

Appendix I.

Analysis of Impediments to Fair Housing Choice

Introduction

This State of Indiana Analysis of Impediments to Fair Housing Choice (AI) includes a comprehensive review of policies, practices, and procedures that affect the location, availability, and accessibility of housing and current residential patterns and conditions within the state. The assessment has been conducted in accordance with the requirements outlined for a state-level Analysis of Impediments to Fair Housing (AI) in 24 CFR 570.487(b). The resulting plan was developed with diverse forms of community input with particular emphasis on persons with disabilities and the impediments of access to housing for this population.

It is unlikely that reiterating past statistics will provide an understanding of the difficulties faced by those who have experienced discrimination in housing choice. As such, contained in this document are the stories of those who have endured discrimination in their attempts to exercise their right of housing choice and to secure safe, decent shelter.

The Process. The primary tasks performed during the process included developing a profile of the protected classes; conducting focus groups and a survey; examining public and private real estate development, banking, zoning and tax practices; and analyzing mortgage loan applications and Community Reinvestment Act data.

The citizen participation process included a survey of community leaders, with a section dedicated to fair housing, and six regional sessions with persons with disabilities, advocates and service providers for this group.

Each year the Consolidated Plan Committee seeks to increase involvement of groups that normally are under-represented in the process. This year, persons with disabilities were targeted. Forums were conducted and surveys distributed to determine the status of housing practices, to help identify any existing problems and to assist in the identification of strategies that will promote fair housing practices statewide.

Demographic Profile of the Protected Classes. According to Community 2020 data projections, there was only minimal change in the demographic and geographic profile of members of the protected classes in Indiana. Preliminary Census 2000 data recently released report a significant growth of persons of Hispanic descent in the northeast area of the state (and negligible increases in small cities and towns in southern Indiana). All other indication leads to assumptions that growth in other minority group populations will be limited. Aside from Hispanics, differences in the demographic profile and geographic location of other minorities is predicted to be negligible in the 2000 Census.

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Minority populations make up a very low percentage of total populations in areas outside the state's urban core. Statewide, approximately 83 percent of the block groups are less than 25 percent minority, and 35 percent are less than 1 percent minority. Where Indiana's minority populations are clustered within the state's urban core, the elderly are evenly distributed throughout the state. There are a growing number of persons with HIV/AIDS and disabilities. The percentage of female-headed households is predicted to continue to increase, with a greater number of these households living in poverty.

Minorities are proportionately the largest population living in poverty and unemployed. Elderly households with incomes of less than \$15,000 are dispersed throughout the state, where minorities with incomes of less than \$15,000 cluster around Indiana's major cities.

Public/Private Policies and Practices

Real Estate Practices. In 1995, a random sampling of real estate agents found most were familiar with fair housing as a concept, but other than displaying the fair housing symbol on their literature and occasionally attending a seminar, few were involved in fair housing activities. A 2000 survey revealed similar findings with only a slight increase in agents who participate in more than just an occasional fair housing activity (Keys Group, Interviews 2000).

Barriers to Housing Development. The development and preservation of housing units are essential to the issue of fair housing. In order for residents (in particular the protected classes) to access housing, there must be units to occupy. Thus, development policies, codes, and practices are consequential to the issue of fair housing.

As in the last review, an inspection of state housing and land development ordinances and statutes that relate to development from 1995 to date found that the impact of policies were minimal. The search found nothing critical to restrict development. However, as in the last review, there were tax policies, zoning ordinances, building permits, building codes, and fees that remain as possible impact on the development of certain types of housing units.

Tax Policies. As in 1995, Indiana taxes are assessed on a formula that calculates replacement value of the structure within its use classification. Real estate tax is always subject to legislation; however, single family homes are currently assessed as residential, while multi-family property is assessed as commercial. Commercial rates are higher than residential rates, and condition, depreciation, and neighborhood location are factored into the tax assessment. This assessment process remains a possible barrier to discourage new construction in older, deteriorating neighborhoods. Although renters do not directly pay property taxes, those living in multi family units may have higher costs than those residing in single-family units as a result of landlords passing on their tax bills. As the legislature ponders new taxing policy, any modifications will have to be assessed to consider the impact they will have on the affordability of housing.

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Zoning Ordinances and Land Use Controls. Many areas still require variances or exceptions for the placement of manufactured housing. Therefore, since manufactured housing units are generally more affordable, using this process to enhance the affordable housing stock could be considered a barrier to the construction of these type of affordable units.

Housing Permits. As reported in the housing analysis section of this document, building permits for single family units were issued at a higher rate than multi-family units. An estimated 81 percent of the building permits issued in 2000 were for single-family units. This percentage remains about the same from 1999 and is slightly higher than in 1998 (78 percent). While statewide construction of single family units rose, construction of multi-family units declined. Between 1999 and 2000, the number of permits issued for multi family units decreased by 9 percent. This preference for new single family development could put additional pressure on the rents of multifamily units if they become relatively more scarce.

Reduction in Statewide Affordable Units. The preservation of expiring use Section 8 assisted units has been a recent concern in Indiana. HUD estimates that there are about 30,000 units with expiring contracts in Indiana. However, recent data show that less than 10 percent of the units have opted out of the program. When owners choose to opt out and not provide Section 8 housing, tenants are provided Section 8 vouchers by the local public housing authorities. The requirement of today's opt-out is for a "one for one" replacement of vouchers for previously subsidized units. In other words, if there were 25 units in a property that was opting out, the local housing authority would be provided 25 vouchers for use for affordable housing residents losing their assistance, whether or not all 25 units are occupied. Therefore, in some cases, expiring use properties can create additional subsidized rental units. Additionally, under the Mark to Market program, there have been over 500 units of affordable housing retained in Indiana for an extended use period because of restructuring of the rents, the debt or both, with an additional 500 units currently under process.

Banking Practices

CRA Compliance. The Community Reinvestment Act (CRA) requires that banks progressively seek to enhance community development within the area they serve. On a regular basis, banking institutions submit information about mortgage loan applications as well as materials documenting their community development activity. The records are then reviewed to determine if the bank satisfied CRA requirements. The assessment includes a review of the institutions' records as related to the following:

- Commitment to Evaluating and Serving Community Credit Needs
- Offering and Marketing Various Credit Programs
- Record of Opening and Closing of Offices
- Discrimination and Other Illegal Credit Practices
- Community Development Initiatives

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The data are evaluated, and a rating for each institution is determined. Ratings for institutions range from substantial noncompliance to an outstanding record of meeting community needs. The following table represents CRA Compliance for 1,106 financial institutions in Indiana as of December 2000.

**Exhibit AI-1.
CRA Ratings,
Indiana Financial
Institutions,
December 2000**

Source:
The Keys Group.

Rating	Number of Banks	Percent
Outstanding	193	17.5%
Satisfactory	872	78.8%
Needs Improvement	38	3.4%
Substantial Noncompliance	3	.3%
Total	1,106	100%

CRA Compliance Comparison of States to Indiana – Midwest/Nationwide. As compared to other states in the Midwest, Michigan had the largest percentage of banks rated outstanding in 1995 with 44 percent and remained at the top in percentage in 2000 with 28 percent. However, it should be noted that this total is 12 percent lower than the previous report. In 1995, the percentage of banks in Indiana rated outstanding equaled that of Illinois. In 2000, Indiana remained about the same, while Illinois' percentage dropped by 7 percent. In 1995, Kentucky and Indiana were at the top of the percentage of banks rated satisfactory (77 percent and 76 percent, respectively), and as shown below, they remain at the top of the list with 78.3 percent and 78.8 percent, respectively. This is a 2 percent increase for Indiana and a 1 percent increase for Kentucky. Indiana also experienced a decrease in banks meeting CRA requirements above the satisfactory level.

Forum participants expressed a concern that banks in Indiana meet CRA conditions primarily to comply with regulatory requirements (not because of their commitment to community development). In their opinion, a large number of banks do only what is necessary to receive a satisfactory rating and will not take the additional steps to help the community and become outstanding in terms of their CRA rating.

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Exhibit AI-2.
CRA Rating by State, 1995 and 2000

State	Outstanding		Satisfactory		Needs Improvement		Non Compliance	
	1995	2000	1995	2000	1995	2000	1995	2000
Indiana	20.0%	17.5%	76.0%	78.8%	1.6%	3.4%	1.6%	0.3%
Ohio	40.0%	19.3%	57.0%	75.2%	4.5%	5.2%	0.0%	.10%
Illinois	20.0%	12.9%	74.0%	81.5%	5.0%	4.5%	0.5%	0.5%
Kentucky	21.0%	20.1%	77.0%	78.3%	0.0%	1.1%	0.0%	0.2%
Michigan	44.0%	28.1%	54.0%	69.2%	0.0%	2.3%	0.0%	0.2%
Nationwide		17.5%		77.5%		4.2%		0.4%

Source: <http://www.ffiec.gov/cra/>.

A comparison of CRA ratings nationwide finds that Indiana ranks 36th out of 56 states and other jurisdictions in the percentage of banks that are outstanding at meeting CRA criteria, and is above (ranked 24th) the mean of states rated satisfactory or higher in meeting CRA requirements.

Exhibit AI-3.
Indiana's CRA Rankings, 2000

State	Outstanding	Satisfactory	O&S Comb	Needs Improvement	Non Compliance	Needs/Non Compl Combo
Indiana	36 th	16 th	24 th	27 th	20 th	27 th

Source: <http://www.ffiec.gov/cra/>.

HMDA Data Analysis. Housing Mortgage Disclosure Act data for 1999 were reviewed for this analysis. Data were obtained from the Federal Financial Institutions Examination Council (FFIEC) web site (<http://www.ffiec.gov/hmda/>). The information was used to examine statewide loan approval rates for the Indiana market area. The HMDA data consisted of information about mortgage loan applications received by banks, savings and loans, savings banks, credit unions and some mortgage companies. The data contain information about the location, dollar amount and types of loans made, as well as racial and ethnic information and incomes of loan applicants.

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Loan Applications. In 1999, there was a total of 360,238 applications for housing loans initiated in the State of Indiana. Of this total, 6.5 percent were FHA mortgage loans; 25.8 percent were conventional mortgages; 51.6 percent were refinancing; and 11.4 percent were home improvement loan requests.

**Exhibit AI-4.
Loan Request by
Application Type**

Source:
The Keys Group.

Application Type	Number of Applications	Percent
FHA	23,323	6.5%
Conventional	93,028	25.8%
Refinance	185,735	51.6%
Home Improvement	40,892	11.4%
Other	17,260	4.8%
Total	360,238	100%

Of the loans applied for, approximately 63 percent of housing loans were approved. Twenty-three percent of the applications were denied; 11 percent of the applicants withdrew their applications; and 2 percent of the files were incomplete and subsequently closed. There was a decrease in the percentage of loans approved compared to 1994, from 76 percent to 63 percent, and an increase in number of loans denied, from 16 percent to 23 percent.

**Exhibit AI-5.
Loan Request by Application Type and Approval Status**

Approval Status	FHA	Conventional	Refinance	Home Improvement	Other	Total	Percent of Total
Loans Originated	19,504	58,492	82,437	20,232	10,122	190,787	53.0%
Approved, Not Accepted	492	6,275	22,221	4,828	1,633	35,449	9.8%
Denied	1,631	20,182	45,731	13,129	3,626	84,299	23.4%
Withdrawn	1,431	6,537	29,232	2,597	1,434	41,231	11.4%
Application Incomplete	265	1,542	6,114	106	445	8,472	2.4%
Loan Applications	23,323	93,028	185,735	40,892	17,260	360,238	100%
Percent of Total	6.5%	25.8%	51.6%	11.4%	4.8%	100%	

Source: The Keys Group.

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The highest approval rate was for loans requesting FHA financing (90 percent of completed applications were approved). Those seeking home improvement loans had the highest denial rate, with 34 percent of completed applications denied.

Exhibit AI-6. Loan Request by Application Type and Approval Status

Approval Status	FHA		Conventional		Refinance		Home Improvement		Other	
	No.	%	No.	%	No.	%	No.	%	No.	%
Loans Originated	19,504	84%	58,492	63%	82,437	44%	20,232	50%	10,122	59%
Approved, Not Accepted	492	2%	6,275	7%	22,221	17%	4,828	12%	1,633	9%
Denied	1,631	7%	20,182	22%	45,731	25%	13,129	32%	3,626	21%
Withdrawn	1,431	6%	6,537	6%	29,232	11%	2,597	6%	1,434	8%
Application Incomplete	265	1%	1,542	2%	6,114	3%	106	.3%	445	3%
Loan Applications	23,323	100%	93,028	100%	185,735	100%	40,892	100%	17,260	100%

Source: The Keys Group.

Rates by Minority Concentration. An analysis of the loan by minority concentration found there was a total of 16,447 (4.6 percent) loans requested in areas where the minority makeup was 80 to 100 percent of the population; 14,310 (4 percent) in areas where the minority population was 50 to 79 percent minority; 19,237 (5.4 percent) in areas where the population was 25 to 49 percent minority; and 307,030 (86 percent) in areas where the population was less than 24 percent minority.

Exhibit AI-7. Housing Loans by Type and Percent of Tract/Minority

Percent Minority	FHA	Conventional	Refinance	Home Improvement	Other	Total	Percent of Total
100 to 80 Percent	343	1,765	10,407	2,062	1,870	16,447	4.6%
79 to 50 Percent	728	2,287	8,339	1,750	1,206	14,310	4.0%
49 to 25 Percent	1,476	3,544	10,406	2,266	1,545	19,237	5.4%
24 to 1 Percent	20,728	85,102	154,276	34,239	12,685	307,030	86.0%

Source: The Keys Group.

GRANT REVIEW FIVE

Complete for all agencies applying for the Sexual Assault Services Grant (GREEN SECTION)

Total Points Available 100

	Max	Score
1. Proposal section does not exceed 5 pages (includes the Program and Financial Narrative and the Certification of Local Approval for Nonprofit Organizations)?	5	
2. Program Narrative has the following information:		
- "Needs" to be met & problems to be solved by the project?	15	
- Contains necessary statistics to demonstrate relevant physical, economic, social, financial, institutional or other problems?	25	
- The objective of the activities do tell who is going to do what, when, how much and how it will be measured?	15	
- The Needs Statement outlines the coordination of service of services in the area and agency's involvement in the area's continuum of care?	25	
3. The Financial Narrative form is typed and completed?	5	
4. The evaluation explains how it will be used to improve the program?	10	
Total	100	

COMMENTS: Grant Review Five - Sexual Assault Services Grant (SOS)

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In addition, of the loans requested, approval percentages and percent minority are inversely correlated. This means that the lower the origination rate, the higher the percentage of minorities. This holds true for all categories of loan disposition except “closed for information,” where the difference is relatively insignificant.

Exhibit AI-8.
Housing Loans by Disposition and Percent of Tract/Minority (Percent of Total Applications)

Percent Minority	Originated	Denied	Approved, Not Accepted	Loan Withdrawn	Closed for Information	Total
100 to 80 Percent	32.0%	36.0%	15.0%	14.0%	3.0%	100%
79 to 50 Percent	36.8%	32.9%	13.2%	14.2%	2.9%	100%
49 to 25 Percent	42.0%	30.0%	12.0%	13.0%	3.0%	100%
24 to 1 Percent	55.1%	22.2%	9.3%	11.2%	2.2%	100%

Source: The Keys Group.

Rates by Low Income Concentrations. An analysis of application by median income as a percentage of MSA median was also completed. The income category consisted of census tracts where the median family income was calculated as a percentage of the median income for the MSA. The four classes analyzed of loan application for this analysis included:

Very low-income category, consisting of census tracts where the median family income is 0 to 30 percent of the median MSA income, based on the 1990 Census.

Low-income category, consisting of census tracts where the median family income is less than 50 percent of the median MSA income, based on the 1990 Census.

Moderate-income category, consisting of census tracts where the median family income is at least 50 percent and less than 80 percent of the median MSA income.

Middle-income category, consisting of census tracts where the median family income is at least 80 percent and less than 100 percent of the median MSA income.

Analysis of loans by income level found a similar trend to that of loans by minority concentration. The higher the percentage of low income, the higher the denial rates and the lower the percentage of applications initiated.

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Exhibit AI-9.
Housing Loans by Type and Percent Low Income

Range	Application Initiated	Application Withdrawn	Denied	Loan Not Accepted	Closed
0% to 30% of Median	47.6%	8.4%	37.4%	12.9%	1.4%
31% to 50% of Median	42.3%	9.0%	33.9%	10.4%	3.4%
51% to 80% of Median	53.7%	9.5%	26.2%	9.2%	2.1%
Over 81% of Median	64.6%	9.6%	18.5%	8.8%	2.6%

Source: The Keys Group.

Approval Rates by Race. It is important to note that, due to limited demographic and location information, a large percentage of the data could not be fully analyzed because information in reference to race and in some cases location was recorded as not available. In addition, loans in areas where the percentage of minorities was less than 25 percent appeared to skew the data sampling. The number of loans that were able to be analyzed totaled 121,000.

The analysis of these loans found that 54 percent of the applicants were Caucasian and 6 percent were minority. (The remainder did not provide information about race.) A further breakdown of minority applicants reveals 6.8 percent were African American, 0.15 percent were Native American, 0.8 percent were Asian, and 1.6 percent were Hispanic.

Exhibit AI-10.
Housing Loan Application Initiated by Race of Applicant

Source:
 The Keys Group.

Race	Number of Loans Initiated	Percent of Total
Caucasian	66,190	54.00%
African American	8,260	6.80%
Native American	177	.15%
Asian	968	.80%
Hispanic	1,936	1.60%
Other/Not Provided/NA	43,469	36.00%
Total	121,000	100%

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Race/National Origin. The largest group of minorities applying for residential loans in 1999 (9.4 percent) was African American. A majority (62.5 percent) of these (African American) loans were approved, with 25 percent being denied. Most of the applications were denied based on credit history (71.9 percent) and debt-to-income ratio (12.1 percent).

Asians comprised 0.8 percent of the 121,000 residential loan requests. Asians had the highest (77 percent) approval rating of all minority groups applying for loans. Unlike African Americans, more of their (Asians) loan requests were denied based on their debt-to-income ratio than for credit history.

American Indian/Eskimo/Aleut also comprised a small portion of loan requests. The majority (63 percent) of their loan requests were approved, while only 12.8 percent were denied. Of the 12.8 percent denied, 51 percent were denied based on their credit history.

Hispanics were similar to other minority groups, with 71.6 percent of the loans approved and only 14.3 percent denied. As in other minority groups, loans were denied mainly (48 percent) based on past credit history.

Most of the findings reflected in the analysis of minority applications are consistent with the residential loan requests of Caucasians. Of the 121,000 residential loans requested, 54 percent, or 66,190 were from Caucasians. Similar to minority groups, the majority (83.2 percent) of Caucasians' loan requests were approved, with very few (10 percent) being denied. Caucasians had the highest approval rating of all groups. Caucasians had the same main (48 percent) reason for denial as most minority groups – credit history.

Exhibit AI-11.
Housing Loans by Race and Disposition

Race	Loan Initiated	Approved, Not Accepted	Denied	Loan Withdrawn	Closed for Information
Caucasian	81%	2.2%	10.6%	4.2%	3.0%
African American	59%	3.5%	25.0%	9.1%	3.4%
Native American	63%	5.5%	12.8%	12.9%	5.8%
Asian	77%	3.3%	9.2%	8.2%	2.3%
Hispanic	68%	3.6%	14.3%	6.9%	7.2%

Source: The Keys Group.

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Exhibit AI-12.
Housing Loans by Race and Reason for Denial

Reason for Denial	Caucasian	African American	Native American	Asian	Hispanic
Debt-to-Income Ratio	15.0%	12.1%	22.0%	33.0%	19.8%
Employment History	4.9%	6.0%	5.9%	5.1%	9.4%
Credit Information	48.2%	71.9%	51.0%	28.0%	48.0%
Collateral	2.6%	3.8%	2.8%	5.2%	3.1%
Insufficient Cash	3.1%	0.4%	0.9%	2.9%	0.3%
Unverifiable Information	1.1%	0.9%	2.1%	0.8%	2.1%
Credit Application Incomplete	11.3%	2.2%	1.2%	9.0%	3.1%
Mortgage Insurance Denied	.09%	.04%	3.0%	3.0%	8.0%
Other	12.9%	2.3%	11.1%	13.0%	6.2%

Source: The Keys Group.

Of the minority categories, the only outstanding factor is the denial rate for African Americans. African American denial rates were 10 percent higher than other groups. Yet the reason for denial was consistent with other racial groups' credit information. Persons at the forums believed this is the most subjective factor in the loan process and that denial based upon credit is subject to question.

Banking Implications. An analysis of the HMDA data uncovered a modest variation in denial rates of African Americans. The difference is insignificant, however, given the low percentages of initiated loan requests in areas with high concentrations of minorities. Nonetheless, the factors related to denials and loan initiations should be reviewed on a regular basis to determine if a problem exists. There are many reasons that loan approval rates may vary: credit ratings, net worth, and loan to debt ratios play a large role in the decision to deny or approve a loan. Without individual data about the applications analyzed above, it is difficult to assess the presence of discrimination. Disparities in approval rates are not definitive proof of discrimination; rather, the presence of disparities suggests the need for further inquiry. Whatever the effect of the missing data, this analysis found that lending practices need further review. Such a review would also be useful in determining what government sponsored programs might be needed to fill the gaps between what the private market is willing to provide and what is needed.

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Forums and Survey Findings

Community Forums – Persons with Disabilities. Six forums were planned and implemented in the months of February and March. The forums were held in the same cities as the Consolidated Plan forums. In addition, since forums were scheduled two hours prior, participants were encouraged to have lunch and return for the afternoon forums. The goal of the forums was to provide an understanding of fair housing issues, in particular the issues faced by persons with a disabilities.

A great deal was learned from the forums about the difficulties persons with disabilities face in finding housing. The following is a list of the concerns and issues relevant to housing choice as presented by participants.

There is a lack of knowledge and understanding of what is lawfully considered an accommodation when renting to a person with a disability.

There was the perception that fair housing laws have no real penalty for persons who violate them, so it was often perceived as easier to not complain and have somewhere to live.

Housing fair market rents are too low and should be based on smaller geographic areas, where due to the limited supply of units, rents are higher.

The current debate over group home vs. independent living is a concern. Most believe it is a personal choice and should not be mandated.

There needs to be more homeownership opportunities for persons with disabilities.

Persons with disabilities often do not like to have credit and, as a result, have difficulties obtaining mortgage loans.

Need to require contractors to adhere to standard building design and develop a penalty for those who do not.

- Money to help assist with cost of accommodations is needed.

Discrimination is prevalent and more testing should be conducted.

Most importantly, forum participants wanted housing providers to be more sensitive to the difficulties they meet while searching for housing that accommodates their needs. In addition, they want all to realize their conditions for housing occupancy are not desires but needs.

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Fair Housing Survey. A survey was distributed to local government officials, community leaders, housing providers, economic development professionals, social service organizations and by the Governor’s Council for Persons with Disabilities to their constituents. Respondents were asked to answer a variety of questions pertaining to fair housing in their community. A total of 347 surveys were returned, representing 85 of the 92 counties. The following is a analysis of the findings revealed in a review of the survey. Complete tables from the survey findings are appended to this section.

As the following exhibit reveals, almost 30 percent of survey respondents believed that housing discrimination occurs in their area; however, only 13 percent believe that housing agencies are equipped to handle complaints. In addition, over half of the respondents (60 percent) reported that people know discrimination is prohibited, but 78 percent replied that if discrimination happens most people do not know who to contact. This was surprising given the high percentage (73 percent) of people who maintained there is open access to civil rights offices.

Exhibit AI-13.

Source:
2001 Indiana Consolidated Plan
Community Survey.

Fair Housing Issues	Agree	Other
Zoning laws encourage segregation in housing	19.8%	80.2%
Landlords can limit number of children	26.6%	73.4%
Housing discrimination happens in my area	29.7%	70.3%
People know that discrimination is prohibited	59.7%	40.3%
People know who to contact for discrimination	22.5%	77.5%
Access to civil rights office	72.7%	27.3%
Housing agencies have resources for handling discrimination	13.3%	86.7%

Respondents were asked what they believed the barriers to housing choice were in their community. Overwhelmingly, respondents considered costs of housing (76 percent), public transportation (52 percent) and distance to employment (46 percent) as major barriers, with a small percentage of respondents replying that discrimination (15 percent) was a barrier.

Exhibit AI-14.

Source:
2001 Indiana Consolidated Plan
Community Survey.

Barriers to Housing Choice	Yes	No
Cost of housing	76.1%	23.9%
Access to public transportation	52.2%	47.8%
Housing discrimination	15.7%	84.3%
Lack of Access	32.1%	67.9%
Distance to employment	46.4%	53.6%

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When questioned about what kinds of discrimination they perceived to be a problem, respondents replied family size (30 percent), language (25 percent), disability (23 percent) and race (20 percent).

Exhibit AI-15.

Source:
2001 Indiana Consolidated Plan
Community Survey.

Is the following a Discrimination Issue?	Yes	No
Race	19.8%	80.2%
Age	6.1%	93.9%
Family size	30.7%	69.3%
Gender	3.8%	96.2%
Language	25.3%	74.7%
Disability	23.5%	76.5%

Only a small percent of respondents agreed that loan, insurance and refinancing opportunities in their communities were accessible, reasonable or competitive to persons with lower incomes. Twenty nine percent of the respondents maintained it was easy to obtain home loans from mortgage or financial institutions, 20 percent agreed their communities offered replacement value loans to low income and first time home buyers at reasonable cost and 21 percent responded that low income families were able to refinance their homes at competitive rates.

Exhibit AI-16.

Source:
2001 Indiana Consolidated Plan
Community Survey.

Banking Practices	Agree	Other
Easy to obtain loans from financial institutions and mortgage companies in my community	29.0%	71.0%
Insurance companies offer policies within 100% replacement value to lower-income & first-time homebuyers at reasonable rates	20.0%	80.0%
Lower-income families are able to refinance their homes at competitive interest rates	20.9%	79.1%

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There was a 12 percent increase over the 1995 figure in the proportion of counties and cities that reported passing a fair housing resolution or ordinance. In 2001, 62 percent of the respondents maintained that their area does have a fair housing ordinance, with 70 percent having an affirmative action plan and 76 percent having an equal opportunity ordinance.

Exhibit AI-17.

Source:
2001 Indiana Consolidated Plan
Community Survey.

Category	Yes	No
Passed fair housing ordinance or resolution	62.1%	37.9%
Joined forces to promote fair housing	36.8%	63.2%
Sought impediments to fair housing	32.5%	67.5%
Initiated efforts to further fair housing	34.8%	65.2%
Know of housing complaints filed in past 5 years	3.5%	98.5%

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In addition, just over one-third of the respondents have participated in fair housing efforts and a very small percentage of respondents (3.5 percent) knew of any housing complaint filed in the area in the last five years. Of those reporting they have assisted in furthering fair housing in Indiana, respondents provided the following list of activities they participate in or implement.

Exhibit AI-18.
Fair Housing Activities of Communities Statewide

Board of Realtors, City of South Bend, Lenders, Urban League of St. Joseph County promote an annual Fair Housing & Affordable Homebuying Expo	City has worked very closely with local housing authority on HUD programs and to build homeless shelter
Formed housing partnership (county-wide) with R.D., SIRPC, local realtors, City, CHDOS, et. al., will apply for CPF for housing assessment this year	Knox County commissioners passed a Fair Housing Ordinance & Knox County Housing Authority observes April as Fair Housing Month with HUD
Community task force (not very active)	Member St. Joseph County Housing Consortium
Offered training with housing partnerships; offered training at SU Casa	Member of the Indiana Civil Rights Commission Fair Housing Task Force outreach and education
Fair housing awareness	Developed a committee for housing
Fair housing forum targeted at Hispanics	Redevelopment commission
Starting housing group to discuss issues.	Some work with Habitat
Helped to start continuum of care process; collaborate on crisis housing assistance	Interfaith federation just beginning to address this issue
Homeless coalition	State laws
Housing authority and framework for change are activity promoting and funding affordable housing; several organizations are involved	We have financial assistance programs and sponsor informational meetings and workshops on a variety of issues United Way Activities
Housing fairs, advertising, news, radio, RFPs	We have HUD financing
Housing Grants	HUD Seniors Program
Work actively with HUD, provide housing information in Spanish and English and fair housing seminars	With Greencastle Housing Authority brochures given to every tenant; posters visible at town offices
HUD/ICRC Fair Housing Task Force	Work with churches

Source: 2001 Indiana Consolidated Plan Community Survey.

In response to the question to describe the activities in which they were involved, the following types of activities were given.

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Exhibit AI-19. Type of Fair Housing Activities

A housing survey was done for the county	Housing Authority, Area 5
Adoption of fair housing ordinance	Housing survey, needs assessment
Recently formed housing partnership to assess and improve housing	In the past worked regionally to establish fair housing board- not active at this time
City HAND department handles	Investigations into alleged discrimination
Commission conducts outreach, assesses complaints filed	Involved on a committee that specifically explored and developed a plan to resolve
Comprehensive economic development planning process	Leadership is by the City of Bloomington and Indiana University
County ordinances and master plan studies	Code enforcement to improve housing quality
Developed a report	Suggestions for consumers
Doing housing study	Task force
Elkhart County Consolidated Housing Plan	Task Forces, forums
Focus groups, surveys	Through human rights commission

Source: 2001 Indiana Consolidated Plan Community Survey.

Voice of the Protected Class. The community input in the development of this analysis was so expressive that this document would not truly represent fair housing in Indiana without the details of the discussions with the forum participants. Thus, this section of stories was developed to present the human side of fair housing issues. Names have been changed to observe confidentiality.

There were four notable situations faced by participants attending the forums planned for persons with disabilities. Each presents a different side to securing affordable, safe housing for persons with disabilities.

Mr. and Mrs. Bryant are a married elderly couple who seek to find suitable housing that will accommodate Mrs. Bryant’s special needs. Mrs. Bryant is blind and requires the use of a service animal. She has inquired at housing developments for seniors about residence but has been turned down because animals are not allowed. Until their meeting with the Indiana Civil Rights Commission (ICRC) representative present at the forum, the Bryant’s were not aware that refusal to rent to them because of Mrs. Bryant’s service animal was in violation of fair housing laws.

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Mr. Pete resides in a home for persons with mental disabilities. Mr. Pete is generally satisfied with his living arrangements but believes if he had the opportunity to move to other accommodations closer to his parents he would. He would like to live in a home similar to the one he lives in now but there are no similar accommodations in the town where his parents live. He likes the group home because he enjoys the fellowship with most of the residents and the activities sponsored. He believes if he could connect with services like those available at the group home he would be amenable to moving. However, in doing so he does not believe he can live alone. If he had his choice, he would like to move into an apartment with his friend but has been told by public housing managers that because they are not related they cannot occupy the same apartment. Until his meeting with an ICRC representative, Mr. Pete was not aware that refusal to allow him to live with an unrelated person to accommodate his special needs was a violation of fair housing laws.

Ms. Hall is a single mom raising three children. She was injured and disabled from a car accident, and is confined to a wheel chair. She believes she was fortunate in that she was disabled in an accident where the insurance company was able to pay a substantial settlement. She now is in the process of building her own home and has been frustrated by a contractor who refused to build her home under the uniform code that accommodates persons with disabilities. She believes it is her right to have her home built according to her specifications, but has had much difficulty finding a contractor who would even consider building her home.

Mr. and Mrs. Jones are a mentally disabled couple who have been married for about three years. When they were married they signed a lease with a company who managed co-op apartment units. Soon after they signed the lease, Mr. Jones began to work two jobs so that they could save to buy a home. It was during this time that several apartment units were broken into, scaring Mrs. Jones. Since Mr. Jones' work schedule left Mrs. Jones at home alone in the evening, the couple inquired about breaking their lease. These inquiries were met with responses from management who refused to provide information about how to break the lease, telling the Jones' that they must find someone else who would rent the apartment before they could move. As Mrs. Jones became more concerned about the accommodations, her mother inquired about the couple moving at the end of their lease, but was also told they needed to find someone to lease the apartment before the couple could move. The apartment complex managers did, however, provide the couple an apartment closer to the front of the complex in an attempt to satisfy Mrs. Jones' fears. The Jones' and Mrs. Jones' mother attended the Consolidated Plan regional forums with the hope that they would receive information on homeownership opportunities for couples with disabilities. After hearing their story, ICRC representatives reviewed

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the lease and found the couple has had the right to move on or after their first year occupancy anniversary by providing the landlord a sixty-day notice. The ICRC representative informed the Jones' they would look into the matter because refusal to recognize the special needs of the couple to explain more clearly their leasing requirements was in violation of fair housing laws.

These stories provide support for an initiative that provides persons with information regarding their rights and responsibilities as they seek to find suitable housing as a tenant or homeowner.

Fair Housing Complaints

Indiana Civil Rights Commission (ICRC) Fair Housing Complaints. The 1996 Analysis of Impediments to Fair Housing referenced the inability to readily determine categorically which complaints to the ICRC were fair housing related. Since this time, ICRC has updated its databases and provided the following data on fair housing complaints filed in the State of Indiana between 1996 and 2000. There were 493 fair housing complaints filed with the commission during this time period. Of that number, 287 of the cases have been closed while the other 206 remain open.

For the 206 open cases, the following table shows the number of currently active cases by year and illustrates when the cases were filed and the disposition of the complaints.

Exhibit AI-20.
ICRC Fair Housing
Complaints Active,
1996-2000

Source:
 The Keys Group.

Year Complaint Filed	Number of Complaints	Percent of Total Complaints
1996	12	6%
1997	29	14%
1998	57	28%
1999	78	38%
2000	30	15%
Total	206	100%

In 1996, it was determined that a new complaint database was needed to provide query fields for enhanced investigative capabilities. Since then, complaint data have been entered into a new system. The following tables provide information unattainable when the 1996 report was written. They also provide much information on the type and number of cases filed.

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Exhibit AI-21.
Fair Housing Complaints, Type of Discrimination

Reason for Discrimination	1997		1998		1999	
	Number	Percent	Number	Percent	Number	Percent
Familial Status	20	17.4%	13	11.1%	9	8.3%
Disability	29	25.2%	25	21.4%	33	30.3%
National Origin	6	5.2%	9	7.7%	5	4.6%
Race	52	45.2%	51	43.6%	56	51.4%
Religion	0	0.0%	2	1.7%	0	0.0%
Retaliation	1	0.9%	7	6.0%	3	2.8%
Sex	3	2.6%	7	6.0%	1	0.9%
Sexual Harassment	4	3.5%	3	2.6%	2	1.8%
Total	115	100%	117	100%	109	100%

Source: The Keys Group.

As shown, the first and second most common housing complaints filed in the state were based on race and disability. Between 1997 and 1999, approximately 47 percent of the housing discrimination cases handled by ICRC staff were based on race, and another 26 percent were based on disability. The table above illustrates that these two categories of cases make up more than 75 percent of the housing discrimination complaints in the state.

As the table below illustrates, an average of approximately 34 percent of the cases filed were in non-entitlement areas. This figure has remained steady over the past three years for both entitlement and non entitlement areas.

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Exhibit AI-22.
Fair Housing Complaints, Non- and Entitlement Areas

Category	1997		1998		1999		Total	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Entitlement Areas	75	65%	80	68%	70	64%	225	66%
Non-Entitlement Areas	40	35%	37	32%	39	36%	116	34%
Total	115	100%	117	100%	109	100%	341	100%

Source: The Keys Group

Between 1996 and 2000, ICRC received and filed 493 fair housing complaints. Since ICRC is the agency HUD refers citizens to when seeking to file fair housing discrimination claims, we assume these cases represent the majority of fair housing grievances encountered throughout Indiana. Since the drafting of the 1996 Assessment of Impediments to Fair Housing, ICRC has had notable success in remedying the dilemma of unverifiable case totals. The following are case number highlights as documented using their newly developed database.

493 housing discrimination cases were filed with ICRC and only 206 remain open.

Cases were filed in 48 counties; 24 of these counties do not have entitlement cities within the county.

34 percent of the cases were filed in counties that do not have an entitlement city within their boundaries.

Sex and disability discrimination claims were the top claims of the cases filed.

Of the total cases filed, 116 or 34 percent were housing complaints located in non-entitlement areas. In addition, 75 percent of the cases involved two types of discrimination.

Assessment of Findings

Overview. The analysis of fair housing complaints in the state is very difficult to conduct. Many communities across the state do not have formalized methods for receiving and documenting fair housing complaints. In addition, most Indiana communities do not test for housing discrimination; thus, it was difficult to find verified cases of discrimination. However, when ICRC's new housing discrimination complaint database and public campaign are fully implemented there will be greater

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access to information, a system to track multiple cases of fair housing violations and information on where to file. This will ultimately increase awareness of fair housing regulations in Indiana and provide those in need information about where to go when they have been discriminated against.

Fair Housing Issues

A review of Indiana’s policies and programs, the surveys, and regional forums revealed several barriers to furthering fair housing statewide. The following presents an overview of the salient issues impacting fair housing in Indiana.

Education. Many citizens fail to consider fair housing laws as remedies for equal housing access and choice. It was also evident from the research that many citizens remain unfamiliar with fair housing laws. While many residents are aware that housing discrimination exists in their communities, they are unaware of their rights and/or that fair housing grievance procedures are in place in their communities.

Availability. The availability of affordable housing units appears to be decreasing. The pre-existing shortage of these units is evident in the length of the waiting lists public housing agencies have for subsidized units. This is coupled with an affordable housing demand that continues to grow faster than supply, and a deteriorating housing stock.

Affordability. When assessing fair housing concerns in Indiana, affordability must be considered to fully understand the circumstances of low to moderate income persons. The prices of new homes are generally too high for low income populations. Without financial assistance, most of these residents will not become homeowners due to down payment and closing cost requirements. In addition, as expressed during the forums, many renters are in need of assistance to secure decent rental units. Seniors, in particular, are having difficulty paying their rents. Many communities are in need of additional Section 8 vouchers and certificates.

Landlords. Uninformed or willfully unlawful landlords create situations in opposition to fair housing laws. Forum participants expressed concern that landlords often refuse to accommodate persons with disabilities, refusing to allow them the right to occupy the unit with their service animal or another disabled friend.

Lending Practices. Between 1995 and 2000, the percentage of banks in Indiana rated “Outstanding” in meeting CRA requirements declined. The percentage of banks receiving a “Satisfactory” rating increased slightly, as did the percentage of banks with a “Needs Improvement” rating. Participants perceive that banks perform only what is minimally necessary to meet CRA regulations and are not truly interested in the development of communities.

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There is also evidence that fewer loan applications are approved in areas with high percentages of minorities. The decline in minority loan applications, coupled with the higher percentage of loans denied to minorities, results in a lower homeownership percentage and a lack of capital for residents to make home improvements, as well as an increased likelihood that the communities affected will decline.

Housing Development. A review of state housing development policies found that 1995 assumptions hold true today. Policies for implementing zoning and taxes are necessary to determine if barriers exist statewide and more incentives are needed to encourage construction of affordable housing statewide.

Assessment of Groups in Place. As reported in the last analysis, it is evident that individuals of the upper and middle income brackets are experiencing the American Dream of housing choice, while large portions of others are not. Also, it is clear that an individual's place is defined by income, as a large number of racial minorities with low incomes are geographically clustered in Indiana's inner cities.

In addition, public transportation that is not routed close to affordable housing can limit a person's ability to access affordable units, as well as employment opportunities. Many areas outlying the urban centers are not serviced by public transit. Consequently, most individuals are limited to housing choices that are accessible via public transportation, as reflected in the number of survey respondents who agreed that access to transportation was a barrier to housing choice.

Organizing Around Fair Housing Issues. Few Indiana communities are prepared to handle fair housing issues. Many Indiana residents are aware that housing discrimination does exist in their communities. However, this analysis and the voice of the people support the opinion that the number of documented complaints does not accurately reflect the level of discrimination throughout Indiana. The Indiana Civil Rights Commission, with support from agencies represented by the Consolidated Plan Committee, is working to alleviate these problems.

Statewide Impediments

Identified Impediments. Considering these fair housing issues, the following list of impediments to fair housing was developed. As in 1995, most of the impediments listed below are linked to the need to define and educate citizens about fair housing regulations. However, there were many impediments associated with accommodations for persons with disabilities.

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Uninformed or intentionally unlawful landlords make easy prey of the disabled and prohibit them from equal access to housing.

The limited supply of decent housing in areas where low/moderate minority income and large families are confined prevents these residents from accessing adequate housing.

The age of homes in many of the areas where large families and low/moderate income minority householders reside can make it difficult to economically rehabilitate and modernize these units. This may result in few decent and safe units in areas where large numbers of the protected classes reside.

Because universal designs are not regularly used to construct rental units, more accommodations are needed for persons with disabilities.

Many privately subsidized developers, contractors and architects ignore required accessibility design standards when constructing multi-family dwellings.

Unreported and perpetual discrimination sets a precedent that housing discriminatory activity is acceptable.

The lack of public transportation outside of Indiana's larger cities prevents individuals from seeking housing and employment choices outside these areas.

- Incentives to develop affordable housing in all areas of the state are not in place.
- Many jurisdictions' regulations requiring variances to build manufactured housing cause additional burdens for those wanting to use this method to increase affordable housing opportunities.

The limited supply of decent affordable units and Section 8 vouchers, coupled with long waiting lists for public housing units, limits low income and moderate income households from securing quality units.

Accomplishments by Action Task, 2000-2001

With the support of a multi-agency team, the state has been able to make strides toward furthering fair housing in Indiana. The Indiana Fair Housing Task Force, along with Indiana Department of Commerce, the Indiana Housing Finance Authority, the Indiana Family and Service Administration, and the Indiana Civil Rights Commission have greatly expanded the state's coordination of activities and campaign to resolve fair housing issues. A complete list of fair housing activities appears in each agency's Consolidated Annual Performance Evaluation Report (CAPER). The following is a summary of the progress made toward the goals presented in the 2000 Action Plan.

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Exhibit AI-23. Action Plan Accomplishments, 2000-2001

<p>A. Action Task – Establish of a statewide verification and documentation process for complaints</p>	<p>Activities</p>
<p>Goal To develop a strategy for the networking of statewide agency fair housing complaints with ICRC.</p> <p>Output Measures Completion of strategy to network the complaint database with other agencies.</p>	<p>ICRC continues to make progress in data entry of complaint information to prepare for the community sharing and processing of statewide data.</p> <p>ICRC is attempting to hire a person who will develop a strategy for the networking of complaint information with other agencies.</p>
<p>B. Action Task – Continue to monitor the progress of equal access to housing in the state</p>	<p>Activities</p>
<p>Goal To enhance the Statewide Fair Housing Committee efforts throughout Indiana</p> <p>Output Measures Increase non-entitlement area representatives on the Indiana Fair Housing Task Force by 10 percent.</p>	<p>Indiana Fair Housing Task Force</p> <ul style="list-style-type: none"> ■ Targeted representatives from non-entitlement communities and under represented segments of the housing industry to become members of the task force <p>Indiana Fair Housing Task Force</p> <ul style="list-style-type: none"> ■ Networked with other enforcement agencies to increase fair housing presence within the state and the Fair Housing Task Force membership
<p>Goal To update the Assessment of Impediments to Fair Housing and establish a process for continuous review of fair housing issues.</p> <p>Output Measures Completion of draft of the Analysis of Impediments and an approved update process</p>	<p>Consolidated Plan Coordinating Committee and Indiana Fair Housing Task Force Representatives</p> <p>Developed strategy to have the <i>Analysis of Impediments to Fair Housing</i> drafted</p> <p>Developed process to update and evaluate action tasks proposed in the plan</p> <ul style="list-style-type: none"> ■ Planned and implemented annual review process for the purpose of discussing fair housing progress <p>Indiana Fair Housing Task Force</p> <ul style="list-style-type: none"> ■ Develop strategy to update fair housing data collection and assessment of findings annually

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Exhibit AI-23. (continued)
Action Plan Accomplishments, 2000-2001

<p>C. Action Task – Continue to improve fair housing intra/inter agency coordination of activities</p>	<p>Activities</p>
<p>Goal To improve fair housing coordination statewide with particular emphasis on non-entitlement areas</p> <p>Output Measures The development of a comprehensive Consolidated Plan document that includes the Analysis of Impediments to Fair Housing data and analysis</p> <p>Increase non entitlement area representation on the Indiana Fair Housing Task Force by 10% and increase distribution of fair housing information throughout the system</p>	<p>IDOC, IHFA, FFSA, ISDH and ICRC</p> <ul style="list-style-type: none"> ■ Continue to partner with Indiana Fair Housing Task Force and provide leadership and financial and human resources for the implementation of task force activities. <p>Indiana Fair Housing Task Force</p> <ul style="list-style-type: none"> ■ Provided the Consolidated Plan Coordinating Committee updates of their activities and continue to have representation on the committee. <p>Consolidated Plan Coordinating Committee</p> <ul style="list-style-type: none"> ■ Worked more closely with representatives from the Task Force to ensure coordination of activities and to provide financial and human support when needed
<p>D. Action Task – Develop methods to seek out violators of fair housing regulations</p>	<p>Activities</p>
<p>Goal To enhance the tester program</p> <p>Output Measures The development of a strategy for the permanent funding of the tester program Computerization of tester program files</p> <p>Goal To increase the number of testers and tests statewide</p> <p>Output Measures Calculation of baseline of tester and tests to be used to increase the number of testers and tests in Indiana by 2 percent and 5 percent yearly.</p>	<p>Indiana Civil Rights Commission</p> <ul style="list-style-type: none"> ■ Worked with the Indiana Fair Housing Task Force to develop a proposal for funding of the tester program ■ Researched funding alternatives for the tester program Conduct tester training in two non-entitlement areas Received FHIP Grant to fund tester & other programs <p>Indiana Civil Rights Commission</p> <ul style="list-style-type: none"> ■ Continue to develop a computer based test program Evaluation is on hold until program is developed <p>Indiana Civil Rights Commission</p> <ul style="list-style-type: none"> ■ Calculated number of testers and tests in FY2000 to determine a baseline of activity. Testers and testing program recruitment on hold until coordinator is hired.

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Exhibit AI-23. (continued) Action Plan Accomplishments, 2000-2001

E. Action Task – Continue Education Programmatic Thrust	Activities
<p>Goal To continue to enhance Fair Housing Month as a major emphasis in the education of Indiana residents on the rights and requirements of fair housing</p> <p>Output Measures Increase non-entitlement number of activities and publicity notifications of events by 10 percent and that of participants residing in non-entitlement areas by 5 percent</p> <p>Increase support of the Fair Housing Summit by soliciting an increased number of scholarships</p> <p>Goal To continue to enhance understanding of fair housing throughout Indiana</p> <p>Output Measures Annual Fair Housing Summit hosted in a non-entitlement city</p> <p>Increase the number of county/city representative who can provide training/workshops to agencies, realtors and housing stakeholders in the field</p> <p>Increase the number of contracts and workshops presently conducted outside of entitlement areas by 20 percent</p>	<p>Indiana Fair Housing Task Force (continue last year’s program as outlined below)</p> <ul style="list-style-type: none"> ■ Governor: Provided a proclamation recognizing fair housing month and its activities Lt. Governor: Promoted the Annual Fair Housing Summit in his weekly column ■ Task Force: Announced and circulated Summit information throughout the state with emphasis on distribution of information in non-entitlement cities ■ Considered offering scholarship opportunities for Fair Housing Summit to be completed in future Lowered registration fee to encourage more participation ■ Housing Summit organizers offer legal continuing education credit this year ■ For those who are unable to attend the Summit for longer than a day conference, it was shortened to one day <p>Indiana Fair Housing Task Force</p> <ul style="list-style-type: none"> ■ Hosting of the annual Fair Housing Summit in a non-entitlement city was not effective; smaller conference planned <p>Indiana Housing Finance Authority</p> <ul style="list-style-type: none"> ■ Continued to require that each grantee take action to further fair housing that reaches the entire community and not just residents of the IHFA-funded projects or low income residents when conducting fair housing activities

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Exhibit AI-23. (continued)
Action Plan Accomplishments, 2000-2001

E. Action Task – Continue Education Programmatic Thrust	Activities
	<p>Indiana Housing Finance Authority</p> <ul style="list-style-type: none"> ■ Continued to require communities that have fair housing ordinance in place to take some other action to affirmatively further fair housing. <p>Indiana Civil Rights Commission</p> <ul style="list-style-type: none"> ■ Continued to target non-entitlement areas for distribution of brochures and location of workshops ■ Continued to distribute the Indiana Civil Rights Commission’s brochure, “You May Be a Victim,” to residents by IHFA grantees through affordability period.
	<p>Indiana Civil Rights Commission and IHFA</p> <p>Continued to update program brochures to reach all populations including providing information in multi-lingual, Braille and large print formats.</p>
	<p>Indiana Housing Finance Authority</p> <ul style="list-style-type: none"> ■ Continued to host their Annual Affordable Housing Conference where a session on fair housing will be presented.
	<p>Indiana Civil Rights Commission and IHFA</p> <ul style="list-style-type: none"> ■ Continued to provide technical assistance, and presentations on fair housing as well as partner with providers to present fair housing training. <p>Indiana Department of Commerce</p> <p>Continued to lists task force and fair housing activities in the <i>Grant Management Quarterly</i>.</p>

Source: 2001 Indiana Consolidated Plan Community Survey.

In addition, IHFA supported Task Force activities by providing funds to coordinate and implement programs to further fair housing from their HOME allocation. ICRC also applied for and received FHIP funds as additional support for these activities.

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Exhibit AI-24. Fair Housing Action Plan, 2001-2005

Goal/Task	01	02	03	04	Responsible
Goal: To explore avenues to incorporate the uniform federal accessibility standards into local/state building codes					
Task: Research and develop position paper on the benefits of uniform accessibility standards in construction of multi family housing statewide	■	■			Task Force & Coordinator
Task: Circulate position paper on the benefits of uniform accessibility standards in construction of multi family housing to advocates for comments		■	■		Task Force & Coordinator
Goal: To complete the networking of fair housing complaints to civil rights commissions with ICRC's database.					
Task: Develop strategy for networking of complaint database with other agencies	■	■			ICRC
Task: Complete networking of ICRC housing complaint database	■	■			ICRC
Goal: To enhance Fair Housing Task Force efforts statewide					
Task: Continue to encourage and appoint members from non entitlement cities to serve on the Fair Housing Task Force	■	■	■	■	Task Force & Coordinator
Task: Continue to network with other enforcement agencies to increase Fair Housing Task Force membership statewide	■	■			Task Force & Coordinator
Task: Continue to network with other enforcement agencies to increase fair housing presence statewide	■	■			Task Force & Coordinator
Goal: To continue to monitor progress of equal access to housing statewide					
Task: To provide ongoing information on accomplishments and progress made to further fair housing statewide	■	■	■	■	Task Force & Coordinator
Task: To monitor potential impact on equal access to housing	■	■	■	■	Task Force & Coordinator
Goal: To improve fair housing coordination within the state with particular emphasis on non-entitlement areas					
Task: IDOC, IHFA, FSSA and ICRC continued participation on the Indiana Fair Housing Task Force	■	■	■	■	IDOC, IHFA, FSSA and ICRC
Task: IDOC, IHFA, FSSA and ICRC continue to provide leadership and financial and human resources for the implementation of task force activities	■	■	■	■	IDOC, IHFA, FSSA and ICRC
Task: Continue to work closely with the Fair Housing Task Force to coordinate activities and the drafting of the Consolidated Plan	■	■	■	■	Consolidated Planning Committee

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Analysis of Impediments to Fair Housing Choice

Exhibit AI-24. (continued)
Fair Housing Action Plan, 2001-2005

Goal/Task	01	02	03	04	Responsible
Goal: To enhance the testing program and increase the number of testers and statewide					
Task: Increase pool of testers statewide	■	■	■	■	Task Force & Coordinator
Task: Develop process to computerize tester program	■	■			Task Force & Coordinator
Task: Conduct tester training	■	■			Task Force & Coordinator
Task: Continue to increase testing statewide	■	■	■	■	Task Force & Coordinator
Goal: To continue to enhance understanding of fair housing statewide					
Task: Target landlords and builders and educate them on fair housing laws and accommodation requirements for persons with disabilities	■	■	■	■	Task Force & ICRC
Task: Host meetings in small cities and town administrator sessions to educate them on fair housing laws and accommodation requirements for persons with disabilities	■	■	■	■	Task Force & ICRC
Goal: To continue to enhance fair housing month as a major emphasis in the education of Indiana residents on the rights and requirements of fair housing					
Task: Increase support of the Fair Housing Summit by soliciting more scholarships sponsors	■	■	■	■	Task Force & Coordinator
Task: Increase the number of non-entitlement activities and publicity/ notification of events	■	■	■	■	Task Force & Coordinator
Task: Governor to provide proclamation recognizing fair housing month and its activities	■	■	■	■	Task Force & Coordinator
Task: Promotion of Fair Housing Month by Governor, Lt Governor and Task Force through proclamation, feature column , and media	■	■	■	■	Task Force, Coordinator, Governor and Lt Governor
Task: Implementation and promotion of small cities and towns fair housing workshops statewide	■	■	■	■	Task Force & Coordinator

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Monitoring Plan

For managerial purposes, the monitoring of the fair housing initiatives outlined in this document will be the administrative responsibility of the Indiana Department of Commerce, Department of Grants Management, in conjunction with the Indiana Fair Housing Task Force and members of the Consolidated Plan Coordinating Committee. The Indiana Department of Commerce will continue to partner with the Indiana Civil Rights Commission, the Indiana Housing and Finance Authority, the Indiana Family and Social Services Administration, and the Indiana State Department of Health to promote fair housing. Under the leadership and direction of the above groups, the responsibility to review and evaluate fair housing initiatives within the state will be included in the responsibilities of the Fair Housing Assessment Committee. This team has a responsibility, with approval of the fair housing partners, to complete the following.

Drafting of an Updated Analysis of Impediments to Fair Housing;

Updating of records related to fair housing initiatives throughout the state;

- Tracking the efforts and program accomplishments of fair housing initiatives within the state;
 - Preparing a report of the accomplishments and monitoring efforts; and
- Maintaining and facilitating the assessment of CRA and HMDA data.

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Exhibit AI-25. Fair Housing Survey Question Tables

"Zoning laws in my community (e.g., growth boundaries, minimum lot sizes) encourage segregated housing."

	Frequency	Percent	Valid Percent	Cumulative Percent
Strongly Agree	20	6.8	7.8	7.8
Agree	38	13.0	14.8	22.6
Neither Agree Nor Disagree	97	33.1	37.7	60.3
Disagree	48	16.4	18.7	79.0
Strongly Disagree	54	18.4	21.0	100
Total	257	87.7	100	

"Minorities, large families, and persons with disabilities can obtain desirable housing in any area of my community."

	Frequency	Percent	Valid Percent	Cumulative Percent
Strongly Agree	28	9.6	10.3	10.3
Agree	55	18.8	20.3	30.6
Neither Agree Nor Disagree	58	19.8	21.4	52.0
Disagree	66	22.5	24.4	76.4
Strongly Disagree	64	21.8	23.6	100
Total	271	92.5	100	

"Landlords in my community can limit the number of children living in an apartment."

	Frequency	Percent	Valid Percent	Cumulative Percent
Strongly Agree	23	7.8	9.3	9.3
Agree	55	18.8	22.3	31.6
Neither Agree Nor Disagree	114	38.9	46.2	77.7
Disagree	28	9.6	11.3	89.1
Strongly Disagree	27	9.2	10.9	100
Total	247	84.3	100	

"It is easy to obtain loans from financial institutions and mortgage companies in my community."

	Frequency	Percent	Valid Percent	Cumulative Percent
Strongly Agree	12	4.1	4.5	4.5
Agree	65	22.2	24.6	29.2
Neither Agree Nor Disagree	104	35.5	39.4	68.6
Disagree	49	16.7	18.6	87.1
Strongly Disagree	34	11.6	12.9	100
Total	264	90.1	100	

"Insurance companies offer policies within 100% replacement value to lower income and first time home buyers at reasonable rates."

	Frequency	Percent	Valid Percent	Cumulative Percent
Strongly Agree	8	2.7	3.3	3.3
Agree	40	13.7	16.7	20.0
Neither Agree Nor Disagree	135	46.1	56.3	76.3
Disagree	38	13.0	15.8	92.1
Strongly Disagree	19	6.5	7.9	100
Total	240	81.9	100	

Appendix I.

Analysis of Impediments to Fair Housing Choice

Exhibit AI-25. (continued)
Fair Housing Survey Question Tables

"Lower income families are able to refinance their homes at competitive interest rates."

	Frequency	Percent	Valid Percent	Cumulative Percent
Strongly Agree	7	2.4	2.9	2.9
Agree	44	15.0	18.0	20.9
Neither Agree Nor Disagree	112	38.2	45.9	66.8
Disagree	63	21.5	25.8	92.6
Strongly Disagree	18	6.1	7.4	100
Total	244	83.3	100	

"Housing discrimination happens in my community."

	Frequency	Percent	Valid Percent	Cumulative Percent
Strongly Agree	23	7.8	8.7	8.7
Agree	64	21.8	24.3	33.1
Neither Agree Nor Disagree	96	32.8	36.5	69.6
Disagree	55	18.8	20.9	90.5
Strongly Disagree	25	8.5	9.5	100
Total	263	89.8	100	

"The people in my community know that discrimination is prohibited in the sale and rental of housing, mortgage lending and advertising."

	Frequency	Percent	Valid Percent	Cumulative Percent
Strongly Agree	48	16.4	18.1	18.1
Agree	127	43.3	47.9	66.0
Neither Agree Nor Disagree	63	21.5	23.8	89.8
Disagree	20	6.8	7.5	97.4
Strongly Disagree	7	2.4	2.6	100
Total	265	90.4	100	

"The people in my community know whom to contact when facing housing discrimination."

	Frequency	Percent	Valid Percent	Cumulative Percent
Strongly Agree	13	4.4	5.1	5.1
Agree	53	18.1	20.6	25.7
Neither Agree Nor Disagree	87	29.7	33.9	59.5
Disagree	73	24.9	28.4	87.9
Strongly Disagree	31	10.6	12.1	100
Total	257	87.7	100	

"The housing enforcement agency in my community has sufficient resources to handle to amount of discrimination that may occur."

	Frequency	Percent	Valid Percent	Cumulative Percent
Strongly Agree	9	3.1	3.7	3.7
Agree	30	10.2	12.3	16.0
Neither Agree Nor Disagree	116	39.6	47.7	63.8
Disagree	56	19.1	23.0	86.8
Strongly Disagree	32	10.9	13.2	100
Total	243	82.9	100	

Appendix I. Analysis of Impediments to Fair Housing Choice

**Exhibit AI-26.
The Fourth Annual Fair Housing Summit Brochure**

THE INDIANA FAIR HOUSING TASK FORCE presents

THE FOURTH ANNUAL FAIR HOUSING SUMMIT

**FAIR HOUSING:
THE AMERICAN
DREAM**

THURSDAY, APRIL 26, 2001

Community & Education Center
M. S. D. of Washington Township
8550 Woodfield Crossing Boulevard
Indianapolis, Indiana 46240



HURRY!
Limited Booth Space
Only \$ 75

INDIANA FAIR HOUSING TASK FORCE

c/o INDIANA CIVIL RIGHTS COMMISSION
100 N. SENATE AVENUE, ROOM N103
INDIANAPOLIS, IN 46204-2211

AN EQUAL OPPORTUNITY EMPLOYER

Indically cannot be registered but service can be registered.
Dr. Martin Luther King, Jr.



INDIANA FAIR HOUSING TASK FORCE

HOTEL ACCOMMODATIONS

Registrants are responsible for their hotel reservations. Rooms are limited and reservations are not guaranteed after deadline date. Please reserve early and state that you are attending the Fourth Annual Indiana Fair Housing Task Force (IFHTF) Summit to qualify for special rate. Free parking and near the Keystone at the Crossing Fashion Mall.

SHERATON INDIANAPOLIS HOTEL & SUITES
8787 Keystone Crossing
Indianapolis, Indiana 46240

Hotel rooms are limited - Please register early
Hotel Registration Deadline: March 28, 2001

REGISTRATION FEE - \$60.00

Prepaid registration cancellations received ten (10) business days prior to the Summit will be refunded less a \$25.00 administrative fee. Early registration is advised. Substitutions may be made at any time. Names of persons substituting for confirmed registrants must be submitted to the IFHTF no later than the Summit. Please complete the registration form and mail with your payment.

MAIL TO: INDIANA CIVIL RIGHTS COMMISSION
ATTN: JACQUELYN SCHMIDT
100 North Senate Avenue, Room N103
Indianapolis, Indiana 46204

FAX TO: (317) 232-6580 TELE: (317) 232-2643

PLEASE PRINT FORM FOR EACH REGISTRANT
METHOD OF PAYMENT ENCLOSED:

Name: _____ Check _____ Purchase Order _____ Billing _____

Organization: _____

Address: _____

City/State/Zip: _____

Tele/FAX: _____

Do You Require Special Accommodation: (please describe) _____

Please Indicate Special Dietary Needs: _____

Appendix I. Analysis of Impediments to Fair Housing Choice

Exhibit AI-26. (continued) The Fourth Annual Fair Housing Summit Brochure

INDIANA FAIR HOUSING TASK FORCE

The **INDIANA FAIR HOUSING TASK FORCE** promotes equal housing opportunity for all people in Indiana through cooperative efforts with federal, state and local government, Indiana businesses, social service organizations, and fair housing advocacy groups.

The goal of the task force is to educate housing providers, consumers, fair housing advocacy organizations and government leaders on their rights and responsibilities in ensuring free housing choices to every Indiana resident.

TASK FORCE MEMBERS

INDIANA STATE DEPARTMENT OF HEALTH
METROPOLITAN INDIANAPOLIS BOARD OF REALTORS
INDIANA CIVIL RIGHTS COMMISSION
GREATER INDIANAPOLIS NAACP BRANCH
SOUTHERN INDIANA REHABILITATION
AREA AGENCY ON AGING
INDIANAPOLIS DEPARTMENT OF REALTY
FEDERAL HOME LOAN BANK
RURAL OPPORTUNITIES
BUILDERS ASSOCIATION OF GREATER INDIANAPOLIS
GOVERNOR'S PLANNING COUNCIL
U. S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT
INDIANAPOLIS NEIGHBORHOOD HOUSING PARTNERSHIP
INDIANA HOUSING FINANCE AUTHORITY
INDIANA BANKERS ASSOCIATION
INDIANAPOLIS COMMUNITY ACTION AGAINST POVERTY
BANC ONE
LEGAL SERVICES ORGANIZATION
INDIANA COALITION ON HOMELESS & HOUSING ISSUES
MICHIGAN CITY HOUSING AUTHORITY
SOCIETY BANK
BLOOMINGTON CHAMBER OF COMMERCE
INDIANAPOLIS COMMUNITY BANK
INDIANA DEPARTMENT OF INSURANCE
INDIANA DEPARTMENT OF COMMERCE
INDIANA MORTGAGE BANKERS
APARTMENT ASSOCIATION OF INDIANA
AFRICAN COMMUNITY INTERNATIONAL CENTER
WELLS FARGO FINANCIAL
UNITED SENIOR ACTION
INDIANAPOLIS URBAN LEAGUE
INDIANAPOLIS HOUSING AGENCY
THE SPANISH CONNECTION

THE FAIR HOUSING SUMMIT

The **FOURTH ANNUAL INDIANA FAIR HOUSING SUMMIT** has been developed to educate a wide range of businesses and organizations involved in the housing industry. Each session is informative to the city planner, apartment manager, realtor, builder, as well as to the fair housing advocate and enforcement specialist. The Summit topics include:

- The impact of housing discrimination on its victims;
- Affordable new construction and modification for accessibility by people with disabilities;
- Discrimination issues in homeowners insurance and mortgage lending; and many more.

FAIR HOUSING: LIVING THE AMERICAN DREAM

WORKSHOP SUMMARIES

Discriminatory Practices in Homeowners Insurance:
Learn how insurance underwriting policies can discriminate and underinsure in violation of federal and state fair housing laws.

Accommodating People with Disabilities:
Learn about your legal obligations to provide accessibility for the disabled.

Fair Housing Laws:
A fair housing expert to discuss updates and trends.

Interactive Discussion on Housing:
Panel on local, state, and federal resources.

Advertising Blunders:
Learn responsible advertising.

Discrimination in Mortgage Lending:
Learn how apparently neutral mortgage lending policies can violate federal and state fair housing laws.

WORKSHOP SUMMARIES cont

Establishing a Fair Housing Ordinance:
Learn how to create and implement an ordinance for your community.

Real Estate Best Practices:
Learn how realtors can avoid unintentional pitfalls of housing discrimination.

AGENDA THURSDAY, APRIL 26, 2001

8:00 - 12:00 Registration
8:00 - 8:45 Continental Breakfast
9:00 - 10:30 Plenary Session:
Fair Housing: Many Faces, Many Dreams

10:30 - 10:45 BREAK
10:45 - 12:00 Simultaneous Workshops I
Insurance
1. Discriminatory Practices in Homeowners Insurance
2. Accommodating People with Disabilities
3. Fair Housing Laws *
4. Interactive Discussion on Fair Housing

12:00 - 1:30 LUNCHEON
1:30 - 3:00 Simultaneous Workshops II
1. Advertising Blunders
2. Discrimination in Mortgage Lending
3. Establishing a Fair Housing Ordinance
4. Real Estate Best Practices

3:00 - 3:15 BREAK
3:15 - 5:00 Closing Plenary Session
New Roads Traveled: A panel to discuss multi-family concerns and affordable housing issues pertaining to a growing and diverse Indiana population

Attendees will receive the Indiana Civil Rights Commission Certificate of Fair Housing Education

* CLE Certification Pending