings

The following is a summary of some key points derived from the data analysis:

- The population of Fort Wayne has changed significantly in the past 20 years. Between 1990 and 2010 the non-White population nearly doubled. Hispanics and Asians were major drivers of this change.
- Owner-occupied units comprise the majority of the City's housing stock at 63%. There are large differences in homeownership rates between racial and ethnic groups. Specifically, Black households are much less likely to own their homes than individuals of other races.
- There are six census tracts in the City that qualify as R/ECAPs, all in the southeast. These are tracts with a high percentage of both non-White residents and households living in poverty.

- Some of HUD's Opportunity Indices have uniform scores across the City. For others, the central and southeastern neighborhoods of Fort Wayne have lower scores (i.e. less access to opportunity). This lower scoring area roughly coincides with the location of the City's R/ECAPs.
- The Housing Authority's HCV waiting list was opened on July 5 and 6, 2017, and accepted 2,923 applications over those two days. The public housing program's waiting list currently has 2,035 applicants.
- Persons with disabilities live throughout Fort Wayne. However, from a very general perspective, southern and southeastern neighborhoods tend to have higher rates of persons with disabilities. This includes the City's R/ECAP tracts.

Fair Housing Goals and Priorities

The combination of quantitative data analysis and qualitative research identified a series of impediments that significantly contribute to fair housing issues in Fort Wayne. These impediments were assigned three priority levels (High, Medium, and Low) based on the amount and strength of the supporting evidence that initially identified the factor. The ultimate purpose of completing an AI and identifying impediments that significantly contribute to fair housing issues is to inform the City's future planning processes and funding decisions. Moving forward, the City will allocate a portion of their federal resources to address these issues and affirmatively further fair housing.

In order to achieve this outcome, a series of goals was developed to overcome the identified impediments and related fair housing issues. Limited financial and staff resources preclude the City from pursuing the resolution of every contributing factor identified in the AI. Therefore, only contributing factors determined to be a High or Medium priority are addressed by one or more of the following goals.

Goal: Enhance, preserve, and stabilize the quality and affordability of Fort Wayne's housing stock

1. Create new affordable homeownership opportunities by funding acquisition/rehab/resale activities, with a special focus on projects outside of the City's R/ECAPs, with the goal of creating 1-5 units over five years.
2. Create new affordable homeownership opportunities by providing downpayment assistance, marketing the program to members of the protected classes who might otherwise face difficulties obtaining conventional loans, with the goals of assisting up to 25 households over five years.
3. Help homeowners complete rehabilitation projects that improve the condition, appearance, and/or accessibility of their property, especially in the City's R/ECAP areas, assisting approximately 10 households per year.
4. Create new affordable rental housing by funding construction, rehabilitation, or adaptive reuse of non-residential buildings, with a special focus on projects outside of the City's R/ECAPs, with the goal of creating 20-40 units over five years.
5. Revise the City's tax abatement program to extend the duration of the abatement.
6. Extend eligibility for City tax abatements to areas outside the R/ECAP census tracts with high neighborhood opportunity as defined by this AI.
7. Adopt proactive code enforcement practices that include assisting property owners to improve the condition of existing housing.
8. Within 18 months, create a resource guide for affordable housing developers to help them navigate the City's processes and contribute to the City's efforts to affirmatively further fair housing.

Goal: Invest in non-housing community revitalization and economic development focused on benefits to protected classes

1. Provide CDBG funds to partners like Lutheran Social Services, YWCA, and other providers of job training that help members of the protected classes secure jobs with a living wage, with a goal of serving 50 individuals per year.
2. Evaluate expanding the Neighborhood Commercial Corridor Program in southeastern Fort Wayne outside of current Economic Development Target Areas, especially for businesses that can provide a critical community need such as access to fresh food.
3. Work with the Urban Enterprise Area (UEA) to identify programs to promote small businesses that employ members of the protected classes or are located in or near the City's R/ECAP areas.
4. Designate OHNS staff to attend regular meetings held by Neighborhood Associations in order to maintain standing communication.

Goal: Increase the level of fair housing knowledge among housing developers, real estate professionals, elected officials, and the general public

1. Partner with local organizations such as lending institutions, landlords, realtors, etc. to host an annual fair housing community forum.
2. In partnership with the Metropolitan Human Relations Commission, sponsor annual fair housing training workshops for elected officials, appointed boards, City department staff, and the general public.
3. Distribute all notices for educational opportunities, application periods, etc. in English, Spanish, and Burmese.
4. Annually train City staff to refer inquiries about fair housing to a designated staff person. In addition, train all staff that interact with the public in techniques to communicate with those with language and/or cultural barriers.

II. Introduction

Analysis of Impediments to Fair Housing Choice

The City of Fort Wayne, Indiana has prepared an Analysis of Impediments to Fair Housing Choice to satisfy the requirements of the Housing and Community Development Act of 1974, as amended. This act requires that any community receiving Community Development Block Grant (CDBG) funds affirmatively further fair housing. As a result, the City is charged with the responsibility of conducting its CDBG programs in compliance with the federal Fair Housing Act. The responsibility of compliance with the federal Fair Housing Act extends to nonprofit organizations and other entities, including local units of government that receive federal funds through the City.

Entitlement communities receiving CDBG funds are required to:

- Examine and attempt to alleviate housing discrimination within their jurisdiction;
- Promote fair housing choice for all persons;

- Provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, or national origin;
- Promote housing that is accessible to and usable by persons with disabilities; and
- Comply with the non-discrimination requirements of the Fair Housing Act.

These requirements can be achieved through the preparation of an Analysis of Impediments to Fair Housing Choice (AI).

The AI is a review of a jurisdiction's laws, regulations, and administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing, as well as an assessment of conditions, both public and private, affecting fair housing choice.

Aided by an extensive stakeholder consultation process, the City built the context for analysis by examining demographic, economic, and housing market trends within the framework of access to housing opportunities.

Fair Housing Choice

Equal and free access to residential housing (housing choice) is a fundamental right that enables members of the protected classes to pursue personal, educational, employment, or other goals. Because housing choice is so critical to personal development, fair housing is a goal that government, public officials, and private citizens must embrace if equality of opportunity is to become a reality.

As a federal entitlement community, the City has specific fair housing planning responsibilities. These include:

- Conducting an Analysis of Impediments to Fair Housing Choice;
- Developing actions to overcome the effects of identified impediments to fair housing; and
- Maintaining records to support the jurisdictions' initiatives to affirmatively further fair housing.

HUD defines an impediment to fair housing choice as any actions, omissions, or decisions that restrict or have the effect of restricting the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin (also known as "protected classes").

This Analysis serves as the basis for fair housing planning, provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates, and assists in building public support for fair housing efforts. The elected governmental body is expected to review and approve the Analysis and use it for direction, leadership, and resources for future fair housing planning. Furthermore, the Analysis will serve as a point-in-time baseline against which future progress in terms of implementing fair housing initiatives will be evaluated and recorded.

HUD Regulations

Two major changes in HUD's program regulations have occurred since the City's last AI in 2010:

HUD Core Programs

As of a Final Rule effective March 5, 2012, HUD implemented policy prohibiting discrimination on the basis of sexual orientation, gender identify, and marital status by any housing provider who receives HUD funding, including public housing agencies, those who are insured by the Federal Housing Administration, including lenders, and those who participate in federal entitlement grant programs through HUD.

This change to HUD program regulations did not amend the Fair Housing Act to prohibit all discrimination in the private market on the basis of sexual orientation, gender identity, or marital status.

Affirmatively Furthering Fair Housing

HUD issued a Final Rule, effective on July 16, 2015, to clarify fair housing obligations for HUD grantees. The Final Rule requires grantees to use an “Assessment of Fair Housing” (AFH) process instead of the current “Analysis of Impediments” process. The AFH process has expanded community outreach requirements and is more intricately connected to the Consolidated Plan process. Per the Final Rule, the City of Fort Wayne will not have to submit an AFH until nine months prior to the start of FY 2021.

Methodology

The firm of Mullin & Lonergan Associates, Inc. (M&L) was retained to conduct the Analysis of Impediments to Fair Housing Choice. M&L utilized a comprehensive approach to complete the AI.

The following sources were utilized:

- The most recently available demographic data regarding population, household, housing, income, and employment at the census tract and municipal level, including data from the U.S. Census Bureau and HUD’s Affirmatively Furthering Fair Housing Data and Mapping Tool
- Public policies affecting the siting and development of housing
- Administrative policies concerning housing and community development
- Financial lending institution data from the Home Mortgage Disclosure Act (HMDA) database
- Consolidated Plans, Annual Plans, and CAPERs for the City
- The 2010-2014 Analysis of Impediments to Fair Housing Choice for the City of Fort Wayne
- Fair housing complaints filed with HUD, the Indiana Civil Rights Commission, and the Fort Wayne Metropolitan Human Relations Commission
- Interview group sessions conducted with agencies and organizations that provide housing and housing related services to members of the protected classes
- Citizen input received through public meetings and an online survey

See the *Appendix* for additional details on the methodology.

III. Community Participation Process

Overview

From June 12-14, 2017, a series of stakeholder interviews and consultations were conducted in Fort Wayne. Over the course of these three days, approximately 38 individuals from organizations whose mission involves housing in one facet or another provided feedback. Stakeholders were identified by local staff and invited to participate personally. Those who were not able to attend a group interview were contacted later by phone. One interview was held with Fort Wayne Housing Authority's Resident Advisory Board.

Two web-based surveys, one for the general public and one for other interested stakeholders, were posted on the City's, as well as publicized on the City's Facebook page. Each stakeholder who was invited to participate in an interview was also encouraged to share the survey with their colleagues, customers or constituents, and any other network of contact they deemed appropriate. During the five weeks the surveys were active, 23 responses were submitted.

The following public hearings were held during the course of preparing the AI:

- June 12 & 13 – two general hearings to solicit input from the public. Information about fair housing, the City's obligation to affirmatively further fair housing, and preliminary data and maps were presented. At least 14 members of the public attended.

Participation

The response to personal invitations for interviews was satisfactory; more than half of those contacted attended a group interview or expressed an interest in participating in the process. The information obtained through the stakeholder interviews, both in-person and through follow-up telephone conversations, was excellent and invaluable in shaping the fair housing analysis.

The response rate to the online survey was low for a community the size of Fort Wayne. Over 80% of the responses were submitted within the first two weeks of the survey opening, with a continued tapering off of responses during the following three weeks. Keeping the survey open for a longer period of time is unlikely to have increased the response rate significantly.

The following organizations participated during the community participation process:

- Amani Family Services
- Apartment Association of Fort Wayne/NEI
- AWS Foundation
- Back Home Alliance
- Biggs Property Management, Inc.
- Board of Safe Housing Builders
- City of Fort Wayne Office of Neighborhood Services
- City of Fort Wayne Department of Planning Services
- Fort Wayne Community Schools
- Fort Wayne Housing Authority (FWHA)
- FWHA Resident Advisory Board
- Habitat for Humanity
- Housing and Neighborhood Development Services
- Language Services Network
- League for the Blind and Disabled
- Legacy Once, Inc.
- Metropolitan Human Relations Commission
- *El Mexicano* Newspaper
- Northeast Area Partnership
- Northern Indiana Healthcare System
- Ren Pointe YMCA
- The Rescue Mission
- SCAN, Inc.
- Southeast Area Partnership
- Southwest Area Partnership
- Turnstone
- Vincent Village, Inc.

Stakeholder Interviews

The City conducted a series of stakeholder interviews and two public meetings from June 12-14, 2017. They met with affordable housing providers, advocacy organizations, homeless assistance providers, neighborhood groups, Fort Wayne Housing Authority staff and residents, and several municipal departments.

A summary of the comments related to fair housing that were identified over the course of these meetings is included below. It is not an exhaustive account of every remark made, nor does it reflect any official position of the City. The statements reflect the comments, opinions, and perspectives of the resident and stakeholders interviewed.

Affordable Housing Development

- There is an extreme shortage of affordable housing, verified by recent housing studies. However, the City has not been aggressive in using the results of those studies.
- The City is segregated because of where affordable housing has historically developed, and the price of land is perpetuating segregation.
- Most public housing is in the southeast. A vast majority of Housing Choice Vouchers are also in the southeast. FWHA has tried to increase

landlord participation in the HCV program, but stigma remains a problem.

- The City has completed some recent redevelopment projects in the southeast, but most new development in the area is assisted/low-income. Tax credit developments have tended to be located in the southeast.
- There has been a trend of conversion from owner-occupied to rental housing in the southeast. At the same time, property conditions have deteriorated and code enforcement has been complaint driven, not systematic or pro-active.
- The City has recently been investing in housing downtown, which has not happened before. The majority of new downtown units are market rate, but the Community Development Department has also committed some HOME funding to finance the development of new affordable units.
- There have been some projects that received tax credit financing in the outskirts of the City, but they tend to have poor transit access.
- Blight elimination has opened up a lot of scattered sites for redevelopment, but those are the projects that face the toughest financing challenges.

- NIMBYism against rental housing and low-income housing is common. The comprehensive plan update, for example, experienced the highest level of backlash regarding mixed income housing.
- Even though neighborhood organizations are vocally opposed to affordable housing development, official approval is usually granted eventually if there are no other mitigating issues.
- Neighborhood organizations continue to scrutinize projects after they are completed.
- How are new affordable units marketed? It seems as if they are full and have a waiting list as soon as they are completed.
- There is an opportunity to educate developers that are not actively developing affordable units.

Access to Community Assets

- The largest barrier to developing outside the central city is transportation access.
- Fort Wayne sidewalks are often not walkable or wheelchair accessible, and there are no audible crossing signals in the City.
- Communicating with the City about making accessibility changes (e.g. curb cuts, crosswalks) is cumbersome/slow. However, as

new projects are completed by Public Works, they are generally ADA-compliant.

- The largest barrier to development in the southeast is lack of amenities – grocery stores, businesses, entertainment, etc.
- Some populations, such as racial/ethnic minorities, have built strong communities and feel more comfortable in the southeast, even if other neighborhoods have better access to community assets.
- There is a perception that the southeast has high crime rates.
- It's difficult for low-income people to get assistance to start a business.

Protected Classes

- Burmese refugees have all been settled in the same area, sometime in the same apartment complexes, and are often given lower quality housing with less ongoing maintenance.
- Persons with language barriers have access issues with being able to report a crime. For example, there is fear that passports may be confiscated during the reporting process, their children may be taken away from their parents, etc.

- Culturally, it's hard to get Burmese individuals to file fair housing complaints, and especially to get them to go to court. There used to be a Burmese advocacy center that is no longer operating.
- There needs to be more homebuyer education for persons with limited English proficiency.
- It's very difficult to find affordable, accessible/visitable housing in Fort Wayne. Waiting lists for accessible housing are long; once a person with a disability finds an affordable and accessible unit, they are not nearly as transient.
- Disability is the highest category of fair housing complaints in the City; requests for ramps and home modifications are involved in a large volume of calls.
- Finding assistance to fund modifications can be difficult, but funding is not always the problem; a program that provided ramps had difficulty finding volunteers to build them.
- A huge obstacle for low-income housing is having a criminal background or poor eviction history. Sex offenders are the most difficult population to assist; the Rescue Mission operates the only homeless shelter that serves sex offenders.

- Agencies dealing with job placement usually deal with persons with mental/intellectual disabilities for unskilled work and are not as capable of dealing with other disabilities or protected classes. None of the agencies are suited for helping those with visual impairments, for example.
- Some neighborhoods aren't welcoming; there can be race-based tensions. Some homeowner associations prohibit renting of units within their restrictive covenants, or actively hassle homeowners who rent their units.

Governmental Operations

- The City's position in the past has seemed to be "every development is good development." There has not been a comprehensive plan for coordinating development and avoiding duplication of services.
- The City does a good job creating shovel-ready industrial parks, but there is no equivalent process for housing development.
- City forms are not available in other languages and the City does little to no non-English advertising; the City does not use a translation service (in-person or by phone).

- When refugees/immigrants do reach out to contact the City, staff is often not trained properly on how to interact with them.
- The racial/ethnic diversity of Fort Wayne employees is not representative of the City's population.
- Paired testing has not been successful in the past because it was hard to find the control tester, both in terms of finding volunteers in general and in maintaining anonymity in such a small community.
- Many property management companies have stopped accepting FWA Housing Choice Vouchers because of the administrative problems – inspections are inconsistent, payment is slow, case workers are ineffective, and so on.

Online Surveys

The City of Fort Wayne developed two online surveys to assess the fair housing experiences of residents and other fair housing stakeholders. The surveys were made available in English and Spanish beginning on June 12, 2017 through July 14, 2017. The survey was advertised through the City's official webpage as well as departmental social media accounts and printed flyers that were distributed at in-person interviews and public meetings.

Resident Survey

A total of 13 residents completed surveys as part of the process. Residents were asked to provide basic demographic information, indicate their experience with affordable housing, and respond to various scenarios intended to discern whether or not they could identify actions that may be considered discriminatory.

Housing Characteristics

More than half of those who responded to the survey (58%) indicated that they have lived at their current location for more than 10 years, and the same majority were also renters (58%).

Respondents were mixed when it came to the last time they searched for housing, with 42% looking in the past year, 25% not looking on over five years, and the rest in between. One-third indicated they not been treated unfairly in the search for housing in the past.

Three respondents had been discriminated against at least once while searching for housing in the past. It should be noted that this is a very small sample size, so only limited conclusions can be drawn from their experiences. Two listed disability as a reason for discrimination; other reasons given were children in household, marital status, and receipt of public assistance. Only one respondent did nothing about the incident; the other two filed a complaint, consulted a lawyer, or dealt directly with the other party involved.

Fair Housing Scenarios

Residents were presented with a series of scenarios to determine their knowledge of fair housing practices and law. Following each scenario, they were asked (1) whether they thought the actions in question were right or wrong, and (2) whether the actions in question were legal or illegal.

Scenario 1: The owner of a group of apartment buildings decides that families with young children will only be allowed to rent in one of the buildings because younger children tend to make lots of noise and may bother other tenants.

The majority of respondents (67%) indicated they did not think the owner should be able to assign families with younger children to one particular building. Most respondents were either unsure whether or not the practice is considered legal (42%) or did not feel the practice was legal (58%). (It is illegal to discriminate against families with children.)

Scenario 2: In checking references on an application for a vacant apartment, an apartment building owner learns that an applicant does not have the best housekeeping habits and does not always keep their current apartment clean and neat. The owner does not want to rent to such a person.

Respondents were split over whether the owner is allowed to reject a potential tenant based on poor housekeeping habits. The most common answer (42%) was that he might be, depending on the circumstances. The majority of respondents also indicated they were unsure of whether or not this was a legal practice (50%). (It is not illegal to discriminate against a person because of their housekeeping habits.)

Scenario 3: An apartment building owner is renting to a tenant who uses a wheelchair. The building is old and does not have a wheelchair ramp, and the tenant wants a small wooden ramp constructed at the building door to more easily access the building. The tenant volunteers to pay all costs and agrees to have the ramp removed at their own expense when they leave the apartment. The owner, however, believes such a ramp will not look good on the building, and does not allow the tenant to build the ramp on the property.

The majority of respondents (58%) indicated that regardless of the law, the apartment owner should not be able to decide whether or not to allow a wheelchair ramp to be constructed on his property. Another 33% thought it might be legal, depending on the circumstances. Likewise, 58% indicated they did not believe this practice to be legal, but 33% were not sure whether it is legal or not. (It is illegal to discriminate against persons with disabilities and deny them the ability to erect a ramp to access a housing unit.)

Scenario 4: In checking references on an application for a vacant apartment, an apartment building owner learns that the applicant has a history of mental illness. Although the applicant is not a danger to anyone, the apartment building owner does not want to rent to such a person.

A strong majority of respondents (83%) indicated that regardless of the law, the apartment owner should not be able to reject the application due to the applicant's mental illness. The majority of respondents also indicated they did not believe this practice to be legal (67%), but 33% were uncertain whether or not the practice was legal. (It is illegal to discriminate against persons with mental illness.)

Scenario 5: A white family is looking to buy a house. They go to a real estate agent and ask about the availability of houses within their price range. Assuming the family would only want to buy in areas where white people live, the agent decides to show them only houses in all-white neighborhoods, even though there are many houses in their price range in other parts of the community.

The majority of those asked (75%) indicated the real estate agent should not be able to decide to focus the search for the home in an all-White area. Respondents were slightly less sure over their understanding of whether or not the practice is legal; most indicated they did not believe it to be (67%). (It is illegal for a real estate professional to steer a homebuyer to specific neighborhoods based on the real estate professional's personal assumptions.)

Stakeholder Survey

Fair housing stakeholders accounted for 10 survey respondents. Most were affiliated with a non-profit housing provider or funder (57%). Most were organization staff members (57%) and held their position for fewer than five years (63%).

Stakeholders were asked a series of questions regarding organizational characteristics, experience with fair housing practices and/or discrimination, and to articulate their thoughts on fair housing impediments.

Organizational Characteristics

The organizations represented manage rental properties (43%), provide fair housing education and outreach (28%), or provide social services or real estate services (14% each). Respondents were asked to identify the population segments for which services are provided. The organizations serve all types of clients, although persons living in or seeking rental units was the most common response (75% and 63%, respectively). None of the respondents represented persons with limited English proficiency.

Respondents indicated that the primary barriers people face in the housing market include the inability to find affordable housing to rent (75%), the inability to qualify for a rental unit due to poor/credit history (75%) or a criminal background (75%), poor housing quality (63%), and the inability to qualify for a mortgage (63%).

Fair Housing/Discrimination Experience

Most of the respondents have encountered someone who has experienced housing discrimination (63%). Those who had encountered housing discrimination advised the person to seek help from a fair housing group or organization or file a complaint with a government agency.

The majority of respondents were not affiliated with organizations that had ever initiated legal action against persons or organizations accused of housing discrimination (88%). Stakeholders most commonly indicated that they have trained staff to recognize housing discrimination and inform clients/consumers of the resources available to them, sponsored fair housing workshops and seminars, and held trainings for their own organizations.

Barriers to Fair Housing

Stakeholders were additionally asked open ended questions regarding impediments to fair housing. The most commonly mentioned were discrimination by landlords (on account of source of income, residency in public housing, criminal background, etc.); a lack of affordable housing options; a lack of housing accessible or visitable to persons with a disability; and poor transit access.

Stakeholders were also asked what actions local government should undertake to remove these barriers. The most common suggestions were incentives and collaborations with private landlords; education directed toward the public, private landlords, and elected officials; and funding initiatives for accessible units, social services, and infrastructure.

IV. Assessment of Past Goals and Strategies

The following goals were included in the City's 2010-2014 Analysis of Impediments to Fair Housing Choice. They are grouped by identified impediments, and the progress that has been made toward their achievement is described.

Past Goals

Racial and Low Income Concentration

GOAL: Increase knowledge of housing opportunities across a wide array of neighborhoods through a housing choice center that would:

- a. Provide information to recipients of housing assistance as to available units across the city;
- b. Develop and initiate affirmative marketing strategies to promote housing opportunities for all persons across the city.

GOAL: Promote integration of diversity in neighborhoods throughout the City and mitigate concentrations of low and moderate income persons and minorities by developing programs focusing on measurable and comparable data for all neighborhoods.

Affordable Housing Concentration

GOAL: Cultivate an environment of unity among Fort Wayne neighborhoods and educate them on the context and benefits of affordable housing in order to help remove the stigma associated these developments.

GOAL: Continue to involve neighborhood organizations to identify the priorities and concerns of neighbors and involve them in planning, decision making, and development of projects.

GOAL: Conduct a review of the Section 8 program operated by the Fort Wayne Housing Authority with a focus on voucher utilization, location of where housing is found, and time needed to identify appropriate housing.

GOAL: Work with the FWHA and private landlords to identify barriers that reduce participation in the Housing Choice Voucher program and implement best practices to lower or remove these barriers.

GOAL: Consider the establishment of a Community Advisory Committee that includes Section 8 tenants and advocates, landlords, and representatives of communities concerned about the impact of families with vouchers moving into their neighborhoods.

GOAL: Incentivize the development of diverse, mixed-income communities in areas with lower concentrations of affordable housing.

Lower Homeownership Rates for African Americans

GOAL: Continue to collaborate with public and private partners to ensure they are aggressively pursuing all available funding offered through HUD for programs geared toward helping people with low incomes and members of racial/ethnic subpopulations realize their dream of homeownership. These programs include but not limited to the Homeownership Voucher Program.

GOAL: Streamline access to information and resources to facilitate the identification of appropriate homeownership options for minority households, specifically African American.

GOAL: Expand partnering arrangements with local and national organizations that provide home buying and financial literacy education to increase resident's ability to evaluate products.

GOAL: Create a Fort Wayne Housing Center.

GOAL: Encourage post-occupancy counseling programs to increase successful outcomes for low income and minority homebuyers.

Minorities Access to Credit

GOAL: Continue to promote fair lending practices by supporting educational efforts by Consumer Credit Counseling and the Fort Wayne Housing Authority.

GOAL: Conduct or fund periodic fair housing testing of real estate market participants, including realtors, mortgage lenders, insurance companies, and property managers.

GOAL: Partner with organizations that represent communities whose members lack bank accounts or have no or poor credit histories to establish accounts with traditional credit providers.

GOAL: Promote acceptable standards for credit counseling service providers.

Other issues of concern

GOAL: Partner with the Apartment Association to provide information on accessible rental units.

GOAL: Assess compliance with fair housing accessibility requirements for multifamily properties and initiate appropriate actions to prompt remediation.

GOAL: Partner with Metropolitan Human Relations Commission to raise public awareness of fair housing protections with information regarding, among other items: precedents and other changes to fair housing laws resulting from litigation, fair housing rights and available remedies and host a fair housing conference.

GOAL: Collaborate with Citilink and the Northeast Indiana Regional Coordinating Council (NIRCC) to identify alternative funding sources to allow public transit to expand service delivery hours and areas.

GOAL: Create a transparent and coordinated City process includes the following elements

- a. Publication of detailed information on how to apply for City programs, along with eligibility criteria, critical path steps, and clear guidelines as to how funding decisions are made;
- b. Cohesive working relationships within and among government agencies. These relationships are based on shared development and service agendas; and
- c. Oversight and monitoring of program activities and accomplishments by funding recipients, with rigorous accountability and reporting requirements, to better account for the impact of City investments and to create a base of information for marketing neighborhoods to prospective investors.

GOAL: Reach out to the Apartment Association and the landlord community to help educate the local standards for upkeep and maintenance.

Progress Made

In 2013 the City launched the Ready-to-Rent program, aimed at rapidly rehousing low-income families coming out of transitional and emergency shelters. As part of the program, the City and its partners actively worked with landlords in what Fort Wayne Housing Authority has called "Opportunity Neighborhoods" to identify rental units in an effort to create more housing options and choices for low-income families.

The Opportunity Neighborhoods are located throughout the City, in areas with less than 20% poverty rate, and may help to disperse some of the low-income concentration in the southeast when individuals have the chance to live in a different part of the community which may be more convenient to the jobs and schools their families use.

In 2016 the City supported an adaptive reuse rental housing project that will include affordable housing in downtown Fort Wayne, which has become one of the more desirable housing markets in all of Fort Wayne and northeast Indiana.

Through an inclusive and collaborative process, the HANDS Board has sought to incentivize the development of diverse, mixed-income communities in areas with low concentrations of affordable housing through developing scoring

criteria for rental housing tax credit projects that placed greater emphasis on de-concentration and other priority criteria.

Rental property owners who receive assistance through the CDBG and Lead-Based Paint Hazard Control Program are required to sign a 3-year marketing agreement that prohibits them from refusing a potential tenant solely because this tenant receives a Housing Choice Voucher. And this property owner agrees to list unit vacancies on Fortwaynehousingnow.com, which is a website commonly utilized by Fort Wayne Housing Authority to assist clients in finding housing units.

Lessons Learned

The 2010-2014 AI recommended a number of general partnerships and non-specific, aspirational goals to further fair housing choice in Fort Wayne. The City will continue to seek out and maintain these initiatives as applicable. However, these types of goals were avoided in this AI in favor of more unambiguous, quantifiable S.M.A.R.T. (Specific, Measurable, Action-oriented, Realistic, Time-bound) goals.

The previous AI also recommended a number of new municipal institutions or committees be formed. These goals proved to be infeasible and were omitted in this AI in favor of more direct and effective applications of the City's resources.

V. Demographic Summary

Population Trends

Historical Settlement

The City of Fort Wayne is named after General Anthony Wayne, a military leader who established the first American fort at the confluence of the three rivers - the St. Mary's, the St. Joseph, and the Maumee.

In 1824, the Indiana General Assembly established Allen County, and the 1830s brought about the construction of the Wabash and Erie Canal in Fort Wayne. This famous canal earned Fort Wayne the nickname "Summit City" because it was the highest point above sea level along the entire canal route.

Years later, with the advent of the railroad, Fort Wayne held a key position in the great Pennsylvania Railroad and soon become known as the "Altoona of the West." As the 1800s drew to a close, industry in Fort Wayne continued to flourish as immigrants poured into the area seeking jobs.

As the 1900s rolled on, Fort Wayne continued to flourish. Even during the Great Depression, Fort Wayne continued its economic boom. Companies like Lincoln National Life Insurance Corporation, Farnsworth Television, Zollner Piston, Central Soya, and the Holsum Bakery all called Fort Wayne home. Notable Fort Wayne landmarks like the Embassy Theatre, the Scottish Rite Auditorium, and the Lincoln Tower were built during these boom years.

Today, Fort Wayne is not only the hub of three rivers, it is also a major metropolitan area and the second largest city in Indiana.

Over time, the southeast quadrant of Fort Wayne became the most affordable part of the City and subsequently became the area with the highest level of non-White population. This pattern remains true today, even as the City is becoming more diverse.

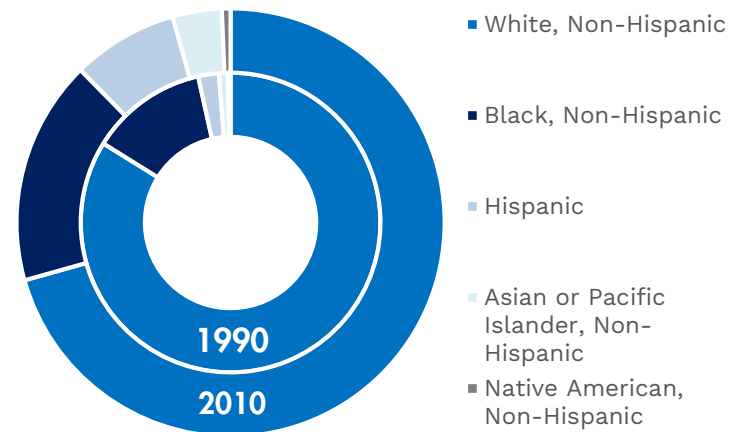
Race and Ethnicity

The population of Fort Wayne is primarily White, with non-Whites accounting for less than one-third (30%) of City residents. Black residents are the largest minority group, followed by Hispanics, then Asians. The Fort Wayne core-based statistical area (CBSA), which covers Allen, Whitley, and Wells Counties, is less diverse than the City, with 21% of residents being non-White.

The population of Fort Wayne has changed significantly in the past 20 years. Between 1990 and 2010 the non-White population nearly doubled, jumping from 16.3% to 29.5% of the City. Hispanics and Asians were major drivers of this change, growing by factors of 3.9 and 4.2, respectively.

The growing Hispanic and Asian populations are influenced by foreign-born residents' countries of origin, the most common being Mexico and Myanmar for the City and the region, respectively. Overall, Fort Wayne's foreign-born population has grown from 2.2% in 1990 to 7.4% in 2013, and from 1.5% to 5.5% in the region. Likewise, residents with limited English proficiency, most of whom speak Spanish, have increased from 1.5% to 4.9%.

Race/Ethnicity



Disability

Across Fort Wayne, 23.3% of residents reported a disability in 2013. The most common type of disability was an ambulatory disability, involving difficulty moving from place to place. Persons with ambulatory disabilities, which affect 6.7% of Fort Wayne residents, often require housing with accessibility features. The next most common disabilities are cognitive and independent living difficulties. This same pattern holds true for the region in roughly the same proportions.

Families with Children

Families with children comprise about 49.1% of families in the City, down from 51.3% in 1990. Family households in Fort Wayne are slightly more likely to have children than family households in the greater CBSA.

Disability Type

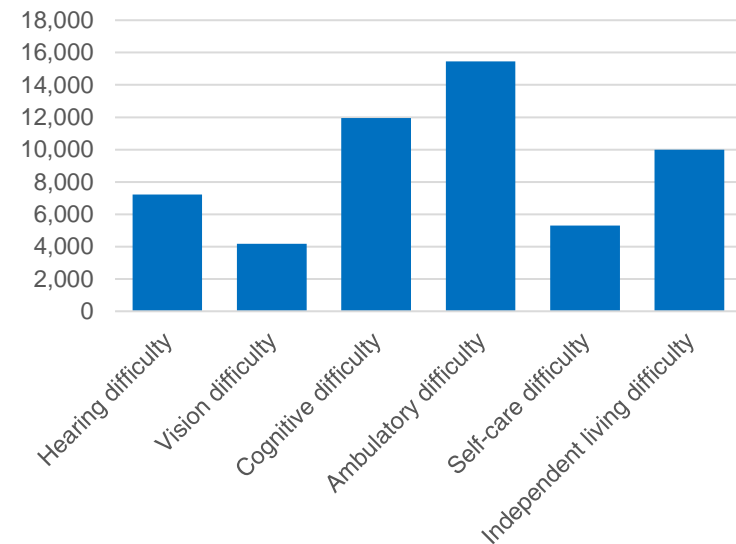


Table 1 – Demographics						
	Fort Wayne (Jurisdiction)			Fort Wayne, IN (Region)		
Race/Ethnicity		#	%		#	%
White, Non-Hispanic		163,350	69.61%		330,540	79.41%
Black, Non-Hispanic		36,313	15.47%		41,183	9.89%
Hispanic		19,237	8.20%		24,172	5.81%
Asian or Pacific Islander, Non-Hispanic		8,056	3.43%		9,947	2.39%
Native American, Non-Hispanic		685	0.29%		1,134	0.27%
Other, Non-Hispanic		6,521	2.78%		8,598	2.07%
National Origin	Country	#	%	Country	#	%
#1 country of origin	Mexico	5,659	2.41%	Mexico	6,229	1.60%
#2 country of origin	Myanmar	2,426	1.03%	Myanmar	2,473	0.64%
#3 country of origin	Bosnia & Herzegovina	1,232	0.52%	Bosnia & Herzegovina	1,232	0.32%
#4 country of origin	India	834	0.35%	India	1,076	0.28%
#5 country of origin	Guatemala	672	0.29%	Philippines	869	0.22%
#6 country of origin	Thailand	652	0.28%	China excl. Hong Kong & Taiwan	856	0.22%
#7 country of origin	Philippines	589	0.25%	Guatemala	745	0.19%
#8 country of origin	Canada	488	0.21%	Canada	717	0.18%
#9 country of origin	Vietnam	456	0.19%	Germany	693	0.18%
#10 country of origin	Germany	405	0.17%	Thailand	655	0.17%
Limited English Proficiency (LEP) Language	Language	#	%	Language	#	%
#1 LEP Language	Spanish	6,609	2.81%	Spanish	7,475	1.92%
#2 LEP Language	Other Asian Language	2,440	1.04%	Other Asian Language	2,470	0.63%
#3 LEP Language	Serbo-Croatian	669	0.28%	German	917	0.24%
#4 LEP Language	Vietnamese	489	0.21%	Serbo-Croatian	669	0.17%

#5 LEP Language	Arabic	425	0.18%	Vietnamese	503	0.13%
#6 LEP Language	Chinese	238	0.10%	Chinese	461	0.12%
#7 LEP Language	German	183	0.08%	Arabic	425	0.11%
#8 LEP Language	French	178	0.08%	Tagalog	191	0.05%
#9 LEP Language	Cambodian	149	0.06%	French	178	0.05%
#10 LEP Language	Tagalog	131	0.06%	Other Indic Language	172	0.04%
Disability Type		#	%		#	%
Hearing difficulty		7,215	3.11%		13,124	3.41%
Vision difficulty		4,182	1.80%		6,743	1.75%
Cognitive difficulty		11,945	5.15%		18,053	4.70%
Ambulatory difficulty		15,444	6.66%		23,394	6.09%
Self-care difficulty		5,306	2.29%		8,411	2.19%
Independent living difficulty		9,984	4.30%		15,544	4.04%
Sex		#	%		#	%
Male		113,678	48.44%		203,376	48.86%
Female		121,003	51.56%		212,881	51.14%
Age		#	%		#	%
Under 18		62,112	26.47%		111,040	26.68%
18-64		144,804	61.70%		254,091	61.04%
65+		27,765	11.83%		51,126	12.28%
Family Type		#	%		#	%
Families with children		28,324	49.06%		50,896	47.21%

Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families.

Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 3: Data Sources: Decennial Census; ACS

Table 2 - Demographic Trends

	Fort Wayne (Jurisdiction)						Fort Wayne, IN (Region)					
	1990		2000		2010		1990		2000	2010		
Race/Ethnicity	#	%	#	%	#	%	#	%	#	%	#	%
White	195,289	83.66%	191,292	76.70%	178,724	70.47%	314,168	88.63%	326,640	83.72%	330,540	79.41%
Black	29,509	12.64%	38,164	15.30%	42,957	16.94%	30,031	8.47%	39,754	10.19%	46,711	11.22%
Hispanic	5,211	2.23%	12,631	5.06%	20,236	7.98%	889	0.25%	2,364	0.61%	24,172	5.81%
Asian or Pacific Islander	2,264	0.97%	4,834	1.94%	9,405	3.71%	2,563	0.72%	5,743	1.47%	11,449	2.75%
Native American	626	0.27%	1,539	0.62%	1,655	0.65%	6,155	1.74%	14,534	3.73%	2,577	0.62%
National Origin												
Foreign-born	5,099	2.18%	11,859	4.75%	16,203	6.39%	6,098	1.72%	13,883	3.56%	19,672	4.73%
LEP												
Limited English Proficiency	3,476	1.49%	8,229	3.29%	11,148	4.39%	5,129	1.45%	9,982	2.56%	13,715	3.29%
Sex												
Male	112,376	48.15%	121,582	48.73%	113,678	48.44%	172,124	48.56%	191,418	49.06%	203,376	48.86%
Female	121,003	51.85%	127,906	51.27%	121,003	51.56%	182,311	51.44%	198,738	50.94%	212,881	51.14%
Age												
Under 18	63,319	27.13%	69,676	27.93%	62,112	26.47%	98,503	27.79%	110,564	28.34%	111,040	26.68%
18-64	142,084	60.88%	150,311	60.25%	144,804	61.70%	214,585	60.54%	233,958	59.97%	254,091	61.04%
65+	27,976	11.99%	29,501	11.82%	27,765	11.83%	41,347	11.67%	45,634	11.70%	51,126	12.28%
Family Type												
Families with children	31,392	51.26%	29,138	51.28%	28,324	49.06%	48,820	51.43%	44,396	50.15%	50,896	47.21%

Note 1: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Note 2: Data Sources: Decennial Census; ACS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

Segregation/Integration

Racial Segregation

The “dissimilarity index” measures the degree to which two racial or ethnic groups are evenly distributed across a geographic area, and is commonly used for assessing residential segregation between racial or ethnic groups. Dissimilarity index values between 0 and 39 generally indicate low segregation, values between 40 and 60 generally indicate moderate segregation, and values between 61 and 100 generally indicate a high level of segregation.

Context is important in interpreting the dissimilarity index. The index does not indicate spatial patterns of segregation, only the relative degree of segregation; and, for populations that are small in absolute numbers, the dissimilarity index may be high even if the group's members are

evenly distributed throughout the area. Since White residents are the largest group in Fort Wayne, all other racial and ethnic groups were compared to the White population as a baseline.

In 2013, the dissimilarity indices for all non-Whites in Fort Wayne was in the “moderate” range. This means that non-Whites in the City are somewhat segregated from Whites. Blacks are driving this trend, with a dissimilarity index higher than all other non-White groups, while Hispanics are the least segregated. Overall in Fort Wayne, however, the level of segregation is roughly consistent among different racial and ethnic minorities.

The greater region is slightly more segregated than the City, with more variance between racial groups. In fact, Blacks in the region score at the bottom end of the “high” range despite accounting for less of the population than they do within the City.

Table 3 - Racial/Ethnic Dissimilarity Trends								
	Fort Wayne (Jurisdiction)				Fort Wayne, IN (Region)			
Racial/Ethnic Dissimilarity Index	1990	2000	2010	2013	1990	2000	2010	2013
Non-White/White	58.15	53.34	45.36	50.34	61.42	55.39	48.24	52.39
Black/White	68.50	65.84	53.45	58.79	73.16	68.72	57.64	63.25
Hispanic/White	36.26	44.36	43.19	46.02	38.25	46.45	45.00	46.47
Asian or Pacific Islander/White	25.98	27.88	39.97	49.48	35.84	37.24	45.34	51.62

Note 1: Data Sources: Decennial Census

Historical Trends

Fort Wayne's White population has decreased over time, from 84% in 1990 to 70% in 2010. Over that same period the segregation index for non-Whites in the City has also decreased at almost the same rate. This means that, overall, the City has become less segregated as it has become more diverse.

However, this is not true for all racial and ethnic groups in the City and in the region. For Blacks, segregation decreased between 1990 and 2010. By contrast, the dissimilarity indices for Hispanics and especially for Asians, the fastest growing group, have increased since 1990. This indicates that even though Asian and Hispanic populations are growing, these residents are likely locating in areas where Asian and Hispanic households already live.

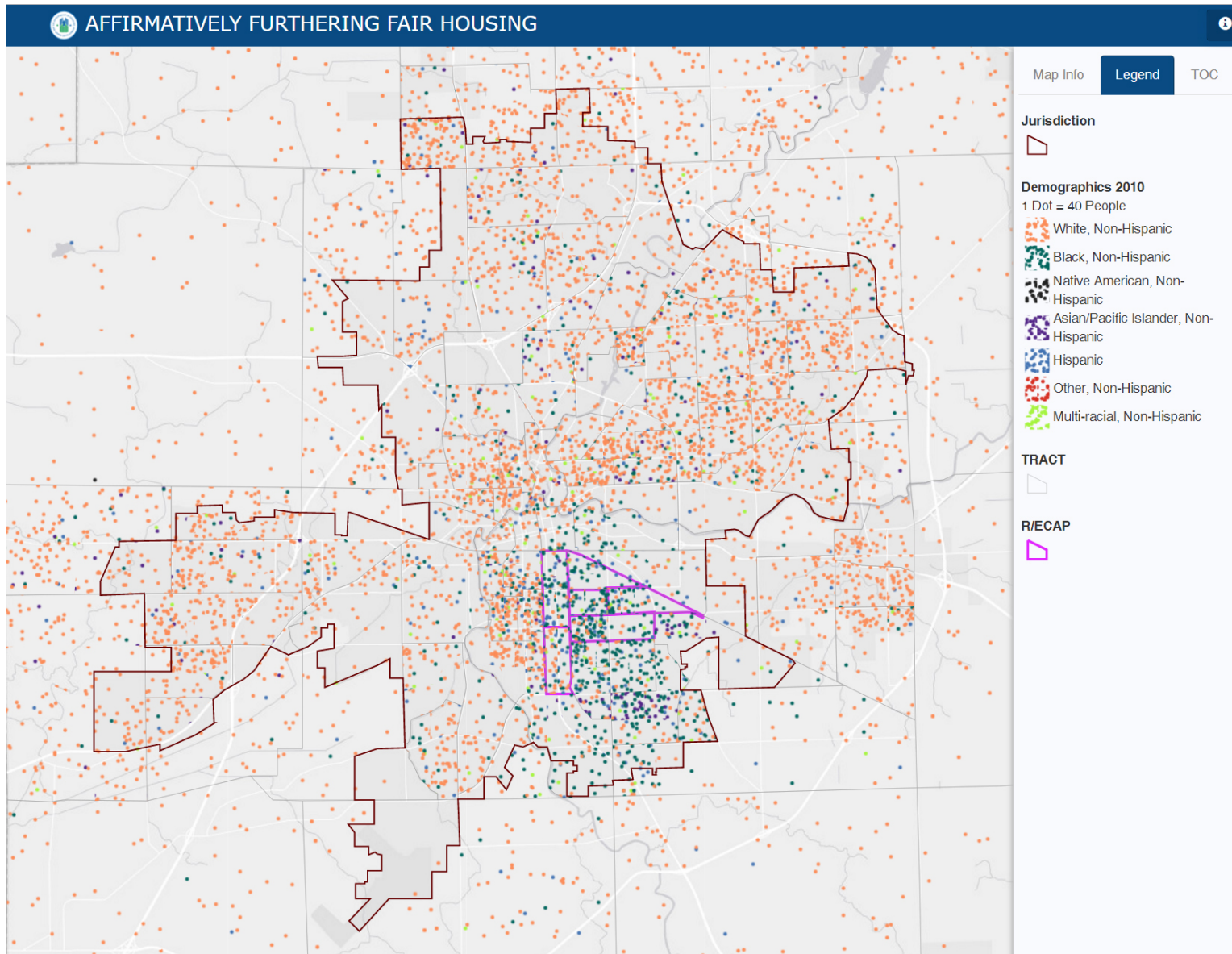
The metro area has diversified in ways similar to Fort Wayne, but to a lesser degree. Every racial and ethnic group is more segregated in the CBSA than within the City, but less segregated now than in 1990.

Geographic Segregation

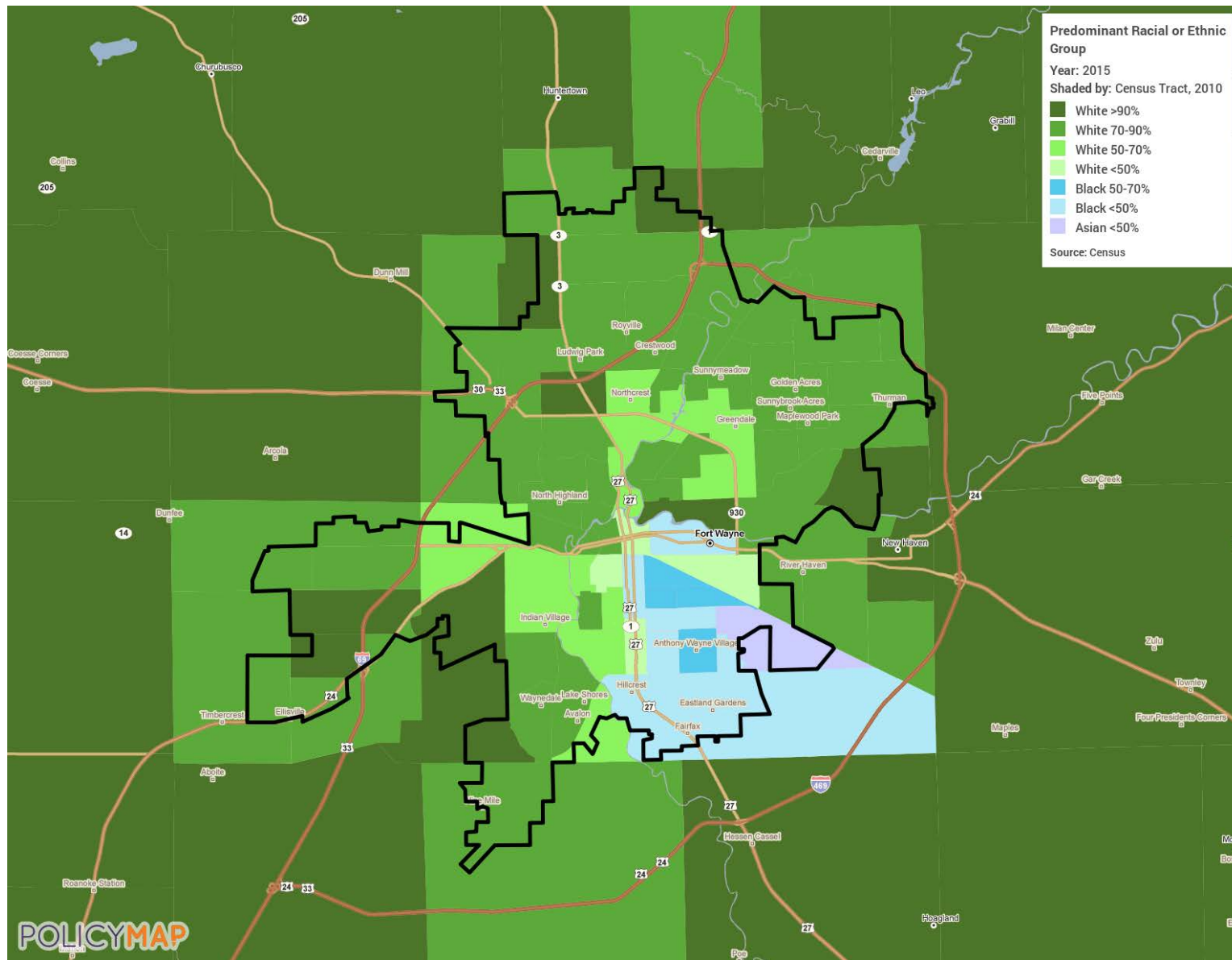
While non-White households live throughout Fort Wayne, the southeastern neighborhoods contain large concentrations of Black and Asian households, with some census tracts being more than 50% Black. Overall, this establishes a clear pattern of segregation at the city-level.

The same southeastern neighborhoods that are predominantly non-White also have high rates of foreign-born population, although in this instance northwestern neighborhoods do as well. However, foreign-born groups are relatively segregated from each other, with Mexicans and Burmese most heavily concentrated in the southeast, Bosnians in the northwest, Indians in the southwest, etc. The location of persons with limited English proficiency closely mirrors that of foreign-born.

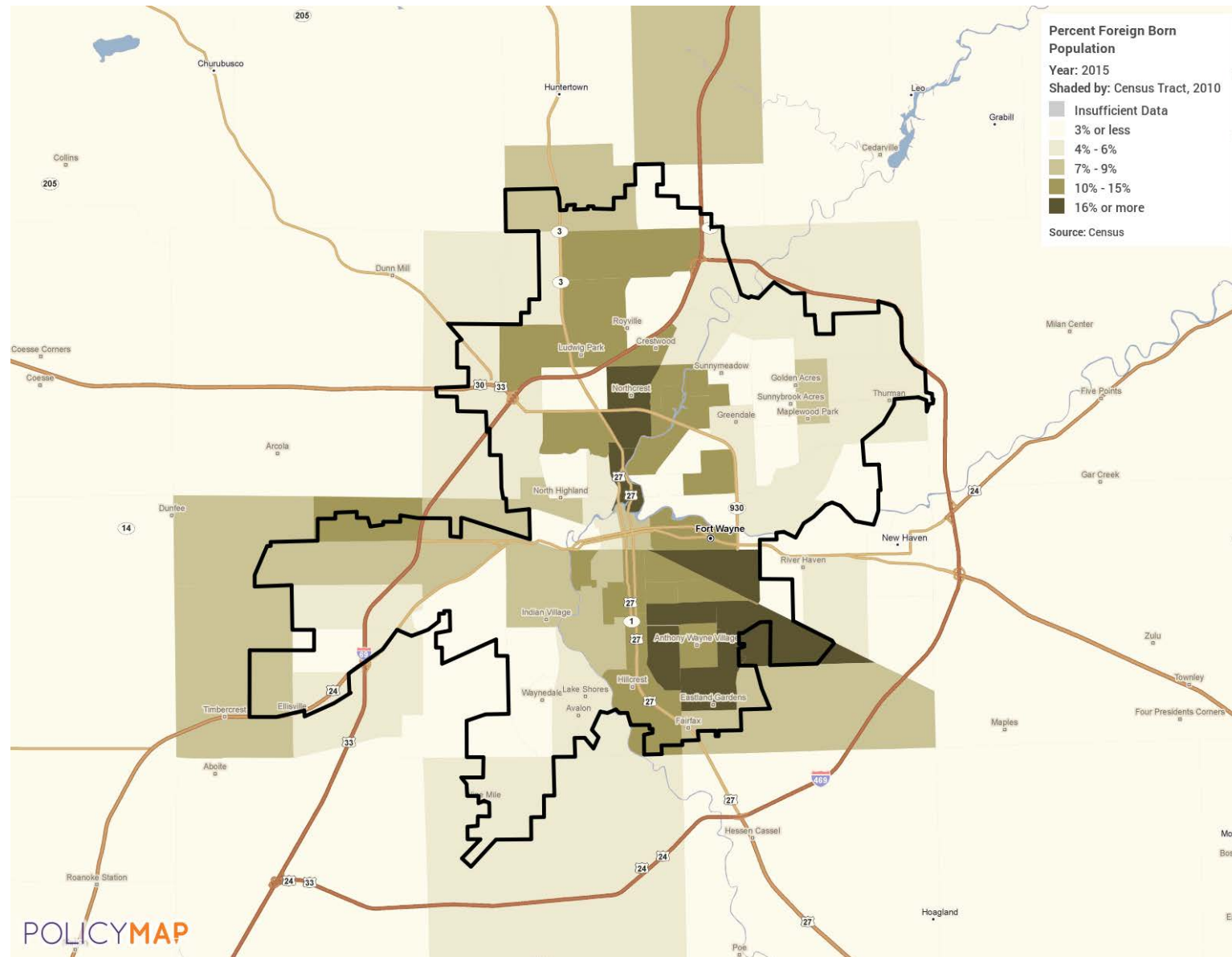
Map 1 – Race/Ethnicity



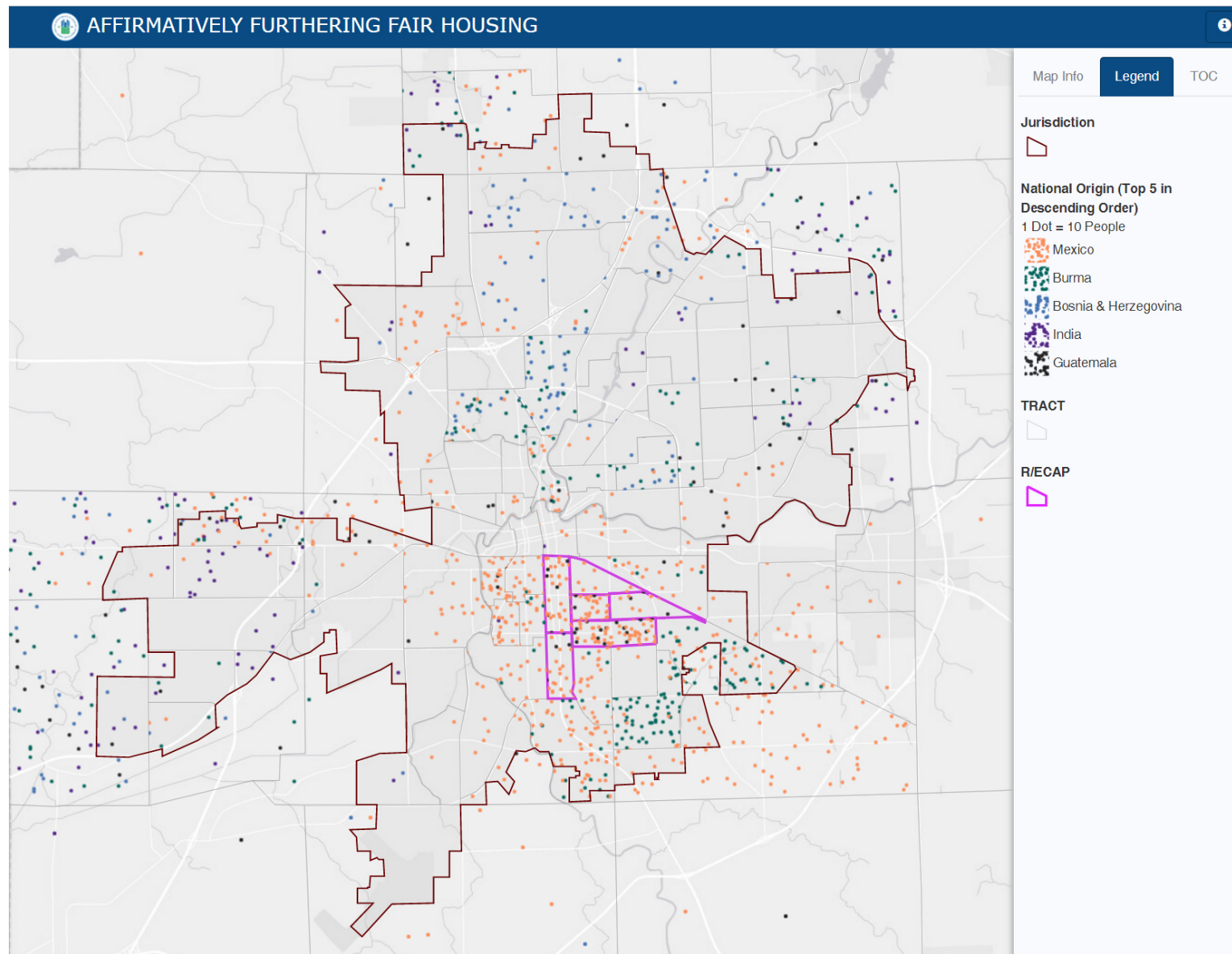
Predominant Racial/Ethnic Group, 2015



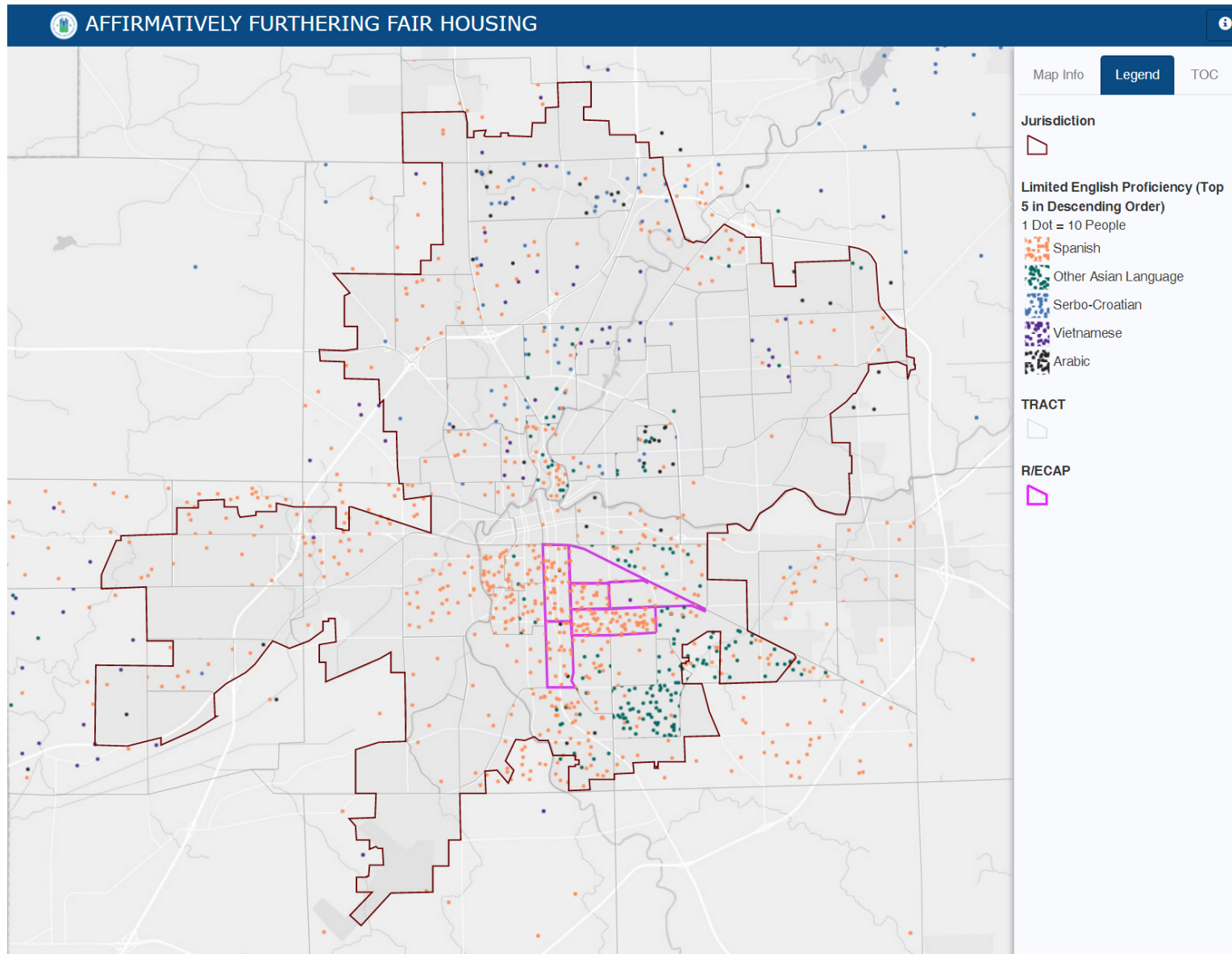
Foreign Born, 2015



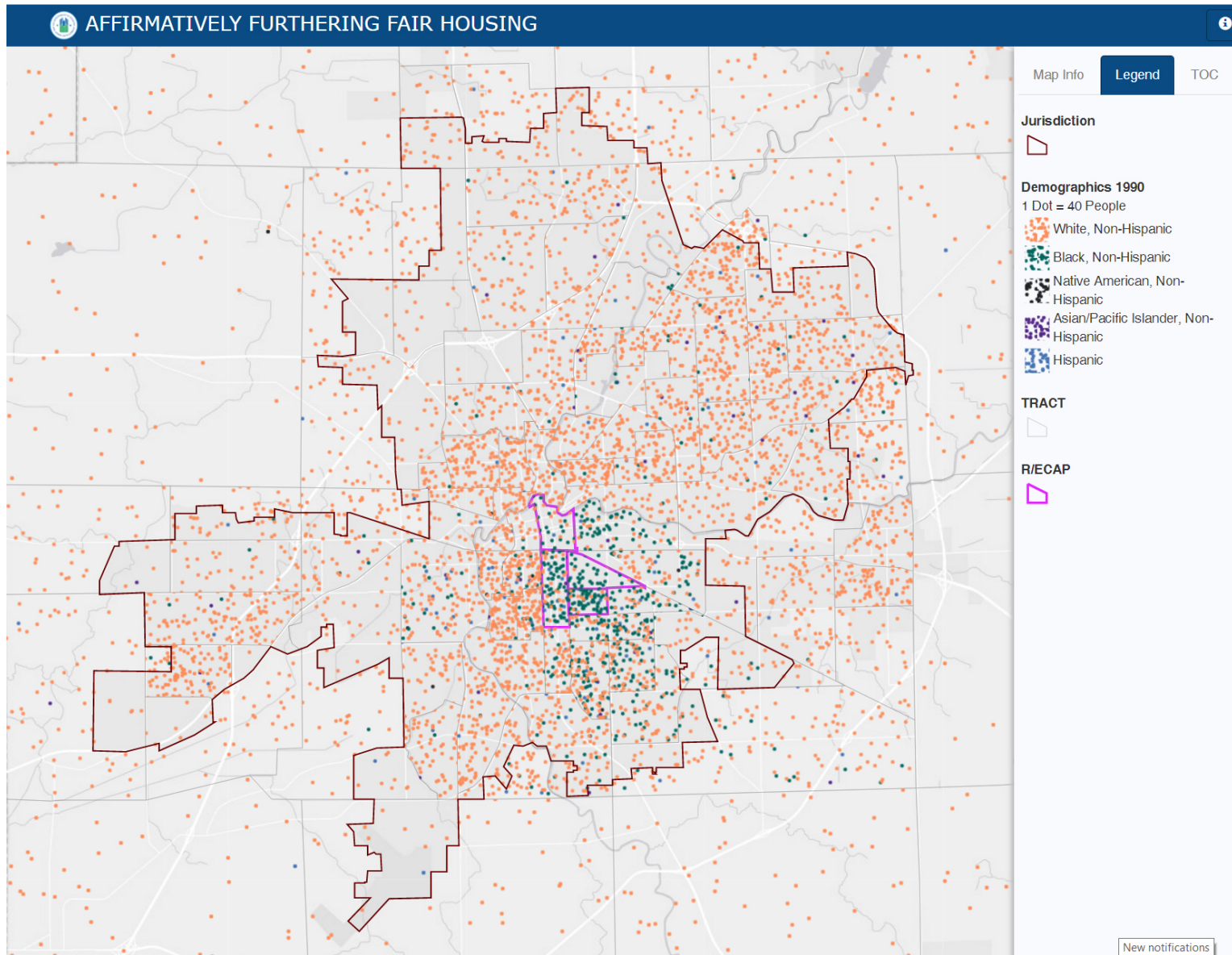
Map 3 – National Origin



Map 4 – LEP



Map 2 – Race/Ethnicity Trends, 1990



Housing Type and Tenure

Owner-occupied units comprise the majority of the City's housing stock at 63%, almost all of which are single-family homes. Renter-occupied units are split roughly one-third single-family, two-thirds multi-family.

Between 2000 and 2015, the total number of occupied housing units in Fort Wayne grew by 23%. Owner-occupied housing increased at a rate slightly higher than renter-occupied, even though owner-occupied multi-family units is the only category to have decreased over this period.

There are large differences in homeownership rates between racial and ethnic groups. Specifically, Black households are much less likely to own their homes than individuals of other races. White households are the most likely to own their homes, even more than all City residents overall. The rate of homeownership is higher across the board in the greater CBSA region, but Blacks still have the lowest homeownership rate outside of Fort Wayne, followed by Hispanics and "Other" races.

Tenure					
	2000		2015		Change
	Number	Percent	Number	Percent	
Total Occupied Units	83,337	-	102,273	-	22.72%
Owner-Occupied	51,316	61.58%	64,041	62.62%	24.80%
Single-Family	48,354	94.23%	61,589	96.17%	27.37%
Multi-Family	1,224	2.39%	875	1.37%	-28.51%
Renter-Occupied	32,021	38.42%	38,232	37.38%	19.40%
Single-Family	9,283	28.99%	13,691	35.81%	47.48%
Multi-Family	22,233	69.43%	23,765	62.16%	6.89%

Source: Decennial Census 2000; 2011-2015 ACS

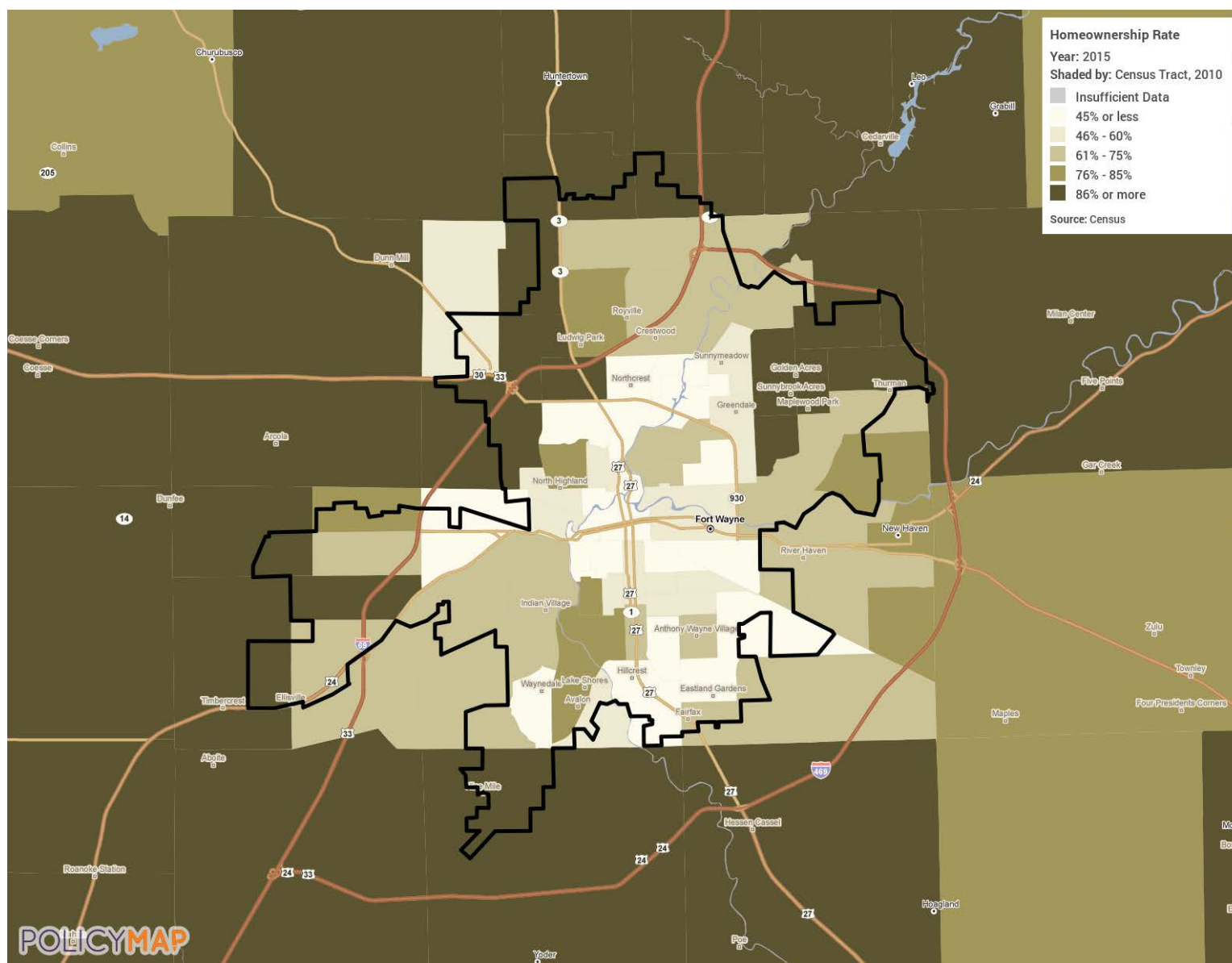
Households living in Allen County outside of Fort Wayne are much more likely to be homeowners than those within the City. Likewise, households closer to downtown are more likely to rent than

those on the City's fringes. The predominantly Black and Asian neighborhoods in the southeast are among the areas with relatively low homeownership rates.

Rate of Owner-occupied Housing by Race/Ethnicity						
	Fort Wayne (Jurisdiction)					
	Total	White	Black	Hispanic	Asian	Other
Households	101,377	80,308	14,822	5,280	2111	2,288
Owner occupied	65,399	56,185	5910	2800	1267	1249
Renter occupied	35,978	24,123	8912	2,480	844	1,039
Ownership rate	64.51%	69.96%	39.87%	53.03%	60.02%	54.59%
	Fort Wayne, IN (Region)					
Households	159,781	136,607	15,672	6,158	2639	2,543
Owner occupied	115,300	104,446	6,453	3,499	1795	1,446
Renter occupied	44,481	32,161	9,219	2,659	844	1,097
Ownership rate	72.16%	76.46%	41.18%	56.82%	68.02%	56.86%

Note 1: Data Sources: 2006-2010 ACS

Homeowners, 2015



Housing Cost

High housing costs are not a direct form of housing discrimination, but a lack of affordable housing does constrain housing choice. Residents may be limited to a smaller selection of communities or neighborhoods because of a lack of affordable housing in other areas. When the cost of quality housing units is high, low-income and marginalized segments of the population are disproportionately more likely to become cost-burdened.

Cost burden is defined by HUD as paying more than 30% of one's income towards housing. Cost-burdened families may have difficulty paying for other necessities, such as food, clothing, transportation, and medical care. This occurs throughout the country for renters and homeowners alike, but is more problematic in areas where housing costs are high.

Between 2000 and 2015, the inflation-adjusted median housing value in Fort Wayne decreased by 2.3%, while the median gross rent (includes estimated utility costs) decreased by 1%. During the same period, the inflation-adjusted median household income decreased by 12.8%. This means that household incomes have not kept up with housing costs. As households must spend nearly the same on housing but with less real income, housing costs have become relatively more expensive between 2000 and 2015.

In Fort Wayne, rental housing is more affordable than owner-occupied housing on a per-month basis. The median gross rent is \$670, compared to median monthly owner costs of \$754. However, a much larger proportion of renter-occupied households are cost burdened (41.2%) compared to owner-occupied households (16.2%). A total of 10,400 homeowners and 15,100 renters in Fort Wayne were cost-burdened in 2013.¹

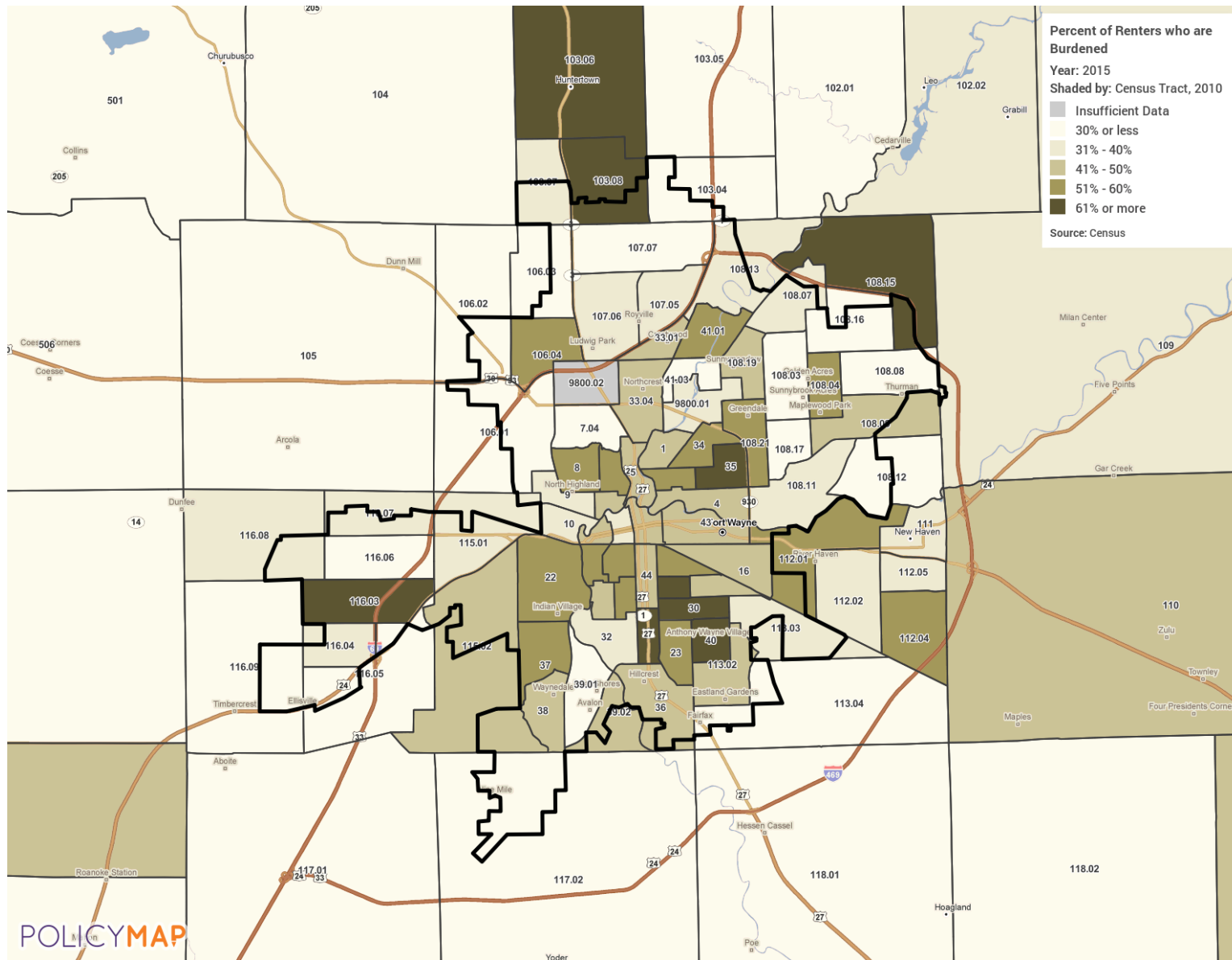
¹ Source: Comprehensive Housing Affordability Strategy (CHAS)

Homeowners tend to have higher household incomes than renters: the median renter income in Fort Wayne is \$27,300 compared to \$57,000 for owners. The maximum monthly gross rent a household would be able to afford at the median renter income is \$683, which is slightly above the City's actual median gross rent of \$670. This indicates that the median renter income is enough to afford the median gross rent in Fort Wayne. However, the 17,300 renter households in Fort Wayne earning less than \$25,000 (45.3% of all renter households) are priced out of units renting for the \$670 median rent.

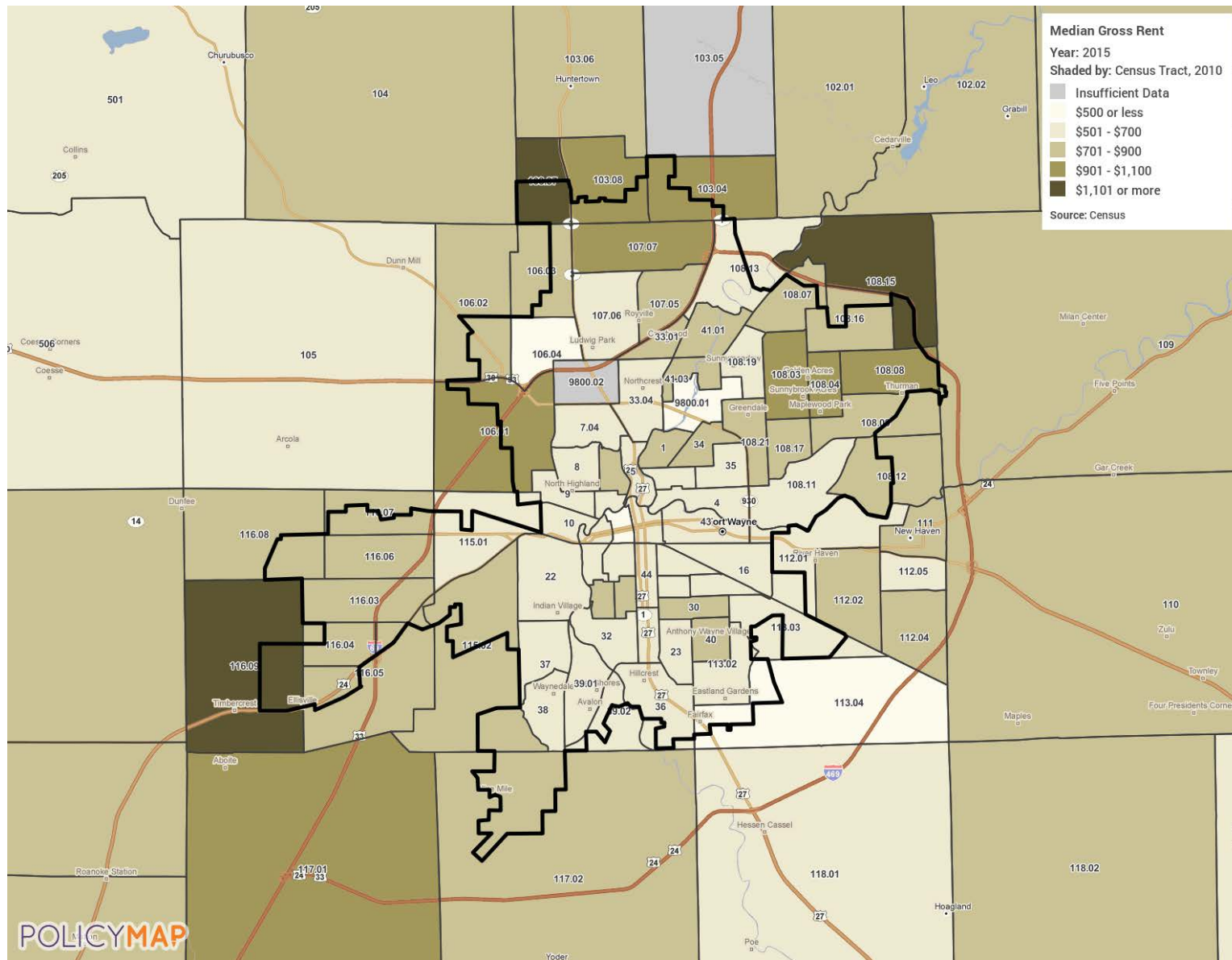
Cost burdened renters are more prevalent closer to the City's core. Some exceptions are census tracts 103.06, 108.15, and 116.03, but these are clear outliers among low cost burdened areas.

Most of the units in Fort Wayne that rent for \$700 or less are located in the neighborhoods near the city center. This includes the City's racially/ethnically concentrated area of poverty, discussed in detail in the following chapter.

Cost Burdened Renters, 2015



Median Gross Rent, 2015



VI. Fair Housing Issues

Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

HUD defines racial and ethnic concentrations of poverty, or R/ECAPs, as areas where the total minority population is 50% or more and the poverty rate is 40% or at least three times the poverty rate for the metropolitan area, whichever threshold is lower.

The purpose of identifying R/ECAPs is to learn where higher rates of low income minority residents live in a community, and then determine if there are any local policies that restrict their housing choice to only these areas. The AI planning process is meant to guide a community in identifying initiatives to expand housing choice into higher opportunity neighborhoods for these lower income minority residents and other members of the protected classes.

There are six census tracts in Fort Wayne that qualify as R/ECAPs (17, 28, 29, 30, 31, 44). They are all contiguous and in the southeastern quadrant of the City. There are no other R/ECAPs in the Fort Wayne CBSA.

Blacks are the largest racial/ethnic group in R/ECAPs, representing just under 50% of residents, compared to 15.5% in the City at large in 2013. Hispanics, similarly, account for 20% of the R/ECAP but only 8.2% of Fort Wayne.

Rates of families with children and foreign-born are roughly equivalent but slightly higher in R/ECAPs than the City at large.

Between 2000 and 2015, Fort Wayne's R/ECAP area has decreased in terms of population but increased in terms of racial and ethnic diversity. Almost all groups grew within the R/ECAP, with the exception of Blacks who shrank by 27%. Because Blacks accounted for such a large proportion of the R/ECAP in 2000 (64%), their decline was enough to offset the gains by other groups.

Table 4 – R/ECAP Demographics			
	Fort Wayne (Jurisdiction)		
Race/Ethnicity		#	%
Total Population in R/ECAPs		25,666	-
White, Non-Hispanic		5,940	23.14%
Black, Non-Hispanic		12,701	49.49%
Hispanic		5,159	20.10%
Asian or Pacific Islander, Non-Hispanic		680	2.65%
Native American, Non-Hispanic		92	0.36%
Other, Non-Hispanic		85	0.33%
Family Type		#	%
Total Families in R/ECAPs		25,666	-
Families with children		5,940	23.14%
National Origin	Country	#	%
#1 country of origin	Mexico	2,089	8.14%
#2 country of origin	Guatemala	356	1.39%
#3 country of origin	Thailand	169	0.66%
#4 country of origin	Burma	93	0.36%
#5 country of origin	Nigeria	74	0.29%
#6 country of origin	Japan	72	0.28%
#7 country of origin	Korea	51	0.20%
#8 country of origin	Iraq	44	0.17%
#9 country of origin	Moldova	37	0.14%
#10 country of origin	Jamaica	35	0.14%

Note 1: Data Sources: ACS

Table 4a – R/ECAP Demographic Trend			
	Fort Wayne (Jurisdiction)		
Race/Ethnicity	2000	2015	% Change
Total Population in R/ECAPs	17,770	16,917	-4.8%
White	4,165	5,775	38.7%
Black	11,413	8,348	-26.9%
Hispanic*	2,283	4,644	103.4%
Asian	46	215	367.4%
Other	1,477	1,585	7.3%
Two or More	542	781	44.1%

* Hispanic ethnicity is not the same as race and may overlap with other categories

Note 1: Data Sources: 2000 Census; ACS 2011-2015

Disparities in Access to Opportunity

A large body of social research has demonstrated the powerful negative effects of residential segregation on income and opportunity for minority families. Households living in lower-income areas of racial and ethnic concentration have fewer opportunities for education, wealth building, and employment.

The rationale for this analysis is to help communities determine where to invest affordable housing resources by pinpointing the areas of greatest existing need. However, current evidence suggests that adding more subsidized housing to places that already have a high concentration of social and economic issues (i.e. R/ECAPs) could be counter-productive, thereby increasing and perpetuating established segregation patterns.

This does not mean such areas should be ignored by communities, however. Residents in R/ECAPs still need services and high quality places to live, and stabilizing and improving conditions in the lowest-income neighborhoods should remain a priority for Fort Wayne. Instead, investment should be balanced between existing R/ECAPs (with initiatives such as housing rehabilitation and preservation along with public infrastructure and

facility improvements) and other neighborhoods that offer opportunities and advantages for families and other protected classes (with initiatives such as new affordable housing development).

To describe the variation in neighborhood opportunity across regions, HUD has adopted a “Communities of Opportunity”² model that assigns each neighborhood a score reflecting the degree to which its residents have access to amenities and services such as good schools, jobs, stable housing, transit, low crime, and minimal health hazards. HUD and the Institute draw upon an extensive research base demonstrating the importance of neighborhood conditions in predicting life outcomes. The ultimate goals of the exercise are to bring opportunities to amenity-deprived areas and to connect people to existing opportunities throughout a region.

HUD has adapted the Communities of Opportunity model to calculate opportunity index scores for each census tract based on separate dimensions. Each dimension analyzed for this AI includes a collection of variables describing conditions for each census tract in Fort Wayne.

² Kirwan Institute, “Communities of Opportunity: A Framework for a More Equitable and Sustainable Future for All,” Ohio State University, 2007.

Table 12 - Opportunity Indicators, by Race/Ethnicity

Fort Wayne (Jurisdiction)	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	55.42	48.92	56.36	34.36	40.82	48.46	67.99
Black, Non-Hispanic	24.19	29.63	25.40	37.19	46.12	46.11	62.62
Hispanic	29.16	31.68	32.75	36.73	45.63	49.57	62.61
Asian/Pacific Islander, Non-Hispanic	39.74	35.51	39.83	36.35	45.55	47.32	65.52
Native American, Non-Hispanic	40.48	38.19	42.21	35.86	44.23	51.13	65.64
Population below federal poverty line							
White, Non-Hispanic	37.49	36.10	39.91	36.95	46.29	52.94	65.10
Black, Non-Hispanic	12.87	26.17	15.26	38.13	46.81	46.08	59.96
Hispanic	18.01	29.13	22.81	37.64	46.51	48.34	63.71
Asian/Pacific Islander, Non-Hispanic	33.75	30.77	37.01	38.13	49.10	44.22	62.74
Native American, Non-Hispanic	18.33	37.82	26.68	32.94	52.23	68.65	56.23

Fort Wayne, IN (Region)	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	62.68	48.92	58.52	28.42	30.74	48.46	75.71
Black, Non-Hispanic	27.15	29.63	28.08	36.51	44.77	46.11	63.54
Hispanic	35.19	31.68	36.94	34.77	42.12	49.57	65.42
Asian/Pacific Islander, Non-Hispanic	46.44	35.51	45.42	34.33	41.22	47.32	66.98
Native American, Non-Hispanic	50.12	38.19	48.24	30.57	36.02	51.13	72.04
Population below federal poverty line							
White, Non-Hispanic	44.15	43.71	43.62	32.70	39.31	53.68	71.11
Black, Non-Hispanic	14.02	26.62	16.33	37.91	46.41	45.86	60.40
Hispanic	23.19	32.61	26.71	36.49	44.13	48.08	65.20
Asian/Pacific Islander, Non-Hispanic	35.59	32.30	38.73	37.51	47.77	44.14	63.29
Native American, Non-Hispanic	24.97	44.01	30.24	28.48	46.41	64.80	62.92

Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

Note 2: Refer to the Data Documentation for details (www.hudexchange.info).

Education

The School Proficiency Index uses the results of standardized testing to describe which census tracts have high performing schools and which have lower performing ones.

The range of School Proficiency Index scores in Fort Wayne is relatively large, meaning that not all protected classes have equal access to high performing schools. Based on the raw index scores, White families have more than 1.5 times the access to proficient schools as Black families, who have the lowest access of all racial groups. Hispanics and Asians score higher than Blacks, but still substantially lower than Whites. The School Proficiency Index scores for the region are the same as for the City.

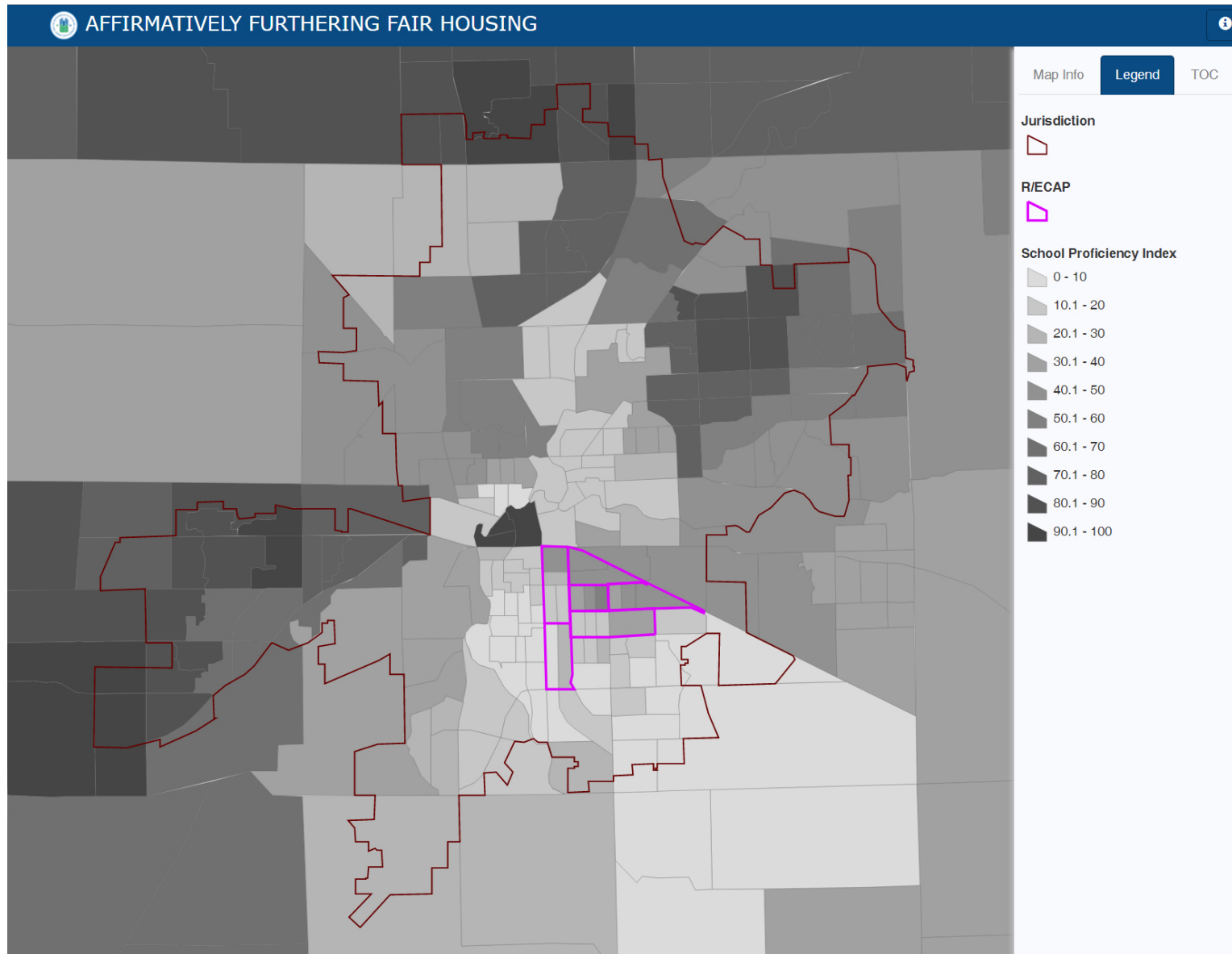
Neighborhoods in the southwest and northeast have the highest School Proficiency Index scores in the City, while the southeast has some of the lowest scores. The R/ECAPs fall in the mid- to low-

end of the range. The area with the highest index score is a small grouping of three census tracts west of downtown Fort Wayne.

Fort Wayne Community Schools has a policy that allows students to attend any school in the district, based on space availability and racial balance. While all students are automatically assigned to a school in their attendance area, parents may choose to enroll their child in a magnet school, a high school Program of Study, or a school outside their assigned attendance area. If a school has more applications than space available, names will be selected in a public lottery.

Anecdotally, the stakeholders interviewed did not indicate that any one particular area of the City had better or worse schools than any other. In fact, they stated that, in general, FWCS does a good job interfacing with low-income communities and families with limited English proficiency.

Map 7 – School Proficiency Index



Employment

White households in Fort Wayne have the highest Labor Market Engagement Index score, 31 points higher than Black households at the bottom of the range. Asians, the next highest scoring group of statistical significance, are still 17 points lower than Whites. The Labor Market Engagement Index measures unemployment, labor force participation, and educational attainment. The higher score for Whites imply that more members of this group are actively employed than others.

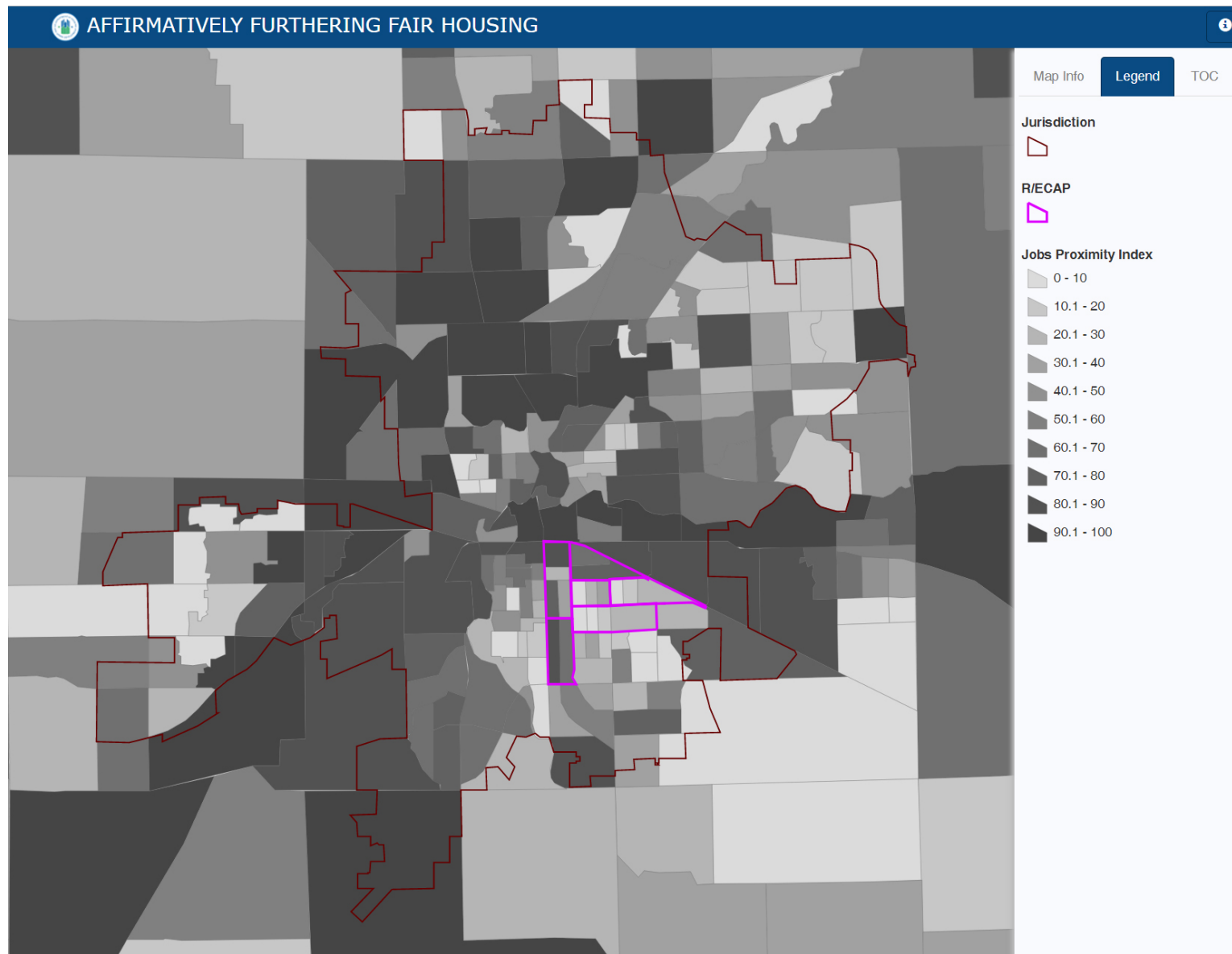
For the Jobs Proximity Index, on the other hand, the range of scores is much narrower, with only a 3 point difference between Hispanics (the highest scorers in this case) and Blacks. This means that all racial and ethnic groups have to travel the same distances to reach their jobs. Jobs Proximity Scores are identical for both the City and region.

Labor Market Engagement is generally the same to slightly higher in the region compared to the City. This means that county residents face similar but slightly less unemployment than Fort Wayne residents. Also, persons living in poverty score lower on this index than their wealthier counterparts. This is especially true for Whites, indicating a stronger dichotomy in this racial group than others.

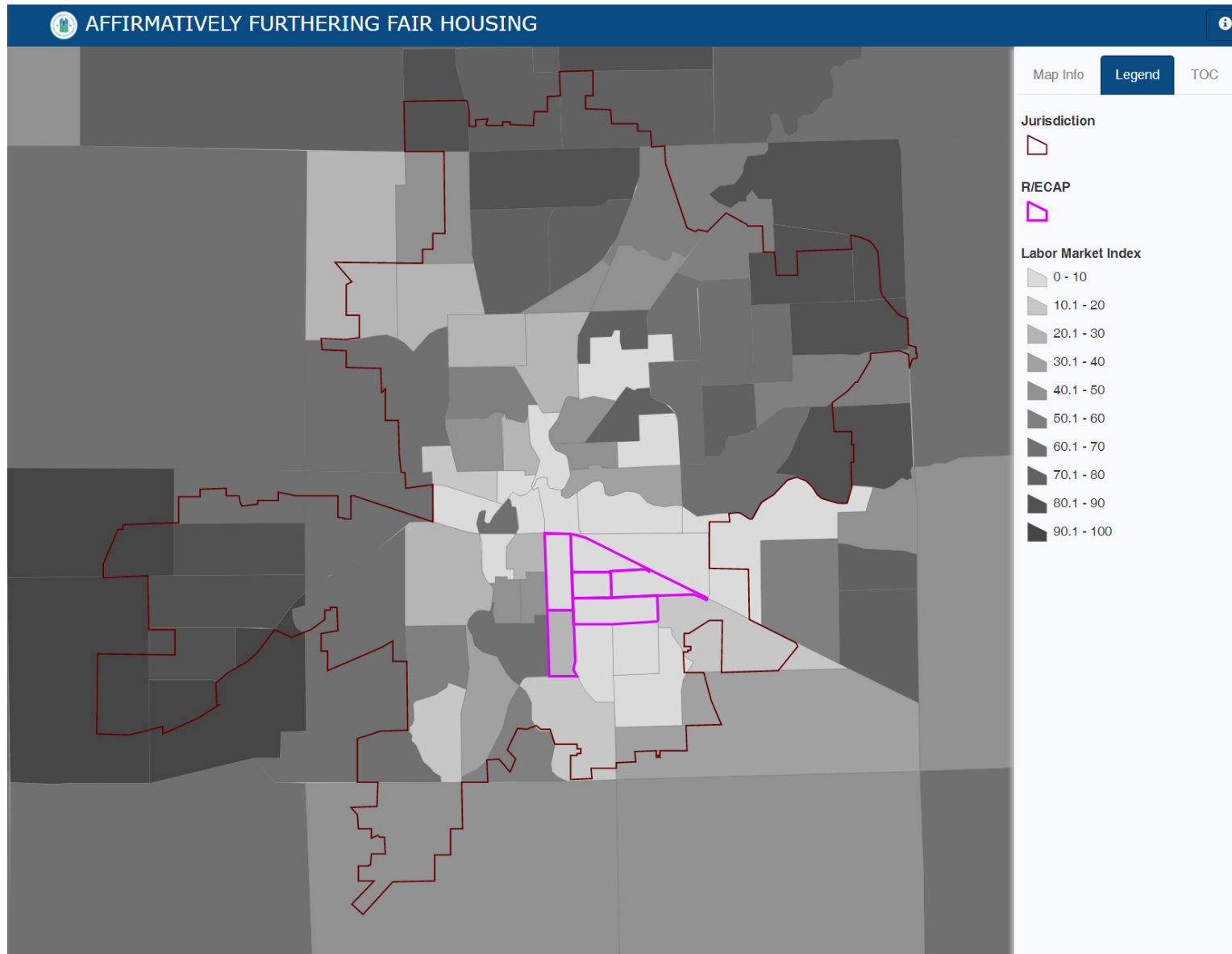
Labor Market Engagement is lowest in southeastern Fort Wayne. As mentioned previously, this area also includes the City's R/ECAP tracts. Job Proximity Index scores are more geographically irregular, with high and low scores intermixed throughout the City.

Based on feedback from stakeholders interviewed during the community participation process, the coverage and hours of Fort Wayne's public busses are an important factor in securing and retaining employment. Residents in neighborhoods far from the central city may not be able to access employment centers at all or during the times of day they need based on shifts worked.

Map 8 – Job Proximity Index



Map 9 – Labor Market Engagement Index



Transportation

The Low Transportation Cost Index measures the cost of transport and proximity to public transportation by neighborhood. The Transit Trips Index measures how often low-income families in a neighborhood use public transportation.

Every racial and ethnic group has a higher Low Cost Index score than Transit Index score. This means that, although transportation is moderately affordable, Fort Wayne renters are not strongly utilizing the transit system. Transit Index scores are very close among racial groups; Whites have the lowest Transportation Cost index scores, Blacks have the highest.

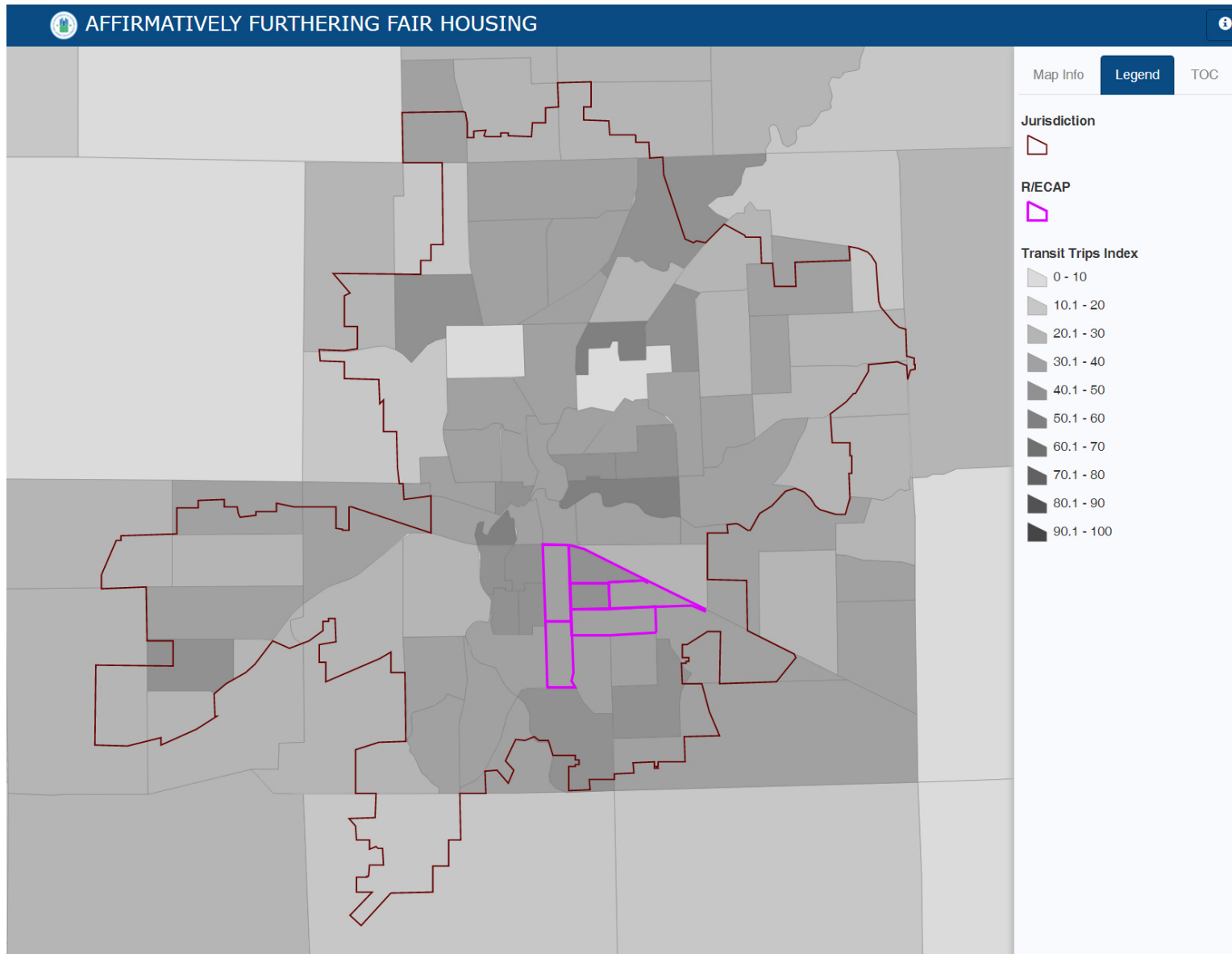
Both the Transit and Low Transportation Cost Indices are roughly the same for the region and the City. In other words, county residents use the transit system as much and are not paying more for transportation.

The Low Cost Index is higher in the central core of the City than the outer fringes or in Allen County, with downtown scoring the highest. The City's R/ECAP falls roughly in the center of the City's total index range.

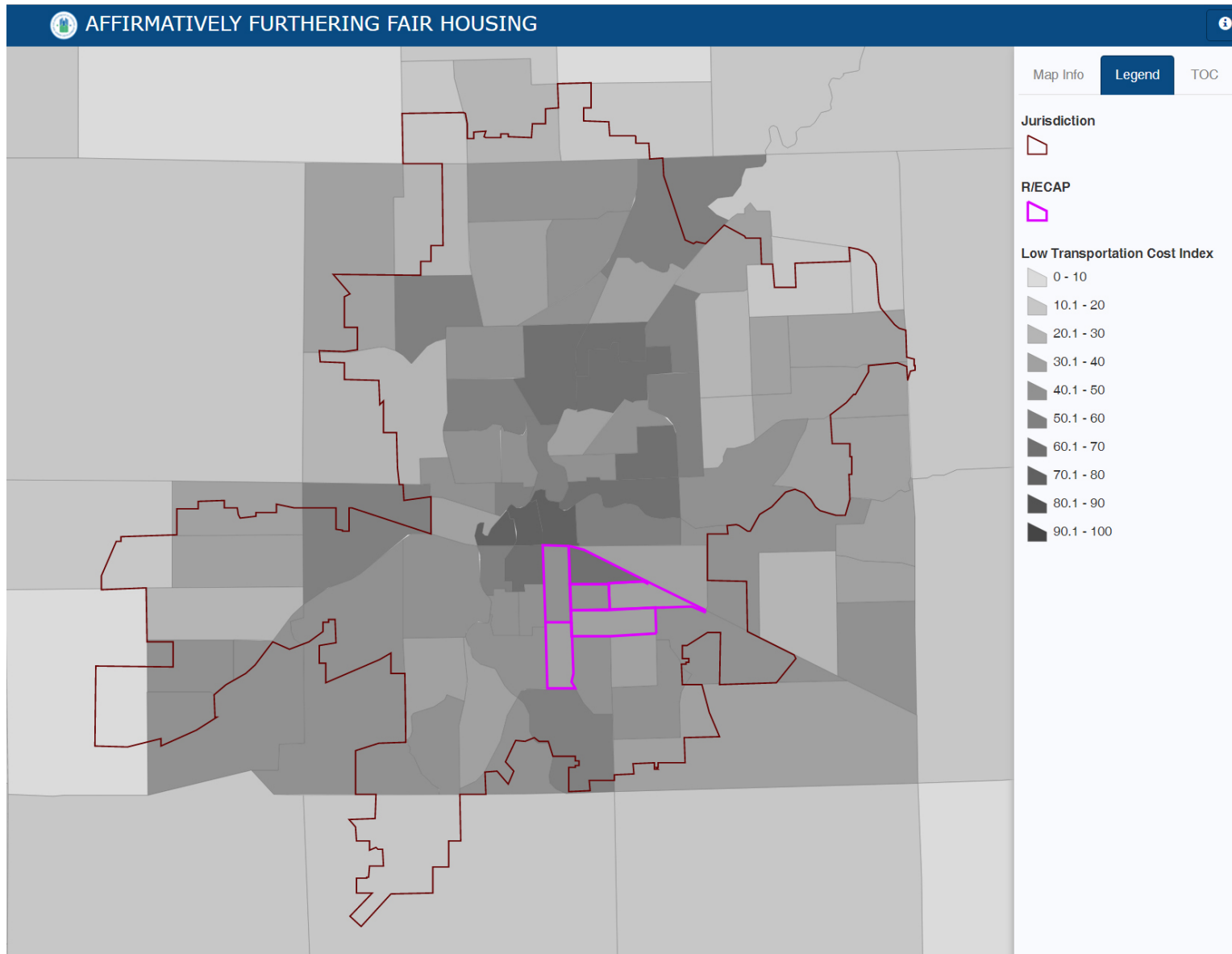
The Transit Trips Index is lower and more uniform throughout the City. Like the Low Cost Index, it tends to be higher within City limits than without.

Poor transit access was the difficulty in daily life most consistently mentioned during the public outreach process, although this applied to the entire City and not any particular neighborhood more than any other. Overall, a lack of reliable, affordable transit affects all low-income households, regardless of protected class, who rely on it to access jobs, education, and community facilities.

Map 10 –Transit Trips Index



Map 11 – Low Transportation Cost Index



Access to Low Poverty Neighborhoods

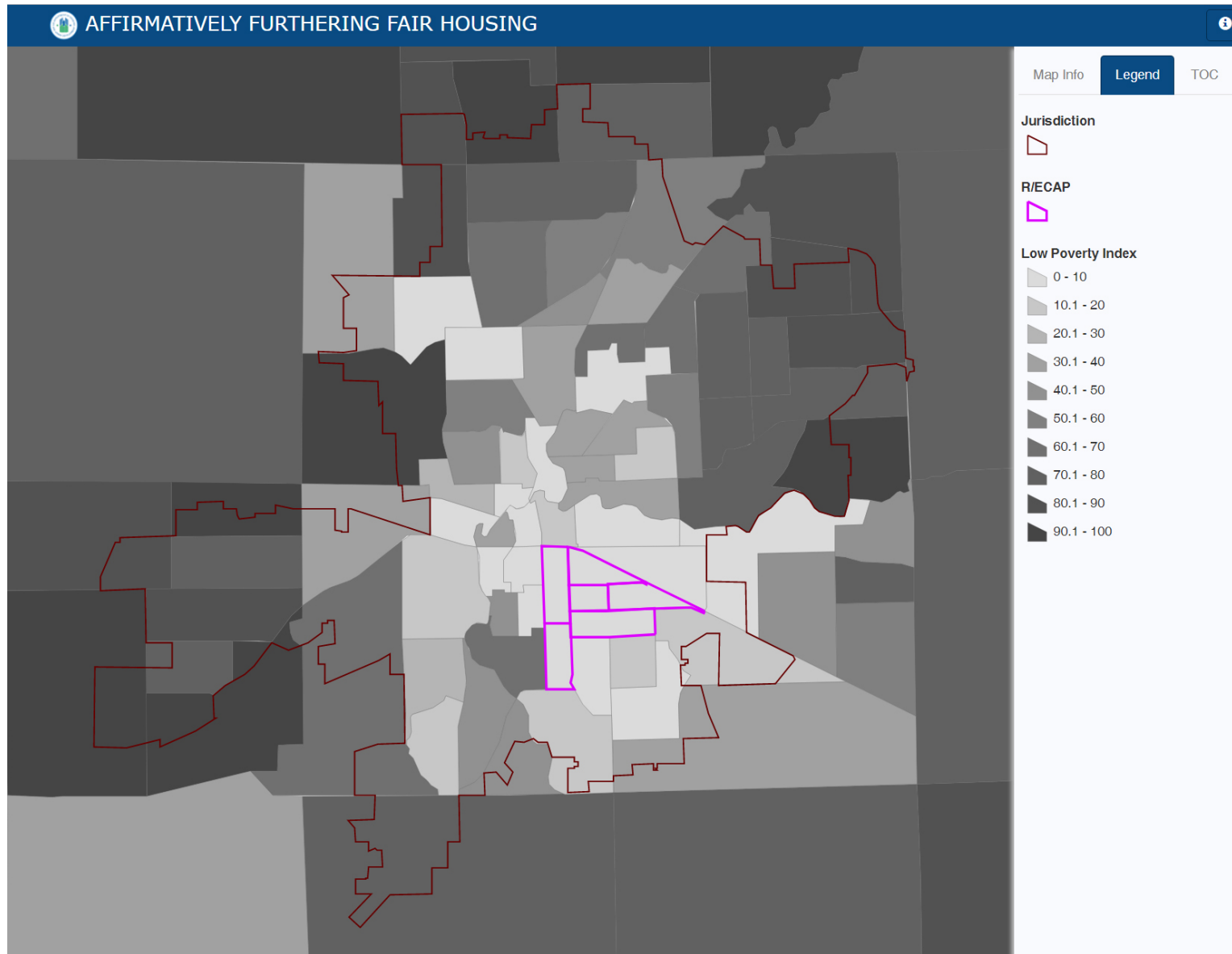
Whites have the highest score on the Low Poverty Index, which is inversely related to the poverty in a given neighborhood. Blacks and Hispanics have the lowest scores, with a 31-point difference between Blacks (the lowest score) and Whites (the highest). Asians score roughly in the center of the range. This means that Hispanic and Black residents tend to live in neighborhoods with higher rates of poverty than other racial groups.

Low Poverty Index scores are generally higher in the CBSA compared to the City. The margin is much smaller for Black residents, however, indicating that Blacks in the region are not much less exposed to poverty than Blacks in Fort Wayne, especially compared to the city-county difference among other racial groups.

The lowest exposure to poverty (i.e. a high index score) occurs on Fort Wayne's borders with Allen County. The greatest exposure to poverty is in the central and southeastern sections of the City, including the R/ECAP tracts.

In general, tracts in the CBSA have less exposure to poverty than those in Fort Wayne. The clustering of Low Poverty Index scores apparent within the City does not extend outside into the region, likely because of the much lower population density in the county.

Map 12 – Low Poverty Index



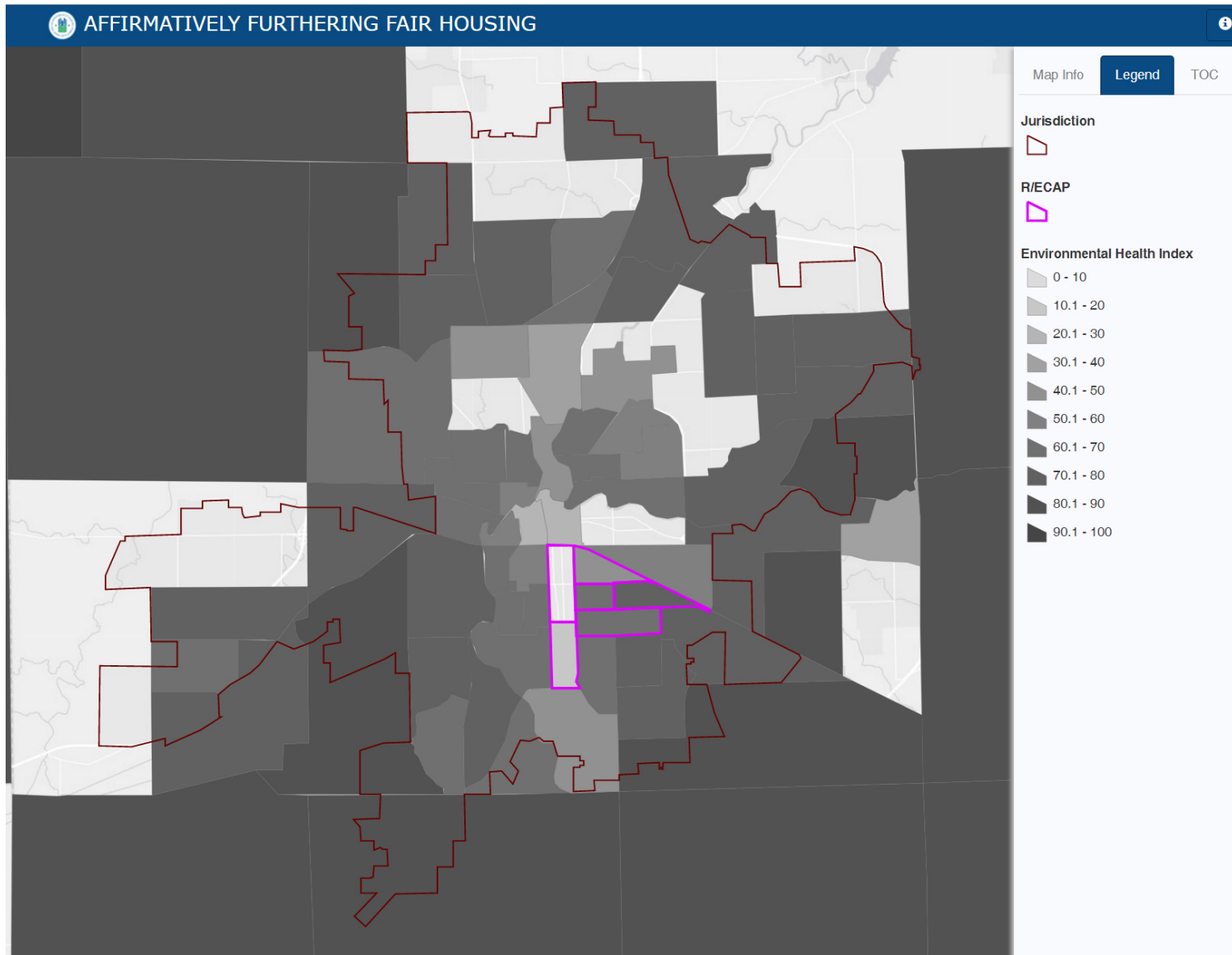
Access to Environmentally Healthy Neighborhoods

The Environmental Health Index measures exposure based on EPA estimates of air quality, carcinogenic, respiratory, and neurological toxins by neighborhood. It is the highest scoring index for the City. The scores for individual racial and ethnic groups are relatively close to each other, with no one group seeming to be disproportionately affected by environmental issues.

Scores for residents in the CBSA are equal or slightly higher than those in Fort Wayne. The difference between racial groups is more pronounced, with a 12 point spread in the region compared to a 5 point spread in the City. In the greater metro area, Whites have less exposure to environmental hazards than others.

Neighborhoods within the City for which data is available received relatively similar scores. The areas in the rest of the region did not score significantly higher on the index, meaning that they have around the same exposure to potential health hazards.

Map 13 – Environmental Health Index



Patterns in Disparities in Access to Opportunity

There is not a significant disparity among racial/ethnic groups for most of the opportunity indices in Fort Wayne. The Jobs Proximity, Transit Trips, Low Transportation Costs, and Environmental Health Indices, to be specific, are generally consistent overall.

The three indices where there is a meaningful difference are School Proficiency, Labor Market Engagement, and Low Poverty. For these measures, White residents fare better, and Black residents generally fare the worst. Patterns in access to opportunity are consistent with earlier findings that Black residents are more segregated and are the largest racial/ethnic group in the City's R/ECAP area.

When comparing Fort Wayne to the region, the City for the most part experiences comparable disparity between racial/ethnic groups. The City has slightly better access to opportunity for some indices, slightly worse for others.

For the indices of opportunity that display a geographic variance, the center and southeastern neighborhoods of Fort Wayne tend have lower scores, while tracts just along the city limits have higher scores. This lower scoring area often coincides with the location of the City's R/ECAPs.

Disproportionate Housing Needs

Housing Problems

Households with any of the following characteristics are classified as having a housing problem:

- Lacking complete kitchen or plumbing facilities
- More than 1 person per room
- Monthly housing costs, including utilities, exceeds 30% of monthly income

Black households experience housing problems at the highest rate in both the City and the region, followed by “Other” races (the results for Native American households are not statistically significant since they account for such a small percentage of the population).

The difference in the rates of housing problems between the highest racial group (Blacks) and lowest (Whites) is significant – 19 percentage points. White households, in fact, experience problems at a slightly lower rate than the City and region overall.

Small families with fewer than five members are less likely to have housing problems than large families and non-families, with a rate of problems 15 percentage points lower than large families within the City.

Southeastern Fort Wayne experiences the highest rates of housing problems, including the R/ECAP census tracts. These neighborhoods are predominantly Black and Asian with concentrations of residents from Mexico and Myanmar.

Although the difference between the City and the region for most racial and ethnic groups is negligible, White households in the CBSA have fewer housing problems than their counterparts in the City.

Table 9 - Demographics of Households with Disproportionate Housing Needs

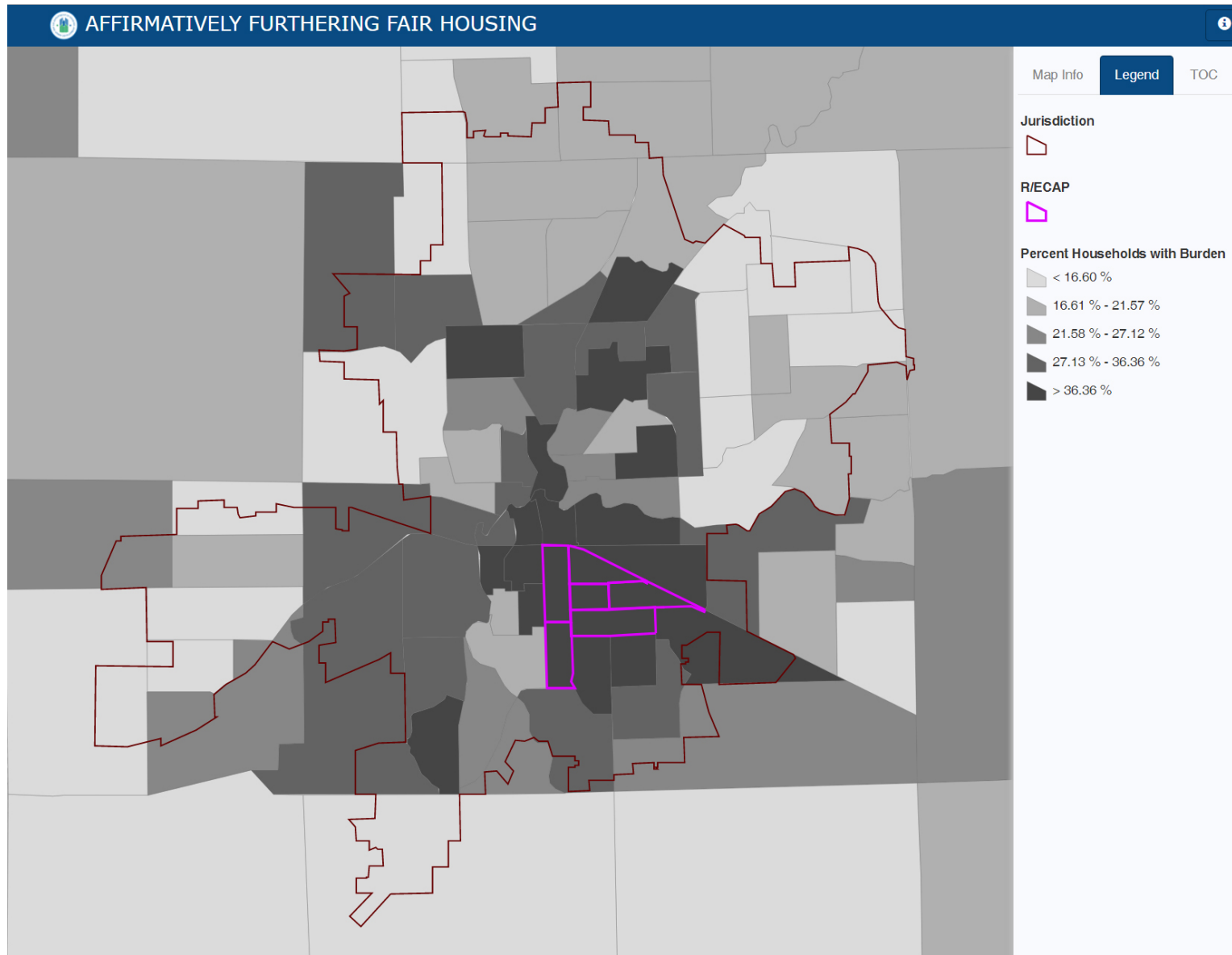
Disproportionate Housing Needs	Fort Wayne (Jurisdiction)			Fort Wayne, IN (Region)		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	17,335	76,310	22.72%	28,890	134,554	21.47%
Black, Non-Hispanic	6,445	15,213	42.37%	6,685	15,939	41.94%
Hispanic	1,724	5,393	31.97%	2,125	6,491	32.74%
Asian or Pacific Islander, Non-Hispanic	819	2,513	32.59%	954	3,039	31.39%
Native American, Non-Hispanic	93	256	36.33%	142	483	29.40%
Other, Non-Hispanic	515	1,240	41.53%	694	1,704	40.73%
Total	26,950	100,905	26.71%	39,495	162,215	24.35%
Household Type and Size						
Family households, <5 people	10,990	53,054	20.71%	17,440	91,809	19.00%
Family households, 5+ people	3,350	9,318	35.95%	4,885	15,808	30.90%
Non-family households	12,580	38,540	32.64%	17,160	54,570	31.45%

Households experiencing any of 4 Severe Housing Problems	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	7,573	76,310	9.92%	12,315	134,554	9.15%
Black, Non-Hispanic	3,865	15,213	25.41%	4,015	15,939	25.19%
Hispanic	1,110	5,393	20.58%	1,330	6,491	20.49%
Asian or Pacific Islander, Non-Hispanic	564	2,513	22.44%	644	3,039	21.19%
Native American, Non-Hispanic	49	256	19.14%	53	483	10.97%
Other, Non-Hispanic	318	1,240	25.65%	360	1,704	21.13%
Total	13,475	100,905	13.35%	18,715	162,215	11.54%

Note 1: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 2: Data Sources: CHAS

Map 6 – Housing Problems



Severe Housing Problems

Households with one of the following characteristics are said to have a severe housing problem:

- Lacking complete kitchen or plumbing
- More than 1.5 persons per room
- Monthly housing costs, including utilities, exceeds 50% of monthly income

All of the racial/ethnic trends previously described for housing problems are roughly comparable for households experiencing severe housing problems, although on a smaller scale.

When considering severe cost burden (paying more than 50% of household income on housing costs) alone, Blacks once again experience the highest rate and Whites the lowest. The pattern is similar, with Whites below the citywide rate of severe cost burden and a substantial 14 point range.

Small families are again less likely than any other household type to be severely cost burdened. However, an important variation is that non-families in this case experience severe cost burden the most. This implies that, although more large families struggle to pay their housing costs, the problem for non-family households is more acute.

Large families comprise about 9% of the households accounted for in Table 10, and about 12% of households with problems. Even given their small relative numbers, nearly 36% of large families, or roughly 3,350 households, experience at least one housing problem.

Households with children are more than half of those with a Housing Choice Voucher and more than one-third of those in a public housing development. Even so, there are more large family households with housing problems in the community than those currently receiving public assistance. This illustrates a greater need among families with children than FWHA can address.

Table 10 - Demographics of Households with Severe Housing Cost Burden

Households with Severe Housing Cost Burden*	Fort Wayne (Jurisdiction)			Fort Wayne, IN (Region)		
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	6,755	76,310	8.85%	10,410	134,554	7.74%
Black, Non-Hispanic	3,545	15,213	23.30%	3,670	15,939	23.03%
Hispanic	625	5,393	11.59%	745	6,491	11.48%
Asian or Pacific Islander, Non-Hispanic	270	2,513	10.74%	344	3,039	11.32%
Native American, Non-Hispanic	49	256	19.14%	54	483	11.18%
Other, Non-Hispanic	273	1,240	22.02%	300	1,704	17.61%
Total	11,517	100,905	11.41%	15,523	162,215	9.57%
Household Type and Size						
Family households, <5 people	4,827	53,054	9.10%	6,707	91,809	7.31%
Family households, 5+ people	1,219	9,318	13.08%	1,489	15,808	9.42%
Non-family households	5,451	38,540	14.14%	7,328	54,570	13.43%

Note 1: Severe housing cost burden is defined as greater than 50% of income.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.

Note 4: Data Sources: CHAS

Table 11 - Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children

	Fort Wayne (Jurisdiction)							
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	414	56.56%	94	12.84%	212	28.96%	262	35.79%
Project-Based Section 8	1,077	75.05%	244	17.00%	102	7.11%	344	23.97%
Other Multifamily	110	92.44%	0	0.00%	0	0.00%	0	0.00%
HCV Program	323	12.70%	842	33.10%	1,306	51.34%	1,484	58.33%

Note 1: Data Sources: APSH

Note 2: Refer to the Data Documentation for details (www.hudexchange.info).

Additional Information

Catholic Charities operates a refugee resettlement program that helps people coming to the United States under refugee status as granted by the US Department of State, as well as assistance to individuals who seek asylum once they are already in this country. Catholic Charities typically places families, primarily Burmese, in a select number of multi-family developments in southeastern Fort Wayne.

According to local stakeholders, due to this population's limited English proficiency, challenging economic circumstances, and frequent unease with government agencies, they are particularly vulnerable to being taken advantage of by landlords. Stakeholders reported that Burmese families live in units that are in disproportionately poorer condition than others in their neighborhoods.

Stakeholders interviewed also described that property maintenance in the southeast in general is mixed. Although Neighborhood Code Enforcement responds appropriately when a complaint is filed, the process is complaint driven and not targeted or proactive.

VII. Publicly Supported Housing

Overview

HUD has three primary housing programs for eligible low-income households: Public Housing, Project-Based Section 8 vouchers (PBV), and the Housing Choice Voucher (HCV) program. Public Housing refers to rental units owned and operated by Public Housing Authorities (PHAs). The Project-Based Section 8 program provides rental housing in privately-owned and operated rental units. Finally, the HCV program provides a subsidy for eligible households to rent private, market-rate units.

The Low-Income Housing Tax Credit (LIHTC) program encourages the private sector to invest in the development of affordable rental housing for lower income households in return for the receipt of federal tax credits.

Fort Wayne and Allen County is served by Fort Wayne Housing Authority (FWHA). FWHA owns and manages over 800 units of affordable housing, administers and manages over 3,000 vouchers, and helps provide homes to over 3,500 families and nearly 9,000 family members.

Demographics

According to 2017 statistics from FWHA, there are approximately three times as many residents in HCV households as in public housing. These households also tend to have slightly higher household incomes on average, and a lower rate of persons with disabilities.

FWHA Demographics				
Participants	Total	With a Disability		Average Household Income
HCV Program	2,535	818	32.3%	\$13,450
Public Housing	717	308	43.0%	\$11,691

Note 1: Data Source: FWHA 2017 Program Profile

Both programs are in high demand, however. The HCV Program cleared its waiting list in April 2017. The waiting list was opened on July 5 and 6, 2017, and accepted 2,923 applications over those two days. The public housing program's waiting list currently has 2,035 applicants, including:

- 292 elderly and/or disabled
- 119 victims of domestic violence
- 32 veterans
- 45 homeless persons

Black households are more heavily represented in publicly supported housing than any other racial or ethnic group. Accounting for only 15.5% of Fort Wayne's population, Black households are 79% of Housing Choice Voucher holders and 60% of public housing residents.

Among the different types of supported housing, White households are much more likely to live in

Project-based Section 8 and Other Multifamily developments than they are in public housing or HCV units. Hispanics, especially when compared to other racial/ethnic groups, are more or less evenly distributed among the various programs. The greatest disparity occurs in the Housing Choice Voucher program in which Blacks account for 79% of all households.

Table 6a - Publicly Supported Housing Residents by Race/Ethnicity

	Race/Ethnicity							
Fort Wayne (Jurisdiction)	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	203	28.23%	428	59.53%	27	3.76%	58	8.07%
Project-Based Section 8	783	55.61%	593	42.12%	29	2.06%	2	0.14%
Other Multifamily	56	56.57%	38	38.38%	2	2.02%	2	2.02%
HCV Program	429	17.38%	1,949	78.94%	83	3.36%	4	0.16%
Income								
0-30% of AMI	6,505	52.59%	4,258	34.42%	780	6.31%	480	3.88%
0-50% of AMI	11,805	50.09%	6,488	27.53%	1,730	7.34%	924	3.92%
0-80% of AMI	25,290	60.50%	9,368	22.41%	3,039	7.27%	1,213	2.90%
Total	76,310	75.63%	15,213	15.08%	5,393	5.34%	2,513	2.49%

Fort Wayne, IN (Region)								
Income								
0-30% of AMI	9,334	60.26%	4,350	28.08%	905	5.84%	485	3.13%
0-50% of AMI	17,529	56.46%	6,625	21.34%	1,974	6.36%	955	3.08%
0-80% of AMI	39,689	67.83%	9,635	16.47%	3,498	5.98%	1,309	2.24%
Total	134,554	82.95%	15,939	9.83%	6,491	4.00%	3,039	1.87%

Note 1: Data Sources: Decennial Census; APSH; CHAS

Note 2: #s presented are numbers of households not individuals.

Black and Hispanic households living in assisted housing in Fort Wayne are much more likely to have low- or moderate-incomes (LMI) than White households. Of those Black LMI households, nearly one-third live in some variety of publicly assisted housing unit. Altogether, Black households account for over 64% of the households in assisted units as reported in HUD's data.

In the region, once again Black and Hispanic households experience the highest rates of LMI –

up to twice that of White households. Again, Black households are 64% of the households in publicly assisted housing. Non-White households in the region comprise subsidized housing residents at the same rate as in Fort Wayne.

As previously mentioned, participants of FWHA's HCV and public housing program have rates of disability at 32.3% and 43%, respectively. These are substantially higher than the 2013 citywide rate of 23.3%.

Table 6b - Publicly Supported Housing Residents by Race/Ethnicity					
Fort Wayne (Jurisdiction)	Households	LMI Households	% of LMI Households	Households in Assisted Housing	% of LMI in Assisted Housing
White	76,310	25,290	33.14%	1,471	5.82%
Black	15,213	9,368	61.58%	3,008	32.11%
Hispanic	5,393	3,039	56.35%	141	4.64%
Asian or Pacific Islander	2,513	1,213	48.27%	66	5.44%
Fort Wayne, IN (Region)					
White	134,554	39,689	29.50%	1,547	3.90%
Black	15,939	9,635	60.45%	3,138	32.57%
Hispanic	6,491	3,498	53.89%	145	4.15%
Asian or Pacific Islander	3,039	1,309	43.07%	68	5.19%

Note 1: Data Sources: Decennial Census; APSH; CHAS

Note 2: #s presented are numbers of households not individuals.

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

Location

The five public housing developments and 35 LIHTC developments identified on HUD's AFFH mapping tool are reasonably dispersed throughout the City. No public housing is located within the R/ECAP area, and only four LIHTC projects are.

The seven Other Multifamily developments in Fort Wayne are all in southern neighborhoods, although none are in an R/ECAP tract. Project-based Section 8 developments tend to be in the northern part of the City, with one 167-unit development in the R/ECAP.

Fort Wayne Housing Authority also owns scattered site housing comprised of 50 three- and four-bedroom single-family homes in various neighborhoods throughout the City.

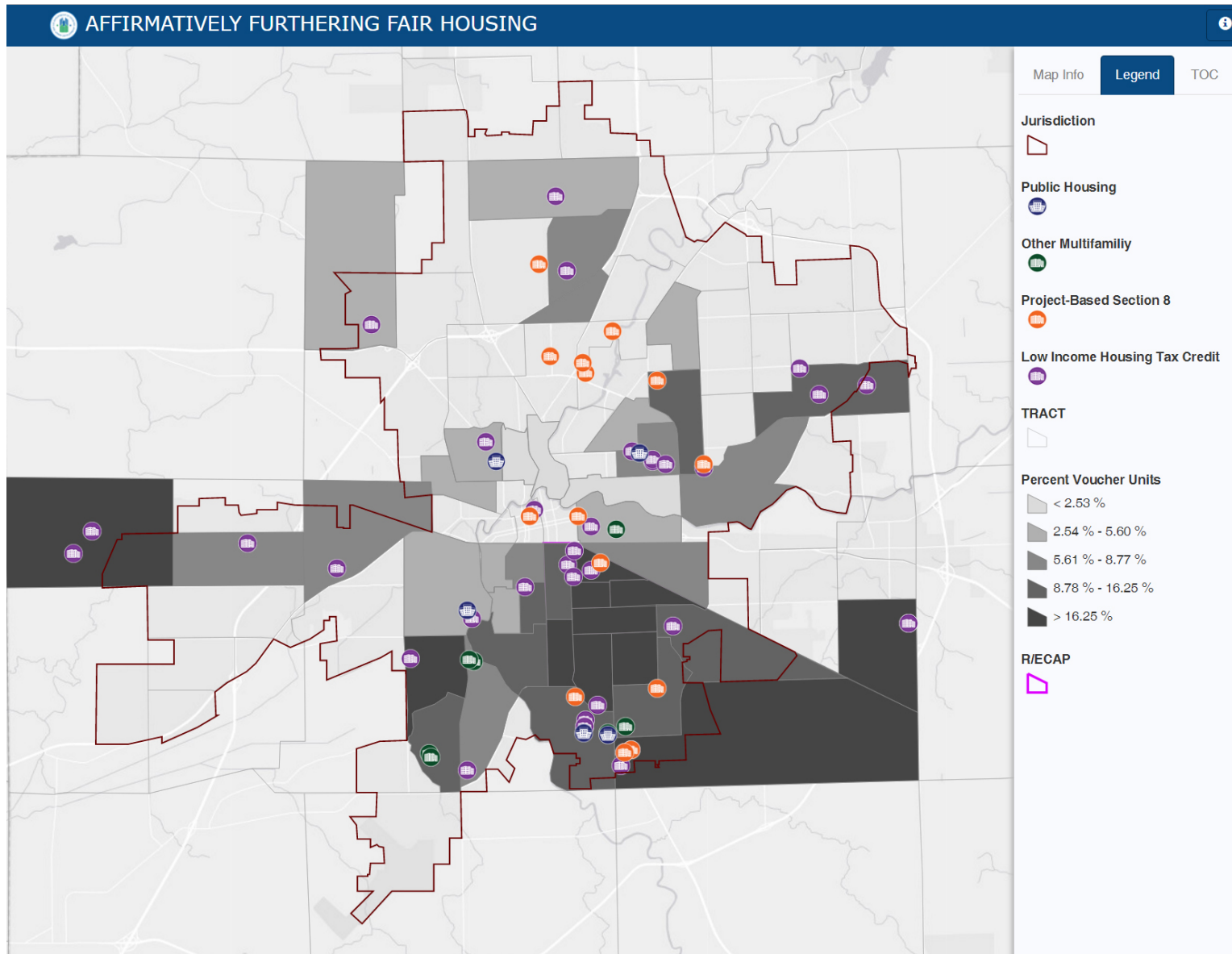
Taken together, the publicly supported housing inventory is spread consistently throughout the City.

Data for HCV holders in Fort Wayne is incomplete, with large sections of the City missing information. Based on the data that is available, the six R/ECAP tracts have a relatively high concentration of voucher holders compared to other sections of the City.

Fort Wayne is the hub of publicly supported housing in the region with the most options for all of Allen, Wells, and Whitley Counties by far.

In spite of the data available in HUD's AFFH mapping tool, there is a universal perception among community members, residents, and stakeholders that southeastern Fort Wayne contains the highest concentration of publicly assisted housing and HCVs.

Map 5 – Publicly Supported Housing



The HUD-provided data only contain complete information for the Project-based Section 8 and HCV programs in the City and region. For Project-based Section 8, residents in R/ECAP tracts are more likely to be young, Hispanic, and have a disability than residents of developments outside of the R/ECAP. HCV residents in R/ECAP tracts also tend to be younger than those in other tracts, but

the other categorical differences are not as strong or not present at all.

Developments under all assisted housing programs tend to have fewer White and Hispanic residents and more Black residents than their corresponding census tract. This discrepancy is strongest among public housing units.

Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category								
Fort Wayne (Jurisdiction)	Total # units (occupied)	% Elderly	% with a disability*	% White	% Black	% Hispanic	% Asian/ Pacific Islander	% Families w/ children
Public Housing								
R/ECAP tracts	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Non R/ECAP tracts	725	28.23%	59.53%	3.76%	8.07%	35.79%	19.67%	23.36%
Project-based Section 8								
R/ECAP tracts	144	12.69%	86.57%	0.75%	0.00%	65.44%	2.94%	2.94%
Non R/ECAP tracts	1,286	60.13%	37.44%	2.20%	0.16%	19.63%	36.64%	38.03%
Other HUD Multifamily								
R/ECAP tracts	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Non R/ECAP tracts	107	56.57%	38.38%	2.02%	2.02%	0.00%	33.61%	73.95%
HCV Program								
R/ECAP tracts	538	7.83%	89.60%	2.57%	0.00%	65.46%	7.49%	14.49%
Non R/ECAP tracts	1,082	22.11%	73.65%	3.76%	0.24%	54.99%	10.79%	17.90%

Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.

Note 2: Data Sources: APSH

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

Table 8a - Demographics by Publicly Supported Housing Developments, by Program Category

Development name	Program category	# Units in Project	% Project head of household race/ethnicity				% Households with children in development
			White	Black	Hispanic	Asian	
Memorial Park Estates	Other Multifamily	34	19%	77%	3%	N/A	N/A
Richardville I	Other Multifamily	14	77%	23%	0%	N/A	N/A
Richardville II	Other Multifamily	14	86%	14%	0%	N/A	N/A
Seddlemeyer	Other Multifamily	18	53%	35%	0%	12%	N/A
Waynedale Apartments	Other Multifamily	24	77%	18%	0%	N/A	N/A
Waynedale II Apartments	Other Multifamily	10	N/A	N/A	N/A	N/A	N/A
Woodside Apartments	Other Multifamily	15	38%	38%	23%	N/A	N/A
Adam & Bruce Apartment	Project-based Sec 8	50	31%	64%	5%	N/A	N/A
Allen County Group Homes	Project-based Sec 8	24	70%	22%	4%	4%	N/A
Arbors Of South Towne Square Apartm	Project-based Sec 8	212	36%	62%	1%	1%	5%
Cambridge Sq. Ft. Wayne II	Project-based Sec 8	80	87%	10%	2%	1%	47%
Chc East Central	Project-based Sec 8	166	28%	68%	4%	N/A	19%
Community Housing Concepts Centenni	Project-based Sec 8	88	11%	84%	5%	N/A	76%
Eden Green	Project-based Sec 8	188	13%	86%	1%	N/A	66%
Edsall House	Project-based Sec 8	203	84%	13%	1%	0%	N/A
Fairington Ft. Wayne	Project-based Sec 8	200	91%	6%	3%	N/A	N/A
Richfield Ft. Wayne	Project-based Sec 8	120	51%	42%	5%	1%	60%
Salem Manor	Project-based Sec 8	84	95%	5%	0%	N/A	N/A
True Love	Project-based Sec 8	30	27%	70%	0%	3%	N/A
Woodbridge Ft. Wayne I	Project-based Sec 8	26	73%	23%	4%	N/A	58%
Woodview Manor Apts.	Project-based Sec 8	48	51%	47%	2%	N/A	61%
Beacon Heights	Public Housing	194	22%	50%	3%	25%	41%
Brookmill Court	Public Housing	186	26%	65%	7%	3%	49%
North Highlands	Public Housing	185	47%	47%	4%	1%	38%
South Side Senior Villas	Public Housing	7	N/A	N/A	N/A	N/A	N/A
Tall Oaks	Public Housing	178	18%	76%	2%	3%	17%

Table 8b - Demographics by Publicly Supported Housing Developments, by Program Category

Development name	Census Tract	% Census Tract race/ethnicity				Census Tract poverty rate
		White	Black	Hispanic	Asian	
Memorial Park Estates	18003004300	32%	50%	12%	2%	34%
Richardville I	18003003901	86%	4%	6%	1%	12%
Richardville II	18003003901	86%	4%	6%	1%	12%
Seddlemeier	18003011302	19%	44%	7%	26%	35%
Waynedale Apartments	18003003800	80%	11%	7%	0%	30%
Waynedale II Apartments	18003003800	80%	11%	7%	0%	30%
Woodside Apartments	18003003600	36%	42%	14%	3%	25%
Adam & Bruce Apartment	18003011302	19%	44%	7%	26%	35%
Allen County Group Homes	18003003304	63%	12%	14%	7%	22%
Arbors Of South Towne Square Apartm	18003011304	40%	41%	13%	2%	17%
Cambridge Sq. Ft. Wayne II	18003010706	78%	7%	5%	7%	10%
Chc East Central	18003004300	32%	50%	12%	2%	34%
Community Housing Concepts Centenni	18003011304	40%	41%	13%	2%	17%
Eden Green	18003001700	9%	65%	21%	1%	48%
Edsall House	18003001200	72%	17%	7%	1%	55%
Fairington Ft. Wayne	18003004103	77%	8%	5%	6%	15%
Richfield Ft. Wayne	18003010821	77%	13%	4%	2%	11%
Salem Manor	18003004103	77%	8%	5%	6%	15%
True Love	18003003600	36%	42%	14%	3%	25%
Woodbridge Ft. Wayne I	18003004103	77%	8%	5%	6%	15%
Woodview Manor Apts.	18003010821	77%	13%	4%	2%	11%
Beacon Heights	18003003500	67%	17%	4%	8%	30%
Brookmill Court	18003002200	68%	14%	14%	1%	27%
North Highlands	18003000800	86%	3%	6%	1%	14%
South Side Senior Villas	18003003600	36%	42%	14%	3%	25%
Tall Oaks	18003003600	36%	42%	14%	3%	25%

There does not appear to be a significant disparity in access to opportunity between residents of publicly supported housing and the general public, or between residents of different types of publically supported housing. Although Other Multifamily developments are primarily located in the southern portion of the City, they are not particularly concentrated in areas of low opportunity.

Housing Authority Initiatives

Fort Wayne Housing Authority is interested in exploring innovative approaches to better serve its residents. FWHA is looking to increase its portfolio of non-traditional public housing, including tax credit projects, permanent supportive housing, and Rental Assistance Demonstration (RAD) conversions to more effectively capitalize some of its maintenance needs. RAD conversions have proven difficult, however, due to Fort Wayne's local rental market. FWHA is also preparing to join the Moving to Work (MTW) program and examine rent reform, work incentives, mobility counseling, and other new approaches as part of that effort.

FWHA has a very active Resident Advisory Board and resident supportive programs. In 2016 they held 58 resident meetings, graduated 21 individuals from the Family Self-Sufficiency program, and graduated 20 individuals from the Ready to Rent program.

VIII. Disability and Access

Population Profile

Persons with disabilities live throughout Fort Wayne. However, from a very general perspective, southern and southeastern neighborhoods tend to have higher rates of persons with disabilities. This includes the City's R/ECAP tracts. Likewise, northern and northeastern neighborhoods tend to have lower rates. The Fort Wayne CBSA has comparable rates of disability to the City.

Within the City, geographic patterns vary somewhat between types of disability. Individuals with ambulatory and cognitive disabilities, in particular, seem to be more highly concentrated in southern neighborhoods than might be expected by baseline patterns of population density. These are also the types of disability with the highest rate of occurrence overall in Fort Wayne.

Other types of disability (hearing, vision, self-care, and independent living) are more evenly dispersed throughout the City.

Citywide, the 18-64 age group has the highest proportion of individuals with disabilities (6.84%), followed by individuals aged 65 and older (4.59%) and children aged 5-17 (1.24%). Southeastern neighborhoods, specifically census tracts in or near Fort Wayne's R/ECAP area, have much higher concentrations of children and adults with disabilities. There are no significant concentrations of elderly individuals with disabilities within the City.

Regionally, persons with all types of disabilities are much more likely to live in urban areas, including Fort Wayne, Columbia City, and Bluffton, than the rest of Allen, Whitley, and Wells Counties. Otherwise, the rates of occurrence of different types of disability and different age groups are the same in both the City and region.

Persons with a Disability, 2015

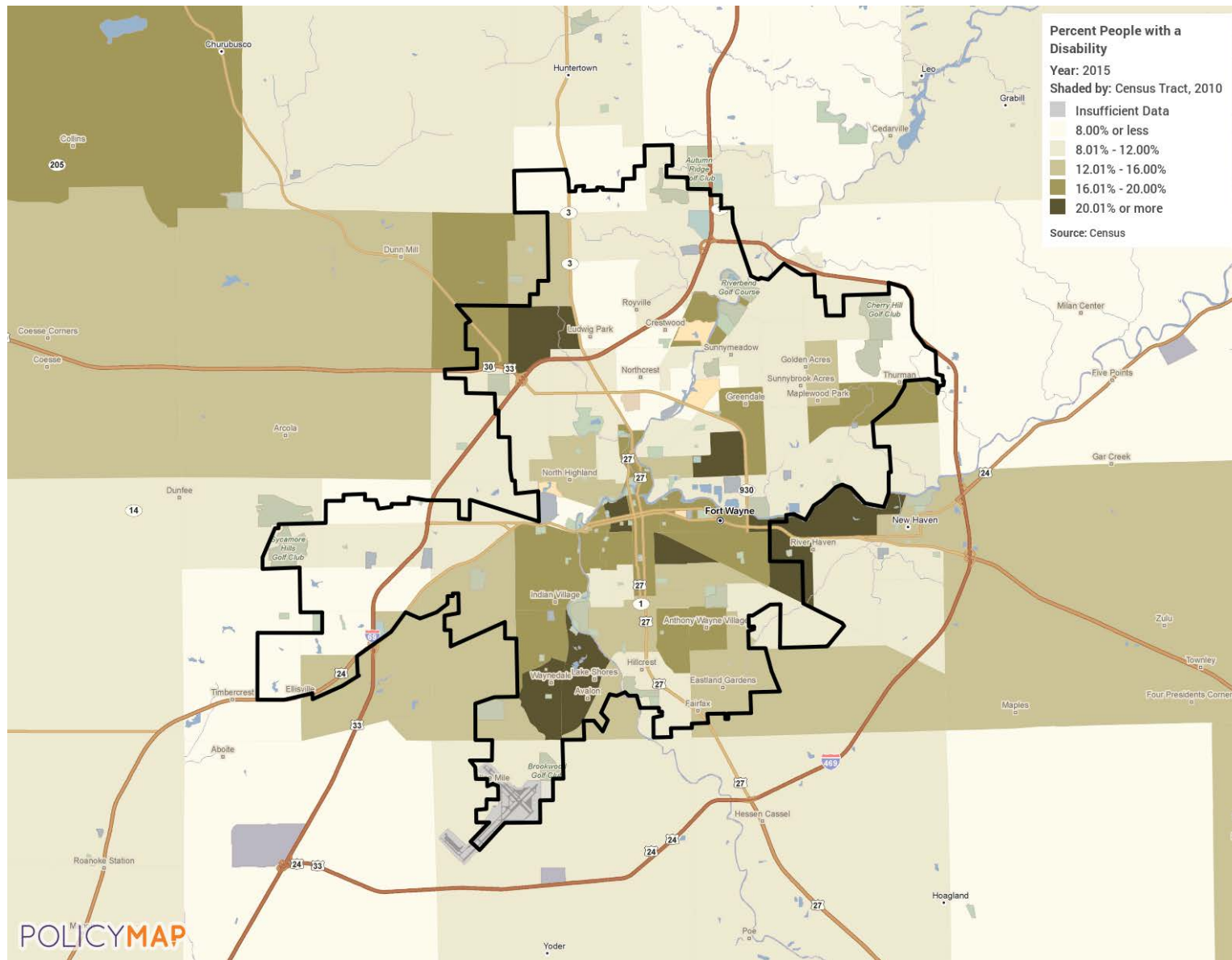


Table 13 - Disability by Type				
	Fort Wayne (Jurisdiction)		Fort Wayne, IN (Region)	
Disability Type	#	%	#	%
Hearing difficulty	7,215	3.11%	13,124	3.41%
Vision difficulty	4,182	1.80%	6,743	1.75%
Cognitive difficulty	11,945	5.15%	18,053	4.70%
Ambulatory difficulty	15,444	6.66%	23,394	6.09%
Self-care difficulty	5,306	2.29%	8,411	2.19%
Independent living difficulty	9,984	4.30%	15,544	4.04%

Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: ACS

[Note 3: Refer to the Data Documentation for details \(www.hudexchange.info\).](http://www.hudexchange.info)

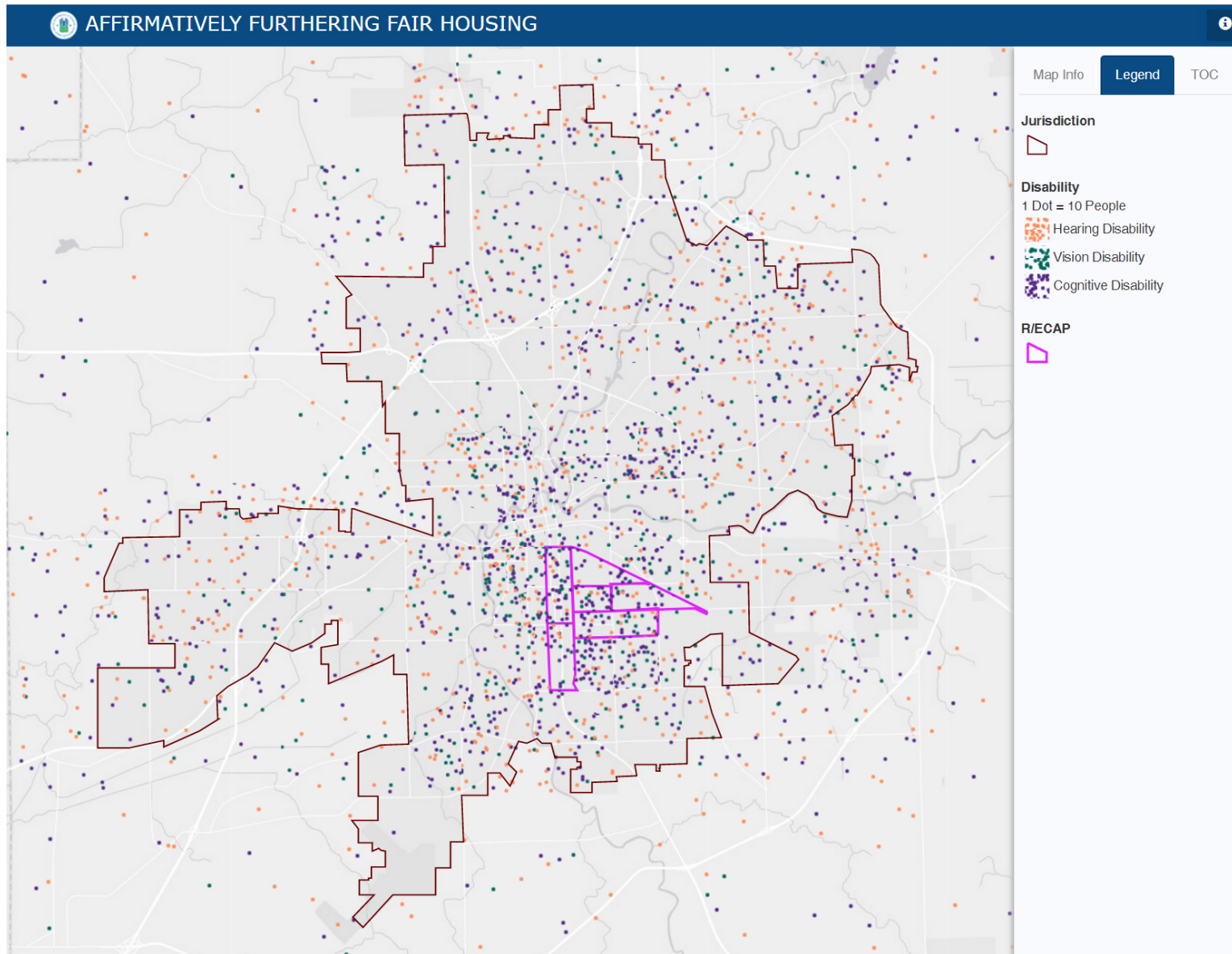
Table 14 - Disability by Age Group				
	Fort Wayne (Jurisdiction)		Fort Wayne, IN (Region)	
Age of People with Disabilities	#	%	#	%
age 5-17 with Disabilities	2,882	1.24%	4,588	1.19%
age 18-64 with Disabilities	15,876	6.84%	24,261	6.31%
age 65+ with Disabilities	10,643	4.59%	17,464	4.54%

Note 1: All % represent a share of the total population within the jurisdiction or region.

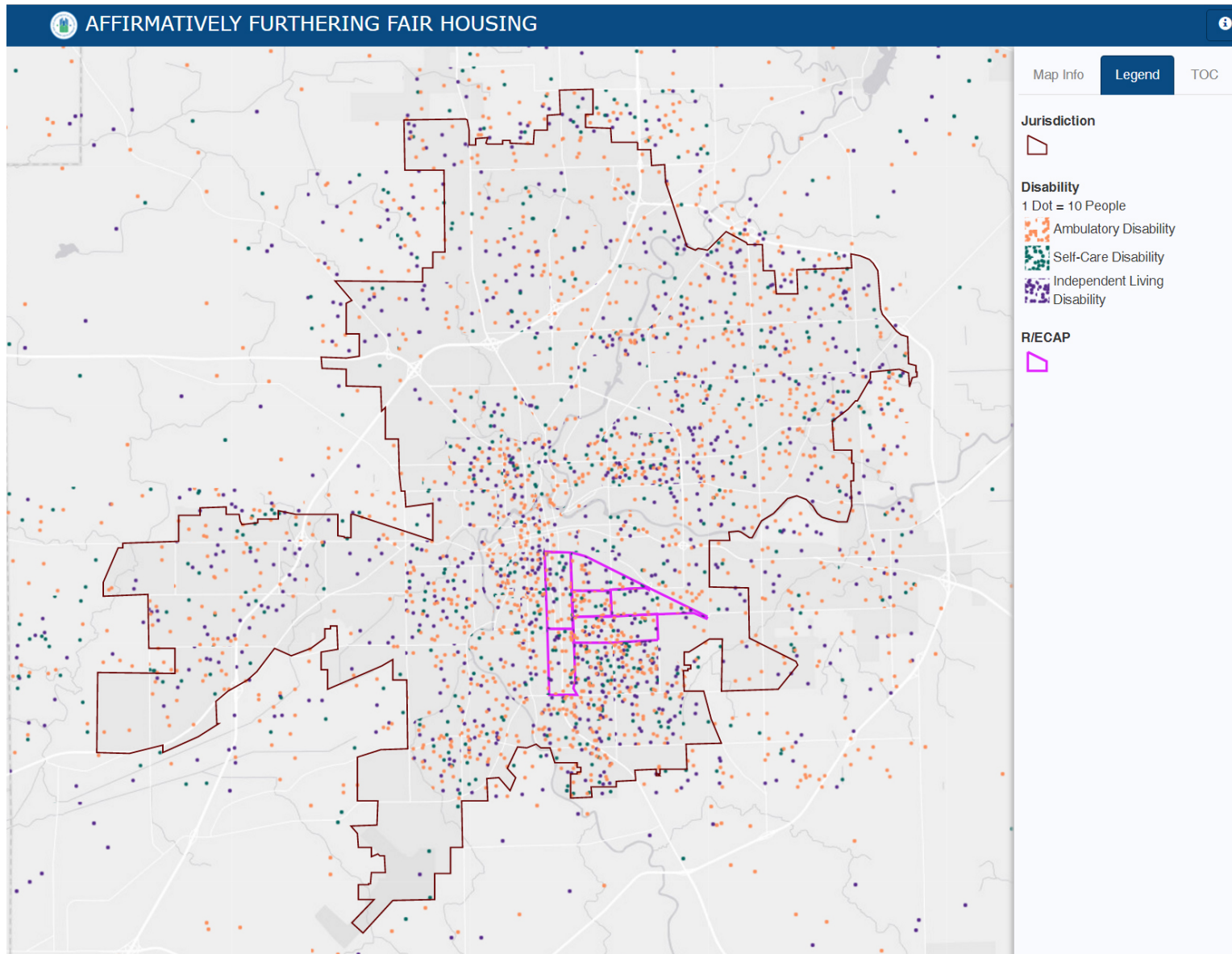
Note 2: Data Sources: ACS

[Note 3: Refer to the Data Documentation for details \(www.hudexchange.info\).](http://www.hudexchange.info)

Map 14a – Disability by Type



Map 14b – Disability by Type



Housing Accessibility

In 2015, according to the US Census, 25.7% of people with a disability in Fort Wayne lived below the poverty level, compared to 18.2% of people without disabilities. This disparity indicates that people with disabilities are more likely to have lower incomes and greater difficulty affording housing.

The more affordable neighborhoods of the City were developed earlier, so neighborhood walkability and accessibility of housing is lower than in newer subdivisions. One representative of a non-profit agency for persons with disabilities reported that requests for ramps and home modifications are a large volume of their calls. Other stakeholders mentioned that waiting lists for accessible housing are very long; once a person with a disability finds an affordable, accessible unit, he or she is not nearly as transient as others might be.

Most single-family housing, which accounts for over two-thirds of Fort Wayne's housing stock, is generally not accessible to persons with disabilities. The Fair Housing Act requires that most multi-family properties built after 1991 meet federal accessibility standards, but over 79% of the City's housing stock was built before this time.

For the most part, the greatest difficulty faced by a person with a physical disability looking to buy a home is finding a unit that is already accessible or easily modified. Features such as no-step entries, bathrooms on the first floor, curb cuts, etc. are not always common features in Fort Wayne's housing stock.

Specific data on privately owned affordable, accessible housing is unavailable. However, it is reasonable to conclude that these findings indicate that neither the City nor region has an adequate supply of affordable, accessible housing in a range of unit sizes.

Publicly Assisted Housing

Citywide, persons with a disability are much more likely to live in Other Multifamily units than other types of publicly assisted housing, according to HUD data. They are least likely to have a HCV.

Table 15 - Disability by Publicly Supported Housing Program Category		
Fort Wayne (Jurisdiction)	People with a Disability*	
	#	%
Public Housing	171	23.36%
Project-Based Section 8	498	34.70%
Other Multifamily	88	73.95%
HCV Program	427	16.78%

Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Note 2: Data Sources: ACS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

According to FWHA data from 2017, 42.96% of public housing residents and 32.27% of HCV participants have a disability.

Reasonable Accommodations

FWHA outlines its process for evaluating requests for reasonable accommodation in its policies as follows, and provides requestors with a Request for Reasonable Accommodation form:

PROCEDURE #1 - Communication with Applicants and Residents

FWHA is responsible for informing all residents that a request may be submitted for reasonable accommodations for an individual with a disability. All residents will be provided the Request Form when requesting a reasonable accommodation. However, a resident may submit the request in writing, orally, or use another equally effective means of communication to request the accommodation. If a request is not submitted on a Request Form, the FWHA staff person receiving the request will complete and date a Request Form and forward it to the 504 Coordinator with a copy to the person making the request.

Upon receiving the request, housing management and/or the 504 Coordinator will send the requestor an acknowledgement of the request, in writing or requested alternative format, within ten business days. If additional information or documentation is required, a written request should be issued to the resident by using the Request for Information or Verification Form. FWHA representative will discuss

and review potential means of making accommodations before making a decision on implementation.

FWHA will consent to or deny the request within twenty business days after receiving all needed information and documentation from the resident or issue an alternate time limit if circumstances require additional time. If an extended time is required, FWHA will update the requestor periodically, but at no time should more than thirty business days lapse between updates, unless agreed upon in writing by both parties.

All decisions to grant or deny reasonable accommodations will be communicated in writing or if required, in an alternative format in order to communicate the decision to the applicant, participant, or resident. Exceptions to the twenty business day period for notification of FWHA's decision on the request should be provided to the resident in writing setting forth the reasons for the delay. FWHA will maintain at its Housing Leasing/Admissions Office; Management Offices; and Administrative Office written materials which summarizes this Policy and highlights the procedures for making a request for reasonable accommodations.

PROCEDURE #2 - Sequence for Making Decisions

1. Is the applicant/resident a qualified "individual with a disability"?

- If NO, we are not obligated to make a reasonable accommodation; therefore, we may deny the request.
- If YES, go to Step 2. If more information is needed, either write for more information using the standard Request for Information letter, or request a meeting using the standard Request for Meeting letter.

2. Is the requested accommodation related to the disability?

- If NO, we are not obligated to make the accommodation; therefore, we may deny the request.
- If YES, go to step 3. If more information is needed, either write for more information using the Request for Information Letter, or request a meeting using the Request for Meeting Letter.

3. Is the requested accommodation reasonable?

This determination will be made by following Procedure #3 - Guidelines for Determining Reasonableness.

- If YES, we will approve the request for reasonable accommodation. A written description of the accommodation will be prepared and included in the Letter Approving Request for Reasonable Accommodations.
- If NO, we may deny the request. Submit the denial using the Letter Denying Request for Reasonable Accommodations. If more information is needed, either write for more information using the Letter Approving Request for Reasonable Accommodations, or request a meeting using the Request for Meeting Letter.

PROCEDURE #3 - Guidelines for Determining Reasonableness

FWHA will consider the requested method for providing reasonable accommodations for an individual with a disability. However, FWHA is required to evaluate the requested method and may require the individual with a disability to provide further information to demonstrate the need for the requested accommodation to enable access to and use of the housing program. Additionally, FWHA may offer equally effective alternatives to the requested accommodation, and/or alternative methods for providing the requested accommodation.

Requests for reasonable accommodations will be considered on a case-by-case basis. Decisions regarding reasonable accommodations will be made in compliance with all applicable accessibility laws and requirements. Additionally, in those circumstances where FWHA deems that a proposed reasonable accommodation would fundamentally alter the service, program, or activity, or would result in undue financial and administrative burdens, FWHA has the burden of proving such results.

The responsibility for the decision that a proposed reasonable accommodation would result in such alteration or burdens shall rest with the Executive Director or his/her designee after considering all resources available for use in the funding and operation of the service, program, or activity, and must be accompanied by written statement of the reasons for reaching that conclusion. If an action would result in such an alteration or such burdens, FWHA shall propose any other action that will not result in or require an alteration or burden.

Verification

FWHA may verify a person's disability only to the extent necessary to ensure that applicants are qualified for the housing for which they are applying; that applicants are qualified for deductions used in determining adjusted income; that applicants are entitled to any preference they may claim; and that applicants who have requested a reasonable accommodation have a need for the requested accommodation. FWHA may not require applicants to provide access to confidential medical records in order to verify a disability nor may FWHA require specific details as to the disability. FWHA may require documentation of the manifestation of the disability that causes a need for a specific accommodation or accessible unit. FWHA may not ask what the specific disability is.

Disparities in Access to Opportunity

Accessing supportive services, community facilities, employment, and other amenities can be challenging for persons with disabilities. Currently, many areas of Fort Wayne require a car to effectively access, and there are no Accessible Pedestrian Signals in the City. There are some neighborhoods where it was reported that wheelchairs cannot be accommodated on the sidewalks and instead must be used in the street. However, as new projects are completed by Public Works, they are generally ADA-compliant.

Individuals with disabilities are disproportionately affected by limited transportation options, as they tend to rely heavily on public transit due to an inability to walk or bike to destinations or a lack of income to purchase a personal vehicle. As discussed earlier, bus service within Fort Wayne is limited and operates on a hub and spoke system, making many trips excessively long. The City's Paratransit Service provides wheelchair accessible service for trips within the City during regular service hours. Community Transportation Network, a non-profit, also offers alternative transportation for seniors, medical trips, and special events.

There has been gradual progress to improve the accessibility of public accommodations, riverfront development, etc. Advocates for persons with disabilities reported that the Fort Wayne/Allen County Convention and Visitors Bureau has become more aware and receptive over time to the issues faced by persons with disabilities.

In May of 2017, the Allen County Board of Commissioners and the Mayor of Fort Wayne jointly announced plans to form a Fort Wayne-Allen County Disability Advisory Council. The purpose of the council is to assist in providing equal access for people with disabilities to employment, services, programs, and activities offered in the City and county. Some of the council's responsibilities will include serving as an information resource for City and county elected officials and administrators regarding needs and conditions of people with disabilities, identifying barriers to full community participation, and recommending corrective actions.

In June, Fort Wayne was designated an "Ability City." Ability Indiana, Inc. is a 501(c)3 organization authorized by state statute to give state and local government entities the mechanism to contract with employment centers without going through the public bidding process.

IX. Policy Analysis

Public Policies

Local units of government can affirmatively further fair housing choice through policies related to the development, financing, and siting of housing. The analysis below evaluates these policies for the City of Fort Wayne.

HUD Grant Programs

Fort Wayne is a CDBG, HOME, and ESG entitlement jurisdiction under the authority of the Community Planning and Development (CPD) division of the U.S. Department of Housing & Urban Development (HUD). Annually, Fort Wayne develops an Annual Action Plan to identify the eligible activities it will fund and implement with HUD CPD funds.

In the past decade, funding from HUD has decreased and additional regulations have required more administrative capacity. This results in entitlements needing to “do more with less,” including the goal of affirmatively furthering fair housing choice. This section analyzes the local policies in place that guide how the City affirmatively furthers fair housing as part of funding decisions through the Annual Action Plan process.

Funding Priorities

Examining the amount of total annual allocations spent specifically on fair housing provides insight into how communities prioritize their commitment to affirmatively further fair housing. Such activities include fair housing planning; preparing an Analysis of Impediments to Fair Housing Choice; providing fair housing education and outreach for City officials, department staff, sub-recipients and the general public; and, using techniques like paired testing to assess the level of discrimination in the private housing market.

Fort Wayne allocated CDBG funds for the preparation of an AI in 2010 and again in 2016. The City has also funded fair housing education and outreach activities in FY 2106 as a means of stopping discrimination and informing residents of their rights.

Project Selection

Communities can implement their commitment to affirmatively further fair housing through an application process that favors projects that expand fair housing choice. For example, communities can require applicants to answer questions about how projects affirmatively further fair housing choice. Communities can also establish an affordable housing location policy to place a higher priority on housing-related activities that occur in higher opportunity areas.

Fort Wayne does not have an affordable housing location policy. However, its application for HOME funding includes questions about racial integration and concentration, access to community amenities, and increasing housing choice for protected classes that would result from the proposed project. The City's application for CDBG funds, while inquiring if the applicant would be willing to accept fair housing training, does not require any description of how the project would comply with the Fair Housing Act or affirmatively further fair housing.

Program Access

Persons with limited English proficiency (LEP) are defined by the federal government as persons who have a limited ability to read, write, speak, or understand English. HUD requires recipients to provide translated vital written materials related to funded programs.

The City's Community Development Department lacks a formal Language Access Plan to ensure meaningful access for persons with limited English proficiency to its housing programs and services.

As detailed in the Demographic Summary chapter, Spanish- and "Other Asian"-speaking (most likely Burmese) LEP groups meet the HUD threshold for requiring provision of translated documents in Fort Wayne. The Community Development Department does not have translated vital documents on file.

Monitoring

Entitlements can ensure that sub-recipients affirmatively further fair housing by requiring and enforcing compliance with fair housing statutes through sub-recipient agreements.

The City's sub-recipient agreements briefly state that compliance with relevant HUD statutes is required, but do not mention any of the City's local fair housing goals or plans.

Comprehensive Plan

A community's primary housing policy is frequently expressed in the form of its comprehensive plan, usually within a housing plan element. Within this document, the community sets forth its goals and objectives for meeting the housing needs of current and future residents. Often, this document includes broad statements that seek to address the diversity of housing needs for a variety of household types and at a variety of income levels. And, in nearly all cases, a jurisdiction will develop these goals and objectives based on a community-driven process.

The criteria used to evaluate the *Plan-it Allen!*, Fort Wayne and Allen County's 2007 joint comprehensive plan, were based, in part, on best practices suggested in HUD's Fair Housing Planning Guide. Specifically, for the purposes of this evaluation, the following criteria were reviewed:

Housing

- Specifically states the City's goal to provide a variety of housing unit types for a variety of household types at all income levels
- Recognizes the need for affordable housing for special needs populations, such as persons with disabilities, the elderly, etc.
- Recognizes and addresses homelessness

- Contains a specific description of the City's housing needs by family/household type and income level for both owners and renters
- Includes a policy statement or goal to address the affordable housing needs
- Promotes an affordable housing set-aside for any new residential development proposed
- Encourages a diversity in dwelling unit types, such as accessory units, townhouses, infill units, etc.
- Promotes preservation/maintenance of affordable housing
- Promotes homeownership for low- and moderate-income homebuyers
- Prioritizes land for affordable housing through land banking or some other comparable mechanism

Transportation

- Includes recognition of linkages between housing, public transit, and employment opportunities
- Recognizes the need to provide transit access between lower income neighborhoods and employment centers

Land Use

- Promotes mixed-use neighborhoods with mixed-income housing
- Encourages land to be zoned in a manner that facilitates the preservation, rehabilitation, and construction of affordable housing to meet local needs

Parks and Open Space Element

- Commits to providing parks, recreational facilities, and open spaces with service areas that cover all of the City, including neighborhoods with lower income and multi-family/mixed-use housing types

Community Facilities

- Commits to providing community facilities (i.e. schools, libraries, emergency services, etc.) with service areas that cover all of the City, including neighborhoods with lower income and multi-family/mixed-use housing types

Goals and Objectives

- Commits to supporting affordable housing initiatives in the City

Assessment

Although *Plan-it Allen!* aims to create a mixture of housing types in the City's neighborhoods, it does not specify targeted household types and income levels. Preservation of existing housing stock is emphasized, but mostly in reference to historic

preservation and not affordable housing. Neither housing accessibility for persons with disabilities, senior housing, nor homelessness are addressed in the plan.

The plan does promote the importance of creating connections between housing and public transit, as well as the provision of parks and community facilities with appropriate service areas.

Overall, the comprehensive plan only addresses housing affordability on a cursory level, usually as an offshoot of another related planning goal.

Zoning Ordinance

Given that zoning ordinances govern the location and characteristics of various land uses, they have the potential to restrict fair housing choice.

Many common fair housing zoning issues are interrelated with affordable housing issues. Because members of the protected classes are disproportionately affected by a lack of affordable housing, zoning that effectively restricts affordable housing development can be an impediment to fair housing choice as well.

For example, many zoning ordinances place restrictions on the location of multi-family housing units, which often results in the concentration of affordable housing in low opportunity areas.

Fort Wayne’s zoning ordinance was reviewed to identify policies that may potentially impede housing choice and affordability. The analysis was based on topics raised in HUD’s Fair Housing Planning Guide, which include:

- The opportunity to develop various housing types (including apartments and housing at various densities)
- The treatment of mobile or manufactured homes
- Minimum lot size requirements
- Dispersal requirements for housing facilities for persons with disabilities in single family zoning districts
- Restrictions of the number of unrelated persons in dwelling units based on the size of the unit or the number of bedrooms

Benchmarking

To evaluate the ordinance consistently, a benchmarking tool was used to assess the ordinance against eleven criteria that are either common indicators of impediments or language that addresses impediments to fair housing choice. The indicators are based on best practices and recommendations from HUD’s Fair Housing Planning Guide.

The full set of criteria includes:

1. Ordinance defines “family” inclusively, without a cap on the number of unrelated persons, with a focus on functioning as a single housekeeping unit
2. Ordinance defines “group home” or similarly named land use comparably to single family dwelling units
3. Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special permit or public hearing
4. Ordinance regulates the siting of group homes as single family dwelling units without any additional regulatory provisions
5. Ordinance has a “Reasonable Accommodation” provision or allows for persons with disabilities to request reasonable accommodation/modification to regulatory provisions
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right
7. Ordinance does not distinguish between “affordable housing/multi-family housing” (i.e., financed with public funds) and “multi-

family housing” (i.e., financed with private funds)

8. Ordinance does not restrict residential uses such as transitional housing or permanent supportive housing facilities exclusively to non-residential zoning districts
9. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less
10. Ordinance does not include exterior design/aesthetic standards for all single family dwelling units regardless of size, location, or zoning district

Each criterion was assigned one of two values. A score of “1” means that the criterion applies to the zoning ordinance – i.e., the impediment was not present in the ordinance or that the positive measure was in place. A score of “2” means that the criterion does not apply – i.e., the impediment was present or that the positive measure was not.

For example, a zoning ordinance would receive a score of “1” for providing residential zoning districts with a minimum lot size of 10,000 square feet or smaller, and a score of “2” for including exterior design/aesthetic standards for single family dwelling units.

The final benchmark score is a simple average of the individual criterion. A score of 1.00 to 1.24 indicates an ordinance at low-risk relative to discriminatory provisions; a score of 1.25 to 1.49 indicates a moderate risk; and, a score of 1.50 to 2.00 indicates a high risk.

Assessment

Fort Wayne’s zoning ordinance received a score of 1.40, indicating that the City is at moderate risk relative to discriminatory provisions for housing and members of the protected classes. The City scored well on most items, but lost points for several items that have a large impact on housing choice.

For example, the City places a limit on the number of non-related people that can comprise a “family.” It also requires certain types of residential treatment facilities to receive a special use permit, and prohibits all types of these facilities from locating within 3,000 feet of one another.

Zoning Ordinance Benchmark		
Zoning Ordinance Regulatory Provision	Score	Notes
Ordinance defines "family" inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit	2	Definition caps at 8 members if not related by blood, no cap if related by blood
Ordinance defines "group home" or similarly named land use comparatively to single family dwelling units	1.5	Definition for small, large, limited, court-ordered, developmentally disabled, homeless, mentally ill, and "other" residential facilities
Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use/conditional use permit or public hearing	1.5	Small residential facilities (up to 8) are permitted by right, but other types are special uses
Ordinance regulates the siting of group homes as single family dwelling units without any additional regulatory provisions	2	Must have 3,000 feet of separation
Ordinance has a "Reasonable Accommodation" provision or allows for persons with disabilities to request reasonable accommodation/modification to regulatory provisions	2	Not included
Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	1	Multiple family dwellings are allowed by right in denser zoning districts
Ordinance does not distinguish between "affordable housing/multi-family housing" (i.e., financed with public funds) and "multi-family housing" (i.e., financed with private funds)	1	No such distinction made
Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing, or permanent supportive housing facilities exclusively to non-residential zoning districts	1	Allowed as special uses in residential districts
Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	1	Allowed, if on public sewer system
Ordinance does not include exterior design/aesthetic standards for all single family dwelling units regardless of size, location, or zoning district	1	Design review only required in Downtown districts
TOTAL SCORE	1.40	

Private Sector

The Fair Housing Act prohibits lenders from discriminating against members of the protected classes in granting mortgage loans, providing information on loans, imposing the terms and conditions of loans (such as interest rates and fees), conducting appraisals, and considering whether to purchase loans.

Home Mortgage Disclosure Act (HMDA) data contains records for all residential loan activity reported by banks pursuant to the requirements of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989. Any commercial lending institution that makes five or more home mortgage loans annually must report all residential loan activity to the Federal Reserve Bank, including information on applications denied, withdrawn, or incomplete by race, sex, and income of the applicant. This information is used to determine whether financial institutions are serving the housing needs of their communities.

The most recent HMDA data available for Allen County is 2015. The data included for this analysis is for three years, 2013 through 2015, and constitutes all types of applications received by lenders: home purchase, refinancing, or home improvement mortgage applications for one-to-

four-family dwellings and manufactured housing units across the entire county. The demographic and income information provided pertains to the primary applicant only. Co-applicants were not included in the analysis.

Mortgage Lending

Overview

Between 2013 and 2015, lenders in Allen County received 51,761 mortgage applications. Of these applications, 28.6% were for home purchases, 45% were for refinancing, and 6.4% were for home improvement equity loans. Refinancing loans were slightly less likely to originate (i.e. be approved by the lending institution and accepted by the applicant) than home purchase loans, with 52.4% of refinancing loans originating compared to 57% of home purchase loans.

Home improvement loans were twice as likely to be denied as refinancing loans, which in turn were three times as likely to be denied as purchase loans. This may be because of the impact of the Great Recession, in which banks were reluctant to finance the addition of equity into a house that was no longer appreciating according to expectations.

Cumulative Mortgage Data Summary, 2013-2015

	Total Applications		Originated		Approved Not Accepted		Denied		Withdrawn/Incomplete	
	#	%	#	%	#	%	#	%	#	%
Loan Purpose										
Home purchase	25,143	48.6%	14,344	57.0%	680	2.7%	1,647	6.6%	1,415	5.6%
Home Improvement	3,302	6.4%	1,637	49.6%	134	4.1%	1,175	35.6%	261	7.9%
Refinancing	23,316	45.0%	12,217	52.4%	747	3.2%	4,200	18.0%	3,126	13.4%
Loan Type										
Conventional	33,302	64.3%	19,941	59.9%	1,058	3.2%	4,987	15.0%	3,047	9.1%
FHA	14,523	28.1%	6,326	43.6%	395	2.7%	1,582	10.9%	1,300	9.0%
VA	3,176	6.1%	1,623	51.1%	84	2.6%	387	12.2%	419	13.2%
FSA/RHS	760	1.5%	308	40.5%	24	3.2%	66	8.7%	36	4.7%
Property Type										
One to four-family unit	51,294	99.1%	28,011	54.6%	1,496	2.9%	6,853	13.4%	4,762	9.3%
Manufactured housing unit	388	0.7%	126	32.5%	64	16.5%	164	42.3%	28	7.2%
Applicant Race										
Native American	180	0.3%	95	52.8%	9	5.0%	47	26.1%	23	12.8%
Asian	1,131	2.2%	650	57.5%	55	4.9%	221	19.5%	128	11.3%
Black	2,401	4.6%	1,123	46.8%	90	3.7%	680	28.3%	328	13.7%
Hawaiian	100	0.2%	47	47.0%	7	7.0%	29	29.0%	9	9.0%
White	38,312	74.0%	24,608	64.2%	1,285	3.4%	5,197	13.6%	3,727	9.7%
No information	2,997	5.8%	1,403	46.8%	112	3.7%	836	27.9%	570	19.0%
Not applicable	6,640	12.8%	272	4.1%	3	0.0%	12	0.2%	17	0.3%
Hispanic*	1,460	2.8%	794	54.4%	59	4.0%	350	24.0%	155	10.6%
Total	51,761	100.0%	28,198	54.5%	1,561	3.0%	7,022	13.6%	4,802	9.3%

Source: Federal Financial Institutions Examination Council

Note: Percentages in the Originated, Approved Not Accepted, Denied, and Withdrawn/Incomplete categories are calculated for each line item with the corresponding Total Applications figures. Percentages in the Total Applications categories are calculated from their respective total figures.

* Hispanic ethnicity is counted independently of race.

The most commonly sought type of financing was a conventional loan, a category that comprised 64.3% of all loan applications. A smaller proportion of applications were for Federal Housing Administration (FHA) loans, a type of federal assistance that has historically benefited lower-income residents due to less stringent down payment and credit history requirements.

There were few applications for Veterans Administration (VA) loans or for financing backed by the Farm Services Administration or Rural Housing Service (FSA/RHS). Conventional loans had the highest denial rate, at 15.0%.

Almost all (99.1%) of the 51,761 applications in Allen County involved one-to-four family housing structures, with fewer than 400 applications requesting financing for a manufactured unit.

The top ten lending institutions reviewed 50.7% of all mortgage applications and were responsible for 51.2% of originations within the county. Wells Fargo and was the largest lending institution, followed by Ruoff Mortgage Company based in Fort Wayne. In total, four of the top ten lenders were Indiana companies.

Top Ten Lending Institutions, 2013-2015				
Institution	Applications		Originations	
	#	%	#	%
Wells Fargo	6,569	13.6%	2,340	8.2%
Ruoff Mortgage Company	3,904	8.1%	3,228	11.3%
JP Morgan Chase	2,657	5.5%	918	3.2%
Hallmark Home Mortgage	2,021	4.2%	1,712	6.0%
3 Rivers Federal Credit Union	1,961	4.1%	1,606	5.6%
Fifth Third Mortgage Co.	1,884	3.9%	1,313	4.6%
PNC Bank	1,701	3.5%	996	3.5%
United Security Bank	1,433	3.0%	891	3.1%
Professional Federal Credit Union	1,226	2.5%	822	2.9%
Quicken Loans	1,102	2.3%	793	2.8%
Subtotal	24,458	50.7%	14,619	51.2%

Source: Federal Financial Institutions Examination Council

Demographics

The racial and ethnic composition of loan applicants differs slightly from the County's general demographic distribution. While 11.4% of all Allen County householders in 2015 were Black, only 4.6% of the loan applications for which racial/ethnic data was reported were submitted by Black applicants. Similarly, Hispanic households comprised 4.8% of all households, but only 2.8% of applicants; and White households accounted for 83.2% of the total households in Allen County but 74.0% of loan applicants with reported racial/ethnic data. These numbers might be slightly skewed by the 18.6% of applications for which no information was provided.

Loan application types differed across racial and ethnic groups as well. Although applications were made for purchase and refinancing loans at similar rates in the county overall, with purchases holding a slight edge, Black households were more likely to seek refinancing by almost 10 percentage points.

Asians, on the other hand, were nearly twice as likely to apply for a new home than for refinancing.

The denial rate for Black applicants was 28.3%, which is significantly higher than the average of 19.5% for Asian applicants and 13.6% for White applicants. Hispanic residents also had a high denial rate at 24.0%.

These patterns hold true at all income levels. Upper-income black applicants had a denial rate of 25.3%, compared to 13.4% and 11.2% for Asian and White applicants.

The reasons for mortgage denial also varied by race and ethnicity. Black and Hispanic residents were most likely to be denied due to credit history than other racial groups, while Asians were more likely to be denied on account of their debt to income ratio.

Denial by Income, 2013-2015								
		Total	White	Black	Asian	Other**	No data	Hispanic*
Lower-Income	Total Applications	18,464	14,778	1,172	664	119	1,123	761
	Denials	3,542	2,537	398	151	41	415	243
	% Denied	19.2%	17.2%	34.0%	22.7%	34.5%	37.0%	31.9%
Upper-Income	Total Applications	24,585	20,882	970	424	137	1,531	573
	Denials	3,025	2,343	245	57	28	352	93
	% Denied	12.3%	11.2%	25.3%	13.4%	20.4%	23.0%	16.2%
Total	Total Applications	51,761	38,312	2,401	1,131	280	9,637	1,460
	Denials	7,022	5,197	680	221	76	848	350
	% Denied	13.6%	13.6%	28.3%	19.5%	27.1%	8.8%	24.0%

Source: Federal Financial Institutions Examination Council

Note: Total also includes 7,345 applications for which no income data was reported.

* Hispanic ethnicity is counted independently of race.

**Small sample size may make analysis unreliable.

Reasons for Denial, 2013-2015							
	Total	White	Black	Asian	Other	No Info	Hispanic*
Collateral	14.1%	15.2%	9.4%	17.2%	5.3%	11.0%	10.6%
Incomplete Application	7.6%	7.8%	4.6%	10.0%	5.3%	8.8%	6.6%
Debt/Income Ratio	12.7%	13.4%	9.7%	19.9%	11.8%	8.8%	15.7%
Other	6.0%	6.3%	5.4%	6.3%	2.6%	4.6%	8.0%
No Reason Given	26.2%	25.9%	28.1%	10.9%	26.3%	30.7%	17.4%
Credit History	27.0%	24.8%	38.8%	22.2%	34.2%	31.8%	34.3%
Unverifiable Information	2.2%	2.2%	1.6%	5.0%	9.2%	1.5%	1.1%
Insufficient Cash	2.9%	3.1%	2.2%	5.0%	3.9%	1.9%	5.1%
Employment History	1.3%	1.4%	0.1%	3.6%	1.3%	0.7%	1.1%
Insurance Denied	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

Source: Federal Financial Institutions Examination Council

* Hispanic ethnicity is counted independently of race.

Fair Housing Enforcement, Outreach Capacity, and Resources

The Fort Wayne Fair Housing Ordinance and the Indiana Fair Housing Act are substantially equivalent to the federal Fair Housing Act, prohibiting discrimination because of a person's race, color, religion, sex, disability, familial status, or national origin. Discrimination includes denial of housing or intimidation of people in their apartments, condominiums, and nearly all housing transactions.

The Indiana Civil Rights Commission (ICRC) enforces the civil rights laws of the State of Indiana. They investigate complaints of discrimination and educate organizations, companies, landlords, associations, and individuals on their rights and responsibilities under Indiana Civil Rights Laws, including the Fair Housing Act. ICRC's FY15 budget was approximately \$2.7 million.

The Fort Wayne Metropolitan Human Relations Commission is focused and committed to creating an environment in the City of Fort Wayne that will produce an inclusive community where trust, acceptance, fairness, and equality are the City's norms. MHRC is committed to accomplishing this mission by empowering the citizens of Fort Wayne through education on diversity and discrimination issues and, when necessary, enforcing anti-discrimination laws in order to protect the community from unlawful discrimination and unfounded allegations of discrimination.

As part of the cooperative agreement between HUD, EEOC, and the City of Fort Wayne, MHRC operates by utilizing funding from all three sources. The breakdown on the budgets utilized for the 2016 calendar year are:

- City: \$712,128
- EEOC: \$190,561
- HUD: \$143,262

MHRC Activities

According to MHRC staff, the largest category of complaints is related to a person with a disability, with race-based complaints being the second largest. Housing complaints have been increasing, punctuated by spikes following radio advertising campaigns.

MHRC has undertaken paired testing in the past, but thought it difficult to execute well. Finding control testers was hard, both in terms of the number of willing volunteers and in maintaining volunteer anonymity. Testing is also not politically popular, and so is not a focus of MHRC's enforcement efforts.

MHRC has found that its most effective outreach method is radio advertisements, each featuring a different scenario of discrimination. This approach was much more successful in generating inquiries from residents than billboards and bus shelter ads.

MHRC partners with Fort Wayne Housing Authority to do annual staff and resident training; resident training can now attract upwards of 100 attendees. MHRC has also trained City staff, although not recently, but has not offered training for elected officials and City-appointed board and commission members.

X. Fair Housing Goals and Priorities

Impediments to Fair Housing

The following impediments were identified as factors that contribute to housing discrimination in Fort Wayne. These items, along with the Assessment of Past Goals, form the basis for the City's Fair Housing Action Plan.

The contributing factors identified throughout this AI were assigned three priority levels based on the amount and strength of the supporting evidence that initially identified the factor:

- High – factors that limit or deny fair housing choice or access to opportunity, as well as other factors that are urgent or establish a foundation for future actions
- Medium – moderately urgent or building on prior actions
- Low – limited impact on fair housing issue

Impediments to Fair Housing Choice		
Contributing Factor(s)	Priority	Discussion
Housing & Neighborhoods		
Lack of access to opportunity due to high housing costs Location and type of affordable housing	High	The most affordable neighborhoods in Fort Wayne are in the city center and the southeast. This is also where the City's R/ECAPs are located and where the highest level of segregation is. Although there is not an extreme discrepancy in access to opportunity between different sections of Fort Wayne, the center and southeastern neighborhoods of the City tend to have lower opportunity index scores, while tracts just along the City limits have higher scores. This lower scoring area often coincides with the location of the City's R/ECAPs and most affordable rents.

The availability of affordable, accessible units in a range of sizes	Medium	There is a significant disproportionate need for housing assistance for both large families with children and small (i.e. single person) households compared to other household types. Given the age and types of most of Fort Wayne's housing stock, persons with disabilities require some level of accessibility modification more often than not. These two cases illustrate how a diversity of units with different physical characteristics are necessary to accommodate the various needs of protected classes. Based on data analysis and reporting from local stakeholders, the current supply of housing in Fort Wayne does not have enough options to accommodate all the different types of households who need affordable units.
Lack of private investments in specific neighborhoods	Low	Limited private investment – e.g. employment opportunities, retail businesses, entertainment, etc. – in southeast Fort Wayne was mentioned frequently by local stakeholders and neighborhood organizations as a major deficit. This lack of amenities is somewhat of a circular problem, since businesses need residents to thrive and vice versa. On the residential side, stakeholders interviewed also described that private property maintenance in general in the southeast is mixed. Although Neighborhood Code Enforcement responds appropriately when a complaint is filed, the process is complaint driven and not targeted or proactive. A lack of investment limits the viability of improvements in this area, but this contributing factor is difficult to address because it is ultimately dependent on private decisions, which may or may not align with public interest.

Accessibility		
The availability, type, frequency, reliability, and accessibility of public transportation	Medium	According to local stakeholders, Fort Wayne's transit system does not allow easy access to employment centers or certain critical community amenities. Citilink provides regular fixed-route service and paratransit shuttles throughout Fort Wayne, but the hub-and-spoke system and hours of operation make accessing destinations outside of the central business district difficult. Individuals with disabilities are disproportionately affected by limited transportation options, as they tend to rely heavily on public transit due to an inability to reach destinations by other means. Consequently, this is a priority because access to decent employment is one of the most effective pathways to increased opportunities for low-income families. Given the scarcity of funds available for public transit and the high costs associated with providing expanded service, it must be noted that the City is limited in its ability to address this contributing factor.
Lack of meaningful language access for individuals with limited English proficiency	High	Because of Catholic Charities' work resettling refugees, Fort Wayne has a relatively large Burmese population. Unfortunately, this group often faces cultural barriers in daily life that others don't, and may even be less likely to use City services that are vital to health and safety, such as reporting a crime, filing a housing complaint, or attending a court hearing. Stakeholders familiar with this population reported that when refugees/immigrants do reach out to contact the City, staff is often not properly trained on how to effectively and sensitively interact with them. In addition, there are nearly 6,500 Spanish-speaking Fort Wayne residents that speak English less than "very well." The City's Community Development Department lacks a formal Language Access Plan to ensure meaningful access for persons with limited English proficiency to its housing programs and services. City forms are not available in other languages and the City does little to no non-English advertising.

Outreach & Enforcement		
Community opposition	Low	NIMBYism against rental housing and low-income housing is not uncommon in Fort Wayne. Neighborhood organizations can be vocally opposed to affordable housing development, even though official approval is usually granted if no other mitigating issues are found. Residents reported that some neighborhood organizations continue to scrutinize projects after they are completed. Allowing vocal opponents to derail projects or dictate where and when affordable or multi-family housing can be developed has a high potential of maintaining segregation and disproportionately impacting members of the protected classes. The fact that community opposition at this strength seems to be uncommon in Fort Wayne keeps this factor from being a more urgent priority.
Private discrimination	Low	Stakeholders reported experiences in which landlords discriminate against potential tenants because of personal characteristics. For example, due to the Burmese population's limited English proficiency, challenging economic circumstances, and frequent unease with government agencies, they are particularly vulnerable to being taken advantage of by landlords. Stakeholders reported that Burmese families live in units that are in disproportionately poorer condition than others in their neighborhoods. Because evidence for this factor is often anecdotal, it is an issue about which the City and fair housing advocacy agencies should be vigilant.
Source of income discrimination	Low	Under current state law, counties and municipalities cannot adopt source of income protections, which would prohibit landlords from refusing to accept Housing Choice Vouchers. Lacking this protection, voucher holders have little recourse against a landlord who rejects them as payment. Unless legislation changes at the state level there is little that Fort Wayne can do to directly mitigate this factor.\
Lack of resources for fair housing agencies and organizations	High	Just as funding for CPD programs around the country have been decreasing, there is a chronic underfunding of enforcement, investigation, and outreach agencies in Fort Wayne. Without sufficient enforcement resources, progress in affirmatively furthering fair housing will be extremely difficult.

Fair Housing Action Plan

The Fair Housing Action Plan describes specific steps that the City should take to eliminate impediments to fair housing choice in Fort Wayne, and sets metrics and milestones associated with implementing each action item. Since many contributing factors are outside of Fort Wayne's authority – for example, the City has no influence over the number of available Housing Choice Vouchers – only action steps that can be taken by municipal entities are described.

Goal: Enhance, preserve, and stabilize the quality and affordability of Fort Wayne's housing stock

9. Create new affordable homeownership opportunities by funding acquisition/rehab/resale activities, with a special focus on projects outside of the City's R/ECAPs, with the goal of creating 1-5 units over five years.
10. Create new affordable homeownership opportunities by providing downpayment assistance, marketing the program to members of the protected classes who might otherwise face difficulties obtaining conventional loans, with the goals of assisting up to 25 households over five years.
11. Help homeowners complete rehabilitation projects that improve the condition, appearance, and/or accessibility of their property, especially in the City's R/ECAP areas, assisting approximately 10 households per year.
12. Create new affordable rental housing by funding construction, rehabilitation, or adaptive reuse of non-residential buildings, with a special focus on projects outside of the City's R/ECAPs, with the goal of creating 20-40 units over five years.
13. Revise the City's tax abatement program to extend the duration of the abatement.
14. Extend eligibility for City tax abatements to areas outside the R/ECAP census tracts with high neighborhood opportunity as defined by this AI.
15. Adopt proactive code enforcement practices that include assisting property owners to improve the condition of existing housing.
16. Within 18 months, create a resource guide for affordable housing developers to help them navigate the City's processes and contribute to the City's efforts to affirmatively further fair housing.

Goal: Invest in non-housing community revitalization and economic development focused on benefits to protected classes

5. Provide CDBG funds to partners like Lutheran Social Services, YWCA, and other providers of job training that help members of the protected classes secure jobs with a living wage, with a goal of serving 50 individuals per year.
6. Evaluate expanding the Neighborhood Commercial Corridor Program in southeastern Fort Wayne outside of current Economic Development Target Areas, especially for businesses that can provide a critical community need such as access to fresh food.
7. Work with the Urban Enterprise Area (UEA) to identify programs to promote small businesses that employ members of the protected classes or are located in or near the City's R/ECAP areas.
8. Designate OHNS staff to attend regular meetings held by Neighborhood Associations in order to maintain standing communication.

Goal: Increase the level of fair housing knowledge among housing developers, real estate professionals, elected officials, and the general public

5. Partner with local organizations such as lending institutions, landlords, realtors, etc. to host an annual fair housing community forum.
6. In partnership with the Metropolitan Human Relations Commission, sponsor annual fair housing training workshops for elected officials, appointed boards, City department staff, and the general public.
7. Distribute all notices for educational opportunities, application periods, etc. in English, Spanish, and Burmese.
8. Annually train City staff to refer inquiries about fair housing to a designated staff person. In addition, train all staff that interact with the public in techniques to communicate with those with language and/or cultural barriers.

