

# Analysis of Impediments to Fair Housing Choice City of Evansville

## Submitted

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### Prepared for

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## EXECUTIVE SUMMARY

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The Analysis of Impediments to Fair Housing the result of a process conducted by the City of Evansville every five years as a part of the city's Consolidated Plan. The Consolidated Plan is the way that the city plans its use of federal HOME Investment Partnership, Community Development Block Grant (CDBG), and Emergency Solutions Grant (ESG) entitlement funds.

The Analysis of Impediments is a review of impediments or barriers that affect the rights of fair housing choice. It covers public and private policies, practices, and procedures affecting housing choice. Impediments to fair housing choice are defined 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.

### Participants

Participation by a wide variety of people and organizations engaged in and affected by housing in Evansville was encouraged. The participation opportunities included:

- Stakeholder interviews
  - Carver Community Organization
  - Catholic Charities of Evansville
  - Center Point Energy
  - Community Action Program of Evansville
  - Department of Metropolitan Development (City of Evansville)
  - ECHO Housing Corporation
  - Evansville Christian Life Center
  - Evansville Housing Authority
  - Evansville Water and Sewer Utility (City of Evansville)
  - Evansville-Vanderburgh County Area Plan Commission
  - Evansville-Vanderburgh County Human Relations Commission
  - Growth Alliance of Greater Evansville
  - Hope of Evansville, Inc.
  - Legal Aid Society – Evansville
  - Memorial Community Development Corporation
  - Metropolitan Evansville Transit System
  - Metropolitan Planning Organization
  - Old National Bank
  - Southwest Indiana Association of Realtors

- Southwestern Indiana Mental and Behavioral Health
- United Caring Shelters
- Young Men’s Christian Association – YMCA
- Public forums
  - 9:30 AM – October 18, 2019, C.K. Newsome Center
  - 4:00 PM – October 18, 2019, C.K. Newsome Center
- Evansville Housing Authority Tenant Meeting
  - 4:00 PM – October 17, 2019, Kissel Center
- Online or paper survey
  - 41 responses

### Methodology

The methodology for development of the AI had three primary components: 1) document review, 2) data collection and analysis, and 3) public participation.

Document review included the following documents:

- Zoning ordinance
- Comprehensive plan
- Consolidated plan
- Annual action plan (2019)
- CAPER (2017)
- Transportation plan
- Capital improvement plan
- Parks and recreation plan
- CHDO lease agreements
- CHDO tenant selection process
- EHA lease agreements
- EHA tenant selection process
- EHA plan
- Plan Commission and BZA minutes



- Local building codes
- Fair housing information program materials
- Fair Housing and Equity Assessment
- 2015 – 2019 Analysis of Impediments

The documents were reviewed specifically for their impact, or potential impact, on fair housing. Census data from the 2018 American Communities Survey 2018 1-year Estimates was used to determine potential patterns of discrimination in the city. Other data, including the Home Mortgage Disclosure Act (HMDA) 2018 reports and Community Reinvestment Act (CRA) 2017 reports for the city, Census Tracts, and county were reviewed for potentially discriminatory practices or outcomes.

A survey was conducted to identify potential barriers to fair housing and housing discrimination in the city. The survey was available online and in hard copy from the Department of Metropolitan Development. All paper copies of the survey were entered into Survey Monkey to be consolidated with the online responses for analysis.

Meeting notes were taken from each of the group/public meetings and comments were integrated into the findings.

### Conclusions

The following findings and recommended strategies are intended to consolidate the barriers to fair housing identified in data, document review, and public participation and suggest ways which the various players in the housing industry in Evansville may improve the access to safe, decent, affordable housing for all Evansville residents over the next five years.

### Findings

Based upon the data and anecdotal information shared in the interviews, many of the findings from 2014 remain the same.

Finding 1: Homeownership rates continue to remain low among Black/African Americans.

- Fifteen (15) percent of the population is Black/African American, the largest minority population in the community.
- The Census Tracts with a significant Black/African American population are: CT 10 (25 percent), CT 11 (38 percent), CT 12 (35 percent), CT 13 (54 percent), CT 14 (47 percent), CT 15 (56 percent), and CT 17 (31 percent).

- Seventy-five (75) percent of Black/African Americans rent, compared to 40 percent of White/Caucasians.

Finding 2: The city's Black/African American population is concentrated in several Census Tracts in the urban core.

- The Census Tracts with a significant Black/African American population are: CT 10 (25 percent), CT 11 (38 percent), CT 12 (35 percent), CT 13 (54 percent), CT 14 (47 percent), CT 15 (56 percent), and CT 17 (31 percent).
- About half of interviewees stated that Evansville remains a segregated city.

Finding 3: Utility costs contribute to housing affordability issues in Evansville.

- This was a consistent comment in both the interviews with nonprofit leaders and with public housing tenants.
- Tenants discussed how it makes it difficult to move from one location to another (better housing options), particularly when unpaid utility debt follows the individual.
- Forty-four (44) percent of survey respondents noted utility costs as a barrier to housing choice in Evansville.
- Thirty-six (36) percent of survey respondents noted difficulty paying utility bills in the past two years.

Finding 4: A large portion of renters and homeowners have monthly payments that exceed 30 percent of household income.

- Twenty-six (26) percent of homeowners with a mortgage spend more than 30 percent of their household income on housing and are considered cost-burdened. Meanwhile, 52.3 percent of renters are cost-burdened and spend more than 30 percent of their household income on rent.
- Approximately 49 percent of survey respondents shared that they had difficulty paying their rent or mortgage in the past two years.

Finding 5: A significant income disparity exists between the city population as a whole and the city's Black/African American population. While discrimination has been identified locally as being economic, there is a disproportionate impact to the Black/African American community.

- There is significant income disparity between races. 27 percent of Black/African Americans in Evansville have a household income below \$10,000 per year compared to eight percent of non-Hispanic Whites.

Finding 6: People are generally unaware of fair housing and how to file housing discrimination cases.

- The survey conducted as part of the AI indicates that at least 76 percent of the respondents are not sure where to report housing discrimination.
- In the meeting with public housing tenants, no participant was able to identify the Evansville-Vanderburgh Human Relations Commission as the correct agency in which to file a housing discrimination complaint.

Finding 7: Mortgage applications and originations are especially low in minority census tracts.

#### Recommended Actions/Strategies

The following recommended actions or strategies should be implemented by the City of Evansville and its partners in the next five years to improve fair housing in the city.

- The Human Relations Commission should improve marketing outreach to community and public housing residents on how to file discrimination grievances pertaining to housing. We recommend that this begin in 2021 and continue through at least 2024.
- The City, along with local utility companies, should continue to assist low-income homeowners with weatherization programs. We recommend that this continue in 2020 through 2024.
- The City should encourage housing developers to build/rehab affordable housing for extremely low-income households. We recommend that this begin in 2021 and continue through at least 2024.
- The City should review CHDO leases for provisions allowing pet exceptions for service animals. The City may also establish criteria to guarantee the animal is a trained service animal and needed to accommodate a disability. We recommend that this begin in 2020 and continue through at least 2024.
- The City should continue to convene roundtable discussions with residents and leaders from the Black/African American community, as well as lenders and real estate professionals to identify solutions to low homeownership among Black/African Americans. We recommend that this continue in 2020 through 2024.

- CDCs and CHDOs should continue to partner with financial institutions to offer financial literacy programs in Low-Income Census Tract neighborhoods with low homeownership rates. We recommend that this continue in 2020 through 2024.
- The City should engage CenterPoint Energy to ensure the emergency utility assistance program funds are reaching those who most need the funds. We recommend that this begin in 2021 and continue through at least 2024.

## INTRODUCTION

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The Analysis of Impediments to Fair Housing is the result of a process conducted by the City of Evansville every five years as part of the city's Consolidated Plan. The Consolidated Plan is the way that the city plans its use of federal HOME Investment Partnership, Community Development Block Grant (CDBG), and Emergency Solutions Grant (ESG) entitlement funds.

The Analysis of Impediments is a review of impediments or barriers that affect the rights of fair housing choice. It covers public and private policies, practices, and procedures affecting housing choice. Impediments to fair housing choice are defined 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.

Conducting an analysis of impediments is a required component of certification and involves the following:

- An extensive review of an entitlement jurisdiction's laws, regulations, and administrative policies, procedures, and practices;
- An assessment of how those laws affect the location, availability, and accessibility of housing;
- An evaluation of conditions, both public and private, affecting fair housing choice for all protected classes; and
- An assessment of the availability of affordable, accessible housing in a range of unit sizes.

In addition to Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), several Executive Orders of the President of the United States affect fair housing:

- Executive Order 11063 prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.
- Executive Order 11246, as amended, bars discrimination in federal employment because of race, color, religion, sex, or national origin.
- Executive Order 12892, as amended, requires federal agencies to affirmatively further fair housing in their programs and activities, and provides that the Secretary of HUD will be responsible for coordinating the effort. The Order also establishes the President's Fair Housing Council, which will be chaired by the Secretary of HUD.

- Executive Order 12898 requires that each federal agency conduct its program, policies, and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color, or national origin.
- Executive Order 13166 eliminates, to the extent possible, limited English proficiency as a barrier to full and meaningful participation by beneficiaries in all federally-assisted and federally conducted programs and activities.
- Executive Order 13217 requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.

To the extent possible, the AI reviews policies and practices for compliance with Executive Orders as well as the Fair Housing Act.

### Consultant

Established as the Indiana Association for Community Economic Development in 1986, Prosperity Indiana (PI) was started by community economic development practitioners eager to find a place to connect under a large tent that recognized the comprehensive nature of the work and the need to coordinate efforts to improve impact, garner a unified voice at the statehouse, and empower innovations. While the ways Prosperity has described its role and work has evolved over time, and new programs have been developed in recent years, it has all been grounded in a belief that community development is best approached from a holistic perspective.

PI is a statewide network of approximately 200 organizations and individual members committed to advancing community economic development. Our members include organizations from every sector – nonprofits, private businesses, and units of government – as well as individuals from each.

PI's mission is to build a better future for our communities by providing advocacy, leveraging resources, and engaging an empowered network of members to create inclusive opportunities that build and improves lives.

All of PI's services to members are centered around the critical functions of providing resources, engagement opportunities, and advocacy – and signature programs are meant to be an intentional deployment of our mission – needed to advance member goals. Combined, PI now communicates how it accomplishes its mission and work as being designed to REAP (Resources, Engagement, Advocacy, and Programs) prosperity for all. PI's resources include consulting around technical program management, project development, organizational development, and comprehensive community development planning processes.

### Participants

PI encouraged participation in the analysis process by a wide variety of people and organizations engaged in and affected by housing in Evansville. The full list of participant organizations in key stakeholder interviews is included in the public participation section of the AI, and sign-in sheets from all meetings are provided in the appendices. The participation opportunities included:

- Stakeholder interviews
- Public forums
- Evansville Housing Authority tenant meeting
- Online or paper survey

### Methodology

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- EHA tenant selection process
- EHA plan
- Complaints and suits
- Plan Commission and BZA minutes
- Local building codes
- Fair housing information program materials
- Fair Housing and Equity Assessment
- 2015 – 2019 Analysis of Impediments

PI reviewed these documents specifically for their impact, or potential impact, on fair housing. PI used data from the 2014-2018 American Community Survey (ACS) 5-year estimates, which the U.S. Census Bureau released on December 19, 2019. PI primarily studied data from the 2018: ACS 1-year estimates. The ACS is the most relied-on source for up-to-date social, economic, housing, and demographic information every year. The ACS is the only source of local statistics for most of the 40+ topics it covers, such as educational attainment, occupation, language spoken at home, nativity, ancestry, and selected monthly homeowner cost to name a few. PI depended upon estimates to determine potential patterns of discrimination in the city. Other data, including the Home Mortgage Disclosure Act (HMDA) 2018 and Community Reinvestment Act (CRA) 2017 reports for the city, Census Tracts, and county, were reviewed for potentially discriminatory practices or outcomes.

A survey was conducted to identify potential barriers to fair housing and housing discrimination in the city. The survey was available online and in hard copy from the Department of Metropolitan Development. All paper copies of the survey were entered into Survey Monkey to be consolidated with the online responses for analysis.

Meeting notes were taken from each of the group/public meetings, and comments were integrated into the findings. Key stakeholder interview notes will remain confidential.



## CITY HISTORY<sup>1</sup>

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The history of Evansville explains how the city developed and some of the events and activities that shaped how different neighborhoods developed the way they did. Geography, early settlement patterns, and school development, as well as institutional segregation, shaped the current city.

In 1803 Hugh McGary Sr. and his family moved to an area near Princeton, Indiana, and would often make trips to what is now Evansville. On March 27, 1812, his son Hugh McGary Jr. purchased just under 441 acres for \$2 per acre, with four years to pay. McGary's tract lay at the "one o'clock" position of the horseshoe bend in the Ohio River. To attract more people, McGary ultimately named his village "Evansville" in honor of Col. Robert M. Evans, a Gibson County legislator and war hero who served as an officer under then General William Henry Harrison in the War of 1812. Robert Evans and his brother-in-law, James W. Jones, purchased a third interest in Evansville, and a new plat was made on about 200 acres, with streets running parallel to the river from northwest to southeast. Soon after, Evansville incorporated in 1817 and became the county seat on January 7, 1818. The county was named for Henry Vanderburgh, a deceased chief judge of the Indiana territorial Supreme Court.

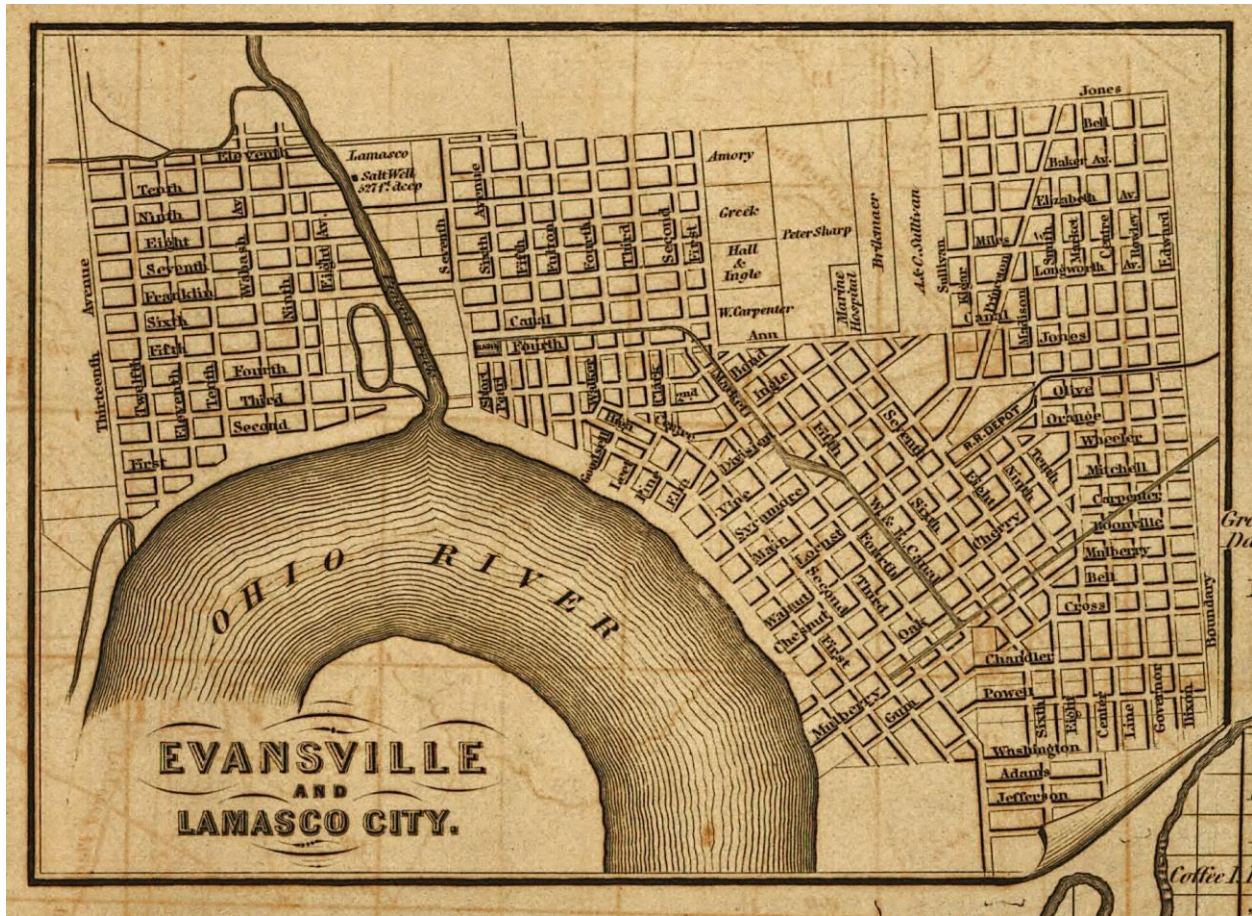
The west side of Evansville was for many years cut off from the main part of the city by Pigeon Creek and the wide swath of factories that once made the creek an important industrial corridor. With a heavy influx of German immigrants in the late 1800s, the west side became further isolated and developed its own culture, sense of community, and self-sufficiency. The land comprising the former town of Lamasco was platted in 1837. In 1839 this area was incorporated as Lamasco, a name formed from the last names of the proprietors of the town, John and William Law, James B. MacCall, and Lucius H. Scott. For 20 years, Lamasco and Evansville remained separate, although their social and business interactions were as one community (Refer to Map 1). In 1857 the area of Lamasco east of Pigeon Creek was annexed into Evansville while the part west of the creek remained independent and was thereafter known as Independence.

Unlike the downtown portions of Evansville, Lamasco's streets were laid out on the cardinal points, due north-south and east-west. Thus, anyone entering or leaving downtown finds that the street makes a confusing oblique-angle turn in one direction or another.

As the 20<sup>th</sup> century began, residential growth in the city continued to move eastward, particularly with the development of the Bayard Park Neighborhood, Washington Avenue, and Lincolnshire. Around this time, Evansville also served as the birthplace of the Indiana Klan, a branch of the Ku Klux Klan.

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<sup>1</sup> Historical information borrowed from *Wikipedia* and research conducted by Joe Engler (December 13, 2010)



Map 1: Evansville and Lamasco City Historic Map

Growing housing demand also caused residential development to leap north across Pigeon Creek and east across Weinbach Avenue. By the late 1950s, this new population, far removed from the traditional downtown commercial area, would encourage the growth of large shopping centers such as North Park on First Avenue, Lawndale on Green River Road and, in 1963, Indiana's first covered shopping mall, Washington Square. In the decades that followed Green River Road on the city's east side, including its anchor Eastland Mall became the area's primary commercial district.

In a bygone era, the schools in Evansville used to be segregated. The word "colored" was term of the times and was eliminated when desegregation occurred in the 1970s. Many recall Lincoln Elementary used to be the former colored school, but there were many other smaller schools that served Evansville's black community. The Lincoln School was built at Lincoln and Governor in 1928. It consolidated Governor Street, Oakdale and Douglass schools. The new building was a state-of-the-art K-12 school, and it served Evansville and even beyond as it was the only colored high school in the area. In 1962 the high school closed, and the EVSC schools were soon desegregated.

The first colored school in Evansville was built in 1867 at 5th and Chestnut. It was called "Upper Colored School" once Clark Street School was built. The Clark Street School was built in the early 1860s. Commonly called "Lower Colored School", several additions were made to the building as Evansville grew. It was renamed Frederick Douglass High School in 1913. The school was closed when Lincoln School was built in 1928, though the yearbook kept the name Dougite.

Governor Street School was built in 1874 to handle the growing black population. Third Avenue Colored School was built in 1897 at the end of Third Ave, just north of Tennessee Street. It was closed, sold, and torn down in 1957. Oakdale School was located at the corner of Governor and Sweetser to serve children in the Oakdale area. It was built in 1911 and torn down sometime around 1970.

Wabash Avenue Colored School was located on Wabash Ave just a block north of St Boniface Church, and was the first school in the Independence area. When Centennial School was built in 1876, the school became a colored school until it was torn down in 1903 when new houses were built on Wabash Avenue. The Twelfth Avenue Colored School replaced the Wabash Avenue Colored School in the early 1900s. It was on the corner of 12th Avenue and Delaware.

## BACKGROUND DATA

Data collected for the Analysis of Impediments to Fair Housing is limited in scope to that which would reveal fair housing concerns. The Analysis of Impediments is not the same as a Housing Needs Assessment and is not intended to replace the identification of housing needs in the community.

The City of Evansville is the only community in Vanderburgh County affected by the Analysis of Impediments to Fair Housing because it is the only Participating Jurisdiction designated by the US Department of Housing and Urban Development (HUD). Other incorporated communities and the unincorporated areas of Vanderburgh County are under the Indiana Statewide Analysis of Impediments as they compete for HUD funds through the Indiana Office of Rural and Community Affairs (OCRA) and the Indiana Housing and Community Development Authority (IHCDA).

The primary data source is the 2018 American Community Survey (ACS) 1-Year Estimates for the City of Evansville.

### Demographic

The population of Evansville stands at roughly 117,967. The population is 50.6 percent female. The median age is 36.9 years old, and 15.5 percent of the population is over age 65. Chart 1 illustrates the age distribution in the community.

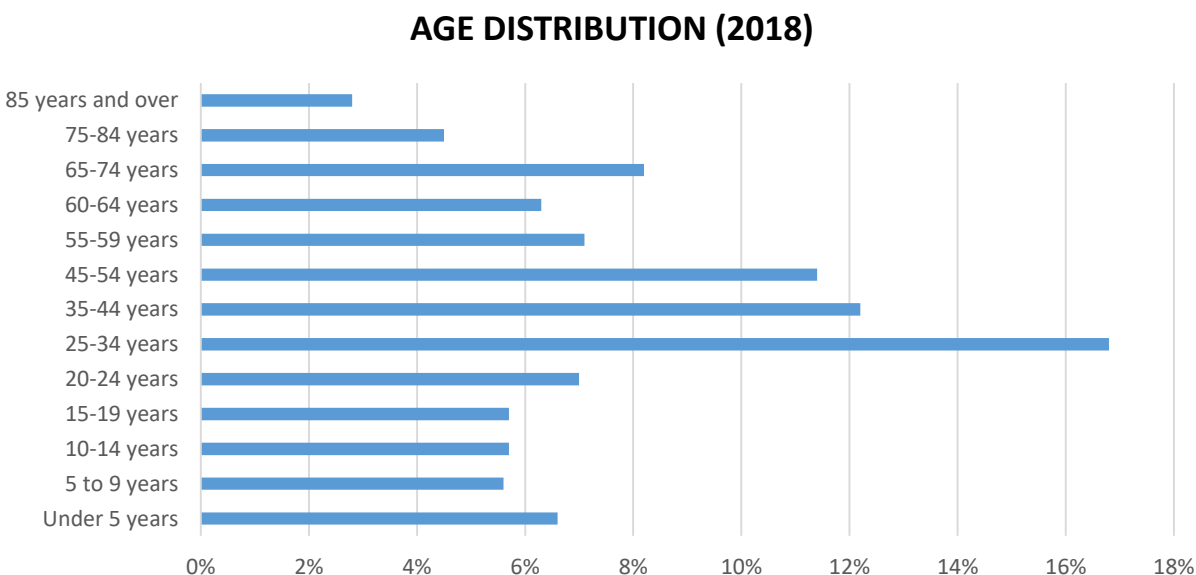
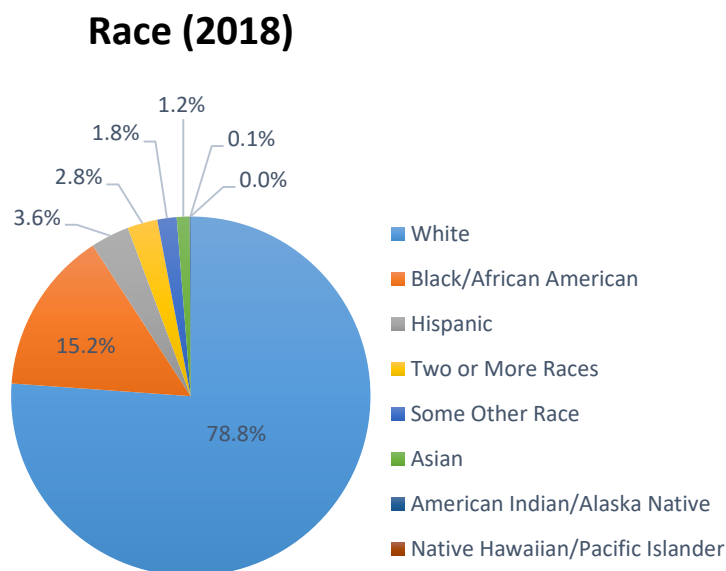


Chart 1: Evansville Age Distribution



Evansville is a majority White/Caucasian community, with 78.8 percent of the population identifying as white. Approximately 15 percent of the population is Black/African American, which is the largest minority population in the community. Hispanics of any race account for 3.6 percent of the population. Chart 2 identifies the racial distribution in the city.



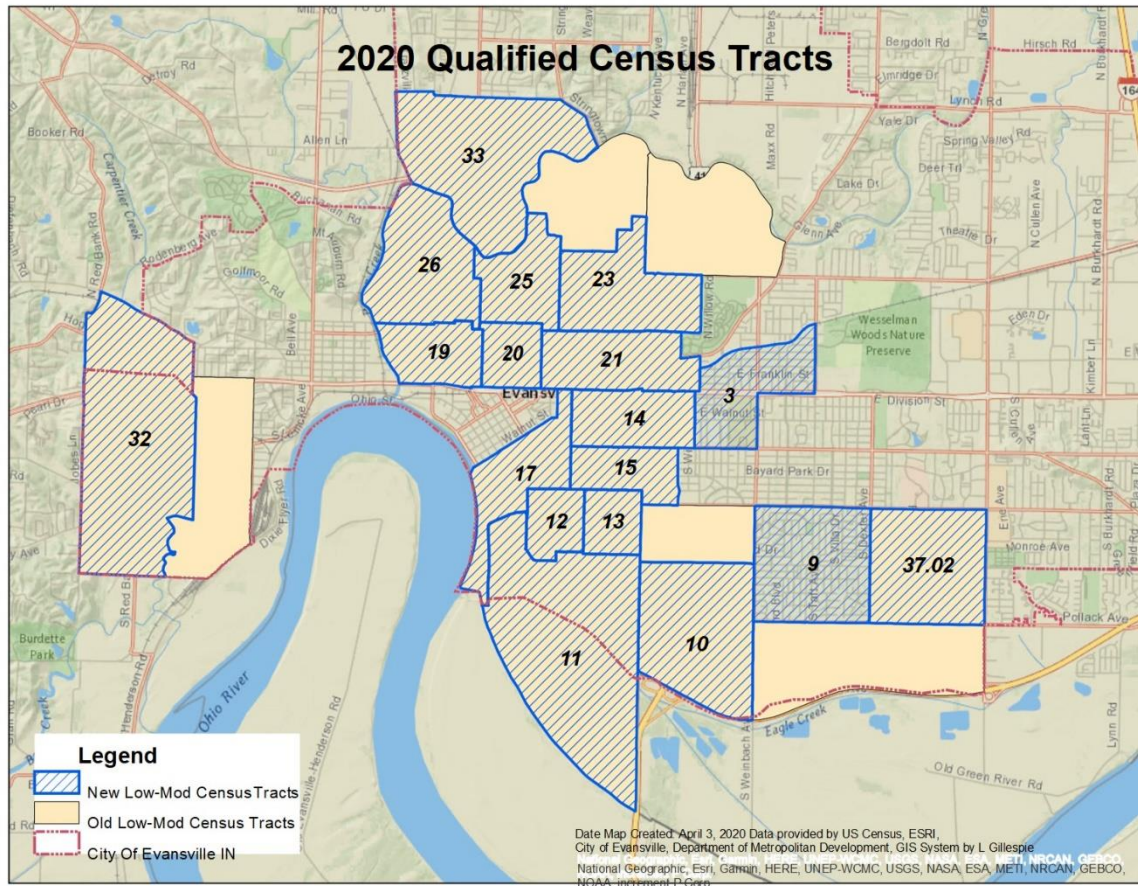
**Chart 2: Evansville Racial Composition**

\*Racial distribution in City below 0.1 percent not represented on pie chart.

The Black/African American population of the city tends to be concentrated in the urban core of Evansville. The Census Tracts with a significant Black/African American population are:

- CT 10 (25 percent Black/African American)
- CT 11 (38 percent)
- CT 12 (35 percent)
- CT 13 (54 percent)
- CT 14 (47 percent)
- CT 15 (56 percent)
- CT 17 (31 percent)

Map 2 shows the City of Evansville’s Census Tracts.



**Map 2: Current New Low-to-Moderate Income Census Tracts – City of Evansville, Indiana**

There are 50,976 households in Evansville, with an average household size of 2.23. Approximately 23 percent of households have people under 18, and 11.1 percent of households have people over age 65. Single female-headed households with children under 18 accounted for eight (8) percent of Evansville households.

Approximately 15.5 percent of the Evansville population has a disability. People aged 35 to 64 years old with a disability make up 6.4 percent of the population, making it the largest age group for non-institutionalized people with disabilities in the city. At 2.7 percent that age group also comprises the largest group of disabled people living below the poverty level.

Over 13 percent of people aged 18 to 64 in Evansville have a disability. The type of disability is documented in Chart 3. Nearly 40 percent of people over age 65 in Evansville have a disability, as documented in Chart 4.

### Disability Type Age 18-64 (2018)

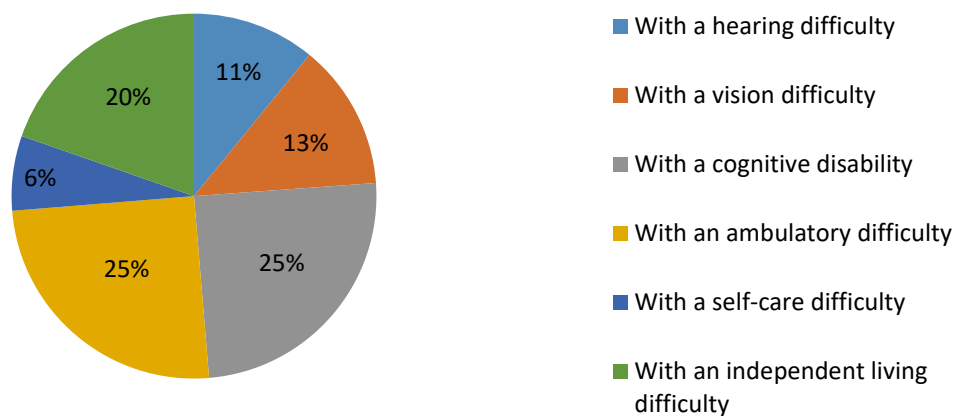


Chart 3: Disability Type Ages 18-64

### Disability Type Age 65+ (2018)

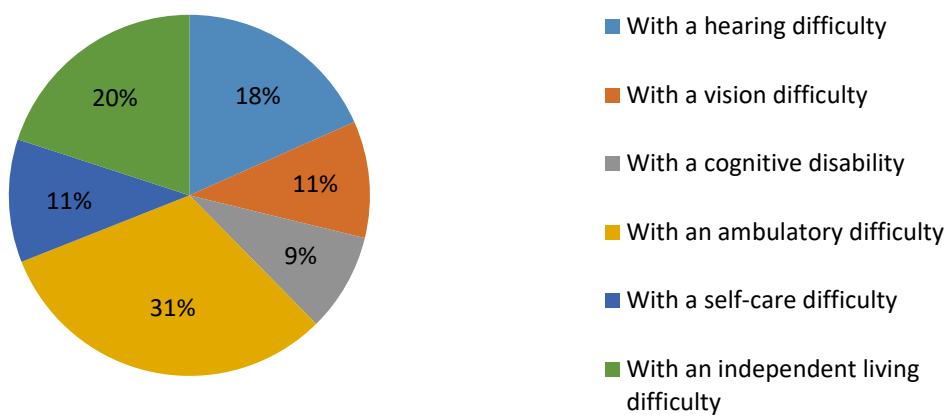


Chart 4: Disability Type Over Age 65

A slightly larger share of the White/Caucasian population has a disability than Black/African Americans (16.4 percent compared to 13.1 percent, respectively).

Disabled veterans make up 18.5 percent of the Evansville civilian population over age 18. Nearly 18 percent of the population is a veteran living in poverty. The Veteran population in Evansville is relatively young, with approximately 63 percent of Veterans being between age 18 and 64.

### *Income and Poverty*

The median household income in Evansville is \$40,899.<sup>2</sup> Median earnings for workers are \$27,565. Full-time male workers earn \$44,929 per year, and full-time female workers earn \$32,043 per year. There is an income gap for women of \$12,886, or 28.7 percent.

Nearly 20 percent of the Evansville population lives below the poverty line. 26.4 percent of the population under 18 lives in poverty, while 11.2 percent of the population over age 65 lives in poverty.

Nearly 10 percent of the population lives on less than 50 percent of the poverty threshold of \$12,490 for a single person to \$43,430 for a household of eight. Twenty-eight percent live below 125 percent of the poverty level.

Significant income disparity is evident between races. Approximately 28 percent of Black/African Americans in Evansville have a household income below \$10,000 per year, compared to eight (8) percent of non-Hispanic Whites. Income levels for the total population in Evansville, for the White/Caucasian population in Chart 6, and the Black/African American population are shown in Chart 5, 6, and 7, respectively.

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<sup>2</sup> The real median income noted in this report is from the United States Census Bureau's American Community Survey (ACS) 2018: Year-1, which is not the same as the 2019 United States Department of Housing and Urban Development's (USHUD) income guidelines. According to the Federal Reserve Bank of Saint Louis, Missouri, the real median household income in the United States in 2018 was \$63,179. Additional notes on the United States Census Bureau's real median income calculation methodology can be found in the notes section located here: <https://fred.stlouisfed.org/series/MEHOINUSA672N>.



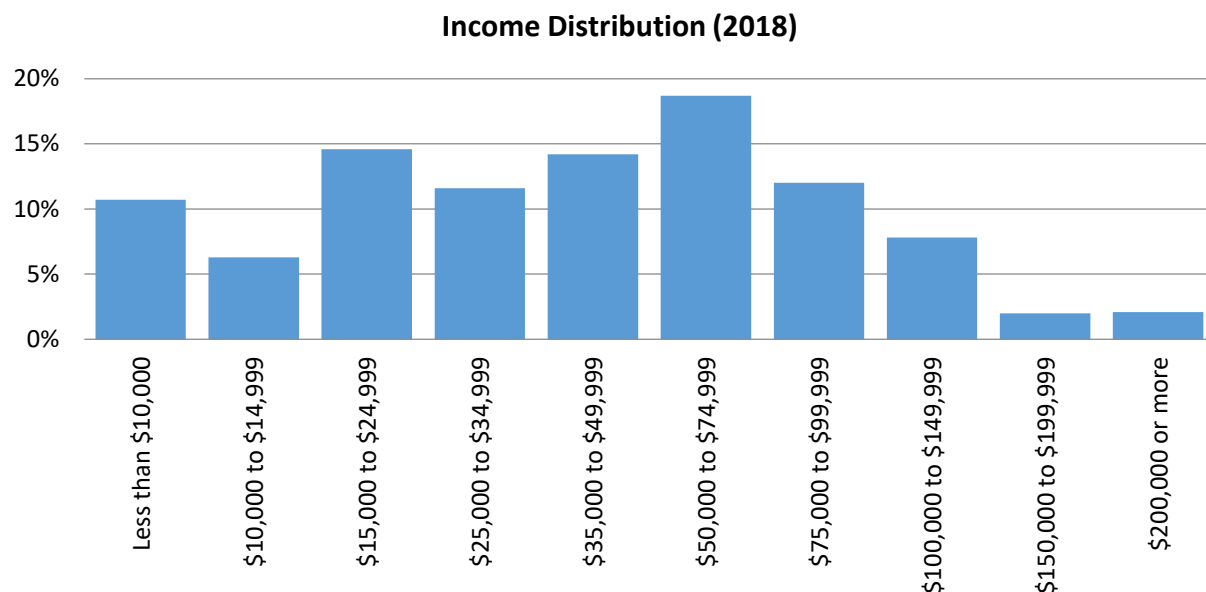


Chart 5: Evansville Income Distribution

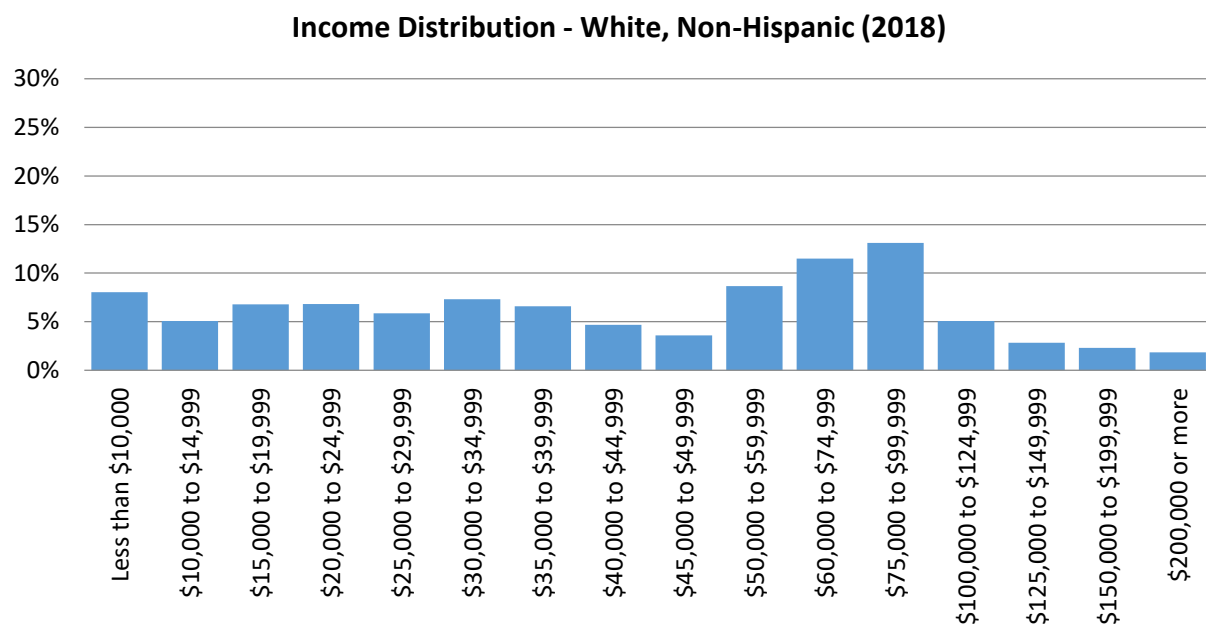


Chart 6: Evansville Income Distribution – White, Non-Hispanic Only

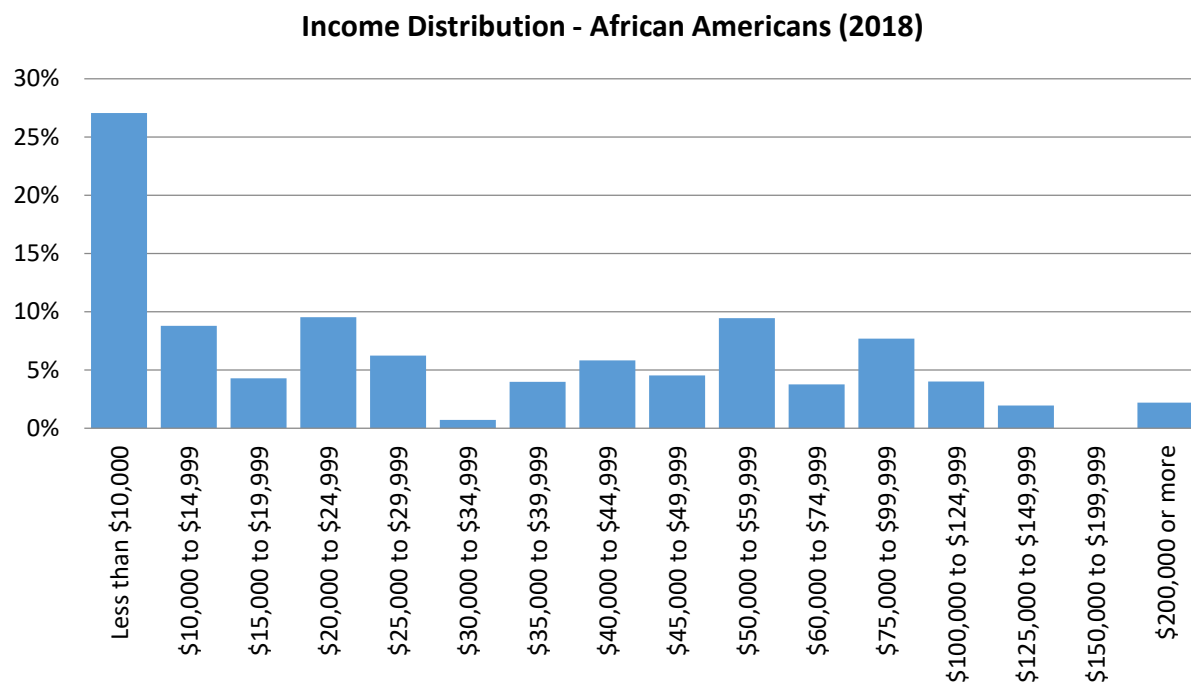


Chart 7: Evansville Income Distribution – Black/African Americans Only

### Housing

Eighty-seven (87) percent of 58,819 housing units in Evansville are occupied, leaving just under 7,850 units vacant. Vacant units include those vacant for sale or rent, those that are rented or sold but not occupied, seasonal homes, and those that are vacant due to foreclosure or abandonment.

Nearly 65 percent of the city’s housing units are single-family detached housing units (Chart 8), and nearly 70 percent of units have two or three bedrooms (35 percent each). Owner-occupied units tend to have two to three bedrooms, while renter units tend to have one to two bedrooms. Less than four (4) percent of renter units have four (4) or more bedrooms (Chart 9).

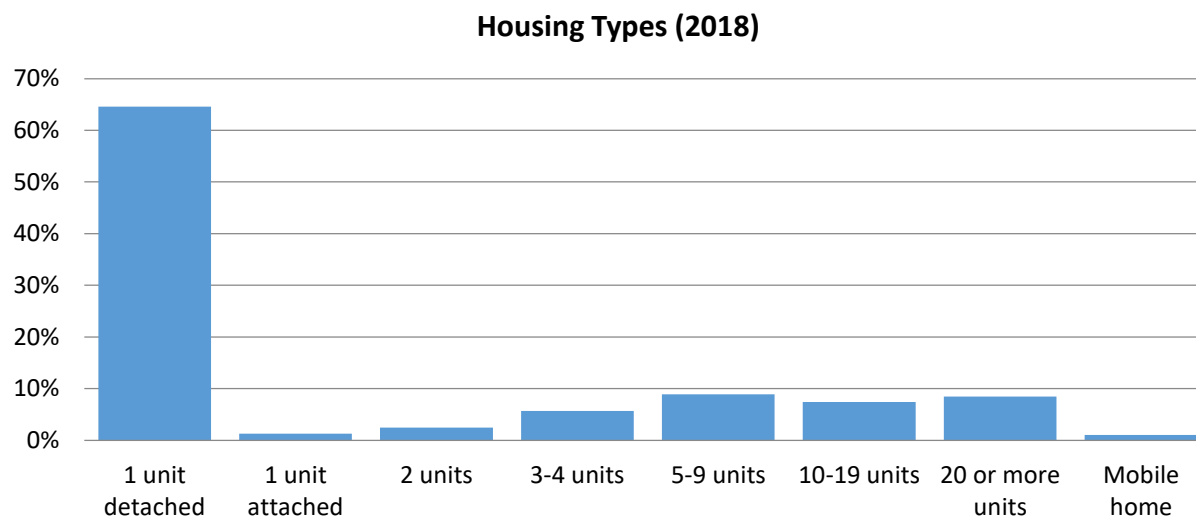


Chart 8: Housing Type

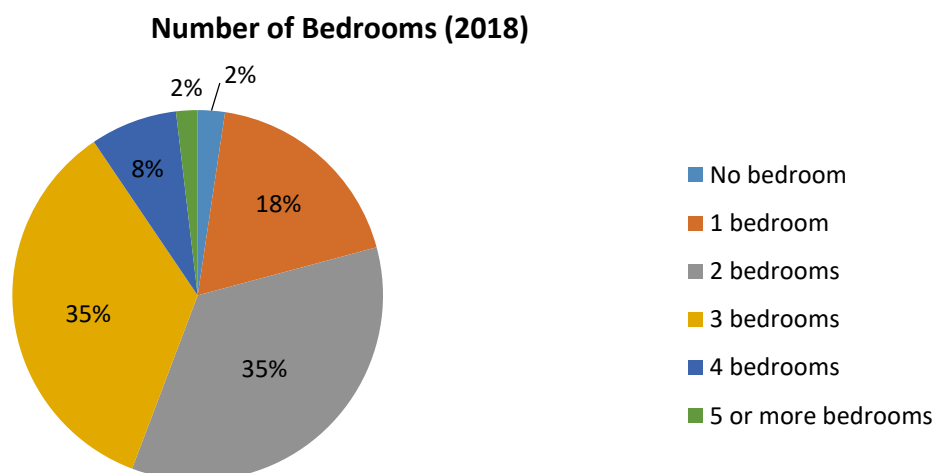


Chart 9: Number of Bedrooms in Occupied Housing Units

Owner occupied housing units comprise 54 percent, while 46 percent are renter occupied. Sixty-seven (67) percent of homeowners have mortgages.

The median home value is \$102,800 (Chart 10). Home values tend to decrease with the age of the home, with the highest value homes in Evansville being built after 2010. The largest percentage of homes was built prior to 1940, and are the least valuable (Chart 11).

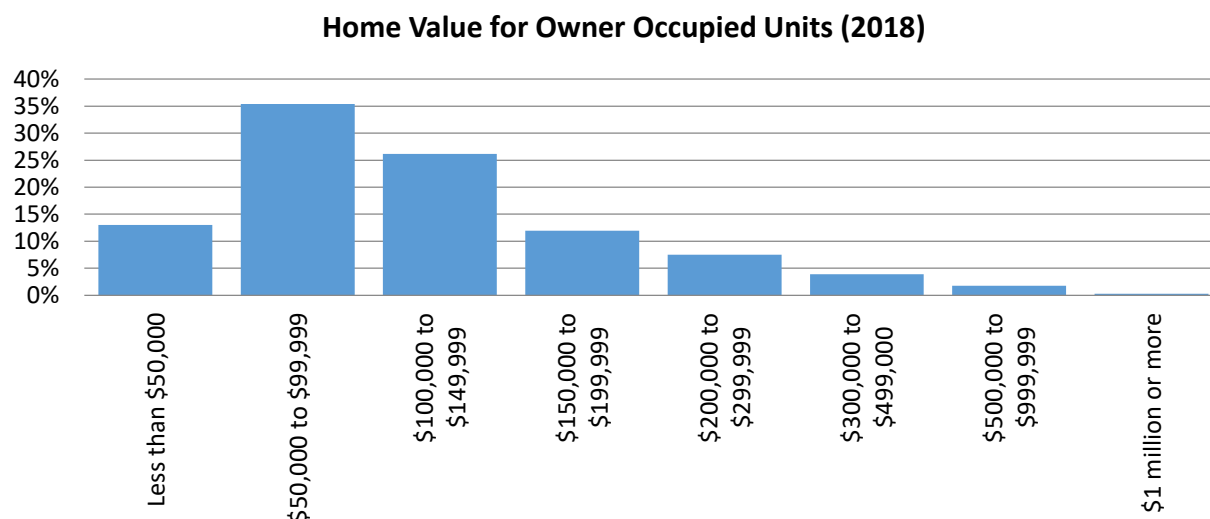


Chart 10: Home Value for Owner Occupied Units

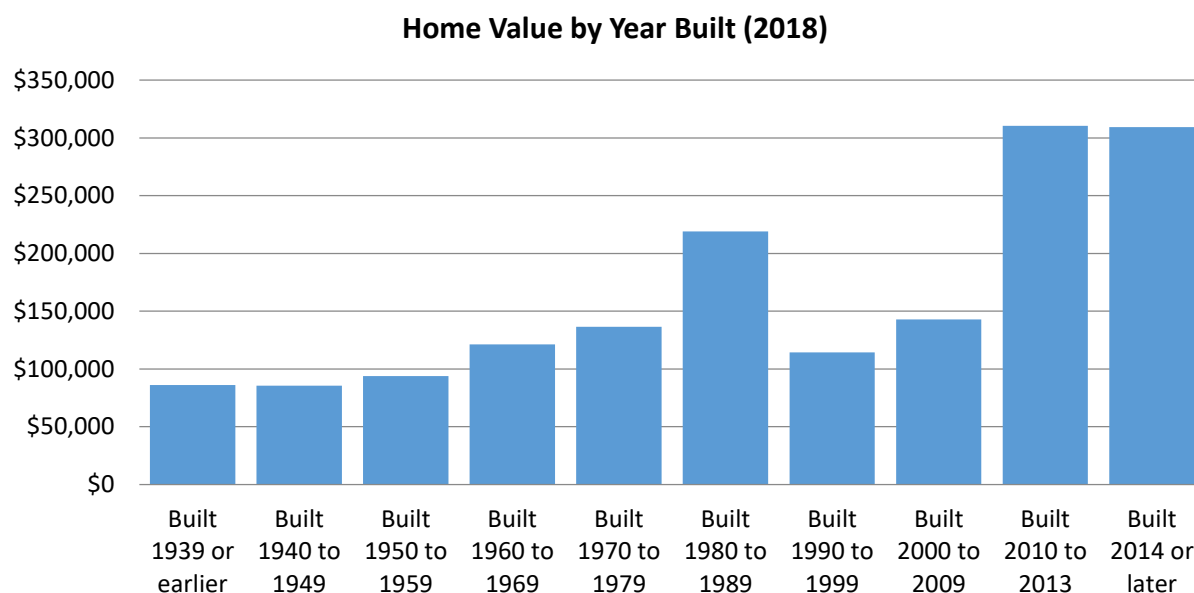


Chart 11: Home Value by Year Structure Built

Of homeowners with a mortgage, 26.4 percent spend more than 30 percent of their household income on housing and are considered cost-burdened (Chart 12). Meanwhile, 52.3 percent of renters are cost-burdened and spend more than 30 percent of their household income on rent (Chart 13).

### Selected Monthly Owner Costs as a Percentage of Household Income (2018)

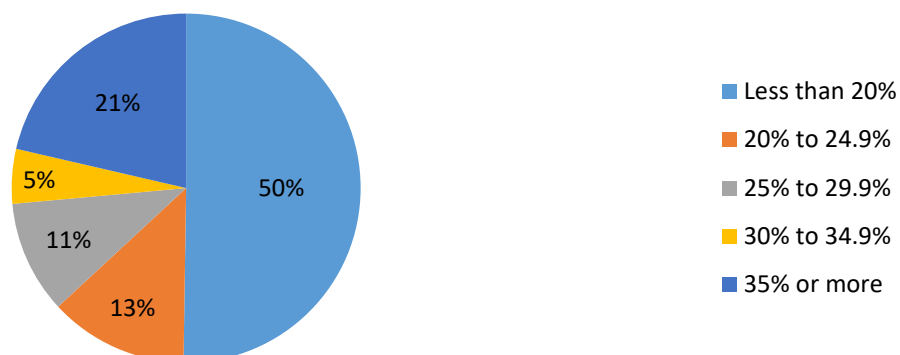


Chart 12: Selected Monthly Owner Costs as a Percentage of Household Income

### Gross Rent as a Percentage of Household Income (2018)

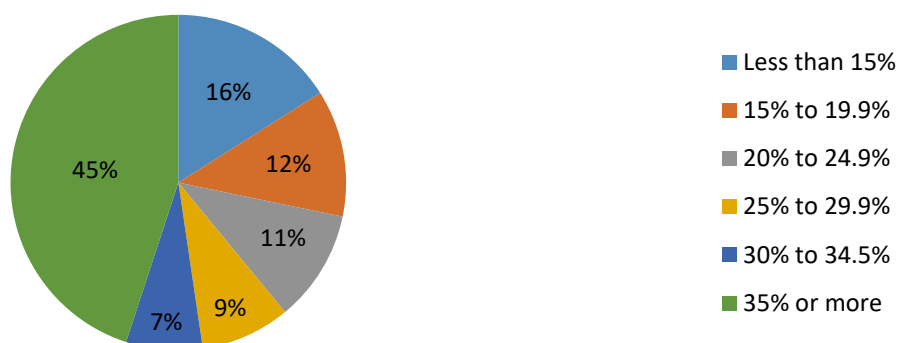


Chart 13: Gross Rent as a Percentage of Household Income

The median gross rent in Evansville is \$764 per month (Chart 14). A little more than 12 percent of renters have their utilities included in their rent.

Single person households in Evansville tend to rent. All other household sizes tend to own their homes. Seventy-five (75) percent of Black/African Americans in the city rent to 40 percent of White/Caucasians.

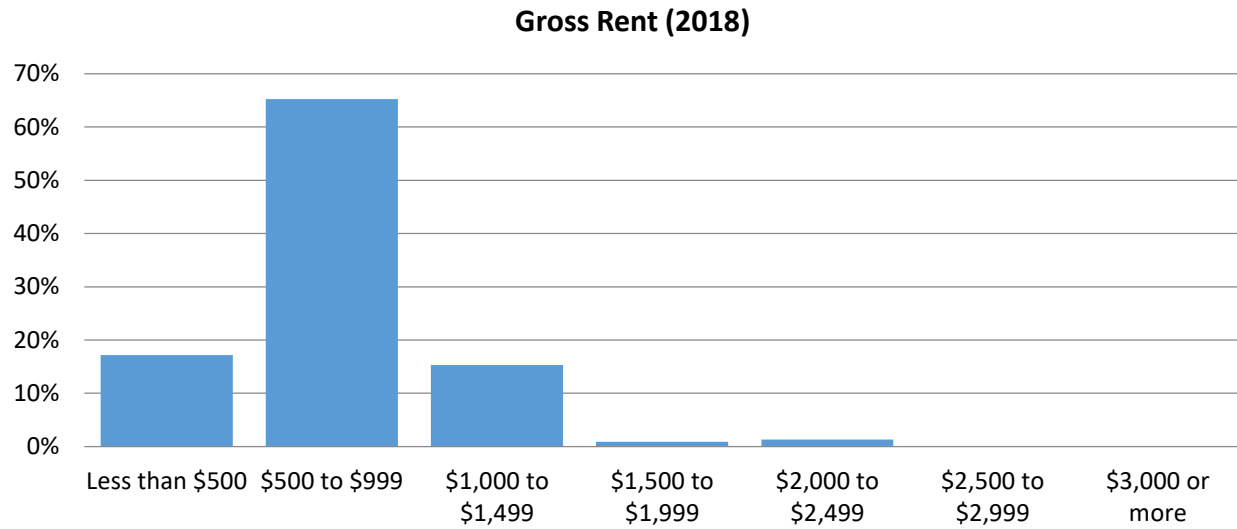


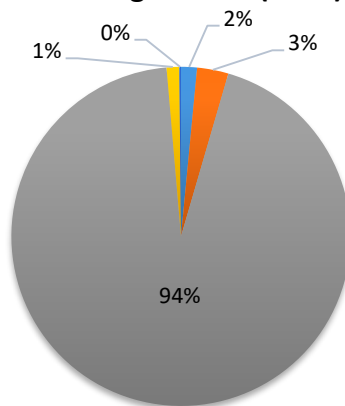
Chart 14: Gross Rent

### Home Mortgage Data

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and was implemented by the Federal Reserve Board's Regulation C. On July 21, 2011, the rule-writing authority of Regulation C was transferred to the Consumer Financial Protection Bureau (CFPB). Regulations require lending institutions to report public loan data.

Loans were denied at nearly double the rate in minority-concentrated census tracts compared to tracts with small minority populations. HMDA data shows that 706 loans (both FHA/VA and Conventional) were denied to White/Caucasians in 2018, and 80 loans were denied to Black/African Americans. Credit history is the largest factor in denial for both races. Loan originations and denials by race are shown in Charts 15 and 16. There is no significant difference between denial rates for males and females.

### Loan Originations (2018)

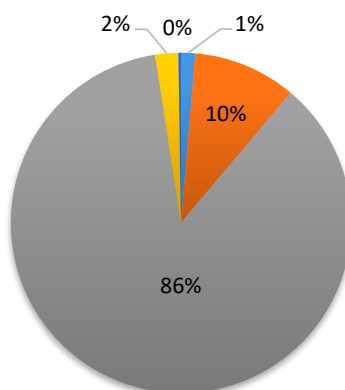


■ Asian ■ Black or African American ■ White (Not Hispanic) ■ White (Hispanic) ■ American Indian or Alaska Native

**Chart 15: Loan Originations by Race**

\*Racial distribution in City below 0.0 percent not represented on pie chart.

### Loan Denials (2018)



■ Asian ■ Black or African American ■ White (Not Hispanic) ■ White (Hispanic) ■ American Indian or Alaska Native

**Chart 16: Loan Denials by Race**

\*Racial distribution in City below 0.0 percent not represented on pie chart.

**Low-income Housing Tax Credits (LIHTC)**

Just over 1,700 housing units in Evansville that were developed using Low-income Housing Tax Credits (LIHTC) are still in their compliance period and must retain affordability thresholds. The largest share of those units are in the 47715 ZIP code (30 percent), followed by 47714 (twenty-five percent) (Table 1).

**Table 1: Evansville Low-income Housing Tax Credit (LIHTC) Projects**

<b>Project Name:</b>	<b>Project Address:</b>	<b>Project ZIP Code:</b>	<b>Total Low-Income Units:</b>
SHANNON GLENN APTS	5095 Tippecanoe Dr	47715	
1224 S. LINWOOD	1224 S LINWOOD AVE	47713	1
772 WASHINGTON AVE	772 WASHINGTON AVE	47713	4
VISION 1505	1505 N Third Ave	47710	0
BUENA VISTA APARTMENTS	1210 VISTA CT	47710	50
JEFFERSON PROJECT	103 JEFFERSON AVE	47713	2
HORIZON HOMES	1450 LUTHER SQ	47714	148
MARTIN HORIZON HOMES			
VANN PARK APARTMENTS I	3305 POLLACK AVE	47714	40
VANN PARK APARTMENTS II	3305 POLLACK AVE	47714	48
VANN PARK APARTMENTS III	3305 POLLACK AVE	47714	32
BRADFORD POINTE APARTMENTS	1680 E FRANKLIN ST	47711	204
VANN PARK APARTMENTS IV	3305 POLLACK AVE	47714	40
WASHINGTON COURT APARTMENTS	111 WASHINGTON AVE	47713	22
MEMORIAL POINTE	428 S MORTON AVE	47713	10
LUCAS PLACE	414 BAKER AVE	47710	20
MEMORIAL PLACE APARTMENTS	920 OAK ST	47713	16
ARBORS AT EASTLAND	6649 OLD BOONVILLE HWY	47715	176
MEMORIAL POINTE PHASE II	658 E CHERRY ST	47713	10
JACOBSTOWN APARTMENTS	240 W FLORIDA ST	47710	35
DALEHAVEN ESTATES APARTMENTS	3701 JUSTUS CT	47714	119



JACOBSVILLE APARTMENTS II	1212 BAKER AVE	47710	35
DELAWARE TRACE APARTMENTS	4901 LENAPE LN	47715	95
MEMORIAL TOWNHOUSES II	920 OAK ST	47713	35
Cedar Trace Apartments II	7th Avenue And Cedar Street	47710	35
CEDAR TRACE APTS II	2130 N Seventh Ave	47710	35
CEDAR TRACE APTS III	2000 N Seventh Ave	47740	48
HOMES OF EVANSVILLE	620 Jackson Ave	47713	40
CEDAR TRACE SENIOR APTS	1501 Keller St	47710	51
EASTLAND APARTMENTS	5308 Eden Drive	47715	161
DELAWARE TRACE, PHASE II	4901 Lenape Ln	47715	80

### Community Reinvestment Act (CRA)

The Community Reinvestment Act of 1977 (CRA) is implemented by regulations of the Office of the Comptroller of the Currency (OCC), the Board of Governors of the Federal Reserve System, and the Federal Deposit Insurance Corporation (FDIC) in 12 CFR parts 25, 228, 345, and 195. The CRA regulations require that information on business, farm, and community development lending by insured depository institutions that meet certain asset thresholds, determined annually, be made available to the public. Institutions subject to CRA data reporting requirements must report the aggregate number and amount of community development loans originated or purchased during the prior calendar year.

In the 2017 CRA data by Census Tract, the following Census Tracts are identified as low-income: 10, 11, 13, 14, 15, 19, 20, 25, 26, and 37.02.<sup>3</sup> Low-income Census Tracts had disproportionately lower business loan investments by banks in Evansville than moderate, middle or upper income Census Tracts (Table 2).

<sup>3</sup> The City of Evansville uses the IRS Section 42(d)(5)(B) Qualified Census Tract Data with a more extensive list of Low-to-Moderate Income (LMI) Census Tracts, which includes 1,10,11,12,13,14,15,17,19,20,21,23,24,25,26,31,32,33,36,37.02, and 8.

**Table 2: Community Reinvestment Act Loans as Percentage of County Totals**

	<i>Loan Amount at Origination</i>							
	< \$100,000		\$100,000 - \$250,000		>\$250,000		Loans to Businesses with Gross Revenue Over \$1M	
	Number	Amount (000s)	Number	Amount (000s)	Number	Amount (000s)	Number	Amount (000s)
<i>Low-income Census Tracts</i>	11%	12%	11%	10%	13%	12%	11%	11%
<i>Moderate income Census Tracts</i>	28%	29%	29%	23%	32%	32%	26%	33%
<i>Middle income Census Tracts</i>	27%	26%	32%	44%	24%	24%	27%	24%
<i>Upper income Census Tracts</i>	27%	25%	19%	16%	22%	23%	31%	27%

Census Tracts 10, 11, 13, 14, and 15 are identified as low-income and also have minority populations over 25 percent. As a percent of the total for the county, the low-income Census Tracts that have significant minority populations have very low levels of business loan investment (Table 3).

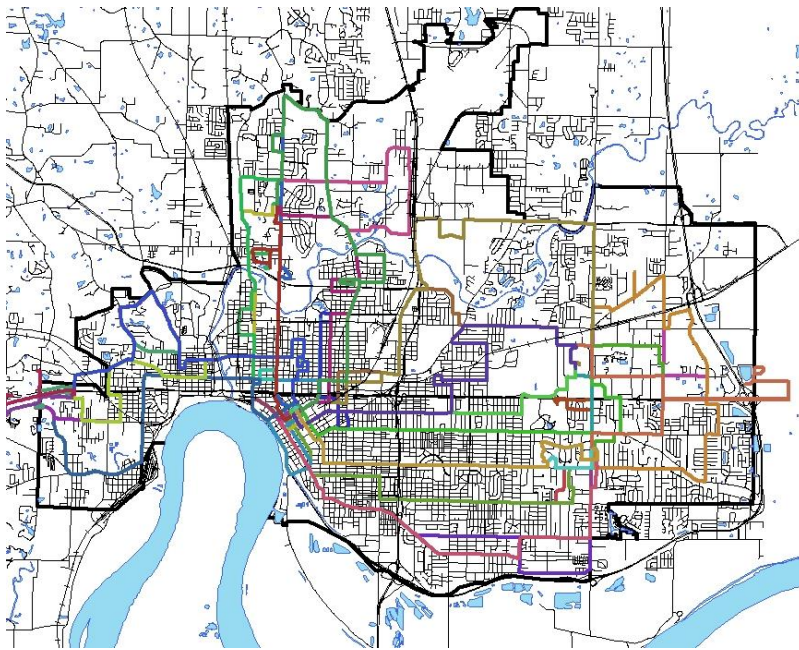
**Table 3: Community Reinvestment Act Loans in Low-income Significant Minority Population Census Tracts as Percentage of County Totals**

	<i>Loan Amount at Origination</i>							
	< \$100,000		\$100,000 - \$250,000		>\$250,000		Loans to Businesses with Gross Revenue Over \$1M	
	Number	Amount (000s)	Number	Amount (000s)	Number	Amount (000s)	Number	Amount (000s)
<i>Census Tract 10</i>	1%	1%	0%	0%	0%	0%	1%	1%
<i>Census Tract 11</i>	1%	1%	0%	0%	1%	1%	1%	0%
<i>Census Tract 13</i>	0%	0%	0%	0%	0%	0%	0%	0%
<i>Census Tract 14</i>	2%	2%	1%	1%	1%	1%	2%	3%
<i>Census Tract 15</i>	1%	0%	1%	1%	0%	0%	1%	1%

### Transportation

The majority (83 percent) of Evansville residents commute to work driving a car alone. Another nine (9) percent carpool with one or more other workers. Less than three (3) percent of residents use public transportation to walk to work. Those below 150 percent of the poverty level tend to take public transportation, walk, or bike to work at a higher rate than those above 150 percent of the poverty level.

Bus service is provided throughout Evansville by the Metropolitan Evansville Transportation System (METS). Current METS routes are included in Map 3.



Map 3: Metropolitan Evansville Transportation System (METS) Bus Routes

## EVALUATION OF CURRENT FAIR HOUSING LEGAL STATUS

The Human Relations Commission is charged with receiving, investigating, and ruling on complaints related to fair housing in Evansville and Vanderburgh County. They are also charged with the dissemination of information about fair housing rights.

Complaints can be filed at the Human Relations Commission:

209 Civic Center Complex

1 N.W. Martin Luther King, Jr. Blvd.

Evansville, Indiana 47708

Charges must be filed within 90 days of an alleged discriminatory act occurring. The Commission is comprised of an 11-member board. Board members are appointed for a two-year term by government officials. There are five staff members, consisting of three investigators, a secretary and the executive director. The Commission is responsible for investigating employment and education discrimination in addition to housing and lending discrimination.

### Complaints and Findings

The Human Relations Commission provided limited data. Of the 140 complaints filed with the Commission in 2018, 7.9 percent, or 11 cases, were housing related. The Commission provided no further information.

In a survey conducted as part of the Analysis of Impediments to Fair Housing, 76 percent of respondents indicated that they did not know who investigates housing discrimination in Evansville. Of the respondents who indicated that they did know and provided a response as to whom, the majority correctly identified the Human Relations Commission. Other responses included the Building Commissioner.

In a meeting with tenants of the Evansville Housing Authority (EHA), many believed that housing discrimination complaints needed to be filed with the EHA. Indeed, there was much confusion over which governmental entity handled such complaints.

Even with training regarding fair housing laws, the protected classes of individuals, and forms of housing discrimination provided at the beginning of each public session held in developing the Analysis of Impediments, many participants still failed to recognize what was likely to be housing discrimination, particularly low-income residents.

Local lenders offer training to their staff on their obligations and fair housing practices. For example, Old National Bank provides an annual continuing education program for its staff, in which fair housing is a component of the training.

The Realtor community noted that it conducts on going continuing education for realtors in which fair housing laws and provisions are discussed. It also provided specific courses to realtors on fair housing. Pockets guides are also provided to realtors.

### Reasons for Trends/Practices

The Human Relations Commission staff time and financial resources remain limited, impacting its ability to promote fair housing and encourage people to report housing discrimination. The majority of complaints filed with the Commission are employment related.

It can be difficult to prove discrimination on the lending side. The Indiana Civil Rights Commission does some testing, but more would be beneficial.

Some people are unaware that fair housing laws apply to both public and private actions, believing that the laws only apply to government agencies.

Much of the housing in Evansville was developed prior to the Americans with Disabilities Act and is not in compliance with the Act, in the same way that much of the older government infrastructure and buildings have not yet been brought into compliance. Retrofitting is expensive and can be difficult, it is not generally undertaken by property owners because the lack of available housing stock for people with disabilities is an issue that has been identified.

### Discussion of Concerns

Three basic concerns arise regarding fair housing: 1) the population is not well informed about fair housing laws, discriminatory practices, and how to file a complaint; 2) proactive efforts to engage residents, landlords, lenders, and real estate professionals in fair housing have been limited; and, 3) while practices may not be discriminatory on their face, the outcomes disproportionately affect the Black/African American community in Evansville.

None of the practices identified in the document review, stakeholder interviews, survey, or public meetings suggest that there is substantial intentional housing discrimination occurring in Evansville. Even the stakeholders that are Black/African American or serve primarily Black/African American people say that discrimination that is encountered is based on income or economic status. Discrimination that has been identified by stakeholder groups is largely against people who are not in protected classes, such as ex-offenders with felony convictions. However, the pattern of concentrated neighborhoods (Census Tracts) with minority populations, low rates of minority homeownership, and difficulty in finding safe, decent, affordable housing for people with disabilities suggests that there are underlying issues. Substantial income disparity exists between Black/African Americans and White/Caucasians in Evansville. This leads to Black/African Americans living in neighborhoods where housing is

older and less expensive and needing to rent over purchasing a home. Reasons for the income disparity are not clear in the analysis conducted as part of the AI.

## IMPEDIMENTS TO FAIR HOUSING CHOICE

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Impediments to fair housing can be public or private. Public barriers may be adopted ordinances, policies, procedures, or programs that have largely unintended consequences of limiting housing choice to certain classes of people. Private barriers include policies and procedures in housing transactions on the lending side, as well as the transactional side.

### Public

Zoning ordinances and actions of the Area Plan Commission, policies and actions of the Department of Metropolitan Development, policies and the investment decisions of the Metropolitan Planning Organization, and the Evansville Housing Authority may impact the availability and accessibility of safe, decent, and affordable housing in the city. Documents from each organization were reviewed, in addition to the stakeholder interviews conducted to identify potential barriers to fair housing.

### Comprehensive Plan

The Area Plan Commission issued a new comprehensive plan in 2015. While the plan recognizes a need for infill development, most of the projected future growth is in the unincorporated areas of Vanderburgh County. It is projected that the area will gain approximately 11,000 additional housing units by 2035, including affordable housing units.

The plan indicates a major reversal in the urban core decline trend by predicting Pigeon Township to have the third fastest growth over the next 20 years (2015 permit records show that Pigeon Township was the second fastest City/County residential growth area). It is anticipated that about 2,000 blighted homes, mostly in Pigeon Township, could be demolished in the next five (5) to 10 years, creating significant opportunities for redevelopment. The plan recognizes a need for demolition of unsafe structures and the need to preserve existing buildings, including housing units, which continue to have useful life. It stresses using the tools of revitalization in all neighborhoods, not only areas that have suffered decline and disinvestment.

### Planning and Zoning Boards

The Area Plan Commission is the local agency designated to carry out land use planning for the City of Evansville, Vanderburgh County, and the Town of Darmstadt. This body is an appointed 13-member board that meets once a month to make decisions on zonings and subdivisions within these jurisdictions. The Area Plan Commission and its staff are also responsible for long range planning to shape the future development and growth of the community, which involves updating the City/County Comprehensive Plan and ongoing efforts to implement the Plan. This office also serves as the staff for the Board of Zoning Appeals, which rules on petitions for variances from the zoning ordinance requirements and special uses.

Another function of the Area Plan Commission, referred to as current planning, is the administration/enforcement of the zoning and subdivision ordinances. In this role, the Area Plan Commission professional and support staff process applications for new development, review site development plans, prepare reports for the Plan Commission and the public on these proposals, and issue permits. Improvement Location Permits are issued for all new buildings, additions to existing buildings, homes, accessory structures, pools, and business signage.

### Building Codes

Building codes in Indiana are adopted at a state level and are the same across the state. As a general rule, local forms of government in Indiana cannot adopt codes that are more restrictive than the state codes. Indiana traditionally utilizes national model codes from a recognized agency. The model code is then reviewed and amended. The approved model code and amendments are then adopted as part of state law.

The Building Commission is responsible for issuing building permits and ensuring compliance with building codes in Evansville.

#### When is a Permit Required?

- A building permit is required for all new buildings, additions, or structural alterations to existing buildings, including accessory buildings, swimming pools, windows, siding, and re-roofing.
- A building wrecking permit is required for the demolition of all buildings, including accessory buildings.
- A building moving permit is required any time a building is moved to a new location.
- A fire alarm permit is required when adding a new system or improving an existing system.
- A fire suppression permit is required when adding a new system or improving an existing system.
- An HVAC permit is required if installing or replacing a furnace, wood burning stove, fireplace, central air conditioning unit or making alterations to the distribution or fuel supply system.
- An electrical permit is required if installing a new service, new wiring, or rewiring.

Since codes are adopted statewide and there is little local control over them, they are not particularly a barrier to fair housing in Evansville.



*Revitalization, Services, Housing, Parks, and Transportation*

The Department of Metropolitan Development is largely charged with redevelopment and revitalization activities in Evansville, working in partnership with nonprofit organizations that build and manage affordable housing. Demolition work continues to address some of the abandoned and unsafe building issues. Some concern was raised that when affordable housing is demolished, it is generally not replaced, reducing the available supply. Another related concern expressed is that the development occurring in the downtown core, where services are available, has been for market rate renters and homebuyers who are more affluent. It is important to many populations served by affordable housing to be near public transportation and services. These services are also attractive to market rate renters and buyers.

The Department of Metropolitan Development and the Evansville Housing Authority are the primary public sector providers of affordable housing in Evansville. The DMD develops affordable housing by providing funding for affordable housing projects developed by partners. An annual process of training, application, review and award takes place for use of HOME funds (as well as CDBG and ESG). The process is transparent and includes opportunities for organizations serving a variety of populations to compete for funding. The Evansville Housing Authority develops housing for project-based assistance recipients and oversees the Housing Choice Voucher program.

Table 4 shows Evansville Housing Authority housing complexes.

**Table 4: Evansville Housing Authority (EHA) Housing**

Name	Address	Efficiency	1 Bedroom	2 Bedroom	Family Units
Buckner Towers	717 Cherry	54	48	6	
Fulton Square Apartments	1328 Dresden	82		110	
John Cable Apartments	1111 Cherry		20	4	
John M Caldwell Homes	736 Cross	6	180		
Kennedy Towers	315 SE Martin Luther King Jr. Blvd	50	43	7	
Schutte Apartments	1030 West Franklin Street	91	23	1	
White Oak Manor	509 North Saint Joseph	91	23	1	

The EHA also maintains scattered site properties.

Parks and recreation opportunities affect the quality of life in neighborhoods. The Parks and Recreation Department is responsible for development, operation, and maintenance of parks and recreation facilities in Evansville. Three regional parks, eight community parks, and 21 neighborhood parks comprise the parks system, in addition to two nature preserves, seven golf courses, and eight special facilities. The Parks and Recreation Department is also responsible for the Pigeon Creek Passageway trail system.

The Metropolitan Planning Organization (MPO) incorporates accommodation of people with disabilities and people with limited English proficiency into their planning process. They are aware of the limitations of their activities and are continually working to improve their inclusivity. The Metropolitan Evansville Transportation Authority operates the bus system in Evansville, and is separate from the MPO. The bus routes are concentrated in the urban core and serve the neighborhoods with the highest concentration of minority population.

### Private

Private actions are also subject to fair housing laws, including lending, real estate transactions, and leasing.

### Lending Policies and Procedures

Home Mortgage Disclosure Act (HMDA) data from 2018 was reviewed for the Evansville region. While there are low loan origination numbers in Census Tracts with significant Black/African American populations, there are also few denials in those Census Tracts. Overall, fewer applications for FHA/VA and conventional loans are received for those Census Tracts. Primary reasons for denial were debt-to-income ratios and credit scores. Nothing in the data suggested a clear pattern of discrimination against applicants based on race, gender, or national origin. Programs, products, and partnerships designed to serve these areas and marketed through service providers could improve these numbers.

### Rental Activities

Other rental companies, and individual property landlords that do not receive federal funds or generally participate in Fair Housing programs did not directly participate in the AI process and were not asked to submit sample lease agreements. However, fair housing regulations do apply to all types of landlords.

In the survey and public meetings general references were made to landlords or management companies who would not show apartments, indicated apartments were not available, or changed prices or policies for some people, based on protected status. Few cases are reported to the Human Relations Commission.

## Public and Private

### *Fair Housing Enforcement*

The Evansville Human Relations Commission receives complaints on fair housing issues and investigates them. They maintain an accounting of cases and their status, and cases are generally closed in a timely manner.

The affordable housing and human services providers consulted all reported that they refer cases of discrimination to the Human Relations Commission. However, several noted that people are generally not willing to file formal complaints, which is consistent with feedback from the Human Relations Commission.

### *Informational Programs*

Information about fair housing is distributed to people at a number of contact points. The Human Relations Commission has a consultant who presents fair housing information at meetings across the city. Many of the housing service providers also have fair housing information available at their offices or properties.

The Human Relations Commission uses radio spots, fair housing workshops, and public speakers on topics like predatory lending to disseminate information about fair housing in the community.

The Human Relations Commission notes that people are often afraid to file a complaint, but they need to test the law to achieve positive outcomes.

### Stakeholder and Public Input

Residents and stakeholders were provided a number of different ways to engage in the AI process. A short survey designed for resident input was made available online and circulated among stakeholder groups, as well as being available as a link on the city's web page. The survey was available from October 1, 2019 through October 29, 2019. Paper copies of the survey were made available through the Department of Metropolitan Development. The Department of Metropolitan Development circulated surveys at a variety of local meetings during the survey period. All results were entered into Survey Monkey (the online survey tool) for analysis.

Interviews were conducted with more than 20 key stakeholders, including government departments related to housing and transportation, Community Housing Development Organizations (CHDOs), and human services providers.

Two public forums were held to solicit input from residents and stakeholders. Additionally, a meeting was held with Evansville Housing Authority (EHA) tenants. Please refer to Appendices A and B for copies of the EHA sign-in sheet and the meeting invite, respectively.

A final public meeting in the form of a webinar took place on May 15, 2020.

### Survey Results

A total of 41 survey responses were collected including online participants and those who submitted paper versions of the survey. Of the respondents, 29.3 percent were from the 47713 ZIP code, 19.5 percent were from 47714, 14.6 percent were from 47711, and 12.2 percent were from 47710 and 47715 each.

Sixty-eight (68) percent of respondents live in a single-family home and nearly 30 percent own their home with a mortgage. 36.6 percent were single people with no children at home, 21.9 percent were married couples, and 14.6 percent were married couples with children under age 18 living at home.

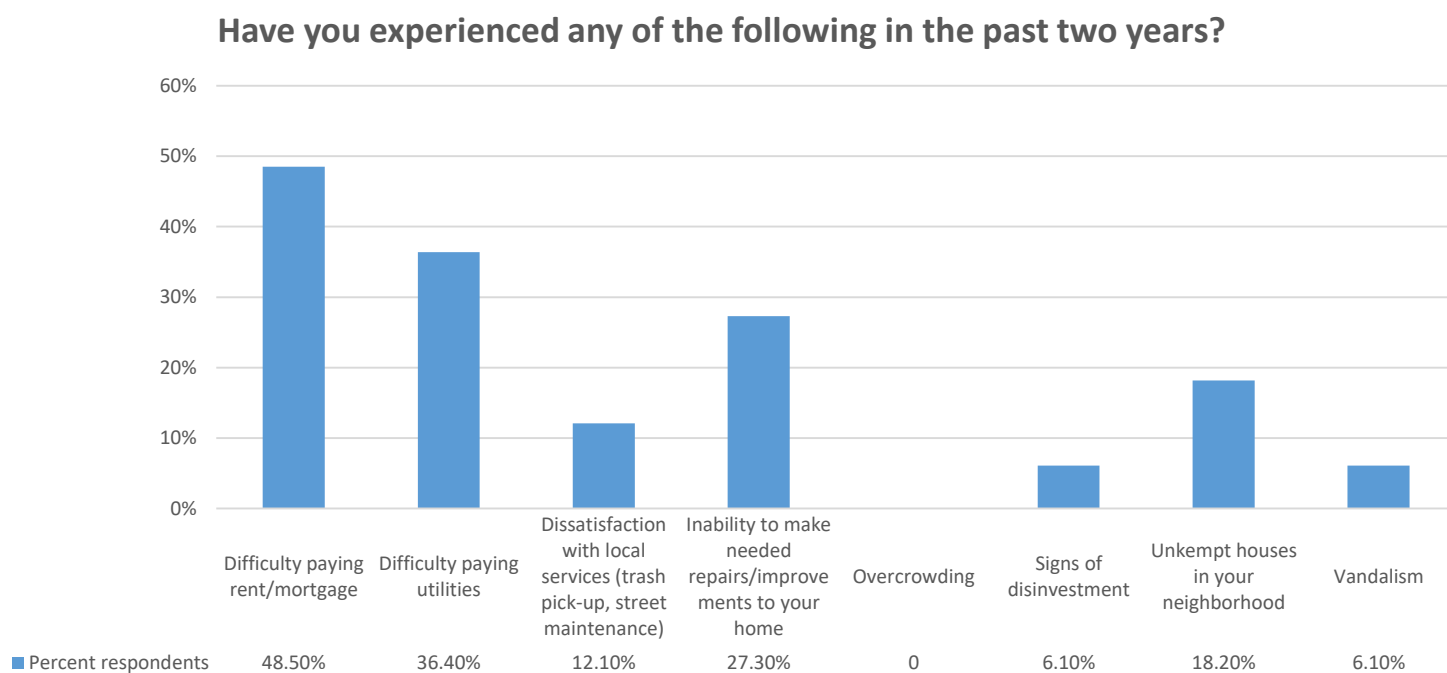
Approximately 51 percent of respondents indicated they spend more than 30 percent of their income on housing (including insurance and utilities), with 22 percent indicating they spend more than 50 percent of their income on housing. Another 24.4 percent spend between 10 and 19 percent of their income on housing.

Thirty-six (36) percent reported a household income over \$45,000, which is higher than the median income for the city. Another 30 percent reported a household income of less than \$20,000.

Sixty-five (65) percent of respondents were White/Caucasian, and 32.5 percent were Black/African American. Most respondents (92 percent) have lived in Evansville for 10 or more years. Almost 28 percent indicated having at least one household member with a disability.

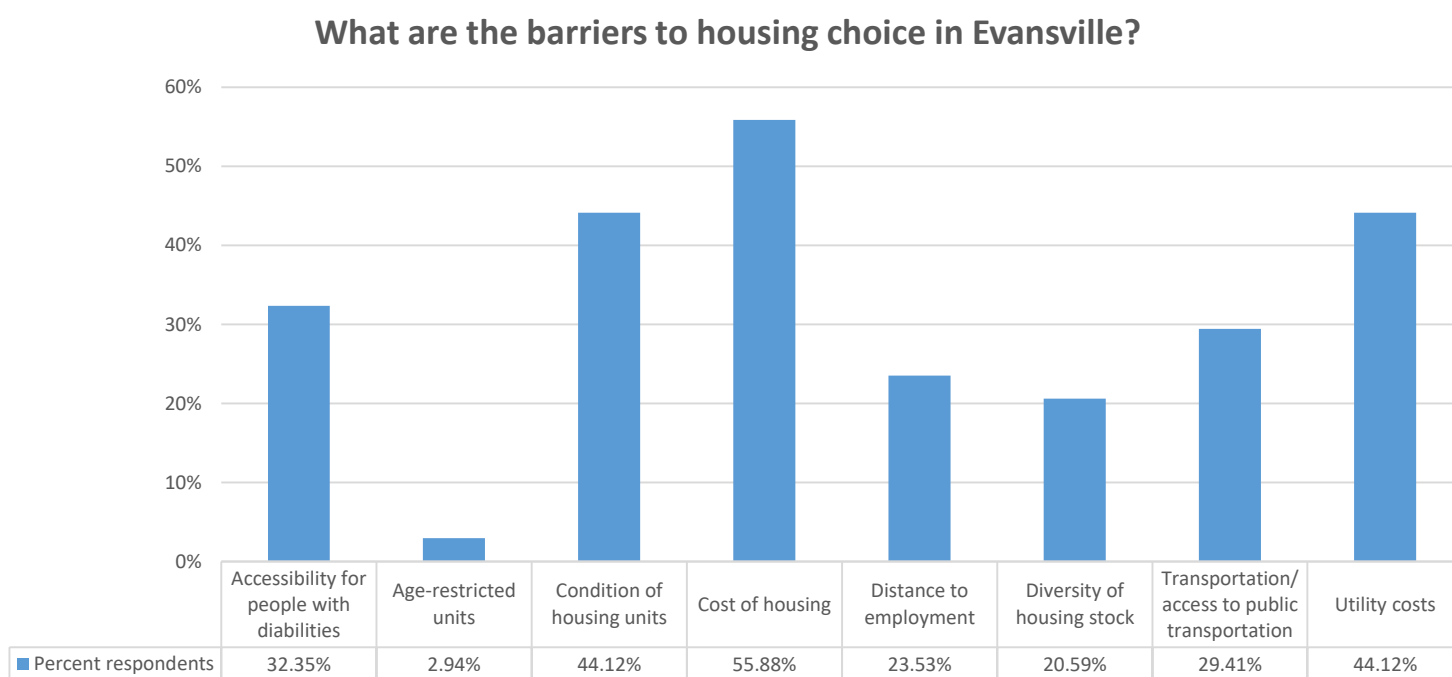
Responses to the question “Have you experienced any of the following in the past two (2) years? (select all that apply)” are shown in Chart 17.

Chart 17: Survey Responses to Have you experienced any of the following in the past two years?



“Cost of housing” was the most common barrier to housing choice reported by respondents, followed by “Condition of housing units” and “Utility costs.” Responses to the question “What are the barriers to housing choice in Evansville? (select all that apply)” are shown in Chart 18.

Chart 18: Survey Responses to What are the barriers to housing choice in Evansville?



Ninety-two (92) percent of respondents said they have not experienced housing discrimination in the past two years. Of those who indicated they had experienced discrimination, the reasons were race/color, national origin, and age. Seventy-five (75) percent of respondents did not know who investigates housing discrimination in Evansville.

Please refer to Appendix C for a copy of the survey.

### Interviews

Interviews were conducted with key stakeholders during the week of October 14, 2019. Each participant was scheduled for a one-hour interview. The contents of the interviews were to provide information and context for use in development of the Analysis of Impediments, but individual responses to questions asked will not be disclosed. Interview participants represented:

- Carver Community Organization
- Catholic Charities of Evansville
- Center Point Energy
- Community Action Program of Evansville
- Department of Metropolitan Development (City of Evansville)
- ECHO Housing Corporation
- Evansville Christian Life Center
- Evansville Housing Authority
- Evansville Water and Sewer Utility (City of Evansville)
- Evansville-Vanderburgh County Area Plan Commission
- Evansville-Vanderburgh County Human Relations Commission
- Growth Alliance of Greater Evansville
- Hope of Evansville, Inc.
- Legal Aid Society – Evansville
- Memorial Community Development Corporation
- Metropolitan Evansville Transit System
- Metropolitan Planning Organization
- Old National Bank
- Southwest Indiana Association of Realtors
- Southwestern Indiana Mental and Behavioral Health
- United Caring Shelters
- Young Men’s Christian Association – YMCA

Questions asked were particular to each organization, but a summary of common questions are provided.

- What do you see as barriers to fair housing in Evansville?
- What discriminatory housing practices have your clients experienced in the community?

### Public Meetings

Two public forums were held in at the C.K. Newsome Center on October 18, 2019. The first forum was held in the morning and well attended by staff from affordable housing providers and service providers in the city. The afternoon meeting saw zero participants. Please refer to Appendices D, E, and F for copies of the sign-sheet, meeting agenda, and meeting notice, respectively.

As a part of the forum, participants were asked to complete a worksheet identifying barriers from the 2014 Analysis of Impediments to Fair Housing, indicating if those barriers identified in 2014 were still barriers today. The results are in Table 5.

**Table 5: Barriers to Housing Choice from 2014 with 2019 participant responses**

Barrier (from 2014)	Yes, still a barrier	No, not a barrier anymore
Homeowner rates are low among Black/African Americans	16	0
The city's Black/African American population is concentrated in several Census Tracts in the urban core	17	0
People with disabilities may have difficulty finding safe, decent, affordable housing	16	0
Low-income large families may have difficulty finding affordable housing	16	0
There is a significant income disparity between the city population as a whole and the city's Black/African American population. While discrimination has been identified locally as being economic, there is a disproportionate impact to the Black/African American community.	12	0
Loss of affordable housing in the urban core limits access to transportation, services, and employment opportunities for low-income households	16	0

People are generally unaware of fair housing and how to file housing discrimination cases.	15	0
While not a protected class, ex-offenders are difficult to house in Evansville.	13	1
There is not enough affordable housing available in Evansville.	16	0

The forum began with a brief presentation regarding fair housing, protected classes, and discriminatory housing practices. The following questions and responses were discussed in a small groups setting and reported to the larger group at the morning session. No individuals participated in the late afternoon session.

*What would you do to remove barriers to fair housing in Evansville?*

- Funding to build more affordable housing, repairs, etc.
- Incentivize the private sector
- More coordination – backbone – between service providers
- Create mediators/counselors – bridge gap between landlords and renters
- Develop a housing fair similar to a job/career fair – invite landlords, offer options available to households
- Apartment complexes – set asides for Section 8
- Human Relations Council – more evaluation of tenants
- Legislation – Contract sales; limit number of parcels homes can occupy
- REOs (banks) – properties sold as is (lift limitations)
- Lots of data, plans, etc. – public input lacking, including visioning; address gaps between what is needed by communities and individuals (go to them); public agencies need to attend more meetings
- Regulations – disincentivize development
- Mandate through legislation/regulation that landlords attend a fair housing training
- Reduce legal regulations, processes, etc.

*What is being done to address barriers to fair housing in Evansville?*

- Elimination of blighted properties through the Land Bank



- City continues to receive funding from U.S. Department of Housing and Urban Development; indicates accountability
- Housing counseling, down-payment assistance; investment through the Community Reinvestment Act; Evansville Housing Trust Fund
- Several permanent supportive housing units
- Greater participation by city officials in neighborhood associations
- Commission on Homelessness
- Promise Zone
- Blight elimination program
- Rental registration through the City of Evansville
- Aurora – inspects housing units before renting
- University of Southern Indiana conducting research on redlining
- Financial literacy – community awareness
- Active Human Relations Commission which investigates housing discrimination
- Collaborative nature of government and nonprofit groups through H.O.U.S.E.; more production of affordable housing
- Tax credit projects
- Repair of existing properties through organizations like Catholic Charities and HOPE of Evansville
- There is good baseline data around the city's housing infrastructure
- Advocacy of tenants' rights
- Spreading the news of the importance of the U.S. Census and participation in it; why it's important to collect this data

*What, if any, are the new barriers to fair housing in Evansville?*

- A person is four-times likely to be homeless because of their race
- No housing for sex offenders
- Housing costs are continuing to rise, particularly in the urban core; gap costs between the development and sale of homes (HFH)
- Personal debt issues
- Opposition to group homes for people with addictions

- Changes to nuclear families (grandparents and extended family raising their grandchildren/children)
- Minimum wage remains low
- Child care gap

#### *Other Issues*

- High rents – not enough supply of housing
- Limitations on the number of family members who can live in the household
- Difficult for persons with disabilities to find affordable housing on bus line
- Social Security Disability Insurance (SSDI) – work regulations threaten loss of housing benefits
- Lack of awareness of what services are available through the public, private, and nonprofit sectors
- Access to quality food – leads to health issues, etc.
- Evictions – more than two evictions and it becomes difficult to find housing
- More awareness of renters rights and responsibilities
- High costs associated with rehabilitation of existing housing stock
- Predatory slum lords
- Lack of financial literacy
- Unable to keep up with production rates; limited funds; there are no funds from the Indiana Housing and Community Development Agency relative to rental development
- Excess of run-down housing (average home built in 1954); 80% of homes in Evansville built before 1980
- Multiple families living in a single residence
- Latino population and language barrier; landlords take advantage of this population
- Lack of credit among single moms and pregnant women
- Lack of support to help navigate through system
- Lack of case management

A final public meeting in the form of a webinar was held on May 15, 2020. The purpose of this meeting was to present the findings and recommendations, as well as data, from the report.

Please refer to Appendices G, H, and I for copies of the attendance list, notice, and slide deck, respectively.

## ASSESSMENT OF FAIR HOUSING ACTIVITIES

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Fair housing is a priority for the organizations that are engaged in the development of affordable housing and the government departments and agencies charged with furthering fair housing. It is not a priority in other agencies/departments or for the general housing industry, let alone the community at large. The general population has a limited understanding of protected classes and fair housing laws.

### Strengths

There are a number of positive actions and outcomes related to fair housing in Evansville.

- Complaints to the Human Relations Commission are investigated and resolved in a timely manner.
- The Human Relations Commission has a consultant working on raising awareness of Fair Housing.
- Home Mortgage Disclosure Act (HMDA) data does not suggest discriminatory practices in lending.
- Representatives from low-income minority areas feel that most of the discrimination is economic, rather than racial.
- Investment is being made in affordable housing in neighborhoods that have concentrations of low-income minority populations by a number of housing organizations.
- Partners in the human/social services, affordable housing, homeless prevention, and public sector know each other well and work well together. There is collaboration with people who work with specific populations including the disabled and people with limited English proficiency.
- There is widespread understanding of the challenges with housing people with felony convictions (particularly drug and sex offense convictions).

### Opportunities for Improvement

While there are no clear barriers to fair housing that are easily correctable through enforcement, there are a number of opportunities to improve access to safe, decent, affordable housing in Evansville.

- Increasing homeownership among Black/African Americans will take a concerted effort by a variety of partners, including financial institutions, to increase financial literacy, increase the affordability of homes through weatherization efforts, and find mortgage products that meet bank underwriting standards while making loans available.
- Large scale weatherization programs for low and moderate income households could make the costs of renting and homeownership more predictable and more sustainable. Utility costs are one of the key drivers of unaffordable housing in the urban core and one of the key barriers to safe, decent housing for many low-income households.
- Testing activities for discrimination in lending and leasing would help further identify if systemic issues are present in the community that need to be addressed related to fair housing. Funding is needed to support this type of testing.
- Business lending, particularly small business lending, practices should be monitored by race in the low-income Census Tracts with significant minority populations to determine if intervention is needed. There is a substantial income gap between the Black/African American population in Evansville and the general population, and it is particularly concentrated in a few Census Tracts in the urban core. Creating opportunities for small business development and entrepreneurship in these areas could support incomes, which improves housing affordability.
- A city-lead rezoning of areas of the city that are in residential use and inappropriately zoned for commercial and industrial uses should be a priority to reduce barriers to investment and housing affordability. An alternative approach, since large-scale rezoning is complex and time consuming, would be working with lenders and real estate professionals to address the issues at the time of real estate transactions. This may be possible with local lenders, but will not be possible with all lenders and underwriting practices, as many mortgages are not originated locally.
- A wholesale revision of the zoning ordinance to incorporate current best practices would improve the development and redevelopment opportunities in the city. The zoning ordinance should be written through the lens of redevelopment and infill development, rather than focus on suburban greenfield development. This may require a comprehensive plan update. The Area Plan Commission is currently working on, and has recently completed, a series of revisions to the zoning ordinance.
- Urban redevelopment and infill development in the city core should balance the need for affordable housing for the people who need access to public transportation and services with the desire to attract market rate professional tenants and homeowners to the downtown.
- Improvements to accessibility of older homes would encourage aging in place and provide greater housing choices for those with physical disabilities.

- Property managers, particularly for affordable housing developments should be mindful of the need to make exceptions to no pet policies for service animals. Failure to do so could result in discrimination based on disability.

## CONCLUSIONS AND RECOMMENDATIONS

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The following findings and recommended strategies are intended to consolidate the barriers to fair housing identified in data, document review, and public participation and suggest ways that various players in the housing industry in Evansville may improve the access to safe, decent, affordable housing for all Evansville residents over the next five years.

### Findings

Based upon the data and anecdotal information shared in the interviews, many of the findings from 2014 remain the same.

Finding 1: Homeownership rates continue to remain low among Black/African Americans.

- Fifteen (15) percent of the population is Black/African American, the largest minority population in the community.
- The Census Tracts with a significant Black/African American population are: CT 10 (25 percent), CT 11 (38 percent), CT 12 (35 percent), CT 13 (54 percent), CT 14 (47 percent), CT 15 (56 percent), and CT 17 (31 percent).
- Seventy-five (75) percent of Black/African Americans rent, compared to 40 percent of White/Caucasians.

Finding 2: The city's Black/African American population is concentrated in several Census Tracts in the urban core.

- The Census Tracts with a significant Black/African American population are: CT 10 (25 percent), CT 11 (38 percent), CT 12 (35 percent), CT 13 (54 percent), CT 14 (47 percent), CT 15 (56 percent), and CT 17 (31 percent).
- About half of interviewees stated that Evansville remains a segregated city.

Finding 3: Utility costs contribute to housing affordability issues in Evansville.

- This was a consistent comment in both the interviews with nonprofit leaders and with public housing tenants.
- Tenants discussed how it makes it difficult to move from one location to another (better housing options), particularly when unpaid utility debt follows the individual.
- Forty-four (44) percent of survey respondents noted utility costs as a barrier to housing choice in Evansville.

- Thirty-six (36) percent of survey respondents noted difficulty paying utility bills in the past two years.

Finding 4: A large portion of renters and homeowners have monthly payments that exceed 30 percent of household income.

- Twenty-six (26) percent of homeowners with a mortgage spend more than 30 percent of their household income on housing and are considered cost-burdened. Meanwhile, 52.3 percent of renters are cost-burdened and spend more than 30 percent of their household income on rent.
- Approximately 49 percent of survey respondents shared that they had difficulty paying their rent or mortgage in the past two years.

Finding 5: A significant income disparity exists between the city population as a whole and the city's Black/African American population. While discrimination has been identified locally as being economic, there is a disproportionate impact to the Black/African American community.

- There is significant income disparity between races. 27 percent of Black/African Americans in Evansville have a household income below \$10,000 per year compared to eight percent of non-Hispanic Whites.

Finding 6: People are generally unaware of fair housing and how to file housing discrimination cases.

- The survey conducted as part of the AI indicates that at least 76 percent of the respondents are not sure where to report housing discrimination.
- In the meeting with public housing tenants, no participant was able to identify the Evansville-Vanderburgh Human Relations Commission as the correct agency in which to file a housing discrimination complaint.

Finding 7: Mortgage applications and originations are especially low in minority census tracts.

### Recommended Actions/Strategies

The following recommended actions or strategies should be implemented by the City of Evansville and its partners in the next five years to improve fair housing in the city.

- The Human Relations Commission should improve marketing outreach to community and public housing residents on how to file discrimination grievances pertaining to housing. We recommend that this begin in 2021 and continue through at least 2024.

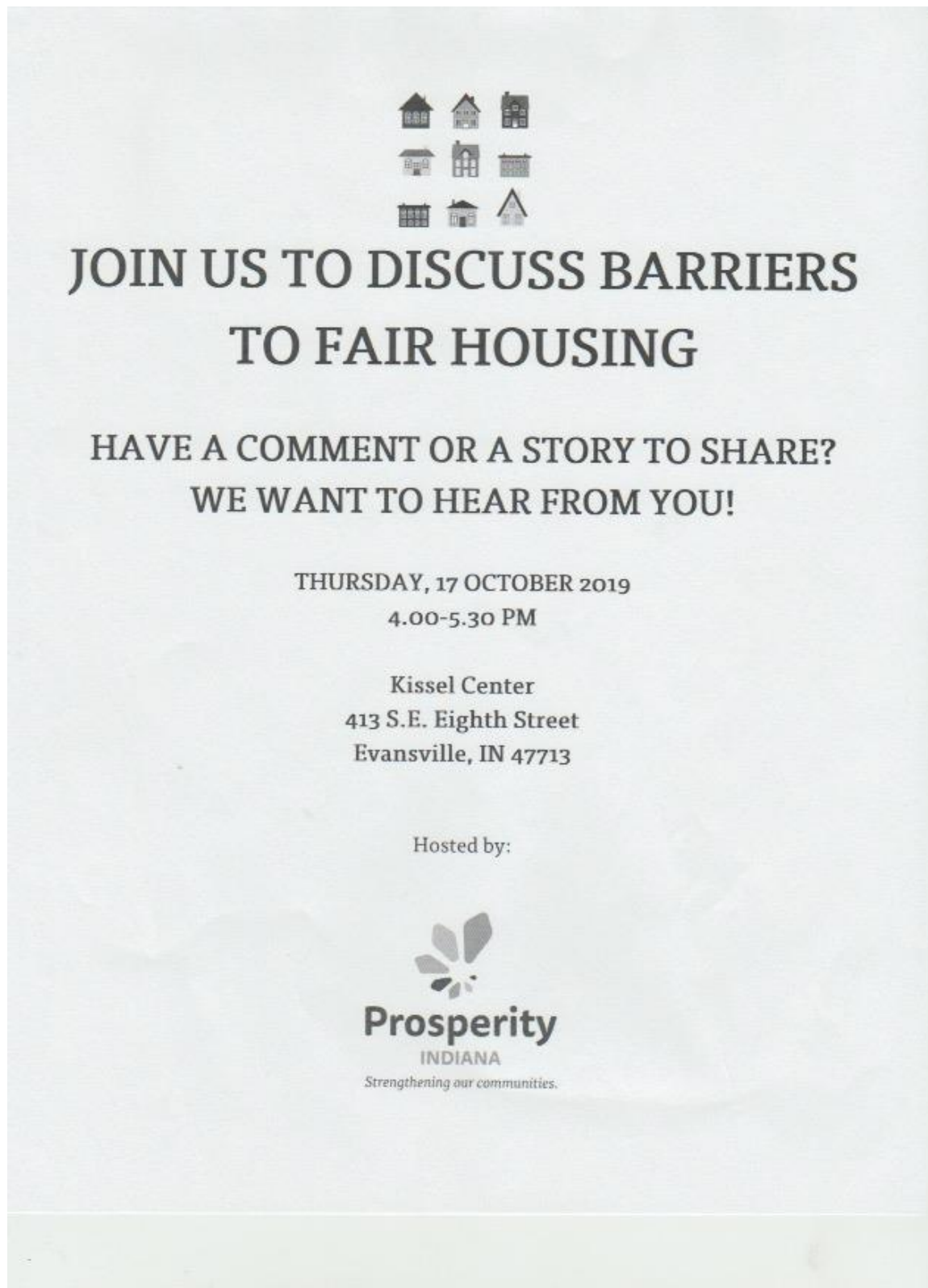
- The City, along with local utility companies, should continue to assist low-income homeowners with weatherization programs. We recommend that this continue in 2020 through 2024.
- The City should encourage housing developers to build/rehab affordable housing for extremely low-income households. We recommend that this begin in 2021 and continue through at least 2024.
- The City should review CHDO leases for provisions allowing pet exceptions for service animals. The City may also establish criteria to guarantee the animal is a trained service animal and needed to accommodate a disability. We recommend that this begin in 2020 and continue through at least 2024.
- The City should continue to convene roundtable discussions with residents and leaders from the Black/African American community, as well as lenders and real estate professionals to identify solutions to low homeownership among Black/African Americans. We recommend that this continue in 2020 through 2024.
- CDCs and CHDOs should continue to partner with financial institutions to offer financial literacy programs in Low-Income Census Tract neighborhoods with low homeownership rates. We recommend that this continue in 2020 through 2024.
- The City should engage CenterPoint Energy to ensure the emergency utility assistance program funds are reaching those who most need the funds. We recommend that this begin in 2021 and continue through at least 2024.



## APPENDIX A – EVANSVILLE HOUSING AUTHORITY RESIDENTS MEETING (SIGN-IN SHEET)

Muriel Kelly	Stewart
Anna McCarty	JFK Tower
Angela Smith	Buckner Tower
Diana M. Bunn	Buckner Towers
Craig Scott Alsup	Buckner Towers
Steve Cope	Buckner Towers
Kenney Baker	Buckner Towers
Leanne Williams	Buckner Towers
John M. Young	Buckner

**APPENDIX B – EVANSVILLE HOUSING AUTHORITY RESIDENTS MEETING (INVITATION)**



## APPENDIX C – SURVEY

**SURVEY**

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Greetings! The City of Evansville is preparing the Analysis of Impediments to Fair Housing Choice and is seeking input from residents of Evansville to identify the barriers to fair housing choice. Survey results will be utilized by the city in the future planning and spending of federal funds. Individual responses from the survey will be confidential.

**\*1. What is your ZIP code?**

**2. What type of home do you live in? (select one)**

☐ Single family home

☐ Duplex

☐ 3-4 unit building

☐ 5+ unit building (apartment)

☐ Mobile home

☐ Other (please specify)

**3. How close is your home to public transportation (a bus stop)? (select one)**

☐ Less than 1/4 mile

☐ 1/4 to 1/2 mile

☐ 1/2 mile to 1 mile

☐ More than a mile

☐ I don't know

**4. Do you own or rent your home? (select one)**

☐ Own, with a mortgage

☐ Own, no mortgage

☐ Rent from a private landlord (no assistance)

☐ Rent in a public housing complex

☐ Rent in an income-qualified complex (low income housing)

☐ Rent with public assistance (Section 8 or other) from a private landlord

☐ Living with others

☐ Living in a shelter or homeless

**5. Which best describes your household? (select one)**

- ☐ Single person
- ☐ Single person over age 65
- ☐ Single parent with children under 18 at home
- ☐ Married couple (no children)
- ☐ Married couple over age 65
- ☐ Married couple with children under 18 at home
- ☐ Unmarried couple (no children)
- ☐ Unmarried couple over age 65
- ☐ Unmarried couple with children under 18 at home
- ☐ Intergenerational (3 or more generations living together)

**6. How many people live in your household?**

**7. How much of your household income do you spend on housing (including insurance and utilities)? (select one)**

- ☐ Less than 10%
- ☐ 10-19%
- ☐ 20-29%
- ☐ 30-39%
- ☐ 40-49%
- ☐ More than 50%

**8. What is your annual household income (before taxes)? (select one)**

- ☐ Less than \$20,000
- ☐ \$20,000 to \$24,999
- ☐ \$25,000 to \$29,999
- ☐ \$30,000 to \$44,999
- ☐ \$45,000 to \$59,999
- ☐ \$60,000 to \$74,999
- ☐ \$75,000 or above

**9. Which age group represents the age of the head of household? (select one)**



- ☐ 18-24 years old
- ☐ 25 to 34 years old
- ☐ 35 to 44 years old
- ☐ 45 to 54 years old
- ☐ 55 to 64 years old
- ☐ Over age 65

**10. What gender is the head of household? (select one)**

- ☐ Male
- ☐ Female

**11. What race/ethnicity best describes the head of household? (select one)**

- ☐ Caucasian (White), non-Hispanic
- ☐ Caucasian (White), Hispanic
- ☐ African American (Black), non-Hispanic
- ☐ African American (Black), Hispanic
- ☐ Asian
- ☐ American Native (American Indian)
- ☐ More than one (Multi-racial)
- ☐ Some other

**12. What is the primary language spoken at home? (select one)**

- ☐ English (American)
- ☐ Spanish

Other (please specify)

**13. What is the disability status of household members? (select all that apply)**

- ☐ No disability
- ☐ Disabled non-Veteran under 65
- ☐ Disabled Veteran under 65
- ☐ Disabled non-Veteran over 65
- ☐ Disabled Veteran over 65

**14. How long have you lived in Evansville? (select one)**

- ☐ Less than one year
- ☐ 2-4 years
- ☐ 5-9 years
- ☐ 10+ years

**15. Have you experienced any of the following in the past two years? (select all that apply)**

- ☐ Difficulty paying rent/mortgage
- ☐ Difficulty paying utilities
- ☐ Dissatisfaction with local services (trash pick-up, street maintenance)
- ☐ Inability to make needed repairs/improvements to your home
- ☐ Overcrowding
- ☐ Signs of disinvestment
- ☐ Unkempt houses in your neighborhood
- ☐ Vandalism

Other (please specify)

**16. Have you experienced housing discrimination in the past two years? (select one)**

- ☐ No (skip to question 18)
- ☐ Yes, I filed a complaint and the issue was resolved
- ☐ Yes, I filed a complaint but nothing happened
- ☐ Yes, I filed a complaint and I am still waiting for resolution
- ☐ Yes, I didn't know where or how to file a complaint so I didn't
- ☐ Yes, but I chose not to file a complaint

**17. If you faced housing discrimination do you feel it was on the basis of: (select all that apply)**

- ☐ Race/Color
- ☐ Gender
- ☐ Religion
- ☐ National origin
- ☐ Age
- ☐ Pregnancy
- ☐ Citizenship

- ☐ Family status
- ☐ Disability status
- ☐ Veteran status
- Other (please specify)

**18. What are the barriers to housing choice in Evansville? (select all that apply)**

- ☐ Accessibility for people with disabilities
- ☐ Age-restricted units
- ☐ Condition of housing units
- ☐ Cost of housing
- ☐ Distance to employment
- ☐ Diversity of housing stock
- ☐ Transportation/access to public transportation
- ☐ Utility costs
- Other (please specify)

**19. Do you know who investigates housing discrimination in Evansville?**

- ☐ No
- ☐ Yes
- If yes, specify who

## APPENDIX D – GENERAL PUBLIC MEETING (SIGN-IN SHEET)

Date: October 18, 2019	9:30 AM	Name	Signature	E-Mail	Telephone #
Beth Foltz		Beth Foltz	bfolz@evansvillehabitat.org	(812) 423-5623	
Phil Knight Williams		Phil Knight Williams	pkwilliams@evansvillehabitat.org	(812) 423-5623	
Amanda Taylor		Amanda Taylor	ataylor@child-care.org	(812) 423-4008	
Kay Johnson		Kay Johnson	kay.johnson@wardonesw.org	812-424-4473 x110	
Patrick Lantry		Patrick Lantry	plantry@evansvillehabitat.org	(812) 423-5623	
Christine Price		Christine Price	cpriac@evansville.in.gov	812-424-3555	
Gael Killough		Gael Killough	gkillough@evansville.in.gov	812-436-7810	
Dahton Bosze		Dahton Bosze	dbosze@evansville.in.gov	812-436-7819	
Glen Schoenbachler		Glen Schoenbachler	gschoenbachler@evansville.in.gov	812-436-7812	
Beth Putzer		Beth Putzer	bputzer@evansville.in.gov	812-436-5297	
Karla Horrell		Karla Horrell	karla.horrell@evansville.in.gov	812-422-1181	
Charles Mearsh		Charles Mearsh	cmearsh@evansville.in.gov	812-436-4932	
Bill Hussman		Bill Hussman	whussman@k-gaw.com	812-474-4400	
Serita Cabell		Serita Cabell	serita.cabell@memorialcity.org	(812) 423-2500	
Susan Steinkamp		Susan Steinkamp	sussteinkamp@evansville.in.gov	812-428-3246	
Leonard Collins		Leonard Collins	LITTLEMAN@evansville.in.gov		



## APPENDIX E – GENERAL PUBLIC MEETING (AGENDA)

# AGENDA

## Analysis of Impediments to Fair Housing (City of Evansville)

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### Public Forums

Friday, 18 October 2019

9.30 AM – 11.00 AM / 4.00 PM – 5.30 PM

C.K. Newsome Center

#### A. Introduction to Fair Housing

*Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and disability.*

#### B. Do previous barriers to fair housing still exist? (worksheet)

#### C. Are there new barriers to fair housing?

#### D. What is already being done to address barriers to fair housing?

- a. Discuss at your table
- b. Report out to the large group

#### E. What would you do to remove barriers to fair housing or affirmatively further fair housing?

- a. Discuss at your table (morning session)
- b. Report out to the large group (morning session) OR
- c. Discuss as a large group (afternoon session)

## APPENDIX F – GENERAL PUBLIC MEETING (NOTICE)

### **Notice of Public Forum Analysis of Impediments to Fair Housing Choice**

Notice is hereby given that the City of Evansville will hold two Public Forums concerning the 2020-2024 Analysis of Impediments to Fair Housing Choice on Friday, October 18, 2019.

The meetings will be held at the C.K. Newsome Center (100 Walnut Street, Evansville, Indiana 47713) at the following times: 9:30-11:00 AM and 4:00-5:30 PM. All interested parties are encouraged to attend one of the meetings to address community concerns involving fair housing choice. Surveys will be available at the meetings or online at <https://www.surveymonkey.com/r/6VDTX3B> to confidentially identify some of the concerns.

The City of Evansville does not discriminate on the basis of race, color, religion, sex, national origin, age, and disability. If a reasonable accommodation is needed, please contact the Department at 436-7823 (TDD: 436-4928 for Deaf and Hearing Impaired) at least three business days before each meeting.

09/25/2019

## APPENDIX G – GENERAL PUBLIC MEETING WEBINAR (ATTENDEE LIST)

Last Name	First Name	Email Address
Bailey	Donna	dbailey@evansville.in.gov
Bosze	Dalton	drbosze@evansville.in.gov
Crenshaw	Tehiji	tcrenshaw@capeevansville.org
Jackson	Kolbi	kkjackson@evansville.in.gov
Jochum	Nathan	njochum@auroraevansville.org
Johnson	Karma	karma.greenjohnson@memorialcdc.org
Lendy	Andrea	andrea@growthalliancevv.com
Messmer	Hannah	hmessmer@ymcaswin.org
Prior	Christine	cprior@evansville.in.gov
Reel	Jane	jreel@evansville.in.gov
Romines	Danette	dromines@restoringpeople.com
Steinkamp	Susan	sussteinkamp@auroraevansville.org
Taylor	Sharon	staylor@restoringpeople.com
Wilhite	Jeff	jeff@wilhiteassoc.com
coures	kelley	kcoures@evansville.in.gov
horrell	karla	karlahorrell@evansvilleblind.org
Baxter	Emily	emily.baxter@centerpointenergy.com
Beck	JoAnna	director@ozanamfamilyshelter.org
Coomes	Katie	ritakcoomes@gmail.com
Emmerson	Jason	director@unitedcaringservices.org
Folz	Beth	bfolz@evansvillehabitat.org
Metzger	Ruth	ruth.metzger@uta.edu

## APPENDIX H – GENERAL PUBLIC MEETING WEBINAR (NOTICE)

### **Notice of Public Forum Analysis of Impediments to Fair Housing PUBLIC PRESENTATION OF FINAL REPORT**

Notice is hereby given that the City of Evansville will hold one Public Forums concerning the 2020-2024 Analysis of Impediments to Fair Housing on Friday, May 15, 2020.

The meetings will be held via webinar at the following time: 10:00 AM – 11:00 AM (CST). All interested parties are encouraged to attend this meeting to address community concerns involving fair housing choice. To register for the webinar, please go to <https://attendee.gotowebinar.com/register/4180585508118391568>. A link to the webinar will be sent to you.

The City of Evansville does not discriminate on the basis of race, color, religion, sex, national origin, age, and disability. If a reasonable accommodation is needed, please contact the Department at 436-7823 (TDD: 436-4928 for Deaf and Hearing Impaired) at least three business days before each meeting.

04/27/2020

## APPENDIX I – GENERAL PUBLIC MEETING WEBINAR (SLIDE DECK)



# ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING

(CITY OF EVANSVILLE)

*Strengthening our communities.*

**PRESENTER**



Carey W Craig, Capacity Development Manager  
Prosperity Indiana

*Strengthening our communities.*



## HOUSEKEEPING

- All lines are muted.
- Feel free to ask questions by typing your question into the Q&A box.
- If you lose your Internet connection, reconnect using the link e-mailed to you.
- The presentation is available to the public. Please e-mail [ccraig@prosperityindiana.org](mailto:ccraig@prosperityindiana.org) to request a copy.

Strengthening our communities.



## SNAPSHOT

- Founded in 1986 as the Indiana Association for Community Economic Development
- “Prosperity Indiana builds a better future for our communities by providing advocacy, leveraging resources, and engaging an empowered network of members to create inclusive opportunities that build assets and improve lives.”
- **RESOURCES**, ENGAGEMENT, **ADVOCACY**, and **PROGRAMS**

Strengthening our communities.



## FAIR HOUSING

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and disability.

Strengthening our communities.



## ANALYSIS OF IMPEDIMENTS

Analysis of Impediments (AI) is a *review of impediments or barriers* that affect the rights of fair housing choice. It covers *public and private policies, practices, and procedures* affecting housing choice. *Impediments to fair housing choice are defined 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.*

Strengthening our communities.



## ANALYSIS OF IMPEDIMENTS

Conducting an analysis of impediments is a required component of certification and involves the following:

- An extensive review of a State or Entitlement jurisdiction's laws, regulations, and administrative policies, procedures, and practices;
- An assessment of how those laws affect the location, availability, and accessibility of housing;
- An evaluation of conditions, both public and private, affecting fair housing choice for all protected classes; and
- An assessment of the availability of affordable, accessible housing in a range of unit sizes.

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## PROTECTIONS

- Race
- Color
- Religion
- Sex (Gender) [1974]
- Disability [1988]
- Familial status [1988]
- National origin
- Age Discrimination Act of 1975  
The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

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## PROHIBITIONS

**In the Sale and Rental of Housing:** No one may take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap:

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different terms, conditions or privileges for 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 a multiple listing service) related to the sale or rental of housing.

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## PROHIBITIONS

**In Mortgage Lending:** No one may take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap (disability):

- 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

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## PROHIBITIONS

Additionally, 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, national origin, religion, sex, familial status, or handicap. This prohibition against discriminatory advertising applies to single-family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

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## REPORT

Strengthening our communities.



## INTERVIEWS

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Carver Community Organization  
Catholic Charities of Evansville  
Center Point Energy  
Community Action Program of Evansville  
Department of Metropolitan Development  
(City of Evansville)  
ECHO Housing Corporation  
Evansville Christian Life Center  
Evansville Housing Authority  
Evansville Water and Sewer Utility (City of  
Evansville)  
Evansville-Vanderburgh County Area Plan  
Commission

Evansville-Vanderburgh County Human  
Relations Commission  
Growth Alliance of Greater Evansville  
Hope of Evansville, Inc.  
Legal Aid Society – Evansville  
Memorial Community Development  
Corporation  
Metropolitan Evansville Transit System  
Metropolitan Planning Organization  
Old National Bank  
Southwest Indiana Association of Realtors  
Southwestern Indiana Mental and Behavioral  
Health  
United Caring Shelters  
Young Men's Christian Association – YMCA

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## PUBLIC MEETINGS

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Barrier (from 2014)	Yes, still a barrier	No, not a barrier anymore
Homeowner rates are low among Black/African Americans	16	0
The city's Black/African American population is concentrated in several Census Tracts in the urban core	17	0
People with disabilities may have difficulty finding safe, decent, affordable housing	16	0
Low-income large families may have difficulty finding affordable housing	16	0
There is a significant income disparity between the city population as a whole and the city's Black/African American population. While discrimination has been identified locally as being economic, there is a disproportionate impact to the Black/African American community.	12	0
Loss of affordable housing in the urban core limits access to transportation, services, and employment opportunities for low-income households	16	0
People are generally unaware of fair housing and how to file housing discrimination cases.	15	0
While not a protected class, ex-offenders are difficult to house in Evansville.	13	1
There is not enough affordable housing available in Evansville.	16	0

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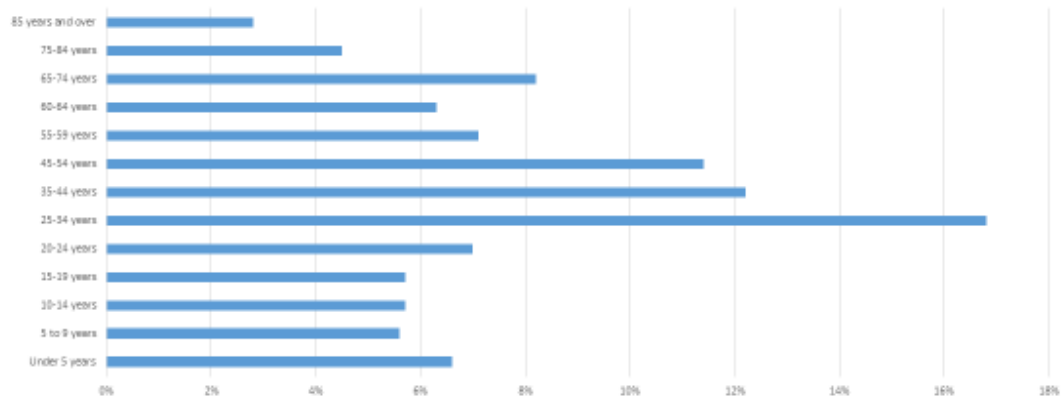
## DATA

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AGE

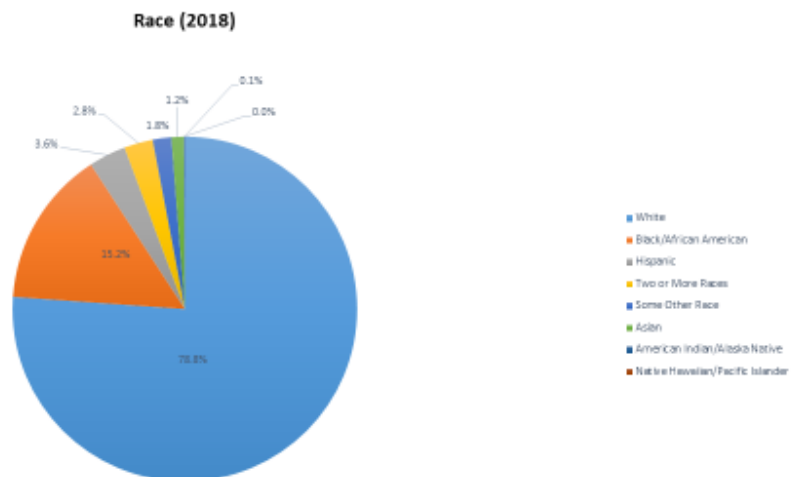
AGE DISTRIBUTION (2018)



Strengthening our communities.



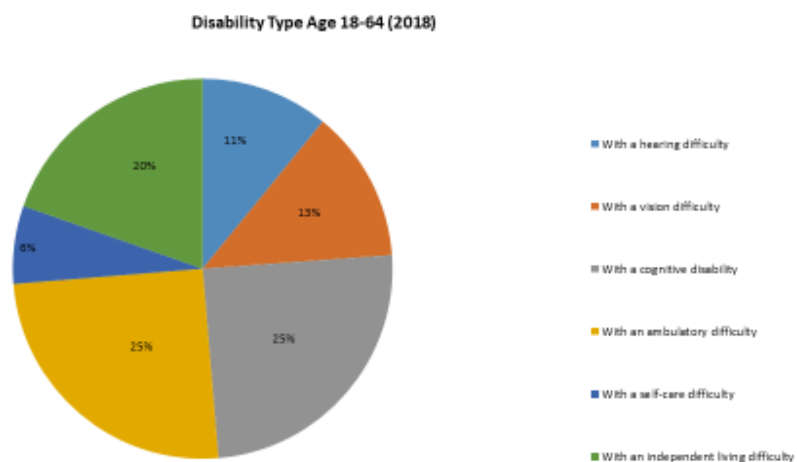
## RACE



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## DISABILITY

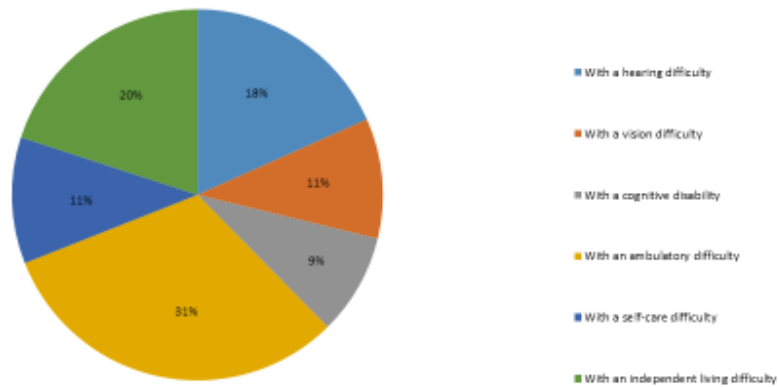


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## DISABILITY

Disability Type Age 65+ (2018)

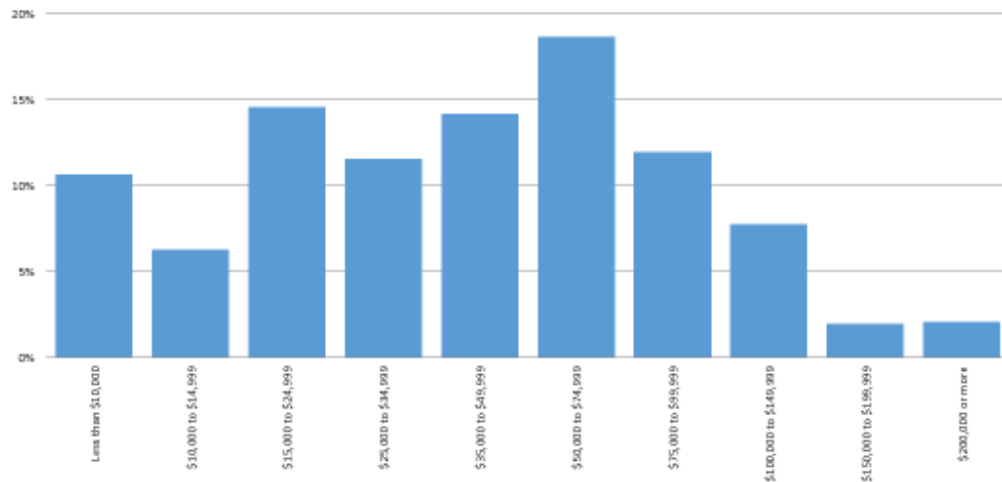


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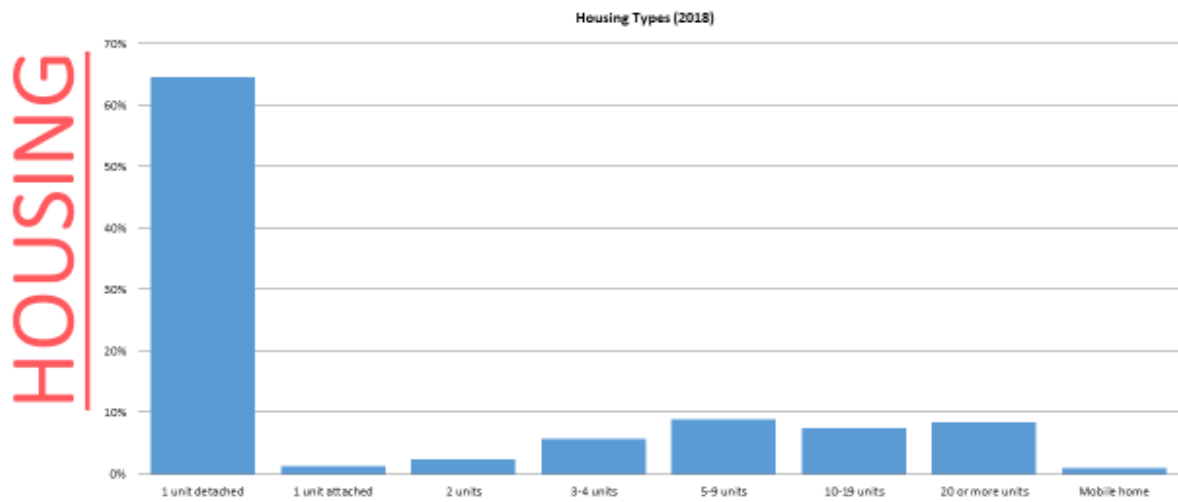
## INCOME AND POVERTY

Income Distribution (2018)

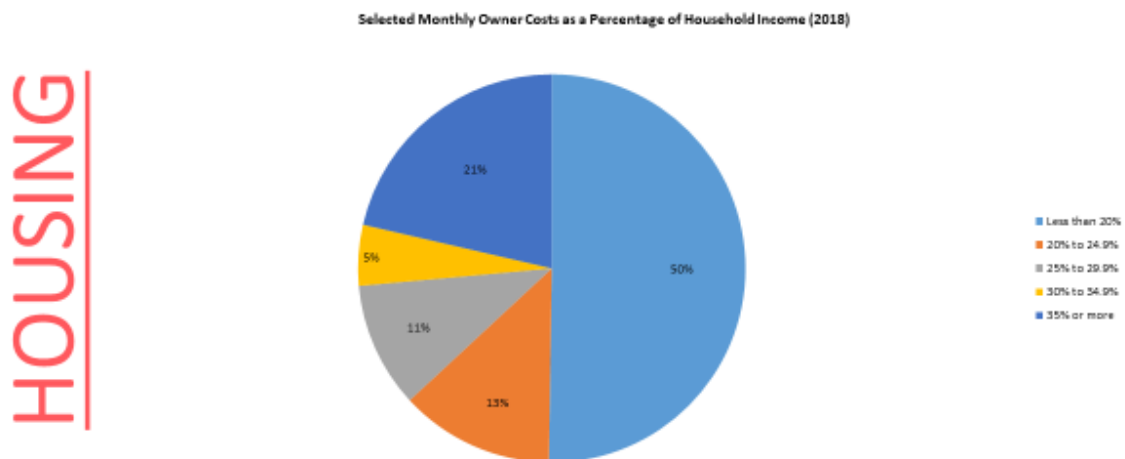


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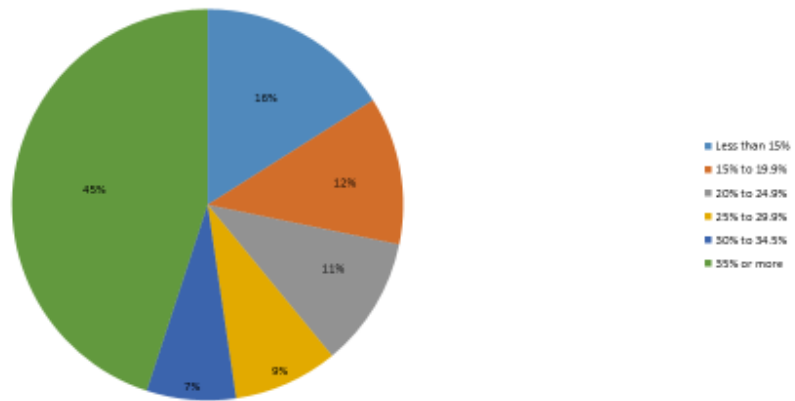
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# HOUSING

Gross Rent as a Percentage of Household Income (2018)

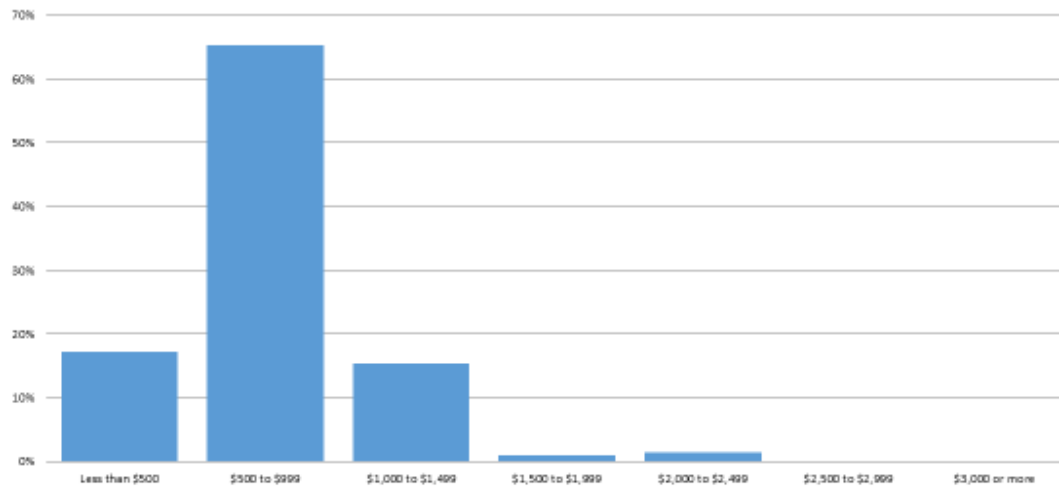


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# HOUSING

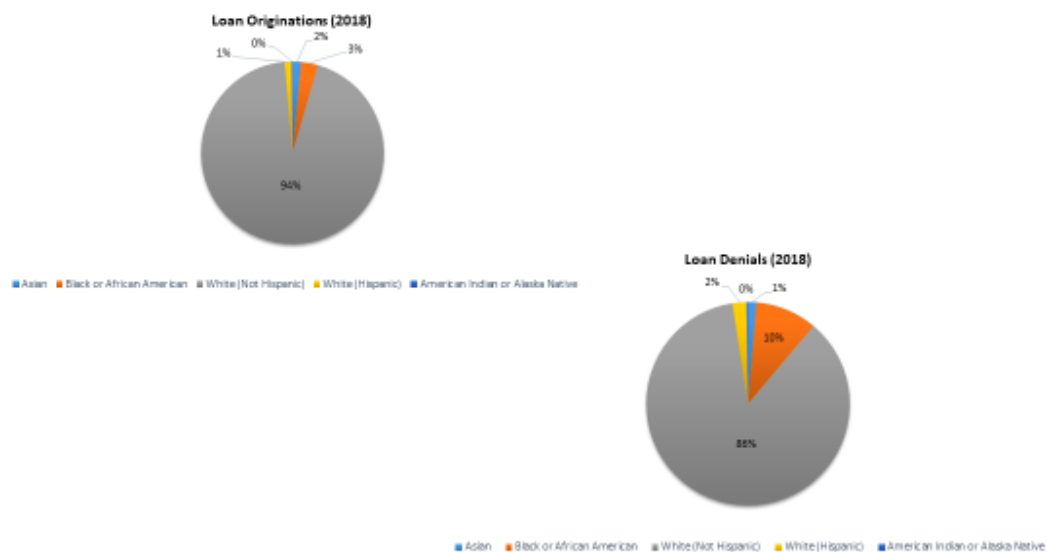
Gross Rent (2018)



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# HOUSING



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## EVALUATION OF CURRENT FAIR HOUSING LEGAL STATUS

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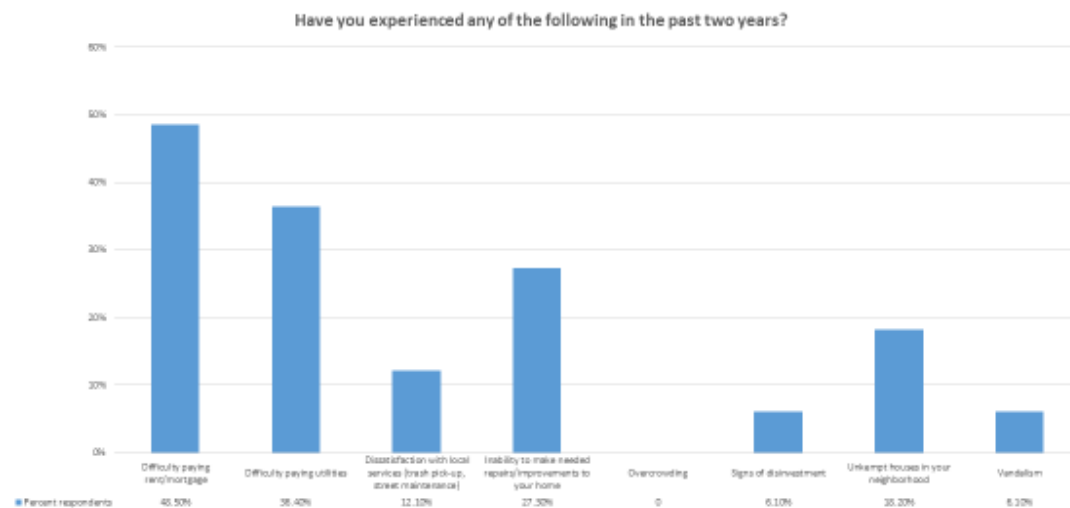


## SURVEY RESULTS

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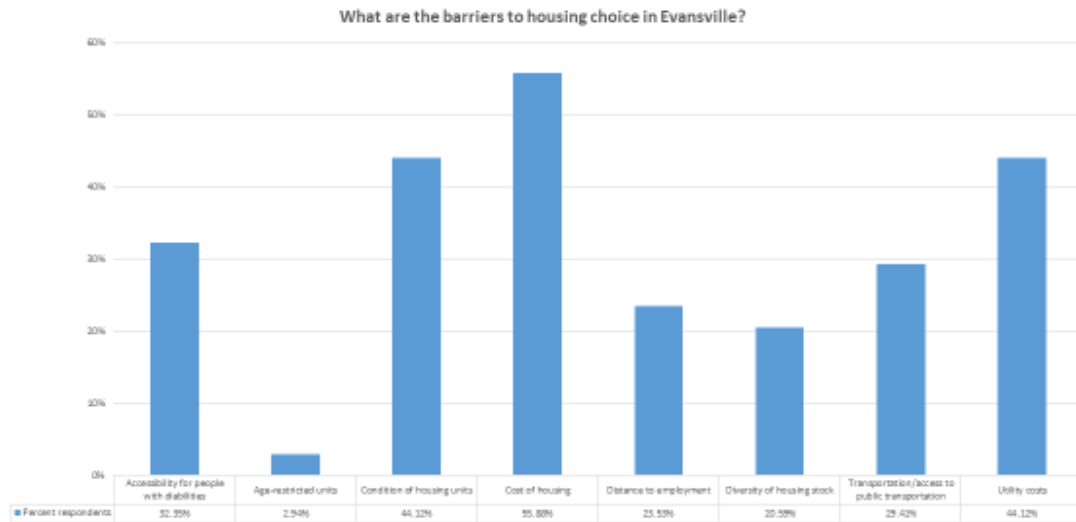
### SURVEY RESULTS



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## SURVEY RESULTS



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## FINDINGS

- Homeownership rates continue to remain low among Black/African Americans.
- The city's Black/African American population is concentrated in several Census Tracts in the urban core.
- Utility costs contribute to housing affordability issues in Evansville.
- A large portion of renters and homeowners have monthly payments that exceed 30 percent of household income.
- A significant income disparity exists between the city population as a whole and the city's Black/African American population. While discrimination has been identified locally as being economic, there is a disproportionate impact to the Black/African American community.
- People are generally unaware of fair housing and how to file housing discrimination cases.
- Mortgage applications and originations are especially low in minority census tracts.

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## RECOMMENDATIONS

- The Human Relations Commission should improve marketing outreach to community and public housing residents on how to file discrimination grievances pertaining to housing. We recommend that this begin in 2021 and continue through at least 2024.
- The City, along with local utility companies, should continue to assist low-income homeowners with weatherization programs. We recommend that this continue in 2020 through 2024.

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## RECOMMENDATIONS

- The City should encourage housing developers to build/rehab affordable housing for extremely low-income households. We recommend that this begin in 2021 and continue through at least 2024.
- The City should review CHDO leases for provisions allowing pet exceptions for service animals. The City may also establish criteria to guarantee the animal is a trained service animal and needed to accommodate a disability. We recommend that this begin in 2020 and continue through at least 2024.

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## RECOMMENDATIONS

- The City should continue to convene roundtable discussions with residents and leaders from the Black/African American community, as well as lenders and real estate professionals to identify solutions to low homeownership among Black/African Americans. We recommend that this continue in 2020 through 2024.
- CDCs and CHDOs should continue to partner with financial institutions to offer financial literacy programs in Low-Income Census Tract neighborhoods with low homeownership rates. We recommend that this continue in 2020 through 2024.

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## RECOMMENDATIONS

- The City should engage CenterPoint Energy to ensure the emergency utility assistance program funds are reaching those who most need the funds. We recommend that this begin in 2021 and continue through at least 2024.

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QUESTIONS?

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THANK YOU!

DEPARTMENT OF METROPOLITAN  
DEVELOPMENT

Kelley Coures  
Kolbi Jackson  
Donna Bailey

Interviewees  
Public Forum Participants

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