2022 Update to Analysis of Impediments to

Fair Housing Choice and Action Plan Completed in 2019

FAIR HOUSING COMPLAINTS RECEIVED BETWEEN JANUARY 1, 2022 AND DECEMBER 31, 2022

All of the complaints received in 2022 were Landlord/Tenant (89/89) complaints.

SUMMARY OF ACTIONS TAKEN TO ADDRESS THE IMPEDIMENTS TO FAIR HOUSING CHOICE IDENTIFIED IN THE AI SUBMITTED IN JULY 2019

INCREASE FAIR HOUSING TRAINING AND OUTREACH OPPORTUNITIES IN TRUMBULL COUNTY, AND TARGET TENANTS, LANDLORDS, REALTORS, CONCERNED CITIZENS, AND ELECTED OFFICIALS

- 1. Trumbull County Planning Commission staff worked with Community Legal Aid to provide training for landlords and property managers. Community Legal Aid provided Fair Housing and Education Sessions to the local legal bar association, general population, Continuum of Care agencies, the elderly and disabled populations, and commercial realtors throughout Trumbull County.
- 2. Trumbull County Planning Commission staff provided additional training programs in coordination with the Trumbull County Zoning Officials Association and the General Public.
- 3. Trumbull County Planning Commission staff and Community Legal Aid distributed Fair Housing Brochures on a quarterly basis.
- 4. Trumbull County Planning Commission staff and members attended Racial Equity Training in 2019, 2020, 2021, and 2022.

5. Trumbull County Planning Commission staff provided referrals to Community Legal Aid to assist with landlord / tenant disputes and dispositions with almost 90 individuals assisted in 2022.

REDUCE HISTORIC AND INSTITUTIONAL SEGREGATION ACROSS TRUMBULL COUNTY

- 1. Trumbull County Planning Commission staff continues to work with the Mental Health and Recovery Board (TCMHRB) to provide outreach and education to the benefits of constructing different types of housing throughout Trumbull County.
- 2. Trumbull County Planning Commission staff and Community Legal Aid continues to provide training and education to local Zoning Officials and their roles in eliminating NIMBY Syndrome.
- 3. Trumbull County Planning Commission staff works with the Warren Area Board of Realtors to provide extensive training and education on prohibited steering of buyers and key points on eliminating historic segregation to local Realtors.
- 4. Trumbull County Planning Commission staff continues to promote development of affordable housing in the rural areas of Trumbull County.
- 5. Trumbull County Planning Commission staff raised over \$7,500 in 2019 in order to present an Equity for All Event on May 23rd, 2019. See attached flyer. Over 200 persons attended the event held at Packard Music Hall in order to hear about the history of redlining and segregation in Trumbull County and how it translates to inequity today for persons of color.
- 6. Trumbull County Planning Commission staff participates in numerous grassroots coalitions organized around addressing institutional racism including the Healthy Community Partnership and Inspiring Minds working groups.

INCREASE SUPPLY OF ACCESSIBLE AND AFFORDABLE HOUSING FOR THOSE PERSONS WITH DISABILITIES

- 1. Trumbull County Planning Commission staff continues to work with the Trumbull County Housing Collaborative to promote affordable and accessible housing opportunities by attending bi-monthly meetings for updates on services and assistance available and using a strong referral network system.
- 2. Trumbull County Planning Commission staff through the Warren-Trumbull Home Consortium offers grants to income-eligible persons to promote affordable housing and homeownership opportunities throughout Trumbull County.
- 3. Trumbull County Planning Commission staff provides housing related assistance to hundreds of homeowners to address health, safety, energy deficiencies and accessibility issues to residents throughout Trumbull County.
- 4. Trumbull County Planning Commission staff through the Warren-Trumbull Home Consortium provides Down Payment Assistance to low- and moderate-income households.
- 5. Trumbull County Planning Commission staff provides referrals to Direction Home and works with the Western Reserve Independent Living Center to promote accessibility.

ESTABLISH A BASELINE AND BEST PRACTICES TO TRACK IMPEDIMENTS TO FAIR HOUSING CHOICE TO AFFIRMATIVELY FURTHER FAIR HOUSING

1. Trumbull County Planning Commission staff continues to collect and review CRA and HMDA data.

- 2. Trumbull County Planning Commission staff continues to collect and review OCRC complaints.
- 3. Trumbull County Planning Commission staff is in the process of collating countywide zoning data in partnership with the Eastgate Regional Council of Governments.

 Once it is complete a resulting deliverable GIS zoning layer will be utilized to analyze existing zoning patterns countywide for potential discriminatory regulations.

2019 IMPEDIMENTS, FAIR HOUSING CONCERNS, OR PROBLEMS

After conducting and completing the eight-month long planning process in coordination with Youngstown state University Center for Urban Research, the cities of Warren and Niles and local Stakeholders, Trumbull County compiled the 2019 Analysis of Impediments To Fair Housing Plan and identified the following impediments to fair housing.

These identified impediments are the focus of Trumbull County's Action Plan for the next 5 years:

- Increase fair housing training and outreach opportunities in Trumbull County, and target tenants, landlords, realtors, concerned citizens, and elected officials
- Reduce historic and institutional segregation across Trumbull County
- Increase supply of accessible and affordable housing for those persons with disabilities
- Establish a baseline and best practices to track impediments to fair housing choice to affirmatively further fair housing

A complete copy of the entire 2019 Analysis of Impediments to Fair Housing Plan was submitted to the State of Ohio Development Services Agency on or before July 1, 2019. The plan is currently available to the public for review and comments.

A SUMMARY OF PROPOSED ACTIONS TO ADDRESS IMPEDIMENTS TO FAIR HOUSING CHOICE THAT WILL BE IMPLEMENTED DURING THE PY 2021 STANDARD FAIR HOUSING PROGRAM PERIOD (JANUARY 1, 2022 THROUGH DECEMBER 31, 2023).

Trumbull County Planning Commission staff will take the following measures to promote awareness and encourage willing compliance with all Fair Housing laws:

Action steps to address historical segregation may include earmarking a certain percentage of grant dollars from HOME, CHIP, and other housing-related programs, to be expended within less segregated census tracts of the county.

Education is a critical component. The Warren Area Board of Realtors (WABOR) facilitates their own fair housing events, while Trumbull County sponsors an annual continuing education training for realtors. Trumbull County also hosted the 1st Equity for All event to shed light on historic redlining practices in Trumbull County and the negative impact it has today on persons of color. The county intends to lead and produce a Public Service Announcement (PSA), and include well-known figures to speak about fair housing rights. This PSA will be aired on local television stations and radio. In addition, the Al implementation team will create a social media page for complaint intake and education purposes, as many residents, especially low-income residents, do not have access to cable television but do have cell phones and access to social media. Education and outreach related to NIMBY syndrome will be targeted to realtors, appraisers, developers, and elected officials.

A review of zoning restrictions countywide will be completed by 2022. Potential funding includes the New Horizons Grant and potential funding partners include local entities such as Trumbull Neighborhood Partnership, Raymond John Wean Foundation, Community Foundation of the Mahoning Valley, City Club, Empowering and Strengthening Ohio's People (ESOP), Trumbull County Planning Commission and Warren Area Board of Realtors.

Finally, there is a need to retrofit older housing, particularly in the urban core, but also in rural areas where the housing stock is also aged, to make it accessible to persons with disabilities. In Trumbull County, 14.6% of the civilian noninstitutionalized population had a disability in 2017. In the City of Warren, the disability rate was 17.5%, and in the City of Niles, it was 17.1%. When accounting only for the population age 65 and over, 33.1% have a disability in Trumbull County, and 39.7% and 40.0% have a disability in the Cities of Warren and Niles, respectively.

ACTION PLAN - 2019 TO 2024

The following are action steps that are being proposed by Trumbull County, and the cities of Warren and Niles, to affirmatively further fair housing.

Goal	Action Steps	Cost	Funding Type	Timeframe	Project Partners
	Provide additional fair housing education and	Low	CDBG	Long	Lead: Trumbull County, cities of Warren and
	outreach opportunities to Landlords and				Niles
Increase fair housing	Tenants				Partners: Warren Area Board of Realtors
training and outreach	Provide outreach to schools and other groups	Low	CDBG	Long	Lead: Trumbull County
opportunities in	that deal with fair housing issues				Partners: Local school districts
Trumbull County, and	Produce a Public Service Announcement about	Medium	CDBG	Short	Lead: Trumbull County, cities of Warren and
target tenants,	fair housing, including success stories. Include				Niles
landlords, realtors,	local public officials and celebrities.				Partners: Local production company, local
concerned citizens, and					media
elected officials	Develop a combined and comprehensive	Medium	CDBG	Medium	Lead: Trumbull County, cities of Warren and
	registry of landlords in the cities of Warren and				Niles
	Niles, and the remainder of Trumbull County				Partners: YSU

Goal	Action Steps	Cost	Funding Type	Timeframe	Project Partners
	Require all landlords to undergo fair housing training as a requirement to receiving an occupancy permit for rental housing units	Low	CDBG	Long	Lead : Trumbull County, cities of Warren and Niles
	Diversify the location construction of low- income housing	High	CDBG County/cities Local non-profits Developers	Long	Lead: Trumbull County, cities of Warren and Niles Partners: Other Trumbull County communities, local non-profits, developers
Reduce historic and	Work to change regulations at the state level that lead to segregation, including requirement that CDBG and HOME funds, and tax credits be used in low-income areas	Low	CDBG County/cities	Long	Lead: Trumbull County, cities of Warren and Niles Partners: Residents, elected officials
institutional segregation across Trumbull County	Consider limited testing as a measure to confirm or deny the existence of housing discrimination	Medium	CDBG	Long	Lead: Trumbull County, cities of Warren and Niles Partners: Ohio Development Services Agency
	Develop one affordable housing unit in a rural area of Trumbull County	High	CDBG County/cities Local non-profits Developers	Medium	Lead: Trumbull County, cities of Warren and Niles Partners: Other Trumbull County communities, local non-profits, developers
	Work with local elected officials to adopt policies that affirmatively further fair housing	Low	CDBG County/cities	Long	Lead: Trumbull County, cities of Warren and Niles Partners: Residents, elected officials
Increase supply of accessible and affordable housing for those persons with disabilities	Work with local elected officials and landlords to identify available affordable housing that is or can be retrofitted for accessibility for those persons with disabilities	Medium	CDBG County/cities Developers	Medium	Lead: Trumbull County, cities of Warren and Niles Partners: Landlords, developers, YSU
Establish a baseline and	Continue to track all data related to fair housing, including demographic changes, housing conditions, HMDA loan applications and originations, and fair housing complaints	Medium	CDBG	Long	Lead: Trumbull County, cities of Warren and Niles Partners: YSU
best practices to track impediments to fair housing choice to affirmatively further fair housing	Review housing-related complaints to Community Legal Aid in Trumbull County and the city of Warren, and housing-related complaints to the city of Niles to determine the location and causes of fair housing issues	Low	CDBG	Long	Lead: Trumbull County, cities of Warren and Niles Partners: Community Legal Aid
	Conduct a countywide analysis of zoning enforcement and recovery housing	Medium	CDBG	Medium	Lead: Trumbull County Partners: Ohio Development Services Agency

OUTREACH PROGRAM- January 1, 2022 through December 31, 2023

Grantees are required to develop fair housing educational materials. Materials must be distributed to a minimum of 10 public events, agencies or organizations each quarter throughout the grant program period. The local fair housing contact's name, address, and phone number must be listed on all materials distributed. In addition, communities must provide fair housing contact information and outreach materials on their official website.

Printed fair housing educational materials must include, at a minimum:

- Local fair housing contact information
- What is covered by the Fair Housing Act
- What is prohibited by the Fair Housing Act
- Examples of housing discrimination
- How to file a fair housing complaint

Fair Housing Outreach Program

Agency, List of Materials			# to be distribute	Approximate Dates of Distribution							
Organization, or Public Event		AI.	d per Quarter	1 st Qtr.	2 nd Qtr.	3 rd Qtr.	4 th Qtr.	5 th Qtr.	6 th Qtr.	7 th Qtr.	8 th Qtr.
<u>Example</u> : County Human Resources Office	Fair Housing "It's Your Right" & Ohio Fair Housing Law brochures		50 of each brochure	1/1/22	4/1/22	7/1/22	10/1/22	1/1/23	4/1/23	7/1/23	10/1/23
Apprisen	Fair Housing "It's Your Right" & Ohio Fair Housing Law brochures		50 of each brochure	1/1/22	4/1/22	7/1/22	10/1/22	1/1/23	4/1/23	7/1/23	10/1/23
Beatitude House	Fair Housing "It's Your Right" & Ohio Fair Housing Law brochures		50 of each brochure	1/1/22	4/1/22	7/1/22	10/1/22	1/1/23	4/1/23	7/1/23	10/1/23
Catholic Charities Regional Agency	Fair Housing "It's Your Right" & Ohio Fair Housing Law brochures		50 of each brochure	1/1/22	4/1/22	7/1/22	10/1/22	1/1/23	4/1/23	7/1/23	10/1/23

Agency,	List of Materials	Al ¹	# to be distribute d per Quarter	Approximate Dates of Distribution								
Organization, or Public Event	to be Distributed	AI.		1 st Qtr.	2 nd Qtr.	3 rd Qtr.	4 th Qtr.	5 th Qtr.	6 th Qtr.	7 th Qtr.	8 th Qtr.	
Coleman Behavioral Health	Fair Housing "It's Your Right" & Ohio Fair Housing Law brochures		50 of each brochure	1/1/22	4/1/22	7/1/22	10/1/22	1/1/23	4/1/23	7/1/23	10/1/23	
Emmanuel Community Care Center	Fair Housing "It's Your Right" & Ohio Fair Housing Law brochures	\boxtimes	50 of each brochure	1/1/22	4/1/22	7/1/22	10/1/22	1/1/23	4/1/23	7/1/23	10/1/23	
Someplace Safe	Fair Housing "It's Your Right" & Ohio Fair Housing Law brochures	\boxtimes	50 of each brochure	1/1/22	4/1/22	7/1/22	10/1/22	1/1/23	4/1/23	7/1/23	10/1/23	
Trumbull County Children's Services	Fair Housing "It's Your Right" & Ohio Fair Housing Law brochures	\boxtimes	50 of each brochure	1/1/22	4/1/22	7/1/22	10/1/22	1/1/23	4/1/23	7/1/23	10/1/23	
Veteran's Services Office	Fair Housing "It's Your Right" & Ohio Fair Housing Law brochures		50 of each brochure	1/1/22	4/1/22	7/1/22	10/1/22	1/1/23	4/1/23	7/1/23	10/1/23	
Valley Counseling	Fair Housing "It's Your Right" & Ohio Fair Housing Law brochures	\boxtimes	50 of each brochure	1/1/22	4/1/22	7/1/22	10/1/22	1/1/23	4/1/23	7/1/23	10/1/23	
Warren Family Mission	Fair Housing "It's Your Right" & Ohio Fair Housing Law brochures	\boxtimes	50 of each brochure	1/1/22	4/1/22	7/1/22	10/1/22	1/1/23	4/1/23	7/1/23	10/1/23	
Trumbull County Fair	Fair Housing "It's Your Right" & Ohio Fair Housing Law brochures		250 of each brochure			7/1/22				7/1/23		

Agency, List of Materials			# to be distribute	Approximate Dates of Distribution								
Public Event	Organization, or to be Distributed	Al ¹	d per Quarter	1 st Qtr.	2 nd Qtr.	3 rd Qtr.	4 th Qtr.	5 th Qtr.	6 th Qtr.	7 th Qtr.	8 th Qtr.	
Trumbull Metropolitan Housing Authority	Fair Housing "It's Your Right" & Ohio Fair Housing Law brochures	\boxtimes	50 of each brochure	1/1/22	4/1/22	7/1/22	10/1/22	1/1/23	4/1/23	7/1/23	10/1/23	
Trumbull County Job & Family Services	Fair Housing "It's Your Right" & Ohio Fair Housing Law brochures	\boxtimes	50 of each brochure	1/1/22	4/1/22	7/1/22	10/1/22	1/1/23	4/1/23	7/1/23	10/1/23	
Warren-Trumbull County Library (Liberty Location)	Fair Housing "It's Your Right" & Ohio Fair Housing Law brochures	\boxtimes	50 of each brochure	1/1/22	4/1/22	7/1/22	10/1/22	1/1/23	4/1/23	7/1/23	10/1/23	
Warren-Trumbull County Library (Brookfield Location)	Fair Housing "It's Your Right" & Ohio Fair Housing Law brochures	\boxtimes	50 of each brochure	1/1/22	4/1/22	7/1/22	10/1/22	1/1/23	4/1/23	7/1/23	10/1/23	
Trumbull Community Action Program	Fair Housing "It's Your Right" & Ohio Fair Housing Law brochures		50 of each brochure	1/1/22	4/1/22	7/1/22	10/1/22	1/1/23	4/1/23	7/1/23	10/1/23	

¹ Outreach to address Analysis of Impediments Issues

Community Development Program Fair Housing Training Plan 2022

Target Population or	Training Location	Description of Training	Actual Date & Time
Target Area			
City of Girard – Target	Girard Multi-Generational Center	Overview of Fair Housing	Q1 – March 28, 2022 @
Population/Area	443 Trumbull Avenue	Law	9:00am
	Girard, OH 44420		
Mahoning Valley Real Estate	Magic Tree Pub & Eatery	Overview of Fair Housing	Q2 – April 11, 2022 6:00pm
Investors (MVREI) –	7463 South Avenue	Law	
Organization requirement	Youngstown, OH 44512		
Trumbull County Housing	Trumbull County Housing Collaborative	Overview of Fair Housing	Q3– July 12, 2022 @ 2:00pm
Collaborative – CHIP	Meeting	Law	
Requirement (Continuum of	YWCA of Warren		
Care)	375 N. Park Avenue		
	Warren, OH 44481		
Elderly and Disabled CHIP	Lordstown S.C.O.P.E	Overview of Fair Housing	Q3- July 25, 2022 @ 1:00pm
Requirement	1824 Salt Springs Rd.	Law	
	Warren, OH 44481		
Warren City Schools -	Warren City Schools-Board of Education	Overview of Fair Housing	Q4 – October 25, 2022 @
School requirement	105 High Street	Law	10:00am
	Warren, Ohio 44481		
West Farmington Village –	West Farmington Senior Center	Overview of Fair Housing	Q4 – November 21, 2022 @
Targeted area	150 W College Street	Law	6:00pm
	West Farmington, OH 44491		
Girard Multi-Generational	Girard Multi-Generational Center	Overview of Fair Housing	Q4 – November 29, 2022 @
Center – Organization	443 Trumbull Avenue	Law	9:00am
requirement	Girard, OH 44420		

Community Development Program Fair Housing Training Plan 2023

Target Population or Target Area	Training Location	Description of Training	Approx. Date
City of Girard – Target Population/Area	Girard Multi-Generational Center 443 Trumbull Avenue Girard, OH 44420	Overview of Fair Housing Law	Q1 – March 2023
Mahoning Valley Real Estate Investors (MVREI) - Organization requirement	Magic Tree Pub & Eatery 7463 South Avenue Youngstown, OH 44512	Overview of Fair Housing Law	Q2 – April 2023
Elderly and Disabled – CHIP Requirement	Lordstown S.C.O.P.E 1776 Salt Springs Road Warren, OH 44481	Overview of Fair Housing Law	Q2 – June 2023
West Farmington Village – Targeted area	West Farmington Village Hall 251 4th Street West Farmington, OH 44491	Overview of Fair Housing Law	Q3 – September 2023
School/Organization/Civic Group requirement	Location TBD (Warren Schools, Stark Trumbull Area Board of Realtors, Zoning Inspectors)	Overview of Fair Housing Law	Q4 – October 2023
Girard Multi-Generational Center – Organization requirement	Girard Multi-Generational Center 443 Trumbull Avenue Girard, OH 44420	Overview of Fair Housing Law	Q4 – November 2023