

# Analysis of Impediments to Fair Housing, 2014

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*St. Joseph County, IN*

**Bruce D. McDonald, III**

P.O. Box 1483

South Bend, IN 46624

bmcdonald@bdmintl.com

(202) 618-9989

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## Executive Summary

Equal and free access to residential housing is fundamental to meeting essential needs and pursuing personal, educational, employment and other goals. Because housing choice is so critical, fair housing is a goal that government, public officials and private citizens must achieve if equality of opportunity is to become a reality. The St. Joseph County Housing Consortium has prepared this Analysis of Impediments to Fair Housing Choice to satisfy requirements of the Housing and Community Development Act of 1974, as amended. Attention was paid to the housing conditions of the Cities of South Bend and Mishawaka, as well as the greater St. Joseph County. This analysis serves as the basis for fair housing planning, provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates, and assists in building public support for fair housing effects.

### Summary of Impediments to Fair Housing

To complete the analysis, a comprehensive review of demographic conditions, public services and policies, and private services was conducted. The following impediments to fair housing were found:

- **Racial and Ethnic Minority Concentrations** – the analysis finds that there is minimal racial and ethnic integration between Whites, Blacks and Hispanics across St. Joseph County and the Cities of South Bend and Mishawaka. The presence of racial and ethnic segregation can present challenges to fair housing as segregation has been linked to economic and service disparities (pg. 21).
- **Individuals with Limited English Proficiency** – a review of the languages spoken across the county showed significant diversity. More than half of non-native English speakers reported speaking English less than very well. Limited capacity to communicate and hinder an individual's access to housing and public services that promote fair housing (pg. 35).
- **Protected Class Status and Unemployment** – significant variation was found in the unemployment rate of the county and cities across gender, race, and ethnicity. Unemployment can have severe implications for fair housing as it has real effects on disposable income for household expenses. (pg. 37)
- **Housing Rental Costs** – a disparity was found between the salary earned by minimum wage laborers and the fair market rent (FMR) established by the U.S. Department of Housing and Urban Development. The FMR for a two-bedroom apartment is \$714, which would require a minimum wage laborer to work 76 hours a week to afford the rent (pg. 39).
- **Housing Affordability** – a disparity also exists in the affordability of housing sales. Median housing values have increased while median income has decreased. This study also shows a disparity in the affordability of a house across race and ethnicity with the housing prices of the area (pg. 40).
- **Protected Class Status and Household Size** – the majority of minority families have three or more persons within its household; however, the housing stock of rental units is

primarily focused on one and two bedroom units. Lower rates of home ownership among minority households suggests that large minority families may have a more difficult time finding adequate rental housing with a sufficient number of bedrooms, which may result in overcrowding (pg. 50).

- **Opportunities to File Fair Housing Complaints** – St. Joseph County and the cities of South Bend and Mishawaka have public ordinances to protect and enforce fair housing for its residents, including the point of contact for filing complaints. A lack of awareness to these contacts and a lack of consistency in the handling of complaints can lead to disparities in treatment across jurisdictions (pg. 61).
- **Unsupported Section 8 Vouchers** – both the Housing Authority of Mishawaka and the St. Joseph County Housing Assistance Office (SHAO) report waiting lists for Section 8 Housing Voucher assistance. Due to financial constraints the SHAO has been unable to support all of the vouchers for which it has been approved (pg. 64).
- **Housing Authority of South Bend** – during the study period, the Housing Authority of South Bend (HASB) was not available for interview. Other interviewees referenced reduced hours of operation and services due to financial constraints and organizational problems. Internal problems within HASB can limit the access of residents to housing services (pg. 68).
- **Public Transit** – the cities of South Bend and Mishawaka offer a public transportation service for its residents. Limited nighttime hours may restrict the commuting ability of second and third shift laborers and limited access to public transportation outside of city limits may limit the commute and access to services of low or moderate income populations that resident in the county (pg. 70).
- **Denial of Mortgage Applications** – an impediment to fair housing can also be seen in the ability of lower income and minority households to gain home loans. The primary causes of denial were related to the household's income. The rate of denial for Blacks and Asians remains higher than the rate for Whites. Hispanic households were also challenged as their denial rate has increased (pg. 76).

## **Introduction**

### **Introduction**

The St. Joseph County Housing Consortium has prepared an Analysis of Impediments to Fair Housing Choice to satisfy requirements of the Housing and Community Development Act of 1974, as amended. This Act requires that each community receiving Community Development Block Grant (CDBG) and HOME funds certifies to HUD that it will affirmatively further fair housing.

Communities receiving CDBG entitlement funds are required to:

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

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

The Analysis of Impediments to Fair Housing Choice is a review of a jurisdiction's laws, regulations, and administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing, as well as an assessment of conditions affecting fair housing choice.

## Fair Housing Choice

Equal and free access to residential housing (housing choice) is fundamental to meeting essential needs and pursuing personal, educational, employment and other goals. Because housing choice is so critical, fair housing is a goal that government, public officials and private citizens must achieve if equality of opportunity is to become a reality.

Federal law defines fair housing choice as the ability of persons to have the same housing choices available to them, regardless of race, color, religion, sex, disability, familial status, and national origin. Persons that are protected from discrimination by fair housing laws are referred to as members of the protected classes.

This analysis encompasses the following areas related to fair housing choice:

- The sale or rental of housing, both public and private;
- The provision of housing brokerage services;
- The provision of financing assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority or ethnic concentration; and,
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by the U.S. Department of Housing and Urban Development regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570 (i.e., the CDBG program regulations).

As a recipient of federal entitlement funds, the St. Joseph Housing Consortium has specific fair housing planning responsibilities. These include:

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

The U.S. Department of Housing and Urban Development interprets these three certifying elements to include:

- Analyzing housing discrimination in a jurisdiction and working towards its elimination;
- Promoting fair housing choice for all people;
- Providing racially and ethnically inclusive patterns of housing occupancy;

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- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities; and,
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

This analysis will:

- Evaluate population, household, income and housing characteristics by protected classes;
- Evaluate public sector policies that impact fair housing choice;
- Identify blatant or de factor impediments to fair housing choice, where any may exist; and,
- Recommend specific strategies to overcome the effects of any identified impediments.

U.S. Department of Housing and Urban Development defines an impediment to fair housing choice as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin.

This analysis serves as the basis for fair housing planning, provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates, and assists in building public support for fair housing effects. The St. Joseph County Housing Consortium is expected to review and approve the analysis and use it for direction, leadership, and resources for future fair housing planning.

The analysis will serve as a baseline for progress against which implementation efforts will be judged and recorded.

## **The Federal Fair Housing Act**

### **What housing is covered?**

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

### **What does the Fair Housing Act prohibit?**

#### ***In the Sale and Rental of Housing***

No one may take any of the following actions based on race, color, religion, sex, disability, familial status or national origin:

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different terms, conditions or privileges for the sale or rental of a dwelling
- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale, or rental
- For profit, persuade owners to sell or rent (blockbusting), or
- Deny anyone access to or membership in a facility or service (such as multiple listing service) related to the sale or rental of housing.

#### ***In Mortgage Lending***

No one may take any of the following actions based on race, color, religion, sex, disability, familial status or national origin:

- Refuse to make a mortgage loan
- Refuse to provide information regarding loans
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees
- Discriminate in appraising property
- Refuse to purchase a loan, or
- Set different terms or conditions for purchasing a loan.

### ***Other Prohibitions***

It is illegal for anyone to:

- Threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right
- Advertise or make any statement that indicates a limitation or preference based on race, color, religion, sex, disability, familial status, or national origin. This prohibition against discriminatory advertising applies to single family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

### **Additional Protections for the Disabled**

If someone has a physical or mental disability (including hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex and mental retardation) that substantially limits one or more major life activities, or has a record of such a disability, or is regarded as having such a disability, a landlord may not:

- Refuse to let the disabled person make reasonable modifications to a dwelling or common use areas, at the disabled person's expense, if necessary for the disabled person to use the housing. Where reasonable, the landlord may permit changes only if the disabled person agrees to restore the property to its original conditions when he or she moves.
- Refuse to make reasonable accommodations in rules, policies, practices or services if necessary for the disabled person to use the housing. For example, a building with a "no pets" policy must make a reasonable accommodation and allow a visually impaired tenant to keep a guide dog.

### **Housing Opportunities for Families with Children**

Unless a building or community qualifies as housing for older persons, it may not discriminate based on familial status. That is, it may not discriminate against families in which one or more children under the age 18 live with:

- A parent or
- A person who has legal custody of the child or children or
- The designee of the parent or legal custodian, with the parent or custodian's written permission.

Familial status protection also applies to pregnant women and anyone securing legal custody of a child under age 18.

Housing for older persons is exempt from the prohibition against familial status discrimination if:

- The HUD Secretary has determined that is specifically designed for and occupied by elderly persons under a federal, state or local government program, or
- It is occupied solely by persons who are 62 or older, or
- It houses at least one person who is 55 or older in at least 80% of the occupied units, and adheres to a policy that demonstrates the intent to house persons who are 55 or older, as previously described.

A transition period permits residents on or before September 13, 1988 to continue living in the housing, regardless of their age, without interfering with the exemption.

### **Significant Recent Changes**

The Housing for Older Persons Act of 1995 (HOPA) makes several changes to the age 55 and older exemption. Since the 1988 Amendments, the Fair Housing Act has exempted from its familial status provisions properties that satisfy the Act's age 55 and older housing condition. First, it eliminates the requirement that housing for persons age 55 and older have "significant facilities and services" designed for the elderly. Second, HOPA establishes a "good faith reliance" immunity from damages for persons who in good faith believe that the age 55 and older exemption applies to a particular property, if they do not actually know that the property is not eligible for the exemption and if the property has formally stated in writing that it qualifies for the exemption.

HOPA retains the requirement that senior housing must have one person who is 55 years of age or older living in at least 80% of its occupied units. It also still requires that senior housing publish and follow policies and procedures that demonstrate the intent to be housing for persons 55 years and older.

An exempt property will not violate the Fair Housing Act if it includes families with children, but it does not have to do so. Of course, the property must meet the Act's requirements that at least 80% of its occupied units have at least one occupant who is 55 or older, and that it publish and follow policies and procedures that demonstrate the intent to be "55 and older housing".

### **Requirements for New Buildings**

In buildings that are ready for first occupancy after March 13, 1991 and have an elevator and four or more units:

- Public and common areas must be accessible to persons with disabilities
- Doors and hallways must be wide enough for wheelchairs
- All units must have:
  - An accessible route into and through the unit
  - Accessible light switches, electrical outlets, thermostats and other environmental controls

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- Reinforced bathroom walls to allow later installation of grab bars, and
- Kitchens and bathrooms that can be used by people in wheelchairs.

If a building with four or more units has not elevator and will be ready for first occupancy after March 13, 1991, these standards apply to the ground floor units. These requirements for new buildings do not replace any more stringent standards in state or local law.

## **State and Local Laws**

### **Indiana Fair Housing Act**

In addition to the Federal Fair Housing Act, Indiana has adopted its own fair housing laws. The Indiana General Assembly passed the Indiana Fair Housing Act in 1991. The protections provided by the Act reflect those provided by the Federal Fair Housing Act. Protection from housing discrimination can also be sought under the Indiana Civil Rights Law, which covers both commercial and residential properties. The Indiana Civil Rights Law provides protection for all protected classes covered by the Indiana Fair Housing Act, except for familiar status.

### **Local Ordinances**

A number of ordinances have been adopted at the local level regarding fair housing. St. Joseph County adopted Chapter 97 of the county's Code of Ordinances to prohibit housing discrimination based on race, creed, color, origin, ancestry, handicap and familiar status. The City of South Bend provides protection under the Human Rights Ordinance (Article 9 of the city's Code of Ordinances). The protections provided by South Bend's Human Rights Ordinance extend beyond those provided by the county's ordinance. These additional protections include sexual orientation and gender identity. The last local ordinance is from the City of Mishawaka, which established fair housing policies under Article II of Chapter 42 in its Code of Ordinances.

Each local ordinance also establishes a contact point for fair housing complaints. For St. Joseph County, complaints are made to the County Auditor. The auditor is then responsible, in coordination with the County Attorney and the Board of County Commissioners, for investigating and mediating fair housing complaints. As part of its Human Rights Ordinance, The City of South Bend established the Human Rights Commission to oversee and enforce fair housing throughout the city. The City of Mishawaka has established the Board of Public Works and Safety, or its designee, as the point of contact for complaints and investigations into fair housing practices.

## **Comparison of Accessibility Standards**

There are several standards of accessibility that are referenced throughout the AI. These standards are listed below along with a summary of the features within each category or a reference to the full, detailed standards.

### **Fair Housing Act**

In buildings that are ready for the first occupancy after March 13, 1991 and include four or more units:

- There must be an accessible entrance on an accessible route
- Public and common areas must be accessible to persons with disabilities
- Doors and hallways must be wide enough for wheelchairs
- All ground floor units and all units in elevator buildings must have:
  - An accessible route into and through the unit
  - Accessible light switches, electrical outlets, thermostats and other environmental controls
  - Reinforced bathroom walls to allow later installation of grab bars, and
  - Kitchens and bathrooms that can be used by people in wheelchairs.

If a building with four or more units has no elevator and will be ready for occupancy after March 13, 1991, these standards apply to ground floor units. These requirements for new buildings do not replace any more stringent standards in state or local law.

### **Americans with Disabilities Act (ADA)**

ADA standards are required for accessibility to places of public accommodation and commercial facilities by individuals with disabilities. These guidelines are to be applied during the design, construction, and alteration of such buildings and facilities to the extent required by regulations issued by federal agencies, including the Department of Justice, under the Americans with Disabilities Act of 1990. A complete description of the guidelines can be found at: [www.ada.gov/stdspdf.htm](http://www.ada.gov/stdspdf.htm).

### **Uniform Federal Accessibility Standards (UFAS)**

UFAS accessibility standards are required for facility accessibility by physically handicapped persons for Federal and federally-funded facilities. These standards are to be applied during the design, construction, and alteration of buildings and facilities to the extent required by the Architectural Barriers Act of 1968, as amended. A complete description of the guidelines can be found at: <http://www.access-board.gov/guidelines-and-standards>.

## **Visitability Standards**

The term “visitability” refers to single-family housing designed in such a way that it can be lived in or visited by people with disabilities. A house is visitable when it meets three basic requirements:

- At least one no-step entrance
- Doors and hallways wide enough to navigate a wheelchair through, and
- A bathroom on the first floor large enough to allow a person in a wheelchair to enter and close the door.

## **Universal Design**

Universal design is the design of products and environments to be usable by all people, to the greatest extent possible, without adaptation or specialized design. Seven principles guide Universal Design. These include:

- Equitable use (e.g., make the design appeal to all users)
- Flexibility in use (e.g., accommodate right- or left-handed use)
- Simple and intuitive use (e.g., eliminate unnecessary complexity)
- Perceptible information (e.g., provide compatibility with a variety of techniques or devices used by people with sensory limitations)
- Tolerance for error (e.g., provide fail-safe features)
- Low physical effort (e.g., minimize repetitive actions)
- Size and space for approach and use (e.g., accommodate variations in hand and grip size).

## Methodology

The consultant Bruce McDonald, Ph.D. was retained by the St. Joseph County Housing Consortium to conduct the Analysis of Impediments to Fair Housing Choice. Dr. McDonald utilized a comprehensive approach to complete the analysis involving St. Joseph County and the cities of South Bend and Mishawaka. The following sources were utilized:

- The most recent demographic data available regarding population, household, housing, income and employment characteristics;
- The respective plans for the county and cities, including the Comprehensive Plan for South Bend and St. Joseph County, the City of South Bend's Housing and Community Development Plan, and the City of Mishawaka's Comprehensive Plan;
- Administrative policies concerning housing and community development;
- Financial lending institutional data from the Home Mortgage Disclosure Act database;
- Previous reports on fair housing within the county;
- Interviews with agencies and organizations that provide housing and housing related services to members of the protected classes; and,
- Data from the U.S. Department of Housing and Urban Development.

In coordination with the members and staff of the St. Joseph County Housing Consortium, a list of community stakeholders were identified and invited to interview. This list of stakeholders is provided in the Appendix.

## **Relationship between Fair Housing and Affordable Housing**

Fair housing choice is understood as the ability of persons to have the same housing choices available to them, regardless of race, color, religion, sex, disability, familial status, and national origin. Persons that are protected from discrimination by fair housing laws are referred to as members of the protected classes.

This analysis of impediments analyzes a range of fair housing issues that can affect housing choice. Income is associated to fair housing issues to the extent that members of protected classes tend to have lower incomes. A primary impediment to fair housing is the relative absence of affordable housing; however, the policies implemented by St. Joseph County, South Bend, and Mishawaka can create or contribute to the lack of affordable housing within the community.

The scope of this study extends beyond the adequacy of affordable housing in St. Joseph County. Included within the scope of this analysis is the presence of the protected class within context of factors that influence their ability to achieve equal access to housing.

## Demographic Information

### Demographic Profile

#### Population Trends

The population of St. Joseph County has been steadily growing since 1960. Between 1960 and 2010, the County grew by 11.9% from 238,614 to 266,931. While the county exhibited positive growth during this period, that growth was less than the rate of change in the state population. The population for the State of Indiana grew 39.1% during the same period. This relationship is demonstrated in Table 1.

Within the county’s population, two trends emerge. The first trend relates to the population of the City of South Bend. Between 1960 and 2010, South Bend saw a 23.6% decline in its population, decreasing from 132,445 in 1960 to 101,166 in 2010. The second trend relates to the City of Mishawaka and the remainder of the county. Mishawaka’s population grew by 44.6% and the population of the remainder of the county grew by 61.4%. While South Bend declined in population, the non-South Bend population grew by 56.1% from 106,169 to 165,765. Approximately 29.1% of the non-South Bend population resides in Mishawaka and 70.9% resident elsewhere in the county.

**Table 1: Population Trends, 1960-2010**

	1960	1970	1980	1990	2000	2010	% Change 1960-2010
Mishawaka	33,361	36,060	40,201	42,608	46,557	48,252	44.6%
South Bend	132,445	125,850	109,727	105,511	107,789	101,166	-23.6%
Other	72,808	83,135	91,689	98,933	111,213	117,513	61.4%
St. Joseph County	238,614	245,045	241,617	247,052	265,559	266,931	11.9%
Indiana	4,662,498	5,193,669	5,490,224	5,544,159	6,080,485	6,483,802	39.1%

Source: U.S. Census Bureau

The transition of the population appears to be one of race and ethnicity, demonstrated by a decline in the White population and an increase in all minority populations. The number of White residents decreased 3.2% between 1990 and 2010, compared to an increase among minority residents by 89.4%. In 1990, St. Joseph County’s population was comprised of 87.8% white residents and 12.2% minorities, compared to 78.7% and 21.3% in 2010, respectively.

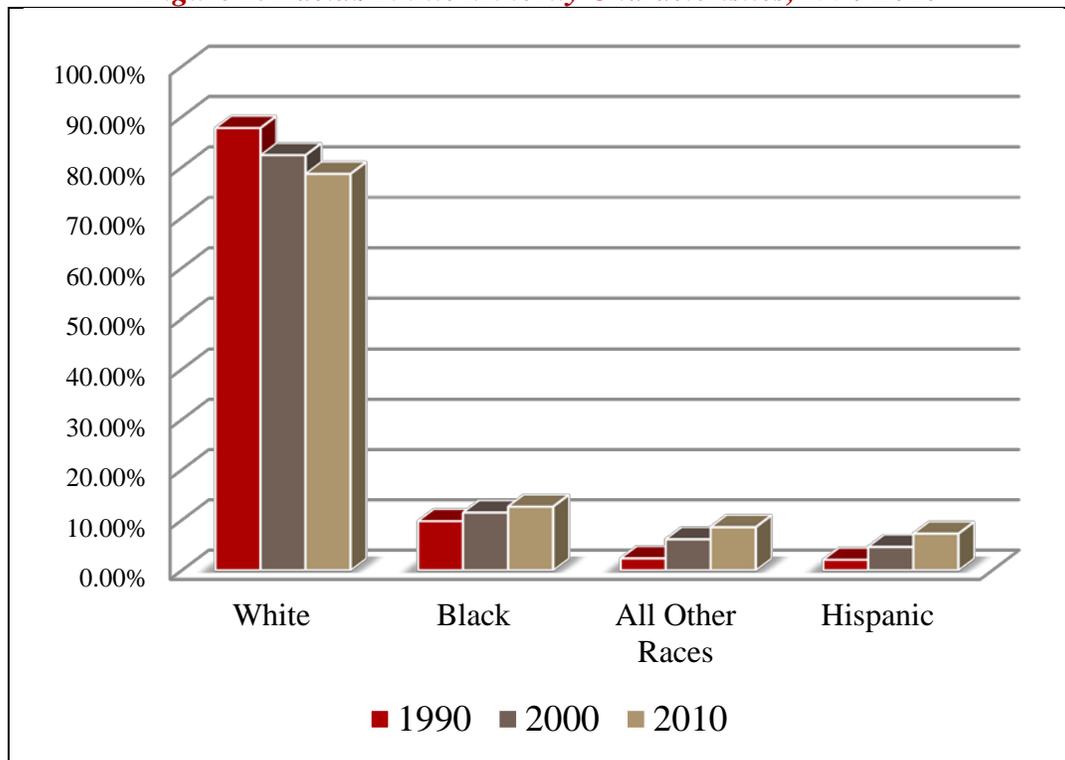
Blacks remain the largest minority group and comprised 59.6% of the minority population in 2010. Persons of other races experienced the largest growth between 1990 and 2010, increasing more than 257% from 2,525 to 9,031. Asian and Pacific Islanders also exhibited significant growth during the study period, increasing by 108.6%. Table 2 and Figure 1 provide an overview of the racial and ethnicity composition of the county.

**Table 2: Population by Race and Ethnicity, 1990-2010**

	1990		2000		2010		% Change 1990-2010
	#	%	#	%	#	%	
St. Joseph County	247,052	100.0%	265,559	100.0%	266,931	100.0%	8.0%
White Population	216,984	87.8%	218,706	82.4%	209,972	78.7%	-3.2%
Non-White Population	30,068	12.2%	46,853	17.6%	56,959	21.3%	89.4%
Black	24,190	9.8%	30,422	11.5%	33,958	12.7%	40.4%
Amer. Indian/Alaska Native	846	0.3%	938	0.4%	1,030	0.4%	21.7%
Asian/Pacific Islander	2,507	1.0%	3,690	1.4%	5,230	1.9%	108.6%
Other	2,525	1.0%	6,580	2.5%	9,031	3.4%	257.6%
Two or More Races	---	---	5,223	2.0%	7,710	2.9%	47.6%
Hispanic	5,201	2.1%	12,557	4.7%	19,395	7.3%	272.9%

Source: U.S. Census Bureau, 1990 Census, 2000 Census, 2010 Census

**Figure 1: Racial/Ethnic Minority Characteristics, 1990-2010**



The Hispanic resident population more than tripled from 1990 to 2010, from 5,201 to 19,395, with a growth of about 273%. Hispanic residents comprised 7.3% of St. Joseph County’s population in 2010, compared to 2.1% in 1990.

It is worth noting that this change in the Hispanic population may include a portion of the population that had previously been counted as White. Census counts origin and race as separate categories. In 2010, the Census form asked respondents to identify their race and whether they were Hispanic, noting that “Hispanic origins are not races.” It is generally believed that most people choosing “some other race” are Hispanic, but many Hispanic individuals identify

themselves as White, Black, or another race. Given the high growth rate of the Hispanic population between 1990 and 2010, it is possible that some of the Hispanic population had previously reported themselves as White.

Tables 3 and 4 provide a more in-depth look at the population of the county, focusing on the total population by location and the racial/ethnicity composition of the county. These tables provide an indication on where the racial transition is occurring. Based on the data, the primary location of racial transition is likely to be occurring within the City of South Bend. In 2010, minorities comprised 39.5% of the population of the City of South Bend. The community with the second largest minority population was the City of Mishawaka with 13.9%.

**Table 3: City and Town Population by Race and Ethnicity, 2010**

	Total Population	Race							Hispanic	Minority	
		One Race						Two or More Races			
		Population One Race	White	Black	American Indian/Alaska Native	Asian/Pacific Islander	Other				
<b>St Joseph County</b>	<b>266,931</b>	<b>259,221</b>	<b>209,972</b>	<b>33,958</b>	<b>1,030</b>	<b>5,230</b>	<b>9,031</b>	<b>7,710</b>	<b>19,395</b>	<b>56,959</b>	
Cities	149,421	143,786	102,737	30,232	678	2,367	7,775	5,634	15,291	46,683	
Towns	9,913	9,725	9,438	90	45	74	74	188	288	471	
Cities	Mishawaka	48,252	46,842	41,538	3,326	200	982	796	1,410	2,175	6,714
	South Bend	101,168	96,944	61,199	26,906	478	1,385	6,979	4,224	13,116	39,969
Towns	Indian Village	133	129	121	6	0	2	0	4	0	12
	Lakeville	786	774	766	1	3	0	0	12	25	16
	New Carlisle	1,861	1,823	1,787	14	11	7	4	38	24	74
	North Liberty	1,896	1,851	1,824	9	7	7	4	45	47	72
	Osceola	2,463	2,420	2,352	34	4	22	8	43	52	111
	Roseland	630	616	551	17	6	30	12	14	32	79
Walkerton	2,144	2,112	2,037	9	14	6	46	32	108	107	

Source: U.S. Census Bureau, 2010 Census

**Table 4: City and Town Population by Race and Ethnicity, 2010**

		Total Population	Race						Two or More Races	Hispanic	Minority
			One Race								
			Population One Race	White	Black	American Indian/ Alaska Native	Asian/ Pacific Islander	Other			
<b>St Joseph County</b>		<b>100.0%</b>	<b>97.31%</b>	<b>78.7%</b>	<b>12.7%</b>	<b>0.4%</b>	<b>2.0%</b>	<b>3.4%</b>	<b>2.9%</b>	<b>7.3%</b>	<b>21.3%</b>
Cities		100.0%	96.2%	68.8%	20.2%	0.5%	1.6%	5.2%	3.8%	10.2%	31.2%
Towns		100.0%	98.1%	95.2%	0.9%	0.5%	0.7%	0.7%	1.9%	2.9%	4.8%
Cities	Mishawaka	100.0%	97.1%	86.1%	6.9%	0.4%	2.0%	1.6%	2.9%	4.5%	13.9%
	South Bend	100.0%	95.8%	60.5%	26.6%	0.5%	1.4%	6.9%	4.2%	13.0%	39.5%
Towns	Indian Village	100.0%	97.0%	91.0%	4.5%	0.0%	1.5%	0.0%	3.0%	0.0%	9.0%
	Lakeville	100.0%	98.5%	97.5%	0.1%	0.4%	0.0%	0.0%	1.5%	3.2%	2.0%
	New Carlisle	100.0%	98.0%	96.0%	0.8%	0.6%	0.4%	0.2%	2.0%	1.3%	4.0%
	North Liberty	100.0%	97.6%	96.2%	0.5%	0.4%	0.4%	0.2%	2.4%	2.5%	3.8%
	Osceola	100.0%	98.3%	95.5%	1.4%	0.2%	0.9%	0.3%	1.7%	2.1%	4.5%
	Roseland	100.0%	97.8%	87.5%	2.7%	1.0%	4.8%	1.9%	2.2%	5.1%	12.5%
	Walkerton	100.0%	98.5%	95.0%	0.4%	0.7%	0.3%	2.1%	1.5%	5.0%	5.0%

Source: U.S. Census Bureau, 2010 Census

## **Racial and Ethnic Minority Concentrations**

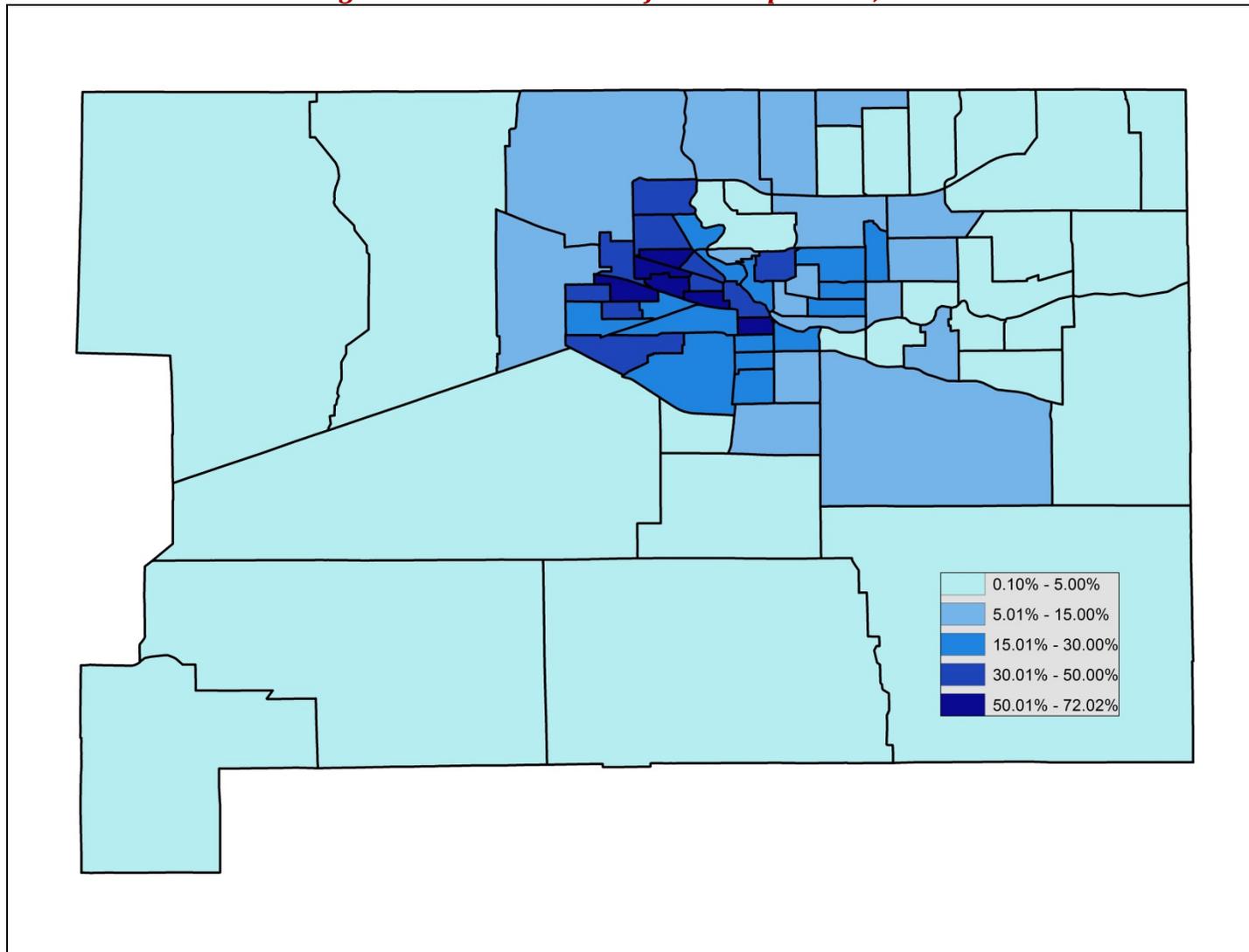
An area of racial or ethnic minority concentration is defined as a geographic area where the percentage of a particular minority or ethnic group is 10 percentage points or higher than the county. In St. Joseph County, Blacks accounted for 12.7% of the total population in 2010. An area of concentration of Black residents would be any census tract where Blacks comprised 22.7% or more of the population. Twenty-one of the census tracts in the county demonstrated high concentrations of Black residents. These high concentration areas accounted for 28% of all tracts in the county. There are no other areas of racial concentration.

Ethnically, Hispanics accounted for 7.3% of the county population 2010. An area of ethnic concentration would include census tracts were 17.3% or more of the population are Hispanic. High concentrations were present in 10 of the tracts, about 13.3% of all tracts in the county.

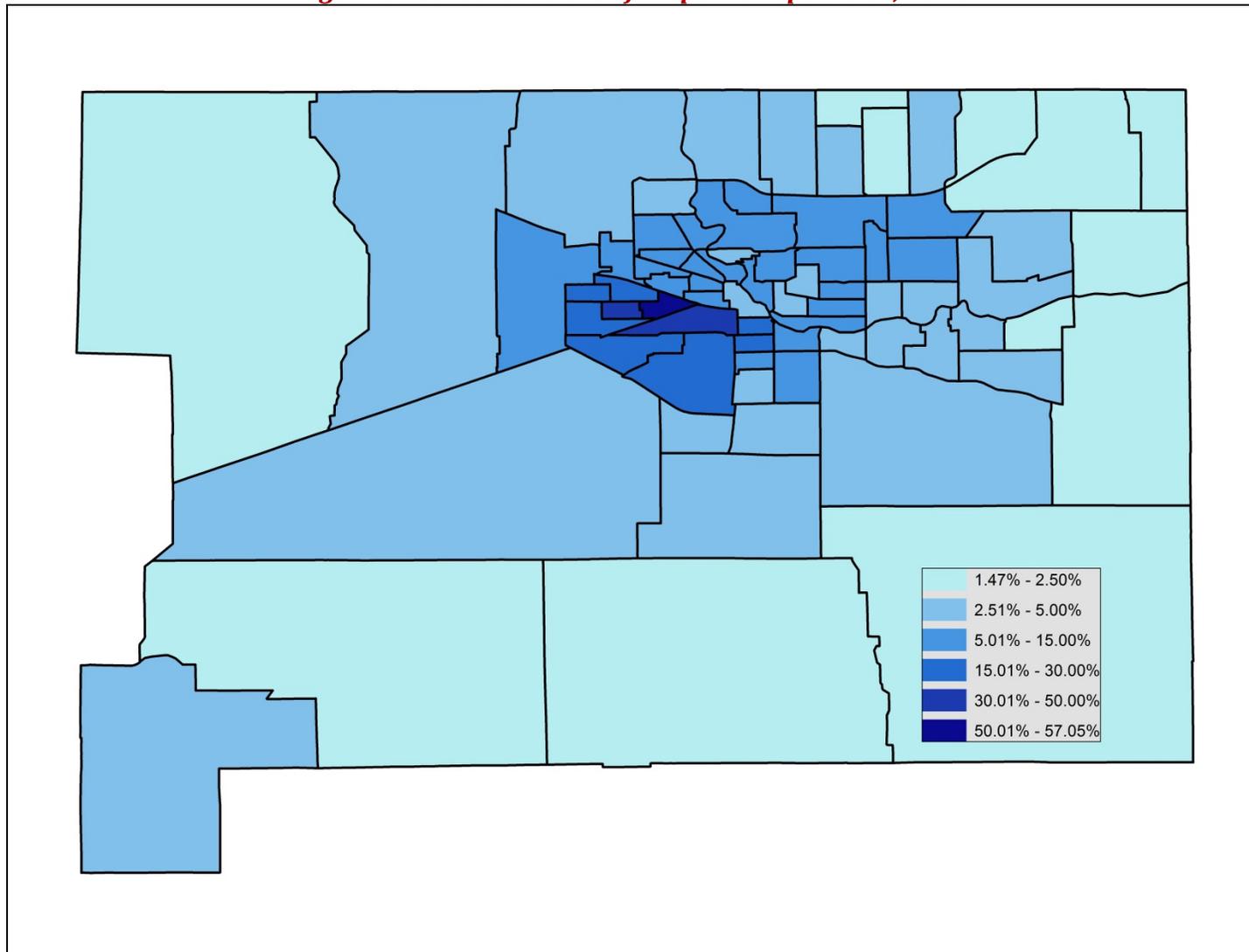
Nine census tracts (23, 24, 25, 26, 27, 28, 29, 30, and 34) exhibited both high concentrations of racial and ethnic minorities.

Figures 2 and 3 and Table 5 detail the locations of the area of minority concentrations. As demonstrated in the maps, the highest concentrations of minority residents are located on the western side of the City of South Bend. This area also contains high concentrations of low income individuals and is characterized by both a deteriorated housing stock and economic decline.

**Figure 2: Concentrations of Black Population, 2010**



**Figure 3: Concentrations of Hispanic Population, 2010**



**Table 5: Percent of Area Racial and Ethnic Concentrations, 2010**

Census Track	Total Population	White	Minority Population			Census Track	Total Population	White	Minority Population		
			Black	Asian/Pacific Islander	Hispanic				Black	Asian/Pacific Islander	Hispanic
1	2076	49.3%	37.9%	0.5%	13.0%	104	3287	93.4%	2.6%	0.3%	3.0%
2	3426	39.2%	49.4%	0.8%	8.7%	105	2927	95.1%	1.1%	1.0%	2.3%
3.01	2456	74.6%	17.5%	1.1%	5.3%	106	4138	89.4%	5.0%	0.9%	4.8%
3.02	2716	54.0%	39.6%	1.0%	4.6%	107	3720	93.2%	2.2%	0.9%	4.1%
4	2252	33.7%	53.3%	0.7%	12.5%	108	4660	96.3%	0.5%	0.3%	2.3%
5	1660	24.0%	65.5%	0.2%	10.9%	109	7754	92.1%	4.4%	0.9%	3.4%
6	2072	41.3%	45.5%	0.5%	13.2%	110	6434	83.0%	10.8%	2.7%	3.6%
7	1573	75.0%	16.8%	2.1%	5.7%	111	4611	78.8%	10.9%	0.5%	12.1%
8	1678	86.9%	6.7%	2.0%	4.6%	112.01	807	83.8%	2.9%	8.6%	5.3%
9	1311	69.8%	20.9%	2.4%	5.7%	112.02	8050	85.9%	2.7%	6.2%	9.0%
10	2913	43.5%	45.6%	1.2%	11.2%	113.01	5817	79.3%	11.8%	3.7%	6.4%
11	4569	68.5%	19.6%	3.3%	7.1%	113.02	6522	84.9%	8.2%	3.4%	3.6%
12	2182	85.2%	9.4%	1.3%	3.8%	113.03	6098	85.4%	9.2%	1.1%	2.9%
13	2464	67.6%	20.5%	2.0%	10.2%	113.04	2427	88.2%	5.4%	4.4%	1.6%
14	3348	76.8%	15.9%	0.6%	5.6%	113.05	4389	88.5%	4.7%	2.8%	3.9%
15	3037	76.4%	11.5%	2.0%	8.3%	113.06	2879	92.0%	2.8%	3.1%	1.7%
16	2323	88.5%	7.4%	1.0%	3.4%	114.03	5924	89.8%	1.8%	6.0%	2.9%
17	1665	50.2%	43.6%	0.6%	4.3%	114.04	6886	86.6%	2.3%	8.6%	2.2%
19	1115	41.0%	48.2%	0.4%	12.0%	114.05	3528	94.1%	1.1%	2.4%	2.0%
20	1775	25.6%	60.3%	0.3%	13.6%	114.06	5172	93.4%	1.8%	2.7%	2.0%
21	1194	15.5%	72.0%	0.1%	11.2%	115.01	3925	62.6%	24.0%	4.5%	9.6%
22	3115	39.3%	20.5%	0.7%	57.0%	115.03	1866	94.3%	2.4%	0.9%	3.8%
23	1566	14.6%	69.5%	0.2%	20.6%	115.04	1598	91.2%	1.8%	3.3%	3.1%
24	2989	38.1%	30.5%	0.4%	45.1%	115.05	3007	80.2%	5.6%	9.2%	5.1%
25	2129	45.9%	33.8%	0.8%	24.2%	115.06	4953	78.5%	13.1%	3.4%	5.6%
26	3213	53.8%	25.4%	0.9%	24.0%	116.01	7911	95.1%	1.5%	1.3%	2.0%
27	1926	43.8%	30.0%	0.4%	37.2%	116.02	7340	94.3%	2.2%	1.2%	1.6%
28	2390	39.0%	34.9%	1.0%	27.1%	117.01	4049	93.3%	1.9%	0.7%	3.3%
29	1170	30.1%	54.2%	0.5%	17.4%	117.02	7854	84.8%	9.3%	2.2%	3.3%
30	1685	55.1%	26.6%	0.5%	17.9%	118.01	1459	93.8%	3.4%	0.7%	3.5%
31	3665	69.3%	18.1%	1.0%	10.5%	118.02	6544	89.1%	5.9%	1.6%	3.9%
32	4935	85.3%	8.7%	1.2%	5.4%	119	3917	93.6%	2.6%	0.7%	3.0%
33	2967	74.0%	16.6%	0.6%	9.1%	120	3976	93.7%	2.4%	0.6%	3.8%
34	3709	51.6%	28.0%	0.8%	23.8%	121	3830	97.1%	0.4%	0.3%	2.0%
35	2811	73.6%	18.7%	1.0%	4.9%	122	3065	95.1%	0.3%	0.5%	4.6%
101	2935	88.6%	5.0%	0.3%	4.5%	123	3668	97.8%	0.3%	0.2%	1.8%
102	5274	91.4%	4.0%	0.5%	3.1%	124	1909	97.1%	0.1%	0.3%	1.5%
103	5746	88.0%	5.9%	0.9%	3.4%	Total	266,931	78.6%	12.7%	1.9%	7.3%

Source: U.S. Department of Housing and Urban Development

## Residential Segregation

Residential segregation is the degree of separation of racial and ethnic groups within a community and typically involves predominately homogenous communities. Examples include suburban communities that are predominately White or low income minority neighborhoods in the intercity. Residential segregation can lead to impediments in fair housing when the range of housing opportunities to minorities is restricted. This can be the result of a variety of factors, including community attitudes and real estate practices. Lack of integration within in a community can also lead to other problems, such as racial or ethnic prejudice and a reduced ability for minority populations to gain access to resources and opportunities elsewhere.

The dissimilarity index provides an opportunity to analyze the distribution of racial or ethnic populations across a geographic area. The index allows for a comparison of subgroups within a population by providing a measure of how much one group is separated from another within the area. The index is calculated using the equation:

$$\text{Dissimilarity Index} = \frac{1}{2} \sum \left| \frac{m}{M} - \frac{t}{T} \right|$$

where  $m$  is the subgroup or minority population of a census tract and  $M$  is that subgroups population across the entire area. The dominant or majority population of the census tract is represented as  $t$  and its population across the entire area is  $T$ .

The resulting measure of the dissimilarity index is given on a 0 to 100 scale where a score of 0 represents perfect integration within the area and a score of 100 represents complete segregation. The score corresponds to the percent of the subgroup that would need to move into the area to achieve full integration. An index between 0 and 30 corresponds with low levels of segregation, 31 to 59 correspond to moderate levels of segregation, and 60 to 100 correspond to high levels of segregation.

**Table 6: Dissimilarity Index, 2010**

	<b>Black Population</b>	<b>White Population</b>	<b>Total Population</b>	<b>Dissimilarity Index</b>
Mishawaka	3,326	41,538	48,252	52.6
South Bend	26,906	61,199	101,168	52.7
St. Joseph County	33,958	209,972	266,931	53.3

Table 6 provides the dissimilarity index for key government areas in St. Joseph County, respectively. St. Joseph County and the Cities of Mishawaka and South Bend all exhibit moderate levels of segregation. St. Joseph County dissimilarity score is 53.3, indicating that 53.3% of Black residents would need to move to a different area within the county to achieve full integration. A measure of 52.6 was found for Mishawaka and a measure of

**Table 7: St. Joseph County Dissimilarity Indices, 2010**

	<b>DI with White Population</b>	<b>Population</b>	<b>% of Total Population</b>
White	---	209,972	78.6%
Black	53.3	33,958	12.7%
Asian/Pacific Islander	36.7	5,230	2.0%
Hispanic	45.9	19,395	7.3%
Total	---	266,931	100%

52.7 was found for South Bend. Although the measures are all within the moderate segregation level, they are nearing high level.

The dissimilarity index for all racial and ethnic populations within St. Joseph County is provided in Table 7. The indices show that a measure of dissimilarity between White and Black populations of 53.3 and 36.7 between Asian/Pacific Islanders and Whites. Ethnically, dissimilarity between the White population and the Hispanic population was found at 45.9. These results indicate that there is moderate segregation against all races and ethnicities across the county. They also indicate that the highest degree of segregation is with the Black population.

## Familial Status and Income

The U.S. Census Bureau also reports data on the familial status of households, separating households into family or non-family categories. Households in the family category include married-couple families with or without children, single-parent families, and other families that include related individuals. Non-family households include two or more non-related individuals living together or single individuals living alone. Data on these measurements for St. Joseph County are provided in Table 8 and Figure 4.

The Civil Rights Act of 1968, through Title VIII, protects women against discrimination in housing. Title VIII was amended in 1988 to include the protection of families with children. Except in limited circumstances involving elderly housing and owner-occupied buildings of one to four units, it is unlawful to refuse to rent or sell to families with children.

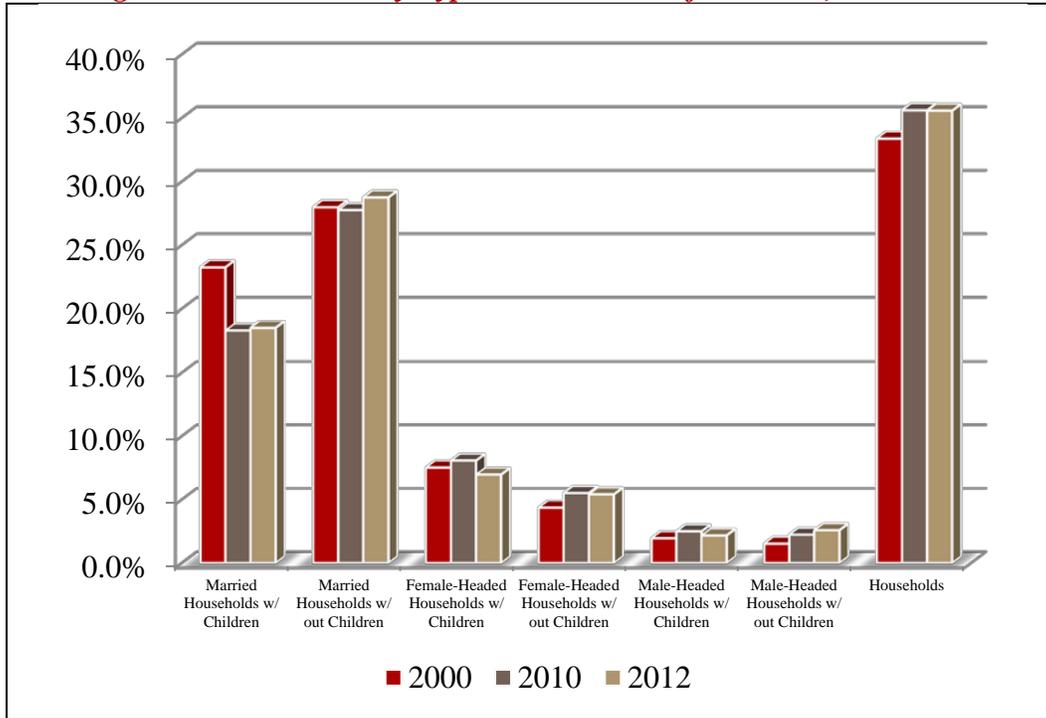
Between 2000 and 2012, the total number of family households decreased by 2.3%, from 67,027 to 65,466. During this period, the number of female-headed households with children remained relatively stable. In 2000, female-headed households with children accounted for 7.5% of all households. In 2012, they comprised 7.0% of households. In comparison, the proportion of married-couple families with children declined 20.1%, from 23.3% to 18.5%. Male-headed households with children saw significant increase of 15.8%, from 1.9% to 2.2%.

**Table 8: Households by Type and Presence of Children, 2000-2012**

	2000		2010		2012	
	#	%	#	%	#	%
Total Households	100,629	100%	103,069	100.0%	101,613	100.0%
Family Households	67,027	66.6%	66,365	64.4%	65,466	64.4%
Married-Couple Family	51,570	51.2%	47,497	45.1%	48,057	47.3%
With Children	23,407	23.3%	18,893	18.3%	18,843	18.5%
Without Children	28,132	28.0%	28,604	27.8%	29,214	28.8%
Female-Headed Households	11,965	11.9%	14,000	13.6%	12,576	12.4%
With Children	7,569	7.5%	8,318	8.1%	7,081	7.0%
Without Children	4,396	4.4%	5,682	5.5%	5,495	5.4%
Male-Headed Households	3,492	3.5%	4,871	4.7%	4,833	4.8%
With Children	1,957	1.9%	2,571	2.5%	2,210	2.2%
Without Children	1,535	1.5%	2,300	2.2%	2,623	2.6%
Other Households	33,602	33.4%	36,705	35.6%	36,147	35.6%

Source: U.S. Census Bureau, 2012 American Community Survey

**Figure 4: Households by Type and Presence of Children, 2000-2012**



Based on national statistics, female-headed households with children are more likely to live in poverty than other families. Although female-headed households with children comprised only 10.8% of all family households in 2012, they accounted for 44.5% of families living in poverty. Of female-headed households with children, nearly half (43.6%) were living in poverty. This compares to 9.5% of married-couple families with children and 36.6% of male-headed households with children.

**Table 9: Household Status by Poverty State, 2012**

	Below Poverty		At or Above Poverty	
	#	%	#	%
Family Households	7,419	100.0%	58,047	100.0%
Married-Couple Family	2,363	31.9%	45,694	78.7%
With Children	1,798	24.2%	18,137	31.2%
Without Children	565	7.6%	27,557	47.5%
Female-Headed Households	3,961	53.4%	8,615	14.8%
With Children	3,300	44.5%	4,622	8.0%
Without Children	661	8.9%	3,993	6.9%
Male-Headed Households	1,095	14.8%	3,738	6.4%
With Children	808	10.9%	1,811	3.1%
Without Children	287	3.9%	1,927	3.3%

Source: U.S. Census Bureau, 2012 American Community Survey

## Race/Ethnicity and Income

Household income is one of several factors used to determine a household’s eligibility for a home mortgage loan. Table 10 provides a look into the impact of a race and ethnicity on income. In St. Joseph County, disparities persist between the earnings of White residents and minority residents. In 2012, Blacks had the lowest median household income<sup>1</sup> of \$26,755, more than half (55.3%) that of Whites. Median incomes for Hispanic and Asian households were equivalent to about 72.2% and 93.6% of the income of White households. Similarly, Blacks and Hispanics were more likely to live in poverty. More than one-third of Black or Hispanic households (36.0% and 34.1%, respectively) were living in poverty in 2012, compared to 11.8% of White households and 14.8% of Asian households.

**Table 10: Median Household Income and Poverty Rates by Race/Ethnicity, 2012**

	Median Household Income	Poverty Rates
St. Joseph County	\$44,989	16.4%
Whites	\$48,344	11.8%
Blacks	\$26,755	36.0%
Asian	\$45,265	14.8%
Hispanics	\$34,924	34.1%

*Source: U.S. Census Bureau, 2012 American Community Survey*

A review of household income distribution also shows a disparity between White and minority households. Among Black households, 53.6% had annual incomes of less than \$25,000 compared to 22.3% of White households. Disparities were also seen in comparing Hispanic and Asian households to Whites, though the percent of households within the range was significantly less at 33.1% and 27.9%, respectively. At the other end of the income scale, only 10.4% of Black households and 9.1% of Hispanic households had a median income greater than \$75,000. This compares to 32.3% of Asian and 27.2% of White households. Table 11 and Figure 5 provide a detailed look at the income distribution of the county by race and ethnicity for 2012.

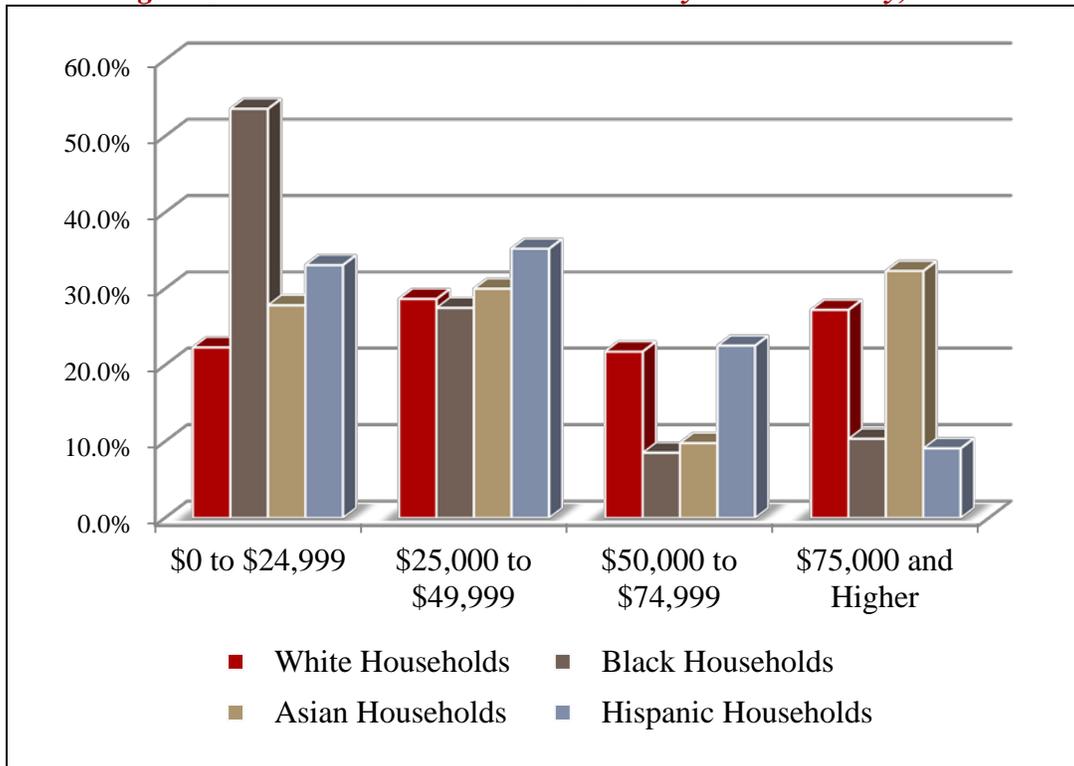
**Table 11: Household Income Distribution by Race/Ethnicity, 2012**

	Total	\$0 to \$24,999		\$25,000 to \$49,999		\$50,000 to \$74,999		\$75,000 and Higher	
		#	%	#	%	#	%	#	%
All Households	101,613	27,069	26.6%	29,108	28.6%	20,369	20.0%	25,040	24.6%
White Households	83,943	18,743	22.3%	24,061	28.7%	18,282	21.8%	22,857	27.2%
Black Households	12,797	6,858	53.6%	3,522	27.5%	1,092	8.5%	1,325	10.4%
Asian Households	1,253	349	27.9%	376	30.0%	123	9.8%	405	32.3%
Hispanic Households	4,945	1,637	33.1%	1,743	35.2%	1,115	22.5%	450	9.1%

*Source: U.S. Census Bureau, 2012 American Community Survey*

<sup>1</sup> Household income refers to the combination of all incomes earned within a household.

**Figure 5: Household Income Distribution by Race/Ethnicity, 2012**



Given the relationship between household income and housing, the income inequality amongst households across the county is likely to create an inequality in housing options and conditions. With lower incomes, minority households will have greater difficulty finding affordable rental units or homes for purchase in St. Joseph County.

## Concentrations of LMI Persons

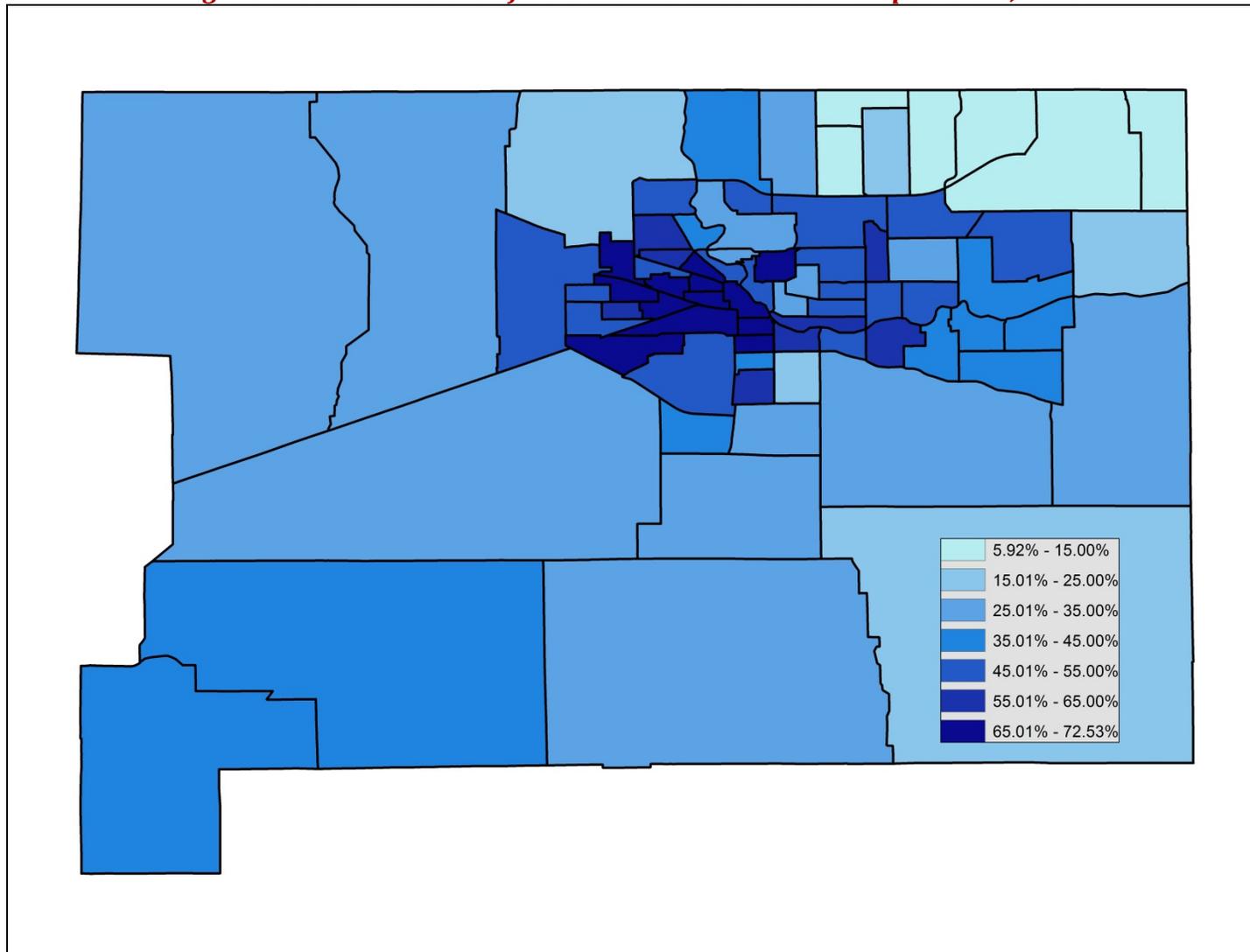
HUD’s Community Development Block Grant Program (CDBG) requires that a minimum of 70% of all funds invested benefit people with low and moderate income (LMI). In St. Joseph County, 33 of the 75 census tracts (44%) had 50% or more of its population earning a LMI. These concentrations significantly overlap with high concentrations areas of minority populations. All nine of the census tracts that exhibited high concentrations of Black and Hispanic populations also exhibited high levels of LMI people. Data on LMI concentrations is presented in Figure 6 and Table 12. Although high concentrations of LMI populations are exhibited across the county, the highest concentrations tend to be on the western side of the City of South Bend, corresponding to concentrations of race and ethnic minority populations.

**Table 12: Areas of Concentration of LMI Persons, 2013**

Census Tract	Universe	Low and Moderate Income Persons		Census Tract	Universe	Low and Moderate Income Persons	
		#	%			#	%
1	2,107	1,380	65.5%	104	3,383	1,378	40.7%
2	4,011	2,223	55.4%	105	2,900	1,174	40.5%
3.01	2,785	1,005	36.1%	106	3,529	1,812	51.3%
3.02	2,414	1,099	45.5%	107	4,330	1,982	45.8%
4	3,007	1,947	64.7%	108	3,582	1,235	34.5%
5	2,079	1,110	53.4%	109	6,513	1,742	26.7%
6	3,187	2,280	71.5%	110	5,498	1,178	21.4%
7	1,828	891	48.7%	111	4,998	2,567	51.4%
8	1,735	466	26.9%	112.01	634	320	50.5%
9	1,611	872	54.1%	112.02	280	89	31.8%
10	3,480	2,418	69.5%	113.01	5,655	2,563	45.3%
11	4,703	2,218	47.2%	113.02	5,836	1,627	27.9%
12	2,024	627	31.0%	113.03	6,187	2,243	36.3%
13	2,501	1,282	51.3%	113.04	2,708	196	7.2%
14	3,775	2,026	53.7%	113.05	4,410	638	14.5%
15	3,323	1,982	59.6%	113.06	2,977	557	18.7%
16	2,311	608	26.3%	114.03	4,041	330	8.2%
17	1,490	991	66.5%	114.04	5,939	587	9.9%
19	1,865	1,295	69.4%	114.05	1,251	74	5.9%
20	1,806	1,278	70.8%	114.06	7,112	927	13.0%
21	1,731	1,204	69.6%	115.01	3,544	2,144	60.5%
22	3,473	2,396	69.0%	115.03	2,038	758	37.2%
23	1,510	1,074	71.1%	115.04	1,936	985	50.9%
24	3,116	1,949	62.5%	115.05	2,185	1,195	54.7%
25	1,790	895	50.0%	115.06	4,238	1,225	28.9%
26	2,958	1,518	51.3%	116.01	7,206	1,624	22.5%
27	1,526	1,000	65.5%	116.02	6,401	1,863	29.1%
28	1,882	1,365	72.5%	117.01	4,270	1,522	35.6%
29	1,010	680	67.3%	117.02	6,094	1,853	30.4%
30	2,395	1,598	66.7%	118.01	1,472	647	40.0%
31	3,603	2,294	63.7%	118.02	6,376	1,666	26.1%
32	5,011	1,168	23.3%	119	3,625	1,079	29.8%
33	3,026	1,226	40.5%	120	3,737	963	25.8%
34	3,826	2,082	54.4%	121	3,043	1,143	37.6%
35	2,807	1,577	56.2%	122	2,955	1,286	43.5%
101	2,939	1,421	48.3%	123	3,297	927	28.1%
102	5,746	3,494	60.8%	124	1,847	384	20.8%
103	5,527	2,283	41.3%	Total	251,945	101,705	32.9%

Source: U.S. Department of Housing and Urban Development

**Figure 6: Concentrations of Low and Moderate Income Populations, 2013**



## **Disability and Income**

One issue of concern for fair housing is its availability and affordability to disabled individuals. Discrimination based on physical, mental, or emotional handicap has been prohibited by the Fair Housing Act. This is conditioned upon whether “reasonable accommodation” can be made. Reasonable accommodation may include changes to address the needs of disabled individuals, including structural changes (e.g. the construction of an entrance ramp) or administrative changes (e.g. the use of service animals).

The disability status for non-institutionalized disabled individuals age 5 years and older is reported by the U.S. Census Bureau. Following the standard, federal government definition, the Census Bureau classifies a disability as a long-lasting physical, mental, or emotional condition that can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business. This data for St. Joseph County is reported in Tables 13 and 14.

In St. Joseph County, 33,438 individuals age 5 years and older reported at least one disability in 2012. This accounts for approximately 12.7% of the responding population. The distribution of disabilities across sex is relatively equal across the population, with males accounting for 50.2% and females accounting for 49.8% of the disabled population. Considering disability status by age, there are some discrepancies. Looking at the population under the age of 18, males account for a larger share of the disabled population at 79.1%. This trend is reversed as the population ages, with 57.2% of the disabled population 65 years of age and older being reported as female.

***Table 13: Disability Status by Age and Sex, 2012***

	<b>Male</b>	<b>Female</b>
<b>Total</b>	127,733	136,157
<b>With a disability</b>	16,786	16,652
<b>No disability</b>	110,947	119,505
<b>Under 18 Years</b>	32,738	31,327
<b>With a disability</b>	2,395	633
<b>No disability</b>	30,343	30,694
<b>18 to 64 years</b>	79,964	84,232
<b>With a disability</b>	8,996	8,822
<b>No disability</b>	70,968	75,410
<b>65 years and Older</b>	15,031	20,598
<b>With a disability</b>	5,395	7,197
<b>No disability</b>	9,636	13,401

*Source: U.S. Census Bureau, 2012 American Community Survey*

**Table 14: Disability Status by Poverty State, 2012**

	<b>Below Poverty</b>	<b>At or Above Poverty</b>
Total	41,642	212,860
With a disability	6,983	25,979
No disability	34,659	186,881
Under 18 Years	14,851	47,895
With a disability	835	2,131
No disability	14,016	45,764
18 to 64 years	24,705	131,422
With a disability	4,802	12,602
No disability	19,903	118,820
65 years and Older	2,086	33,543
With a disability	1,346	11,246
No disability	740	22,297

*Source: U.S. Census Bureau, 2012 American Community Survey*

The National Organization on Disabilities reports that an income gap exists between individuals with a disability and individuals with no disability. This gap is attributed to a lower rate of employment for individuals. Among all individuals in St. Joseph County with a disability in 2012, 21.2% were living in poverty, compared to 15.6% of individuals with no disability. This relationship does appear to have an age influence. Of the disabled population under the age of 18, 28.2% were living in poverty, compared to 23.4% of individuals with no disability. Alternatively, only 10.7% of the disabled population 65 years and older were living in poverty.

## Individuals with LEP

Individuals with limited English proficiency (LEP) are defined as people who have a limited ability to read, write, speak, or understand English. The U.S. Department of Housing and Urban Development uses the prevalence of individuals with LEP to identify the potential for impediments to fair housing choice due to their inability to comprehend English. Individuals with LEP may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. To assist these individuals, it is important that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent, and establishes policies to eliminate barriers. It is also incumbent upon the U.S. Department of Housing and Urban Development entitlement communities to determine the need for language assistance and comply with Title VI of the Civil Rights Act of 1964.

In its American Community Survey, the U.S. Census Bureau reports on the reliance upon the English language at home. This data includes only household members aged 5 and over and is reported in Table 15. Of the population in St. Joseph County, 90.5% reported that they speak only English. The remaining 9.5% of the population reported a language other than English as their dominant language. The LEP population of St. Joseph County accounted for 23,104 individuals, 66.3% of whom (about 6.3% of the total population) report that their English understanding is “very well”. In total, 7,953 individuals (about 3.2% of the population aged 5 and older) speak report their English capacity as “less than very well”.

**Table 15: Understanding of English by Native Language, 2012**

	Very Well	Less than Very Well	Total
Total	15,151	7,953	23,104
Spanish	8,703	4,889	12,962
Chinese	391	659	1,050
Indic Languages	746	233	979
African Languages	720	106	826
Polish	728	71	799
German	627	110	737
Serbian-Croatian	414	315	729
Arabic	455	126	581
French	415	142	557
Vietnamese	159	301	460

*Source: U.S. Census Bureau, 2012 American Community Survey*

Also of interest is the dominance of languages throughout the county. According to the survey, Spanish is the leading language after English. In 2012, 5.5% of the county spoke

Spanish as their native language, 37.7% of whom spoke English “less than very well”. The only other language group that exceeded 1,000 speakers was Chinese, 62.7% of whom spoke English “less than very well”.

In lieu of in-house capabilities and the availability of forms in languages other than English, several interviewees mentioned their reliance upon family members and others throughout the community for interpretation assistance when the need arises. There are some exceptions to this. The City of South Bend, for example, provides some of its key forms in Spanish and has access to a number of services at their disposal when language issues arise.

The size of the LEP population in St. Joseph County and the number of languages spoken does present a serious concern regarding fair housing. HUD entitlement communities serve LEP individuals in accordance with Title VI of the Civil Rights Act of 1964. To ensure that the LEP individuals have adequate access to governmental services, the county should perform a four-factor analysis. The result of the analysis will determine the extent to which the translation of vital documents is warranted.<sup>2</sup> The four-factor analysis, the county would determine:

- The number of individuals with LEP;
- The frequency with which individuals with LEP interact with local government programs;
- The nature and importance of the programs with which LEP individuals interact; and,
- The resources available to the county and the costs associated with providing additional language services.

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<sup>2</sup> The term “vital documents” refers to any publication that is needed to gain access to a program or service.

## Protected Class Status and Unemployment

The unemployment rate of St. Joseph County was 9.5% in 2012. At 21.0%, unemployment was highest among the Hispanic population. This was closely followed by the Black population at 20.9%. Men are also more likely than females to be unemployed (11.2% to 8.3%, respectively).

**Table 16: Civilian Labor Force, 2012**

	St. Joseph County		City of South Bend		City of Mishawaka	
	#	%	#	%	#	%
Total Civilian Labor Force (CLF)	133,916	100.0%	48,900	100.0%	26,428	100.0%
Employed	121,226	90.5%	42,325	86.6%	23,320	88.2%
Unemployed	12,690	9.5%	6,575	13.4%	3,108	11.8%
Male CLF	69,428	100.0%	24,428	100.0%	13,074	100.0%
Employed	61,675	88.8%	20,040	82.0%	11,251	86.1%
Unemployed	7,753	11.2%	4,388	18.0%	1,823	13.9%
Female	64,919	100.0%	24,825	100.0%	13,354	100.0%
Employed	59,551	91.7%	22,285	89.8%	12,069	90.4%
Unemployed	5,368	8.3%	2,540	10.2%	1,285	9.6%
White CLF	109,717	100.0%	32,731	100.0%	23,462	100.0%
Employed	100,976	92.0%	29,371	89.7%	20,566	87.7%
Unemployed	8,741	8.0%	3,360	10.3%	2,896	12.3%
Black CLF	16,430	100.0%	12,373	100.0%	1,746	100.0%
Employed	13,003	79.1%	9,239	74.7%	1,689	96.7%
Unemployed	3,427	20.9%	3,134	25.3%	57	3.3%
All Other Races	7,769	100.0%	3,796	100.0%	1,220	100.0%
Employed	7,247	93.3%	3,715	97.9%	1,065	87.3%
Unemployed	522	6.7%	81	2.1%	155	12.7%
Hispanic	9,041	100.0%	6,023	100.0%	1,097	100.0%
Employed	7,145	79.0%	4,912	81.6%	835	76.1%
Unemployed	1,896	21.0%	1,111	18.4%	262	23.9%

*Source: U.S. Census Bureau, 2012 American Community Survey*

On a city-basis, South Bend exhibited a higher rate of unemployment than Mishawaka (13.4% to 11.8%); however, both cities exhibited rates higher than the county average. In most categories, South Bend had a higher than county rate. The exceptions are with the Hispanic population and those reported as “all other races”. Mishawaka also had rates that were higher than the county-wide average in most areas except in the Black population, which showed a 3.3% unemployment rate compared to the 20.9% rate of the county.

The overall unemployment rate and the variation in unemployment across races, ethnicities, and genders have implications for fair housing. Regardless of whether unemployment is temporary or permanent, it has real effects on disposable income for household expenses, including housing.

## Housing Market

### Housing Inventory

Between 2000 and 2012, the housing stock of St. Joseph County exhibited growth in the total number of units available. Across the county, there was an increase in 7,953 units, about 7.4%. At 8.4%, growth within the City of Mishawaka was higher than the county rate. However, the City of South Bend’s growth was only 3.3%, well below the county rate. The majority of growth occurred outside of the two main cities, where 4,635 of the new units were located. These units accounted for 58.3% of all new units.

**Table 17: Trends in Housing Inventory, 2000-2012**

	2000		2010		2012		% Change 2000-2012
	#	%	#	%	#	%	
Mishawaka	21,572	20.2%	24,088	20.9%	23,380	20.3%	8.4%
South Bend	46,349	43.3%	46,324	40.3%	47,859	41.6%	3.3%
Other	39,092	36.5%	44,437	38.7%	43,727	38.0%	11.9%
St. Joseph County	107,013	100%	114,849	100%	114,966	100%	7.4%

Source: U.S. Census Bureau, 2000 Census, 2010 Census, 2012 American Community Survey

The trends in Table 17 do present some concerns. In most cases, the increase in housing inventory occurred across all years; however, all growth within South Bend occurred since 2010. When placed in context of the demographic trends, the housing stock does present concern. Table 18 provides the growth rate of the housing stock and the total population. Overall, the change in housing stock was larger than that of the population. This suggests more availability in housing which should decrease the average cost .

**Table 18: Percent Change in Population and Housing, 2000-2012**

	% Housing Change	% Population Change
Mishawaka	8.4%	5.1%
South Bend	3.3%	-7.2%
Other	11.9%	5.5%
St. Joseph County	7.4%	0.3%

## Housing Costs

An increase in housing cost is not a direct form of housing discrimination, although a lack of affordable housing does constrain housing choice. People may be restricted to select neighborhoods or communities when looking for housing due to the lack of affordable housing in other areas.

***Table 19: Trends in Housing Value, Rent and Income, 2000-2012***

	<b>2000</b>	<b>2010</b>	<b>2012</b>	<b>% Change 2000-2012</b>
<b>Median Housing Value</b>				
Actual	\$85,700	\$121,700	\$116,500	36.9%
2013 Dollars	\$115,900	\$130,000	\$118,100	1.9%
<b>Median Gross Rent</b>				
Actual	\$535	\$673	\$699	30.6%
2013 Dollars	\$724	\$719	\$709	-2.1%
<b>Median Household Income</b>				
Actual	\$40,420	\$42,089	\$45,225	11.9%
2013 Dollars	\$54,690	\$44,960	\$45,860	-16.1%

*Source: U.S. Census Bureau, 2000 Census, 2010 Census, and 2012 American Community Survey*

Table 19 provides the trends in housing value, rent and income for St. Joseph County. Between 2000 and 2012, both median housing costs and median household income have risen. When adjusting for inflation, median housing costs have increased since 2000 while median income has fallen. Between 2000 and 2012, the real median housing value in St. Joseph County increased 1.9% and the real median household income decreased by 16.1% from \$54,690 (in 2012 dollars) to \$45,860. At the same time, the real median gross rent decreased 2.1%.

### *Rental Housing*

The U.S. Department of Housing and Urban Development calculated the annual “Fair Market Rent” (FMR) rental housing in each county of the U.S. for 2014. This data is provided in Table 20. In St. Joseph County, the FMR for a two-bedroom apartment is \$714. In order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household would need to earn \$2,380 each month, or \$28,560 per year. Based on a 40-hour work week, 52 weeks a year, the hourly wage of the earner would need to be at least \$13.74.

**Table 20: FMRs by Unit Bedrooms, 2014**

Efficiency	1 Bedroom	2 Bedrooms	3 Bedrooms	4 Bedrooms
\$490	\$558	\$714	\$895	\$954

Source: U.S. Department of Housing and Urban Development, FMR Documentation System

In St. Joseph County, the minimum wage is \$7.25 per hour. To afford the FRM of a two-bedroom apartment, a minimum wage earner would need to work 76 hours per week, 52 weeks a year. Alternatively, the household would need to include at least 2 minimum wage earners working 40 hours per week to make a two-bedroom apartment affordable at its FMR. Currently, the estimated average wage for a renter in St. Joseph County is \$11.28 an hour. To afford the FMR for a two-bedroom apartment at the average wage, a renter must work 49 hours a week, 52 weeks a year.

**Table 21: Loss of Affordable Rental Housing Units, 2000-2012\***

Units Renting For:	2000	2010	2012	Change	
				#	%
Less than \$500	11,325	6,434	6,112	-5,213	-46.0%
\$500 to \$699	10,549	9,443	8,571	-1,978	-18.8%
\$700 to \$999	4,218	11,145	11,504	7,286	72.7%
\$1,000 or More	967	2,450	3,086	2,119	219.1%
Total Units	27,059	29,472	29,273	2,214	8.2%

Source: U.S. Census Bureau, 2000 Census, 2010 Census, and 2012 American Community Survey

\* Does not include units with no cash rent

Monthly Supplemental Security Income (SSI) payments are \$750 for a person in St. Joseph County. If SSI represents a person’s only source of income, \$225 in monthly rent is affordable. This is approximately 45.9% of FMR on an efficiency apartment or 40.3% of a 1-bedroom apartment.

### **Housing Purchases**

To understand the costs of housing in St. Joseph County, the maximum affordability of the housing market is estimated using the medium income of households across the county. The process of estimation is built around several assumptions. These assumptions are:

- The mortgage was 30-year fixed rate loan with a 5.0% interest rate;
- A 10% down payment was made on the sales price;
- The principal, interest, taxes, and insurance (PITI) equated to no more than 30% of the gross monthly income; and,

- There were no additional consumer debts within the household.

Following these assumptions, the results of the estimates are provided in Table 22.

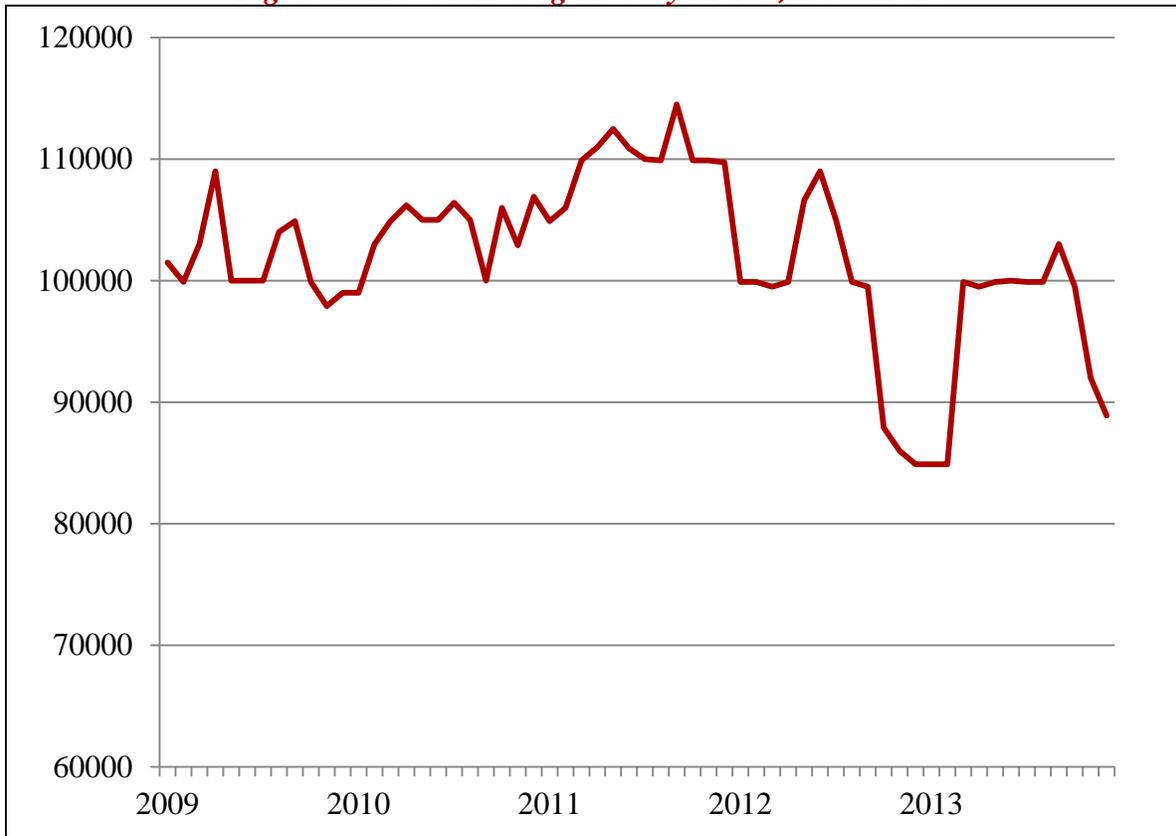
**Table 22: Maximum Affordable Purchase Price by Race and Ethnicity, 2012**

	<b>Median Household Income</b>	<b>Monthly PITI</b>	<b>Maximum Affordable Purchase Price</b>
St. Joseph County	\$44,989	\$1,124	\$102,500
White	\$48,344	\$1,208	\$110,900
Black	\$26,755	\$668	\$57,000
Asian	\$45,265	\$1,131	\$103,300
Hispanic	\$34,924	\$873	\$77,600

The median income in St. Joseph County is \$44,989. This provides a maximum affordable purchase price of a house at \$102,500. Similar estimates were calculated based on the median incomes across racial and ethnic groups. The White population had the highest level of affordability. Their median income of \$48,344 suggests an estimated maximum price of \$110,900. The Asian population had the second highest level of affordability at \$103,300. Blacks had the lowest affordability of all racial groups. With a median income of \$26,755, the maximum affordable purchase price of \$57,000. Ethnically, Hispanics also had a lower level of affordability, with a median income of \$34,924 and a maximum affordability of \$77,600.

To place the affordability of housing into context, the price of homes must be considered. Figure 7 provides a monthly overview of the median listing price of homes in St. Joseph County for the period 2009 to 2013. While the listing prices of homes have decreased in recent years, the median listing price remains above the affordability of Blacks and Hispanics across the county.

**Figure 7: Median Listing Price by Month, 2009-2013**



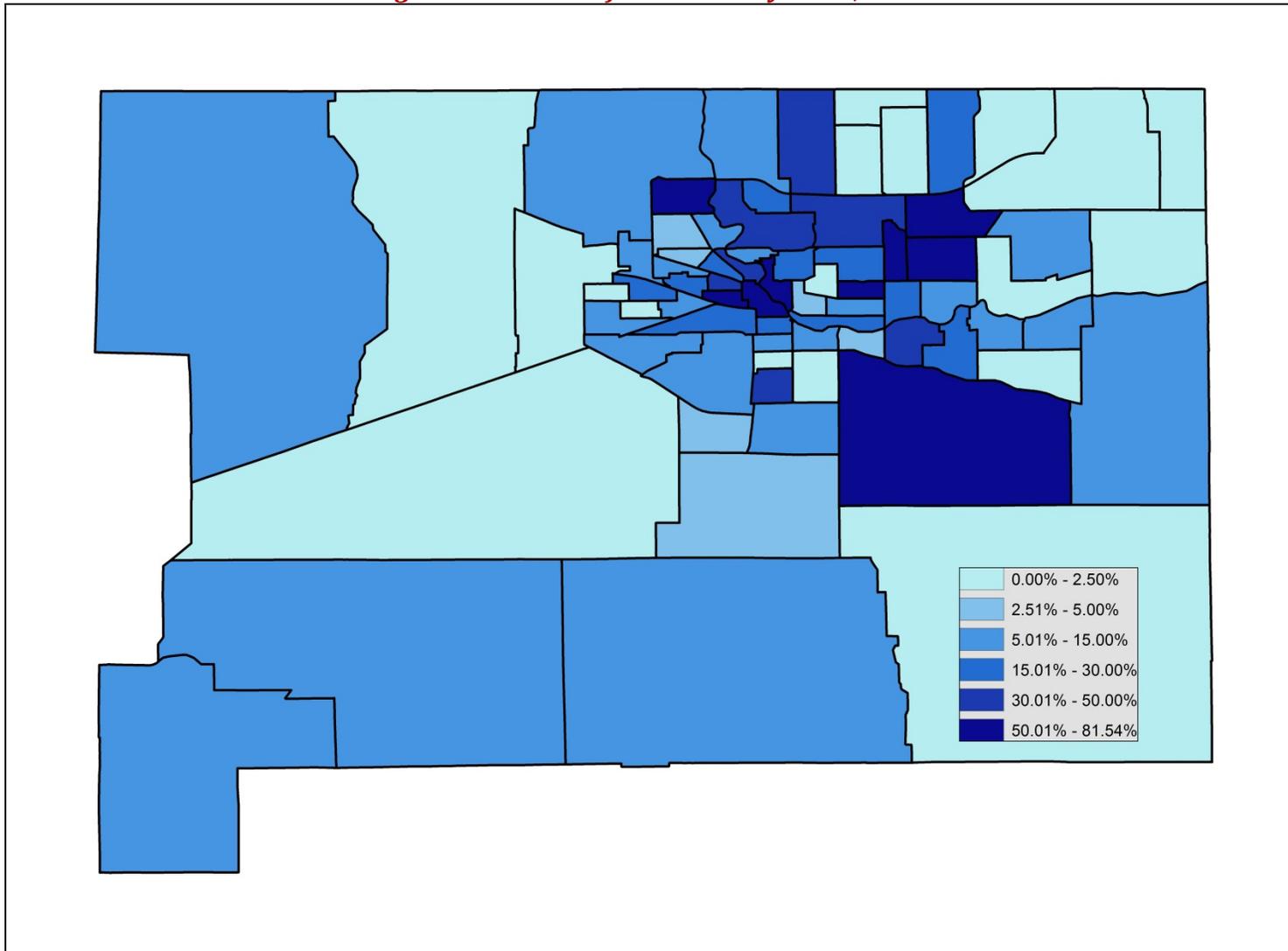
Source: Zillow Real Estate Research

## **Types of Housing Units**

In 2012, there were 114,803 housing units in St. Joseph County. Approximately 78.8% of the housing units were located in single family structures and 19.7% were multi-family units. Multi-family units are housing units located in structures with two or more units located in the structure. An overview of the types and locations of housing units are provided in Figure 8 and Table 23.

Eight of the census tracts had 50% or more of its housing units located in multi-family structures and two were more than 80% multi-family. Census tracts with high concentrations of multi-family housing were spread throughout the county by tended to reflect areas of higher economic activity. They also reflected some of the tracts of the highest minority population concentrations.

**Figure 8: Percent of Multi-Family Units, 2012**



**Table 23: Housing Units in Structures, 2012**

Census Track	Total Units	Single Family Units	Multi-Family Units				Mobile Homes	Census Track	Total Units	Single Family Units	Multi-Family Units				Mobile Homes
			2 to 4	5 to 9	10 to 19	20 or more					2 to 4	5 to 9	10 to 19	20 or more	
1	880	799	43	24	0	14	0	104	1,493	1,360	44	82	0	0	7
2	1,507	1,456	29	0	16	0	6	105	1,256	1,142	42	63	9	0	0
3.01	1,198	1,065	39	4	33	11	46	106	1,771	1,247	227	171	97	13	16
3.02	1,476	575	444	161	279	17	0	107	1,725	1,374	196	13	0	44	98
4	1,162	1,105	44	0	0	0	13	108	1,914	1,658	56	98	36	31	35
5	802	743	8	51	0	0	0	109	3,098	3,070	0	0	0	0	28
6	1,134	864	261	9	0	0	0	110	2,808	2,456	0	45	45	262	0
7	907	552	237	0	11	107	0	111	3,002	2,696	0	16	0	0	290
8	836	771	15	0	0	50	0	112.01	417	328	12	66	0	0	11
9	761	306	197	66	63	129	0	112.02	304	193	49	30	20	12	0
10	1,389	1,166	29	38	46	110	0	113.01	2,593	1,606	121	302	138	309	117
11	2,010	1,640	116	96	131	18	9	113.02	2,958	1,865	226	319	227	308	13
12	1,009	990	19	0	0	0	0	113.03	2,418	2,180	0	130	0	102	6
13	1,453	613	17	342	141	333	7	113.04	834	824	0	0	0	0	10
14	1,709	1,438	92	140	0	13	26	113.05	1,533	1,525	0	0	0	0	8
15	1,383	996	156	133	17	72	9	113.06	1,133	1,119	0	0	0	14	0
16	983	951	8	0	0	24	0	114.03	2,109	1,669	25	108	194	113	0
17	932	172	169	27	40	524	0	114.04	2,047	2,030	0	0	17	0	0
19	824	432	131	61	43	156	1	114.05	1,230	1,230	0	0	0	0	0
20	886	389	183	52	43	219	0	114.06	1,842	1,827	0	0	0	0	15
21	706	564	108	5	6	8	15	115.01	2,410	354	74	500	779	610	93
22	1,144	1,011	117	16	0	0	0	115.03	774	766	0	8	0	0	0
23	697	522	3	97	6	40	29	115.04	556	527	29	0	0	0	0
24	1,149	1,149	0	0	0	0	0	115.05	1,725	531	31	345	228	530	0
25	795	771	0	0	0	0	24	115.06	2,744	1,070	360	546	552	195	21
26	1,265	1,070	6	161	10	0	18	116.01	2,890	2,851	0	34	0	0	5
27	432	357	75	0	0	0	0	116.02	2,949	2,544	159	212	22	12	0
28	991	894	56	23	12	0	6	117.01	1,572	1,064	9	0	0	0	499
29	413	288	75	39	0	0	11	117.02	4,429	1,673	157	702	602	1,275	20
30	805	727	77	0	1	0	0	118.01	611	585	26	0	0	0	0
31	1,601	1,508	64	0	29	0	0	118.02	3,007	2,744	79	33	15	136	0
32	2,119	2,073	26	0	0	0	20	119	1,761	1,561	0	0	0	48	152
33	1,245	1,200	14	0	0	0	31	120	1,722	1,707	0	0	0	0	15
34	1,630	1,405	89	20	108	0	8	121	1,481	1,353	57	67	4	0	0
35	1,358	920	164	224	44	0	0	122	1,177	1,025	111	6	25	0	10
101	1,311	1,270	41	0	0	0	0	123	1,579	1,364	92	69	54	0	0
102	2,771	1,771	666	83	37	202	12	124	710	696	0	0	0	7	7
103	2,548	2,097	156	107	171	17	0	Total	114,803	90,434	6,156	5,944	4,411	6,091	1,767

Source: U.S. Census Bureau, 2012 American Community Survey

## Protected Class Status and Homeownership

Homeownership provides economic value to households through the accumulation of wealth. A payment on a mortgage is an investment towards its equity in the asset. Homeownership is a concern to fair housing both in terms of the resources available to purchase a home and the economic value that ownership provides.

In St. Joseph County, minorities have significantly lower rates of home ownership than Whites. In 2012, Blacks accounted for only 6.2% of all homeowner-occupied housing. Asians and Hispanics accounted for 0.1% and 3.61% of owner-occupied housing. Whites were more likely to own their homes, owning 89.1% of all owner-occupied housing. The highest rate of minority ownership occurred within the racially concentrated areas, with little diversity in ownership occurring outside of the city of South Bend.

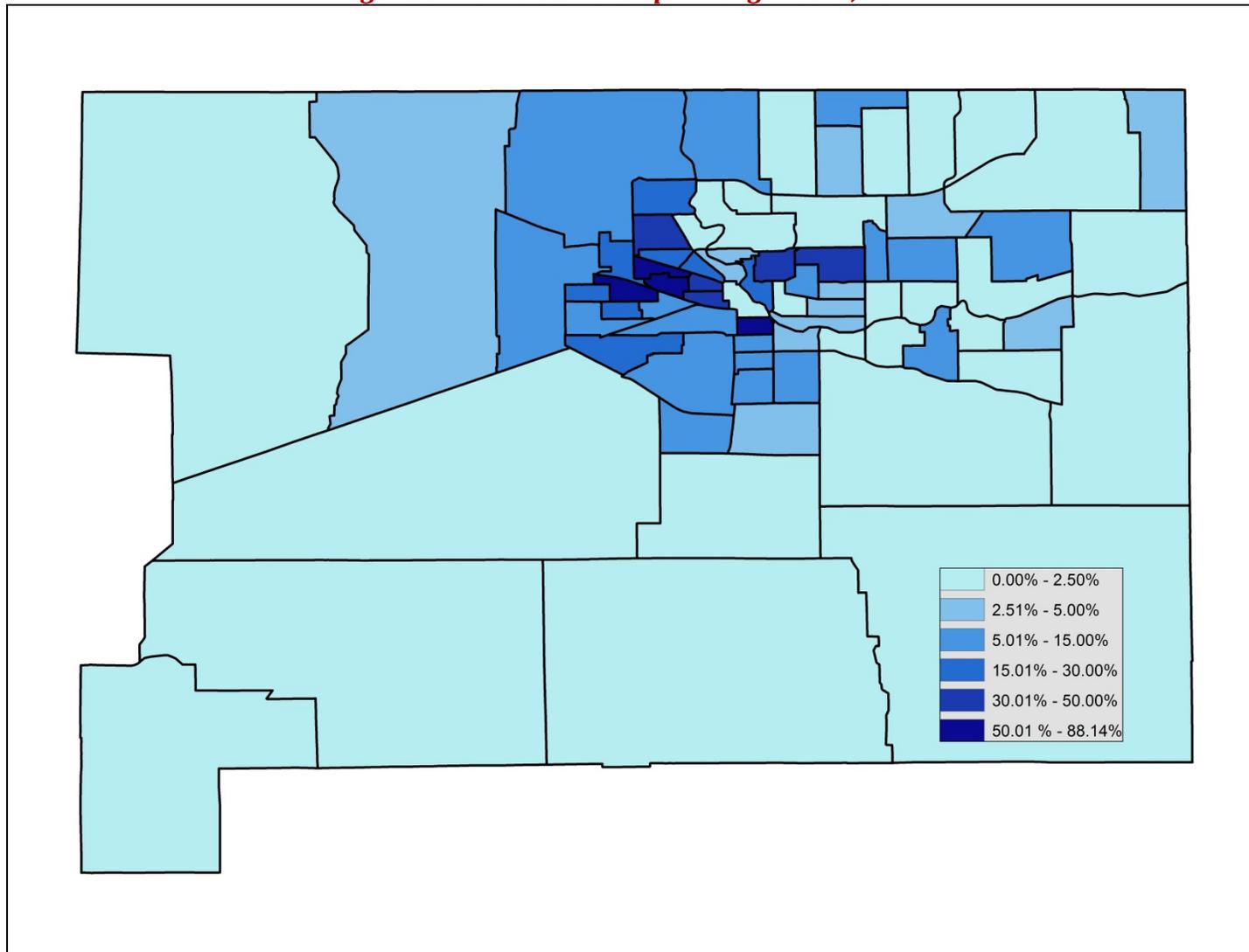
**Table 24: Owner-Occupied Housing by Race and Ethnicity, 2012**

	#	%
St. Joseph County	71,784	100.0%
White	63,981	89.1%
Black	4,482	6.2%
Asian	700	0.1%
Hispanic	2,621	3.6%

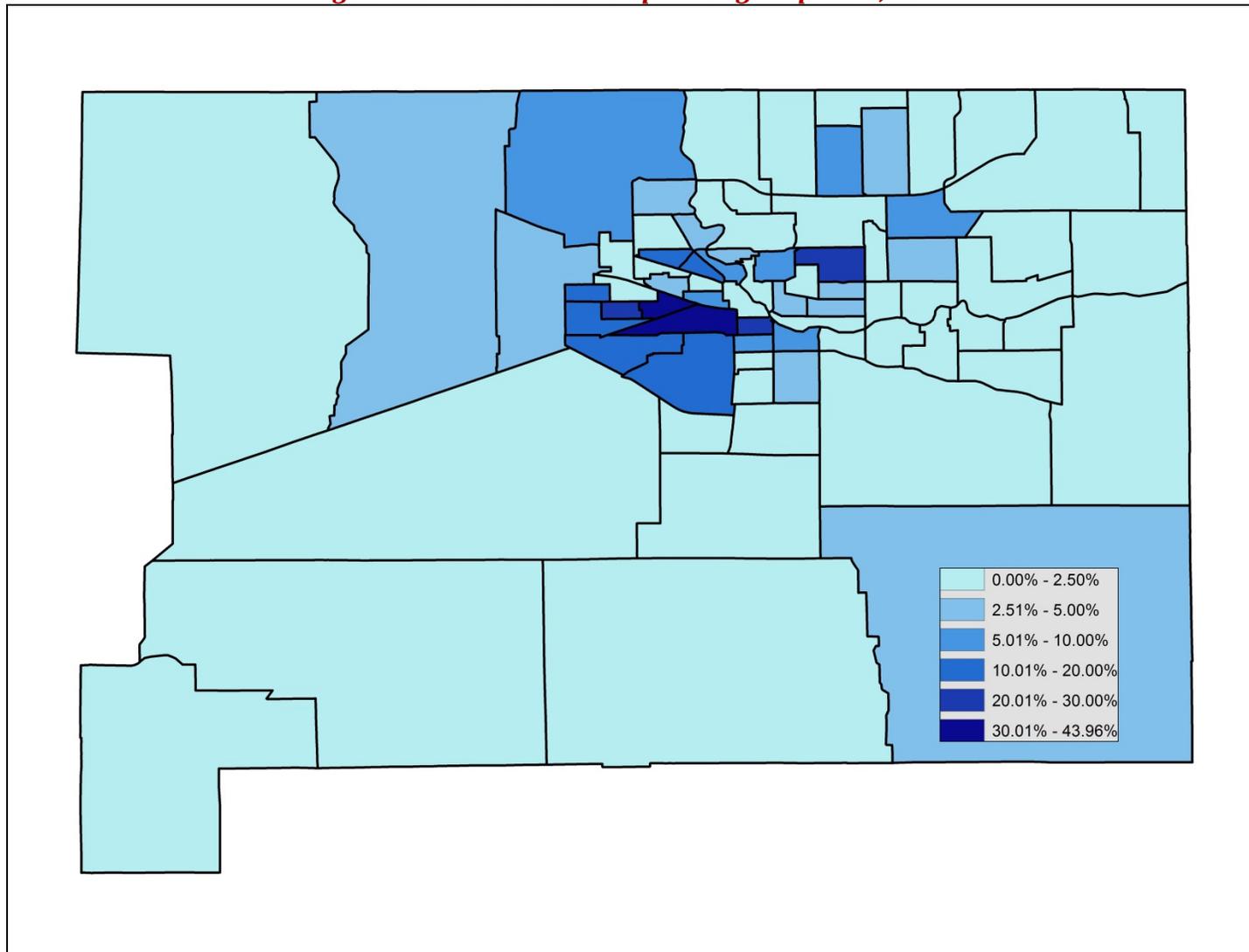
*Source: U.S. Census Bureau, 2012 American Community Survey*

A broad overview of owner-occupied housing by race and ethnicity is provided in Table 24. Figures 9 and 10 and Table 25 demonstrate the share of owner-occupied housing within a census tract for the respective demographics.

**Figure 9: Home Ownership Among Blacks, 2012**



**Figure 10: Home Ownership Among Hispanics, 2012**



**Table 25: Owner-Occupied Housing by Race and Ethnicity, 2012**

Census Track	White	Black	Asian	Hispanic	Census Track	White	Black	Asian	Hispanic
1	465	111	0	13	104	1,042	19	0	0
2	394	310	0	18	105	932	26	20	9
3.01	765	6	0	35	106	757	16	0	15
3.02	245	66	0	9	107	994	0	3	15
4	219	108	0	43	108	1,395	0	0	7
5	158	227	0	0	109	2,703	100	0	74
6	245	86	9	44	110	1,894	146	84	120
7	293	11	9	24	111	2,204	167	0	108
8	560	16	0	26	112.01	218	2	0	4
9	81	15	3	0	112.02	108	0	0	0
10	246	232	0	29	113.01	1,285	21	8	9
11	116	94	16	74	113.02	1,562	19	26	27
12	737	58	16	17	113.03	1,587	125	0	29
13	529	16	0	17	113.04	711	64	5	4
14	821	32	0	34	113.05	1,328	53	17	94
15	573	28	8	6	113.06	1,052	0	9	41
16	807	14	7	30	114.03	1,528	26	32	19
17	99	0	0	0	114.04	1,794	50	138	40
19	93	72	0	1	114.05	1,128	45	0	0
20	71	76	0	12	114.06	1,551	24	21	0
21	18	223	0	12	115.01	182	13	10	0
22	354	59	4	253	115.03	694	0	2	8
23	44	256	0	7	115.04	438	25	7	0
24	387	135	0	188	115.05	394	13	0	26
25	450	134	2	108	115.06	708	51	13	30
26	717	101	6	143	116.01	2,569	0	23	44
27	96	20	0	91	116.02	2,132	13	0	30
28	327	137	0	73	117.01	1,256	17	0	0
29	38	107	0	37	117.02	1,391	0	43	0
30	287	46	5	36	118.01	503	54	0	2
31	644	35	31	64	118.02	2,313	69	57	52
32	1592	148	20	56	119	1,397	8	0	30
33	792	58	0	0	120	1,520	9	0	23
34	602	103	0	162	121	1,079	8	6	0
35	465	68	13	5	122	822	3	0	21
101	846	0	0	13	123	1,107	0	0	9
102	1,337	0	0	24	124	602	5	13	18
103	1,536	83	16	10	Total	63,981	4,482	700	2,621

Source: U.S. Census Bureau, 2012 American Community Survey

## Protected Class Status and Household Size

The presence of larger households may raise fair housing concerns as larger families may be at risk of housing discrimination based on their race and familial status, including the presence of children in the household. If there are policies or programs that restrict the number of persons that can live together in a single housing unit, and members of the protected classes need more bedrooms to accommodate their larger household, there is a fair housing concern because the restriction on the size of the unit will have a negative impact on members of the protected classes.

**Table 26: Families with Three or More Persons, 2010**

	% of Families with 3 or More Persons
St. Joseph County	56.6%
White Population	53.6%
Non-White Population	70.3%
Black	66.3%
Amer. Indian/Alaska Native	68.6%
Asian/Pacific Islander	70.6%
Other	86.6%
Two or More Races	72.8%
Hispanic	82.3%

*Source: U.S. Census Bureau, 2010 Census*

In St. Joseph County, minorities are more likely than Whites to live in families of three or more people. Just over half of White households (53.6%) have three or more people. This compares to 70.3% for the minority population. Among Black and Hispanic families, 66.3% and 82.3% had three or more people. Similar trends were also exhibited for other minority groups, including Asian/Pacific Islanders and American Indian/Alaska Natives, 70.6% and 68.6% of who had families with three or more people.

**Table 27: Housing Units by Number of Bedrooms, 2012**

Size of Housing Units	Renter-Occupied Housing Stock		Owner-Occupied Housing Stock	
	#	%	#	%
Total	30,705	100%	70,908	100%
0-1 Bedrooms	8,213	26.7%	1,455	2.1%
2 Bedrooms	13,309	43.3%	12,652	17.8%
3 Bedrooms	6,538	21.3%	37,600	53.0%
4+ Bedrooms	2,645	8.6%	19,201	27.1%

*Source: U.S. Census Bureau, 2012 American Community Survey*

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A sufficient supply of larger housing units that consist of three or more bedrooms may be necessary to adequately house larger families. In St. Joseph County, 29.9% of the rental housing stock and 80.1% of the owner housing stock in 2012 contained three or more bedrooms. The demand for larger rental units is further demonstrated by the fact that almost 40% of all public housing households and almost 43% of all Section 8 voucher holders reside in units consisting of three or more bedrooms.

Given the lower rates of home ownership among minority households, this suggests larger minority families may have a more difficult time finding adequate rental housing with a sufficient number of bedrooms, which may result in overcrowding.

## **Foreclosure Trends**

Foreclosure rates are related to fair housing to the extent that protected classes may be over represented and that it may be disproportionately distributed across geographic locations. High rates of foreclosures can threaten the economic viability of a neighborhood and the ability of a household to build capital. The U.S. Department of Housing and Urban Development's Neighborhood Stabilization Program (NSP) estimated the number of foreclosure and the foreclosure rate by census tract for the period of January 2007 to June 2008. Estimates were based on a national survey and results were distributed across tracts according to a number of economic conditions, including the decline of home values, the rate of high-cost mortgages, and the unemployment rate. St. Joseph County had an estimated 4,520 foreclosure filings between January 2007 and June 2008. The overall estimated foreclosure rate was 7.4%. Twenty-eight tracts (37.3%) had a foreclosure rate of 10.0% or more and 10 had a rate of 15.0% or more. The highest foreclosure rates were observed in areas with large minority populations.

Residents of St. Joseph County do have options for seeking assistance prior to foreclosure; however, the availability of these services is limited. Options include working with local bankers to restructure loans and seeking the assistance of financial advisors in the region to establish a financial plan. One provided of these services includes the Housing Development Corporation, a non-profit organization that focuses on providing personal financial counseling and homebuyer education classes. Several interviewees commented that the staff members in some of the local governments have provided foreclosure assistance on an ad hoc basis.

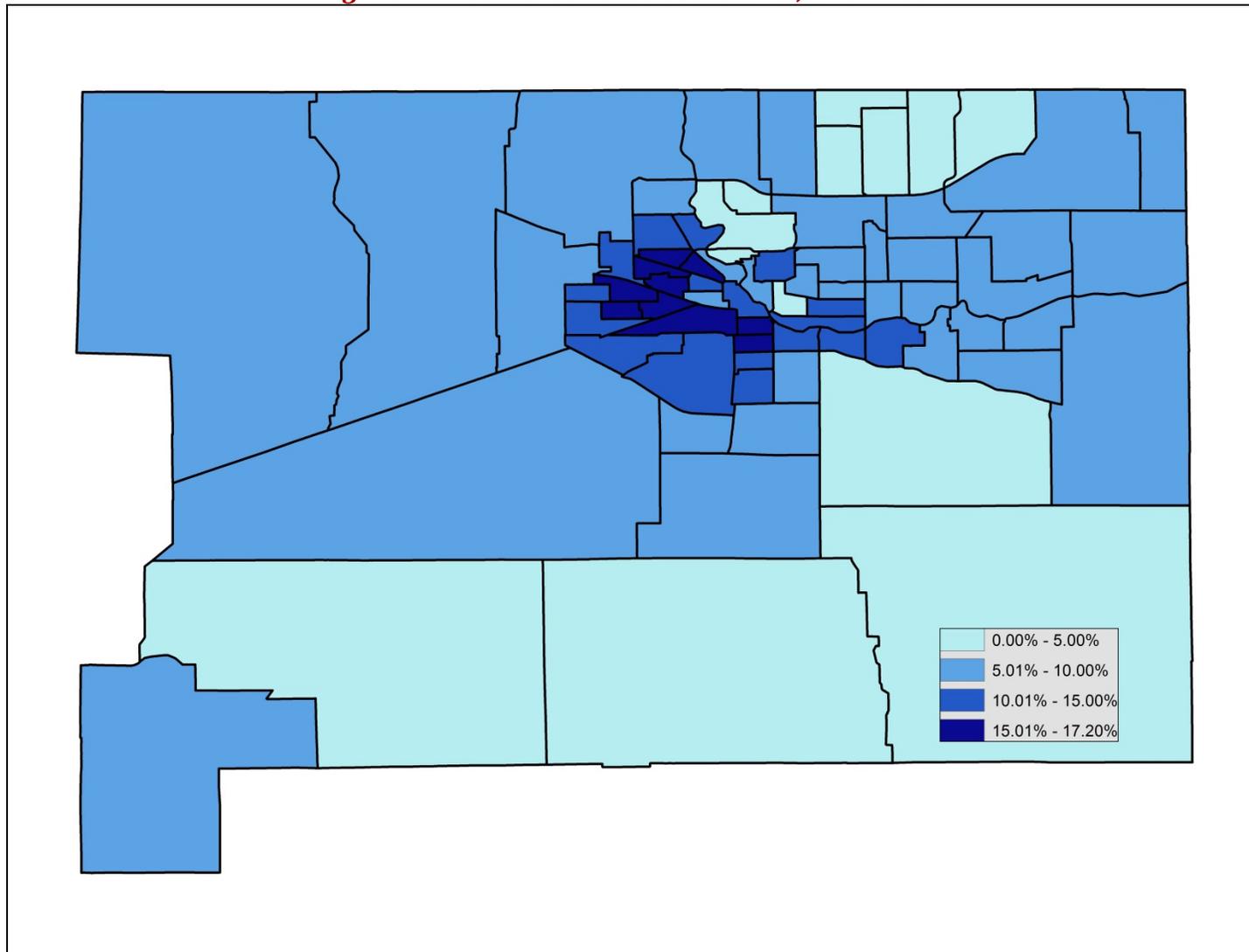
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**Table 28: Estimated Foreclosure Rate, 2007-2008**

Census Track	Foreclosure Filings	Total Mortgages	Foreclosure Rate	Census Track	Foreclosure Filings	Total Mortgages	Foreclosure Rate
1	51	496	10.3%	104	80	949	8.4%
2	81	592	13.7%	105	70	861	8.1%
3.01	60	570	10.5%	106	56	636	8.8%
3.02	29	291	10.0%	107	83	846	9.8%
4	40	244	16.4%	108	71	1,166	6.1%
5	51	296	17.2%	109	122	2,310	5.3%
6	51	325	15.7%	110	146	2,293	6.4%
7	18	256	7.0%	111	92	952	9.7%
8	22	468	4.7%	112.01	5	115	4.3%
9	12	123	9.8%	112.02	5	114	4.4%
10	44	412	10.7%	113.01	68	986	6.9%
11	101	1,080	9.4%	113.02	85	1,677	5.1%
12	42	831	5.1%	113.03	129	1,556	8.3%
13	21	293	7.2%	113.04	24	791	3.0%
14	102	831	12.3%	113.05	54	1,240	4.4%
15	90	715	12.6%	113.06	36	826	4.4%
16	32	715	4.5%	114.03	71	2,229	3.2%
17	10	91	11.0%	114.04	71	2,229	3.2%
19	26	202	12.9%	114.05	107	1,584	6.8%
20	10	106	9.4%	114.06	106	1,584	6.7%
21	22	131	16.8%	115.01	7	72	9.7%
22	50	318	15.7%	115.03	39	572	6.8%
23	22	133	16.5%	115.04	38	566	6.7%
24	62	397	15.6%	115.05	39	566	6.9%
25	51	375	13.6%	115.06	39	567	6.9%
26	96	695	13.8%	116.01	164	2,781	5.9%
27	13	79	16.5%	116.02	137	2,012	6.8%
28	50	370	13.5%	117.01	57	969	5.9%
29	25	155	16.1%	117.02	55	1,383	4.0%
30	44	256	17.2%	118.01	70	1,158	6.0%
31	96	663	14.5%	118.02	70	1,157	6.1%
32	128	1566	8.2%	119	48	932	5.2%
33	88	816	10.8%	120	51	939	5.4%
34	92	619	14.9%	121	51	1,053	4.8%
35	58	498	11.6%	122	54	774	7.0%
101	91	747	12.2%	123	39	804	4.9%
102	113	1,045	10.8%	124	16	323	5.0%
103	137	1,657	8.3%	Total	4,520	61,032	7.4%

Source: U.S. Department of Housing and Urban Development, NSP Foreclosure Estimates

**Figure 11: Estimated Foreclosure Rate, 2007-2008**



## Protected Class Status and Housing Problems

The U.S. Department of Housing and Urban Development defines a housing problem as a housing situation that meets one or more of the following conditions:

1. Lacking complete plumbing or kitchen facilities;
2. Overcrowding of more than 1.5 person per room; and,
3. Cost burden of 30% or more of gross income on monthly housing expenses.

Lower income minority households tend to experience housing problems at a higher rate than lower income White households. This tendency is only partially true for St. Joseph County. Among renting households with lower incomes, Asian or Pacific Islanders are least likely to have a housing problem. Approximately 60% of renting Asian or Pacific Islanders exhibited at least one housing problem. This compares to 71.7% of Black households and 74.6% of White households. At 77.9%, Hispanics were most likely to experience a housing problem.

Among lower income home owners, Asian or Pacific Islanders were most likely to experience a housing problem, with more than three-quarters (78.9%) of home owners experiencing at least one of the conditions established by HUD. White homeowners were least likely to exhibit a housing problem, with just over half (50.6%) exhibiting a problem. This compares to 58.4% of Black and 66.6% of Hispanic homeowners.

**Table 29: Low Income Households with Housing Problems, 2011**

	Total Households 0-80% of MFI	
	Total	% with a Housing Problem
Total Renters	20,798	73.6%
White	13,505	74.6%
Black	5,395	71.7%
Amer. Indian/Alaska Native	63	71.4%
Asian/Pacific Islander	300	60%
Other	265	54.7%
Hispanic	1,270	77.9%
Total Owners	19,227	74.6%
White	16,025	50.6%
Black	1,645	58.4%
Amer. Indiana/Alaska Native	64	54.7%
Asian/Pacific Islander	209	78.9%
Other	180	47.2%
Hispanic	1,104	66.6%

*Source: U.S. Department of Housing and Urban Development, Comprehensive Housing Affordability Strategy Data*

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For both renting and owning households, those whose reported their race or ethnicity as “other” exhibited the lowest rate of housing problems. Approximately 54.7% of renting and 47.2% of owning households reported a problem. Given the diversity of the population included in the “other” category, it is difficult to make conclusive decisions based on the data.

In total, Hispanic households were most likely to experience a housing problem, with 72.6% reporting at least one problem in 2011. This compares to 61.6% of White households and 68.6% of Black households.

## Homelessness

The U.S. Department of Housing and Urban Development implements a point-in-time count of the homeless population across the United States. The point-in-time approach allows for an estimate of the homeless population without duplication of count. While the count approach does not capture all homeless within a region, it does provide an understanding of the homeless trends and the demographics of the homeless population.

**Table 30: Homeless Population by Race and Ethnicity, 2014**

	Sheltered		Unsheltered	Total
	Emergency	Traditional		
St. Joseph County	202	281	9	492
White Population	125	127	5	257
Non-White Population	77	154	4	235
Black	65	139	4	208
Amer. Indian/Alaska Native	3	2	0	5
Asian/Pacific Islander	1	1	0	2
Two or More Races	8	12	0	20
Hispanic	12	16	1	29

Source: U.S. Department of Housing and Urban Development, Continuum of Care Program

**Table 31: Homeless Population by Race and Ethnicity, 2014**

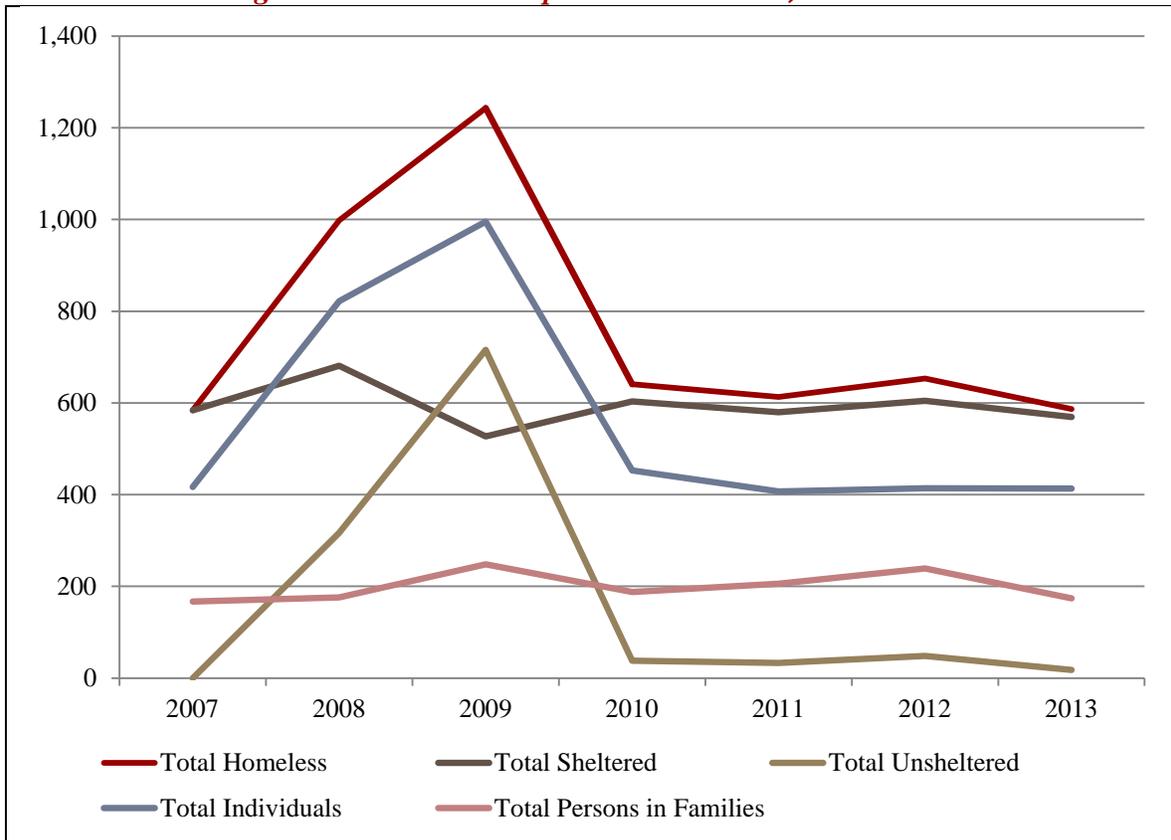
	Sheltered		Unsheltered	Total
	Emergency	Traditional		
St. Joseph County	100.0%	100.0%	100.0%	100.0%
White Population	61.8%	45.2%	55.5%	52.2%
Non-White Population	38.1%	54.8%	44.4%	47.8%
Black	32.2%	49.4%	44.4%	42.3%
Amer. Indian/Alaska Native	1.5%	0.7%	0.0%	1.0%
Asian/Pacific Islander	0.5%	0.4%	0.0%	0.4%
Two or More Races	3.9%	4.3%	0.0%	4.1%
Hispanic	5.9%	5.6%	11.1%	5.9%

Source: U.S. Department of Housing and Urban Development, Continuum of Care Program

The 2014 point-in-time count identified 492 homeless individuals in St. Joseph County. Tables 30 and 31 provide the demographic characteristics of the homeless population. Whites were more likely than minorities to be homeless, accounting for 52.2% of the total homeless population. Blacks were the second most likely demographic to experience homelessness at 42.3%. Only 12 (about 5.9%) of the homeless individuals identified their race as something other than White or Black. Considering the type of shelter provided to the homeless population, Whites were more likely to experience a need for emergency shelter. Approximately 61.8% of the homeless population utilizing emergency shelter

were White and 32.2% were Black. However, Blacks were more likely than other racial groups to utilize traditional shelters, accounting for 49.4% of the traditionally sheltered homeless population. Looking at ethnicity, Hispanics accounted for 5.9% of the total homeless population. Hispanics were more likely to utilize traditional shelter services than emergency shelter, 41.4% and 55.2% of the Hispanic population.

**Figure 12: Homeless Population Estimates, 2007-2013**



Source: U.S. Department of Housing and Urban Development, Continuum of Care Program

Figure 12 provides an overview of the homeless population estimate for the years 2007 to 2013. The trend of the homeless county for St. Joseph County reflects the Great Recession, growing in 2008 and returning to a more steady size by 2010.

## **Evaluation of Current Fair Housing Profile**

This section provides a review of the existence of fair housing complaints or compliance reviews where a charge of a finding of discrimination has been made. Additionally, this section will review the existence of any fair housing discrimination suits filed by the U.S. Department of Justice or private plaintiffs in addition to the identification of other fair housing concerns or problems.

### **Existence of Fair Housing Complaints**

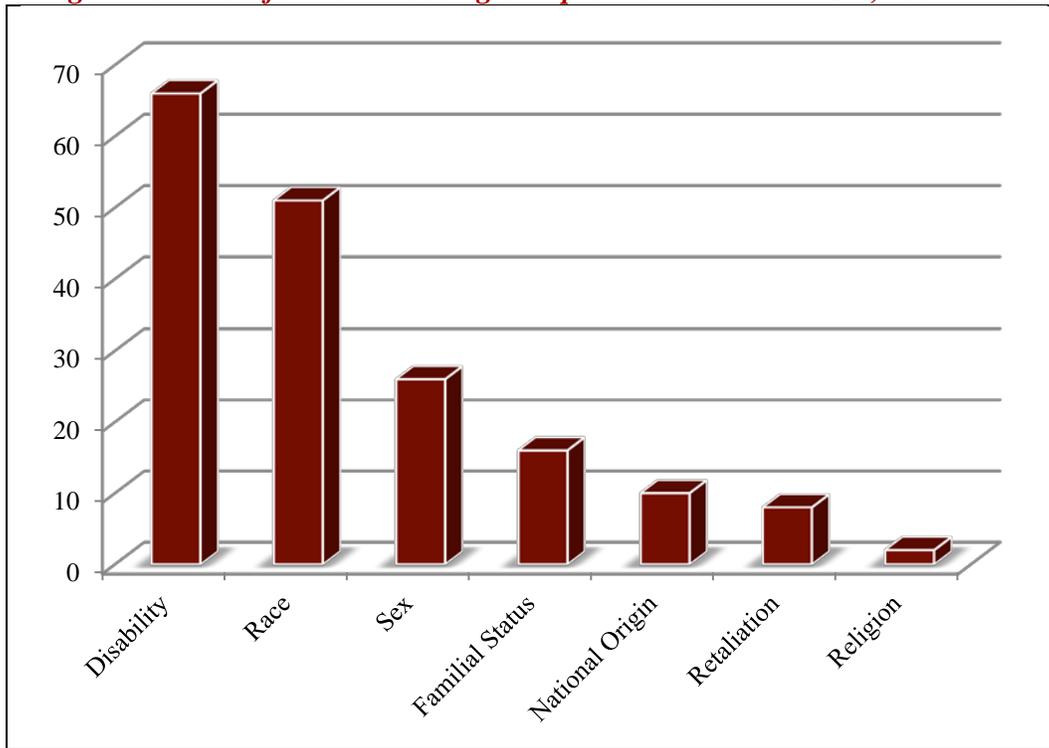
A lack of filed complaints does not necessarily indicate a lack of housing discrimination. Some individuals may not file a complaint because they are not aware of the process for filing a complaint. In a tight rental market, tenants may avoid confrontations with prospective landlords. Discriminatory practices can be subtle and may not be detected by someone who does not have the benefit of comparing his treatment with that of another home seeker. Other times, individuals may feel that they are being discriminated against, but they may not be aware that the discrimination is against the law and that there are legal remedies to address the discrimination. Finally, households may be more interested in achieving their first priority of finding suitable housing and may prefer to avoid going through the process of filing a complaint.

In St. Joseph County, residents have a number of options for filing a fair housing complaint. The ordinances that establish fair housing policies for St. Joseph County and the cities of South Bend and Mishawaka all establish points of contact for residents to make their complaints. For the county, the point of contact is the county auditor's office, whereas South Bend utilizes its Human Rights Commission and Mishawaka relies upon the Board of Public Works and Safety. Residents can also file a complaint with the Office of Fair Housing and Equal Opportunity (FHEO) at the U.S. Department of Housing and Urban Development.

### **Office of Fair Housing and Equal Opportunity**

Between January 2009 and December 2013, 138 cases of potential housing discrimination within St. Joseph County were filed with the FHEO. Of these, 66 alleged discrimination based on disability and 51 alleged discrimination based on race. Another 26 alleged discrimination based on sex, 16 based on familial status, 10 on national origin, eight on retaliation, and two were based on religion. A number of complaints alleged discrimination on multiple bases. Details on allegations of discrimination are provided in Figure 13.

**Figure 13: Basis for Fair Housing Complaints Filed with HUD, 2009-2013**



## **Local Complaints**

Despite the local options available to residents for filing fair housing complaints, as established by the respective ordinances, there is concern over awareness to the process and the handling of complaints when made. Both St. Joseph County and the City of Mishawaka handle complaints on an ad hoc basis by whichever department receives the complaint. The ad hoc approach does not lend itself to maintaining records on the number and types of complaints they receive. Anecdotally, they also report that few complaints are ever made.

The City of South Bend relies upon the Human Rights Commission. The Human Rights Commission confirms that they receive fair housing complaints for residents of South Bend, but they also frequently receive complaints for residents in the rest of the county. The Commission is limited in their ability to assist outside of the city due to jurisdictional constraint and limited financial resources.

Issues regarding the handling of local complaints are not new. While St. Joseph County and the City of Mishawaka have established contacts for fair housing complaints, this information is not readily available. It is also not published on their websites. As a result, the 2006 *Analysis of Impediments to Fair Housing* noted that the City of South Bend's Human Rights Commission responds to complaints from across the county, even though the commission only has jurisdiction within South Bend. The study made the recommendation to expand South Bend's Human Rights Commission to a county-wide agency. Since 2006, several moves have been made to expand the commission, including a study on possibility of collaboration between Mishawaka and South Bend and the allocation of CDBG funding by Mishawaka to South Bend's Human Rights Commission to promote the consolidation. A consolidation had not occurred by the time the 2010 analysis of impediments was undertaken, resulting in the reiteration of the recommendation to merge. Although some discussion was undertaken by the cities in 2013, no definitive action has been taken.

Rather than continuing to recommend an expansion of the Human Rights Commission, a more definitive solution is needed to protect residents of St. Joseph County and Mishawaka. Such a solution could include the establishment of a complaint hotline and forms on the respective websites that would directly link residents to the appropriate office. Awareness to these resources could be made through prominently placed information on the websites and in the phone directory. Such a solution would provide residents of Mishawaka and St. Joseph County with increased service and protection, as well as to appropriately track housing complaints within the respective jurisdictions, but it would also minimize costs that would otherwise be witnessed through commission expansion.

## **Existence of Fair Housing Proceedings**

Only one case involving fair housing proceedings was found for the study period. The case involves the eviction of a tenant by the South Bend Housing Authority for failure to pay rent. The Housing Authority filed a notice of claim for back rent in St. Joseph Superior Court and the tenant answered the claim with a report of alleged discrimination based on gender and national origin. In July of 2013, the court entered a judgment in favor of the Housing Authority.

## **Determination of Unlawful Segregation**

No unlawful segregation suits or court order were found to have been filed and or are pending within the St. Joseph County court system.

## **Evaluation of Public and Private Sector Policies**

The analysis of impediments is a review of impediments to fair housing choice in the private and public sectors. Impediments to fair housing choice are any action, omission, or decision taken because of race, color, religion, sex, disability, familial status, or national origin that restricts housing choice or the availability of housing choices, or any action, omission or decision that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin. Policies, practices, or procedures that appear neutral on their face but which operate to deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status, or national origin may constitute such an impediment.

### **Public Sector Policies**

An important element of the analysis of impediments is the examination of public policies that relate to housing choice. This section evaluates those policies for St. Joseph County and the Cities of South Bend and Mishawaka to determine opportunities for furthering the expansion of fair housing choice.

#### **Public Housing**

Residents of St. Joseph County are served by one of three public housing organizations. These are the St. Joseph County Housing Assistance Office, the Housing Authority of South Bend and the Housing Authority of Mishawaka.

##### ***St. Joseph County Housing Assistance Office***

An interview was conducted with the staff of the St. Joseph County Housing Assistance Office (SHAO). The office also completed a questionnaire upon request. The office serves the residents of St. Joseph County that are not under the jurisdiction of the Housing Authority of South Bend or Mishawaka. SHAO does not provide public housing, focusing solely on the Section 8 Housing Choice Voucher program.

In 2013, SHAO supported 165 Section 8 voucher holders. Of these, 55.8% were White and 43.0% were Black. Only 0.6% reported a different race and only 0.6% of all holders reported themselves as being of a Hispanic ethnicity. More than three-quarters (about 77.6%) of all voucher holders live in a 1-2 bedroom house. In addition to those holding a Section 8 voucher, there were another 628 on the waiting list. Household characteristics were unavailable for those on the wait list. The characteristics of the voucher holders are provided in Table 32.

**Table 32: Characteristics of Section 8 Voucher Holders**

	Current Voucher Holders		Waiting List Applicants	
	#	%	#	%
Total Households	165	100.0%	628	100.0%
Very Low Income (<50% MFI)	161	97.6%	628	100.0%
Low Income (<80% MFI)	4	2.45	0	0.0%
Black Households	71	43.0%	---	---
White Households	92	55.8%	---	---
Other Race of Household	1	0.6%	---	---
Hispanic Households	1	0.6%	---	---
Characteristics by Bedroom Size				
0 Bedrooms	0	0.0%	---	---
1 Bedroom	51	30.9%	---	---
2 Bedrooms	77	46.7%	---	---
3 Bedrooms	31	18.8%	---	---
4+ Bedrooms	6	3.6%	---	---

In accordance with the national program, Section 8 voucher holders have the option of using their voucher within the county or to “port out” to another jurisdiction, including South Bend or Mishawaka. Based on the interview with SHAO staff, the determining cause of porting is the variation in housing costs across jurisdictions and access to public transportation.

One area of concern with SHAO related to the availability of fair housing is the resources with which it operates. Over the last several years, SHAO has seen a reduction in its budget. As a result, the number of staff available to assist voucher holders and others seeking housing assistance has been significantly reduced and the hours of operation for the SHAO office have been cut back. Currently, the office is maintained by four staff and is only able to meet with the public by appointment. This has also impacted the number of vouchers the office is able to support. Although the county supports 165 vouchers, it has been approved for 210. The remaining 45 vouchers are unsupported due to a lack of financial resources at SHAO.

### ***Housing Authority of Mishawaka***

An interview was also conducted with the staff of the Housing Authority of Mishawaka (HAM). The office also completed a questionnaire upon request. The office serves the residents of the City of Mishawaka.

HAM manages 299 units of public and affordable housing in Mishawaka across three properties. The vacancy rate for 2013 was estimated at 13.0%. Table 33 details the total number of public housing units in Mishawaka by property and unit size.

**Table 33: HAM Public and Affordable Housing Developments, 2013**

Development Name	0 Bedrooms	1 Bedroom	2 Bedrooms	3 Bedrooms	4+ Bedrooms	Total Units
Total	15	182	32	54	16	299
Barbee Creek	15	31	32	54	16	148
River View	---	113	---	---	---	113
Battell	---	38	---	---	---	38

Elderly households accounted for 75% of all public and affordable housing residents in 2013. Black households were also disproportionately represented among public housing residents. Black households accounted for 31.0% of HAM’s current residents, although Blacks accounted for only 6.9% of Mishawaka’s total population. Hispanics were also overrepresented, accounting for 7.6% of current residents and only 4.5% of the city’s population. Table 34 provides an overview of the demographics and housing unit size of current public housing residents and applicants on the waiting list.

**Table 34: Characteristics of Public and Affordable Housing Residents and Applicants, 2013**

	Current Residents		Waiting List Applicants	
	#	%	#	%
Total Households	145	100.0%	237	100.0%
Very Low Income (<50% MFI)	139	95.8%	221	93.2%
Low Income (<80% MFI)	6	4.2%	12	5.1%
Black Households	45	31.0%	72	30.4%
White Households	88	60.7%	143	60.3%
Other Race of Household	12	8.3%	22	9.3%
Hispanic Households	11	7.6%	18	7.6%
Characteristics by Bedroom Size				
0 Bedrooms	15	5.0%	36	15.2%
1 Bedroom	182	60.9%	57	24.1%
2 Bedrooms	32	10.7%	73	30.8%
3 Bedrooms	54	18.1%	55	23.2%
4+ Bedrooms	16	5.4%	12	5.1%

**Table 35: Accessible Housing Units by Development**

Development Name	# of Mobility Accessible Units
Barbee Creek	4
River View	6
Battell	5

**Table 36: Accessible Housing Units by Size**

Unit Size	# of Mobility Accessible Units
0 Bedrooms	---
1 Bedroom	12
2 Bedrooms	2
3 Bedrooms	1
4+ Bedrooms	---

Section 504 of the Rehabilitation Act of 1973 and CFR Part 8 require that 5% of all public housing units be accessible to persons with mobility impairments. Another 2% of public housing units must be accessible to persons with sensory impairments. Currently, 15 of its housing units (5.0%) are mobility accessible units. HAM also reports that any of its units can be made sensory accessible upon request. Tables 35 and 36 document mobility accessible units by unit size and development.

In addition to public housing, HAM also is the administrator of the Section 8 Housing Choice Voucher program for the City of Mishawaka. The majority of voucher holders (77.3%) were residing in units of 2 bedrooms or less. Black households continued to be over represented, accounting for 58.9% of voucher holders and 56.6 of applicants on the waiting list. The characteristics of current Section 8 voucher holder households in detailed in Table 37.

**Table 37: Characteristics of Section 8 Voucher Holders**

	Current Voucher Holders		Waiting List Applicants	
	#	%	#	%
Total Households	251	100.0%	286	100.0%
Very Low Income (<50% MFI)	240	95.6%	264	92.3%
Low Income (<80% MFI)	11	4.4%	12	4.2%
Black Households	148	58.9%	162	56.6%
White Households	90	35.8%	99	34.6%
Other Race of Household	13	5.2%	15	5.2%
Hispanic Households	10	3.9%	13	4.5%
Characteristics by Bedroom Size				
0 Bedrooms	2	0.8%	12	4.5%
1 Bedroom	101	40.2%	110	41.5%
2 Bedrooms	91	36.3%	90	33.8%
3 Bedrooms	52	20.7%	58	21.8%
4+ Bedrooms	5	1.9%	6	2.3%

***Housing Authority of South Bend***

The Housing Authority of South Bend (HASB) provides public housing and Section 8 voucher services to residents of the City of South Bend. During the study period, numerous attempts were made to contact HASB, though neither HASB staff nor board members responded to requests. Attempts were also made to contact HASB by visiting its office in-person; however, the office was found locked. Anecdotally, a number of those interviewed referenced reports of limited hours of operation and organizational discord.

In 2012, the City of South Bend requested a federal investigation into HASB after allegations of sexual harassment and misuse of funds by its former director emerged. A new director was brought to the organization after the investigation, but the new director gave his resignation in the spring of 2014. Currently, HASB is managed by three staff members.

The practice and management of HASB is a concern for fair housing within the City of South Bend. This comes both in terms of the discord within the organization but also in terms of reduced resources. Reports have surfaced in regards to layoffs in the staff that limit the ability of the organization to provide and maintain adequate housing. Several references were made during the study interviews in regards to the difficulty of the HASB and that, when they were able, those in need of housing assistance left the city for other communities. Given the demographic characteristics of South Bend, a poorly operating housing authority is a significant impediment to fair housing.

## **Zoning Regulations**

In Indiana, the power behind land development decisions resides with local governments through the formulation and administration of local controls. These include comprehensive plans, zoning ordinances, and subdivision ordinances, as well as building and development permits.

The analysis of zoning regulations was based on the following six topics raised in the U.S. Department of Housing and Urban Development's *Fair Housing Planning Guide*. These include:

- The opportunity to develop various housing types (including apartments and housing at various densities);
- The opportunity to develop alternative designs (such as cluster developments, planned residential developments, inclusionary zoning and transit-oriented developments);
- The treatment of mobile or modular homes, and if they are treated as stick-built single family dwellings;
- Minimum lot size requirements;
- Dispersal requirements and regulatory provisions for housing facilities for persons with disabilities (i.e., group homes) in single family zoning districts; and,
- Restrictions on the number of unrelated persons in dwelling units.

Upon reviewing the zoning and building codes for the county, no impediments to fair housing were found. No cause of concern in regards to zoning regulation was mentioned in any of the interviews that were conducted.

## Public Transit

Households without a vehicle, which in most cases are primarily low-moderate income households, are at a disadvantage in accessing jobs and services, particularly if public transit is inadequate or absent. Access to public transit is critical to these households. Without convenient access, employment is potentially at risk and the ability to remain housed is threatened. The linkage between residential areas of concentration of minority and LMI persons and employment opportunities are key to expanding fair housing choice.

The American Community Survey of the U.S. Census Bureau reports that there were 7,970 transit dependent households living in St. Joseph County in 2012, comprising 7.8% of all households. Renters are far more likely to be transit-dependent than homeowners. Among renting households, 18.9% did not have access to a vehicle. This compares to only 3.0% of owner-occupied households.

Table 38 provides a summary of the means transportation to work for county residents. Ninety percent of residents drove to work, with 81.5% driving alone and 8.5% carpooling. Throughout St. Joseph County, only 1.4% of residents utilized public transportation to get to work, all of whom rode the bus. Additionally, 3.5% of residents walked and 0.9% rode a bicycle.

***Table 38: Means of Transportation to Work for Workers 16 Years and Older, 2012***

	#	%
Total	119,052	100.0%
Car, Truck, or Van	107,186	90.0%
Drove Alone	97,072	81.5%
Carpooled	10,114	8.5%
Public Transportation	1,705	1.4%
Bus or Trolley Bus	1,705	1.4%
Streetcar or Trolley Car	0	0.0%
Subway or Elevated	0	0.0%
Railroad	0	0.0%
Ferryboat	0	0.0%
Taxicab	0	0.0%
Motorcycle	249	0.2%
Bicycle	1,136	0.9%
Walked	4,085	3.4%
Other Means	420	0.4%
Worked at Home	4,271	3.6%

*Source: U.S. Census Bureau, 2012 American Community Survey*

**Table 39: Means of Transportation to Work by Race, 2012\***

	<b>St. Joseph</b>	<b>South Bend</b>	<b>Mishawaka</b>
Total	1.2%	2.5%	1.1%
White	57.4%	48.2%	78.2%
Black	36.2%	46.4%	15.5%
Asian	1.3%	0.3%	6.3%
Other	5.1%	5.1%	0.0%
Hispanic	7.9%	9.9%	0.0%

\*Based on 5-Year Estimate

Source: U.S. Census Bureau, 2012 American Community Survey

Over half of public transit users in St. Joseph County were White. At the city level, 48.2% of utilizers in South Bend and 78.2% of utilizers in Mishawaka were White. The second largest group of utilizers were Black, accounting for more than a third of all utilizers (36.2%). Utilization by Asians were largest in Mishawaka at 6.3%, compared to 0.3% in South Bend and 1.3% across the entire county. Ethnically, approximately 7.9% of utilizers throughout the county were Hispanic. When placed into context of each group’s respective share of the population, minorities are much more likely than Whites to utilize public transit.

The South Bend Public Transportation Corporation (SBTranspo) operates public transit in the area. SBTranspo primarily serves the Cities of South Bend and Mishawaka with limited service outside the city limits. SBTranspo charters \$1.00 with free transfers.

***Destinations and Routes***

SBTranspo operates a total of 20 fixed-route bus routes. Most routes begin service around 5:30 am and run until 10:00 pm during the week. Restricted hours are maintained during the weekend. This limited service may disproportionately affect transit dependent LMI individuals who work second and third shifts through South Bend and Mishawaka. Downtown South Bend is well served by public transit, with most of the routes running to the South Street Station on the edge of the downtown district. Routes do connect residents to major employment centers throughout the community, including city and county government offices and universities, as well as access to commercial centers and grocery stores.

In 2004, St. Joseph County completed a transportation planning study that discussed the needs of a public transit system reaching into the county. Although a need was referenced, the study concluded that resources were not available to construct a system. Many of the stakeholders contacted for this study discussed the lack of county transit system. Anecdotally, several stakeholders noted that the absence of public transit forced many households to maintain a vehicle at the cost of losing their home to maintain employment during and after the Great Recession. The absence of public transportation

outside of South Bend and Mishawaka provide severe limitations on housing options for lower-income and/or persons with disabilities.

***Accessibility***

All of SBTranspo's buses are ADA accessible. SBTranspo also operates ACCESS, a paratransit service. The American Disabilities Act of 1990 requires public entities operating a fixed route transportation system to provide comparable paratransit services to people with disabilities. ACCESS services are provided within ¾ mile of SBTranspo's fixed-route service.

## **Private Sector Policies**

In addition to the public sector policies that influence fair housing choice, there are private sector policies that can influence the development, financing, and advertising of real estate. While St. Joseph County and its respective local governments cannot be held responsible for impediments to fair housing choice identified in private sector policies the consortium does have an obligation to identify such impediments and bring them to the attention of the appropriate entity. In some cases, it is appropriate and even expected that the county or cities will attempt to communicate the existence of such impediments to the appropriate entity. For example, if real estate advertisements in a local newspaper are noted to contain questionable language that may be discriminatory, then the respective government should advise the newspaper of its legal obligations under the Fair Housing Act.

In this section of the analysis, mortgage lending practices are analyzed.

### **Mortgage Lending Practices**

Under the terms of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (FIRREA), any commercial lending institution that makes five or more home mortgage loans must report all residential loan activity to the Federal Reserve Bank under the terms of the Home Mortgage Disclosure Act (HMDA). The HMDA regulations require most institutions involved in lending to comply and report information on loans denied, withdrawn, or incomplete by race, sex, and income of the applicant. The information from the HMDA statements assist in determining whether financial institutions are serving the housing needs of their communities. The statements also assist in identifying possible discriminatory lending practices and patterns.

The most recent HMDA data available for St. Joseph County are for 2012. The data focus on the number of homeowner mortgage applications received by lenders for home purchase one- to four-family dwellings and manufactured housing units in the county. Table 40 summarizes the HMDA data by race, ethnicity, and action taken on the applications for the years 2010 to 2012.

Between 2010 and 2012, the number of mortgage applications fell 4.9% from 2,731 applications to 2,598. By 2012, the number of applications grew 14.4%, surpassing the 2010 high. The most growth in applications was from the White applicants, which grew 10.5% between 2010 and 2012. Black, Asian and Hispanic applicants all saw a decline in their respective number of applications. The percent of applications that resulted in loan originations increase slightly, from 75.1% in 2010 to 78.2% in 2012. The percentage of successful applications for White applicants increased from 76.8% to 79.4%. Among Hispanic applicants, the percentage of originations decreased from 77.1% to 76.7% between 2010 and 2011 and increased to 93.3% in 2012.

**Table 40: Action on New Mortgage Applications, 2010-2012**

	2010		2011		2012	
	#	%	#	%	#	%
Applied For	2,731	100.0%	2,598	100.0%	2,972	100.0%
White	2,370	86.8%	2,237	86.1%	2,620	88.2%
Black	112	4.1%	94	3.6%	103	3.5%
Asian	46	1.7%	58	2.2%	43	1.4%
Other Race	43	1.6%	22	0.8%	46	1.5%
Hispanic	83	3.0%	73	2.8%	75	2.5%
No Information	160	5.9%	187	7.2%	160	5.4%
Originated	2,052	75.1%	1,979	76.2%	2,323	78.2%
White	1,820	76.8%	1,738	77.7%	2,079	79.4%
Black	79	70.5%	66	70.2%	72	69.9%
Asian	31	67.4%	42	72.4%	33	76.7%
Other Race	31	72.1%	17	77.3%	34	73.9%
Hispanic	64	77.1%	56	76.7%	70	93.3%
No Information	91	56.9%	115	61.5%	105	65.6%
Denied	335	12.3%	295	11.4%	342	11.5%
White	272	11.5%	244	10.9%	284	10.8%
Black	22	19.6%	11	11.7%	17	16.5%
Asian	8	17.4%	8	13.8%	4	9.3%
Other Race	4	9.3%	3	13.6%	17	37.0%
Hispanic	11	13.3%	9	12.3%	13	17.3%
No Information	29	18.1%	29	15.5%	31	19.4%

Source: Federal Financial Institutions Examination Council, 2013

The proportion of applications resulting in denials decreased from 12.3% in 2010 to 11.5% in 2012. Denials among White applicants decreased steadily from 11.5% to 10.8%. The denial rates for Black applicants fluctuated year-by-year from 19.6% in 2010, to 11.7% in 2011, and finally to 16.5% in 2012. Asians saw the largest decline (from 17.4% in 2010 to 9.3% in 2012), whereas other races saw a significant increase (9.3% to 37.0%). Hispanic applicants also saw an increase across the three years, from a denial rate of 13.3% in 2010 to a rate of 17.3% in 2012.

Table 41 provides a summary report of the number of new mortgage applications and their actions according to loan type, loan purpose, applicants race, and applicants sex.

**Table 41: Summary of New Mortgage Applications, 2012**

	Total Applications		Originated		Approved Not Accepted		Denied		Withdrawn or Incomplete	
	#	%	#	%	#	%	#	%	#	%
<b>Loan Type</b>										
Conventional	1,825	61.4%	1,433	61.7%	87	77.7%	190	55.6%	115	59.0%
FHA	947	31.9%	739	31.8%	22	19.6%	152	44.4%	65	33.3%
VA	119	4.0%	90	3.9%	2	1.8%	14	4.1%	12	6.2%
FSA/RHS	81	2.7%	61	2.6%	1	0.9%	122	35.7%	3	1.5%
<b>Loan Purpose: Home Purchase</b>										
1-4 Family Unit	2,908	97.8%	2,286	98.4%	101	90.2%	327	95.6%	194	99.5%
Manufactured Housing	64	2.2%	37	1.6%	11	9.8%	15	4.4%	1	0.5%
<b>Applicant Race</b>										
White	2,620	88.2%	2,079	89.5%	93	83.0%	284	83.0%	164	84.1%
Black	103	3.5%	72	3.1%	6	5.4%	17	5.0%	8	4.1%
Asian	43	1.4%	33	1.4%	1	0.9%	4	1.2%	5	2.6%
Other	46	1.5%	34	1.5%	2	1.8%	17	5.0%	2	1.0%
Hispanic	75	2.5%	70	3.0%	2	1.8%	13	3.8%	3	1.5%
No Information/NA	160	5.4%	105	4.5%	10	8.9%	31	9.1%	14	7.2%
<b>Application Sex</b>										
Male	1,035	34.8%	780	33.6%	37	33.0%	149	43.6%	68	34.9%
Female	679	22.8%	542	23.3%	29	25.9%	64	18.7%	44	22.6%
Joint Application	1,133	38.1%	917	39.5%	39	34.8%	72	21.1%	72	36.9%
No Information/NA	125	4.2%	84	3.6%	7	6.3%	57	16.7%	11	5.6%
<b>Total</b>	<b>2,972</b>	<b>100.0%</b>	<b>2,323</b>	<b>100.0%</b>	<b>112</b>	<b>100.0%</b>	<b>342</b>	<b>100.0%</b>	<b>195</b>	<b>100.0%</b>

Source: Federal Financial Institutions Examination Council, 2013

### *Denial of Applications*

In 2012, the mortgage applications of 342 households (about 11.5% of all mortgage applications) in St. Joseph County were denied. Reasons for denial were given for 335 applications and were categorized into primary basis for denial of lending application. The causes of denial, and the respective categories share of denials, are:

- Debt-to-Income Ratio: 15.8%
- Employment History: 5.1%
- Credit History: 25.1%
- Collateral: 17.6%
- Insufficient Cash: 5.4%
- Unverifiable Information: 5.4%
- Credit Application Incomplete: 15.2%
- Mortgage Insurance Denied: 0.9%
- Other: 9.3%

An applicant’s credit history was the main reason why mortgages were denied, followed by insufficient collateral and the applicant’s debt-to-income ratio. These reasons for denying a mortgage are tied to the income of applicants, which have previously been shown as an impediment to fair housing in St. Joseph County.

As discussed in section on housing foreclosure rates, some services are available to residents in the areas of financial counseling. Despite the need for such services, as established by the number and reasons of mortgage denials, the availability of these services is limited.

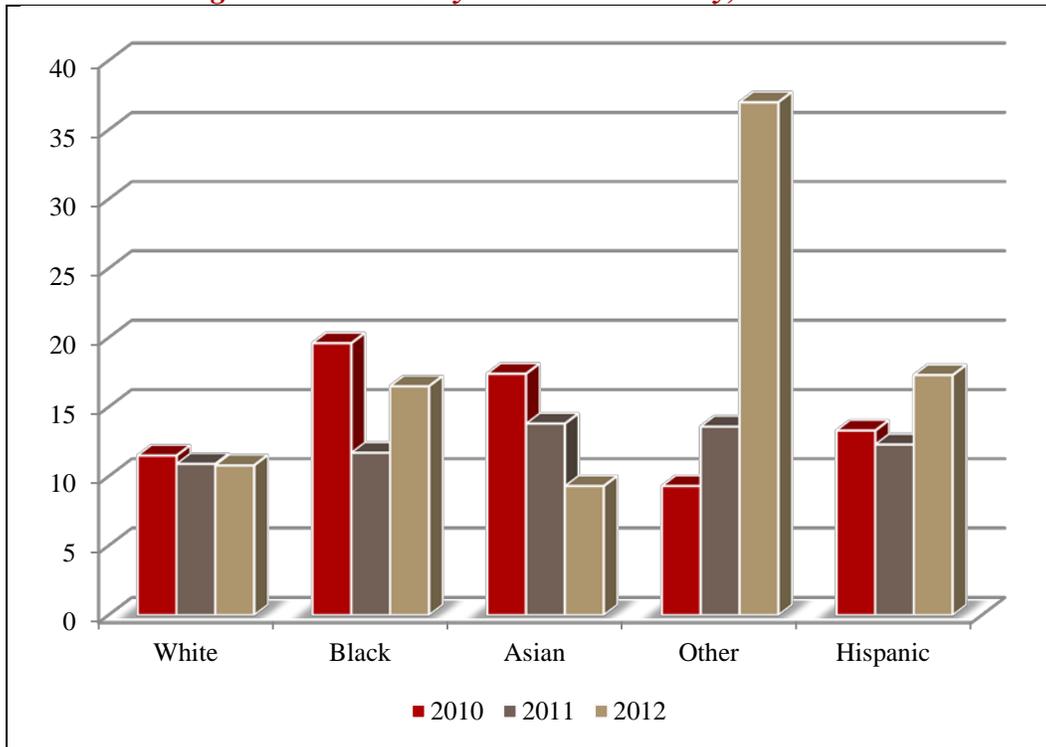
The denial rate across race and ethnicity is provided in Table 42 and Figure 14. Between 2010 and 2012, the denial rates decreased for White, Black and Asian households. Whites saw a decrease in their rate from 11.5% to 10.8% and Blacks saw a drop from 19.6% to 16.5%. Asian applicants saw the biggest decline, from 17.4% to 9.3%. During the same period, the denial rate increased for those households of other racial origin, which grew from 9.3% to 37.0%, and for Hispanic households, which grew from 13.3% to 17.3%.

***Table 42: Denials by Race and Ethnicity, 2010-2012***

	2010			2011			2012		
	Total	Denials	Denial Rate	Total	Denials	Denial Rate	Total	Denials	Denial Rate
White	2,370	272	11.5%	2,237	244	10.9%	2,620	284	10.8%
Black	112	22	19.6%	94	11	11.7%	103	17	16.5%
Asian	46	8	17.4%	58	8	13.8%	43	4	9.3%
Other	43	4	9.3%	22	3	13.6%	46	17	37.0%
Hispanic	83	11	13.3%	73	9	12.3%	75	13	17.3%
No Information	160	29	18.1%	187	29	15.5%	160	31	19.4%

*Source: Federal Financial Institutions Examination Council, 2013*

**Figure 14: Denials by Race and Ethnicity, 2010-2012**



The relationship between income and the denial of a mortgage application is also considered. Table 43 provides an overview of the number of denials and the denial rate based on the relationship between the households income the median family income (MFI) for the area. Any household with an income of less than 80% of MFI is considered lower income, for the purposes of this analysis, whereas households with an income of 80% or greater of MFI are considered higher income households.

**Table 43: Denials by Income, 2010-2012**

	2010			2011			2012		
	Total	Denials	Denial Rate	Total	Denials	Denial Rate	Total	Denials	Denial Rate
Below 80% MFI	1,263	192	15.2%	1,195	166	13.9%	1,324	186	14.0%
At Least 80% MFI	1,468	143	9.8%	1,403	129	9.2%	1,648	156	9.5%
Total	2,731	335	12.3%	2,598	295	11.4%	2,972	342	11.5%

Source: Federal Financial Institutions Examination Council, 2013

Applications made by lower income households accounted for 57.3% of all denials in 2010, 56.3% in 2011, and 54.4% in 2012. During the same years, lower income households accounted for 46.2%, 45.9%, and 44.5% of all applications, respectively. Among lower income households, the denial rates were highest amongst minorities, as shown in Table 44. In 2010, more than 20% of mortgages applications submitted by lower income Black and Asian households were denied, compared to 14.7% of lower

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income White households. By 2012, the denial rates had improved for most lower income races, but increased for those of other racial origin. The denial rate of lower income Hispanic households also increased.

**Table 44: Denials for Lower Income Applicants, 2010-2012**

	2010			2011			2012		
	Total	Denials	Denial Rate	Total	Denials	Denial Rate	Total	Denials	Denial Rate
White	1,113	164	14.7%	1,035	137	13.2%	1,183	153	12.9%
Black	65	14	21.5%	58	6	10.3%	67	11	16.4%
Asian	19	4	21.1%	17	3	17.6%	6	1	16.7%
Other	14	2	14.3%	6	1	16.7%	8	2	25.0%
Hispanic	59	9	15.3%	44	5	11.4%	47	8	17.0%
No Information	52	11	21.2%	80	19	23.8%	55	19	34.5%

Source: Federal Financial Institutions Examination Council, 2013

Similar trends between race, ethnicity and income are witnessed for higher income houses. Between 2010 and 2012, higher income White applicants saw an increase in their denial rate from 8.6% to 9.1%. Applicants of other racial origins also observed an increase, whereas Black and Asian households saw a decrease in their rate of mortgage denial. Hispanics continued to see an increase, from 8.3% in 2010 to 17.9% in 2012.

**Table 45: Denials for Higher Income Applicants, 2010-2012**

	2010			2011			2012		
	Total	Denials	Denial Rate	Total	Denials	Denial Rate	Total	Denials	Denial Rate
White	1,257	108	8.6%	1,202	107	8.9%	1,437	131	9.1%
Black	47	8	17.0%	36	5	13.9%	36	6	16.7%
Asian	27	4	14.8%	41	5	12.2%	37	3	8.1%
Other	29	2	6.9%	16	2	12.5%	38	15	39.5%
Hispanic	24	2	8.3%	29	4	13.8%	28	5	17.9%
No Information	108	18	16.7%	107	10	9.3%	108	12	11.4%

Source: Federal Financial Institutions Examination Council, 2013

## Appendix

### Interviewees

In coordination with the members and staff of the St. Joseph County Housing Consortium, a list of community stakeholders were identified and invited to interview. The invited individuals that chose to take part in the interview are as follows:

- Steve Camilleri  
*Center for the Homeless*
- Brendan Devitt  
*Center for the Homeless*
- Lonnie Douglas  
*South Bend Human Rights Commission*
- Marco Mariani  
*South Bend Heritage Foundation*
- Colleen Olund  
*Housing Authority of Mishawaka*
- Kathryn Roos  
*Office of the Mayor*  
*City of South Bend*
- Dave Thomas  
*Department of Community Development*  
*City of Mishawaka*
- David VanderVeen  
*Hope Rescue Mission*
- Lani Vivirito  
*Center for the Homeless*
- Laura Wagley  
*St. Joseph County Housing Assistance Office*
- Jim Williams  
*Habitat for Humanity*

## **St. Joseph County Housing Consortium**

St. Joseph County Housing Consortium is led by a board of six members. The board members are as follows:

- Donald F. Fozo (Chair)  
*Michiana Area Construction Industry Advancement Fund*
- Kathryn Roos  
*Office of the Mayor  
City of South Bend*
- Dave Wood  
*Mayor of Mishawaka  
City of Mishawaka*
- Dave Thomas  
*Department of Community Development  
City of Mishawaka*
- Marsha McClure  
*Board of Commissioners  
St. Joseph County*
- Andrew Kostielney  
*Board of Commissioners  
St. Joseph County*

The Consortium is supported by two staff members from the City of South Bend. These staff members are:

- Pam Meyer  
*Department of Community Investment  
City of South Bend*
- Lory Timmer  
*Department of Community Investment  
City of South Bend*