

HAMILTON COUNTY, INDIANA

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE 2019



I: Introduction

Hamilton County serves as a signpost to the past and the future of Indiana and perhaps the U.S. In 1802 two brothers, John and William Conner, were among the earliest white settlers in territory of Indiana, establishing fur trading post in Whitewater Valley near present day Cedar Grove. Following the steady displacement of the Delaware Indians, the brothers moved “Conner’s Post” 20 miles north, to the location that John Conner would develop into Connersville. William Conner continued northward where in 1823 he participated in laying out the town of Noblesville, later to become the seat of Hamilton County. Conner’s family farm and home are now a historical interactive park, Conner Prairie, preserving the site and exhibiting the traditions of early Midwestern European settlement.

The achievements of William Conner serve as a template for the continued and perhaps future development of Hamilton County. The county’s cities have shown remarkable growth in residential and commercial development, and yet actively work to protect its agricultural productivity and natural resources. Currently home to numerous parks and trails, several popular performance venues, attractive shopping districts and strong primary and secondary schools. These amenities all contribute to the county’s high rankings as a favorable place to live and raise a family. Additionally, Hamilton County is enhanced by its proximity to strong post-secondary institutions, arts and entertainment assets, and industrial development, since it is within easy commuting distance of Indianapolis. With such a high quality of life, Hamilton County attracts much attention from people in search of a home, and by extension, from developers. With the fastest growing population in the state, Hamilton County is experiencing both significant change and the expansion of current conditions. A survey of the development plans for each city, town and the county shows that the various levels of government are aware of the coming growth and change.

Hamilton County receives funding from HUD for the development and continuation of affordable housing. Annually, Hamilton County receives approximately \$850,000 to help with this effort. The Consolidated Plan is a five-year plan that sets goals and strategies for using those funds to help with affordable housing and community development efforts. Each year, the County is required to assess and implement its Consolidated Plan through an annual Action Plan. Also, the federal government mandates a review of impediments to fair housing choice in the private and public sectors. This is the new *Analysis of Impediments to Fair Housing Choice* (AI) for the Hamilton County, examining the housing choices for residents living in Hamilton County. The last AI was published in 2017. This document serves to both fulfill the requirements set by the U.S. Department of Housing and Urban Development (HUD) and steer Hamilton County and its municipalities as they plan for future development.



Federal regulations do not require a formal approval of this document by HUD to be compliant; however, the document must include:

- A review of Hamilton County's laws, regulations, administrative policies and planning;
- An analysis of how those laws affect the placement and development of housing;
- An assessment of public and private sector circumstances affecting housing choice.

According to HUD, impediments to fair housing choice are:

- Any actions, omissions or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices;
- Any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin.

Race, color, religion, sex, disability, familial status and national origin are defined by HUD as protected classes. The Noblesville Housing Authority, on behalf of Hamilton County, utilizing funding from the Community Development Block Grant, has prepared this report.

History of the Fair Housing Act

The Fair Housing Act, passed by the U.S. Congress in 1968, is an extension of the Civil Rights movement to protect certain classes of people from discrimination when trying to locate housing. The U.S. Department of Housing and Urban Development, through its Office of Fair Housing and Equal Opportunity, enforces the Act to prevent discrimination and intimidation of people in their homes, apartments and condominium complexes and in nearly all housing transactions related to the rental or sale of housing and provision of mortgage financing. The Act only exempts owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a real estate agent or broker and housing operated by organizations and private clubs that limit occupancy to members (US Department of Housing and Urban Development). The protected classes in the Act include race, color, religion sex, disability, familial status and national origin. Income level is not a protected class in the Act, however, many of the protected classes do have a higher ratio of people with lower incomes, so this document will examine the location of households based on income, as well as the protected classes.

The act prevents the following activities based on race, color, religion, sex, disability, familial status or national origin:



- Refusal to rent or sell a property;
- Refusal to negotiate on housing;
- Refusal to make housing available;
- Denial of housing;
- Setting different terms, provisions or conditions for the sale or rental of the housing;
- Providing different housing services or facilities;
- Persuading a person to sell their home or rent their home by suggesting a certain race has moved into the community;
- Denial of a person access to membership or participation in an organization, facility or service on the basis or related to the sale or rental of housing;
- Refusal to provide a mortgage;
- Refusal to provide information on mortgages;
- Imposing different terms for mortgages;
- Appraising property differently;
- Refusal to purchase a loan or mortgage;
- Intimidation or interference with anyone exercising fair housing or assisting others with fair housing;
- Refusal to provide homeowners insurance;
- Providing different insurance rates or terms related to insurance;
- Refusal to provide all terms of homeowners insurance or all information regarding available insurance;
- Making or printing any information regarding the sale or rental of housing, including mortgage and insurance information that indicates a preference or limitation to one of the protected classes.

State of Indiana Fair Housing Acts

The primary enforcement agency for the State of Indiana is the Indiana Civil Rights Commission. The agency was established in 1961 as the Indiana Fair Employment Practices Commission. The agency lacked ability to enforce decisions or laws and had a limited scope. In 1963, the scope expanded to include civil rights and renamed the Indiana Civil Rights Commission (ICRC). The agency's ability to enforce laws, prosecute and make administrative decisions expanded at that time. The ICRC further expanded its jurisdiction in 1965 to include Housing.

In 1991, the State of Indiana General Assembly passed the Indiana Fair Housing Act. Enacting the Indiana Fair Housing Act and promulgating rules and regulations were part of a process that allowed



the agency to be certified as a substantially equivalent fair housing enforcement agency with the U.S. Department of Housing and Urban Development (HUD). The Indiana Fair Housing law prohibits activities like blockbusting and discriminatory advertising, which have the effect of making it harder for a person to live in a neighborhood or individual housing unit of their choice. The Indiana Fair Housing Act is considered substantially equivalent to the federal Fair Housing Act.

The ICRC recently issued its 2015-2018 Strategic Plan. One of the primary focuses will be to affirmatively further fair housing by:

1. To effectively educate Hoosiers on civil rights issues;
2. To provide efficient services to Indiana residents; and
3. To better understand civil rights issues Statewide.

The three strategic objectives each have a number of performance measures detailing outcomes to be achieved during the four-year period the plan is in effect. The different outcomes are designed to measure the Commission's progress in carrying out its mission in a time of static resources and an increasing need for services.

Fair Housing Provisions in Hamilton County and Its Municipalities

Within Hamilton County there are a number of governmental levels in which each have its own plans and ordinances for development. While each focuses on its own particular context, they share the recognition of the need for affordable housing with equality of access to protected populations.

According to the *Hamilton County, Indiana 2019-2023 Consolidated Plan*, both Hamilton County and the City of Carmel receive annual Community Development Block Grants. Together they have formed a single Urban Entitlement County. This agreement to function together in the “Urban County” program was initially established from 2013-2015, and has since been extended from 2016-2018 and for 2019-2021. The towns of Atlanta, Arcadia, Cicero and Sheridan have opted out of the CBDG program, so that neither the funds nor the requirements of the AI may be applied within their boundaries. However, the federal and state fair housing acts apply to those communities. The action plan states:

“through the Consolidated Plan, Hamilton County Commissioners and the Noblesville Housing Authority developed some general priorities and goals to offer flexibility in programming for all communities to address their specific needs.

- Expand the supply of safe, decent affordable housing.
- Support programs that help the most vulnerable households achieve self-sufficiency.



- Invest in public facilities and public infrastructure needs of low-income neighborhoods.
- Improve institutional structure and coordination among providers across the County.”

Under the goal of to improve institutional structure and coordination, Hamilton County is to address fair housing and the items found in the previous Analysis of Impediments to Fair Housing. Those items include: 1) lack of local capacity and coordination, 2) lack of public awareness, and 3) disparate treatment in the rental market.

The 2019-2023 Consolidated Plan and Action Plan covering the fiscal year 2019 will need to include items from this AI as part of the goals. Hamilton County will include it under the goal of improving institutional structure and coordination.

Research Methodology

The Noblesville Housing Authority (NHA) drafted the *Analysis of Impediments to Fair Housing Choice* on behalf of Hamilton County, Indiana. The Fair Housing Planning Guide, Volume 1 guided NHA to prepare this document. Our scope of work included:

1. Project Initiation: This included a meeting with Hamilton County staff to begin the project. Meeting topics included communicating important stakeholders’ contact information for consultation interviews, the review of previous actions taken and collected other relevant data.
2. Community Data Review: NHA conducted a community profile review using 2000 and 2010 U.S. Census information, the 2018 American Community Survey, data from the U.S. Bureau of Labor Statistics and the Indiana Business Research Center. Information was broken down into demographic information, income information and household type.
3. Housing Profile: NHA conducted a review of the housing market of Hamilton County and the Indianapolis MSA. Information and data were collected from the 2010 U.S. Census, the 2018 American Community Survey, data from the National Low Income Housing Coalition and U.S. Department of Housing and Urban Development CHAS data sets, 2011-2015. NHA also examined reports analyzing Home Mortgage Disclosure Act (HMDA) data and foreclosure information to determine if any racial disparities occurred.
4. Compliance Profile: NHA examined legal documents such as zoning regulations, zoning variance procedures, fair housing education programs and reporting to determine if any legal structures exist that prohibit fair housing choice.



5. Survey and Community Input: Past participation of Surveys in Hamilton County has been unsuccessful with low rates of return. Hamilton County utilized an electronic format to solicit input. Hamilton County also utilized local agencies' electronic newsletters to reach low to moderate-income residents or people who represent low to moderate-income residents. The Good Samaritan Network, Hamilton County Area Neighborhood Development and the Noblesville Housing Authority each used their listing of stakeholders and participants. Hamilton County utilized Facebook as a way to reach more residents and workers in Hamilton County. NHA also conducted face-to-face interviews of stakeholders to determine the housing issues with greatest need as it pertains to fair housing choice. The survey and results are included in Appendix C.
6. Self-Evaluation and Identification of Impediments: NHA reviewed all sections of the analysis to identify any impediments to fair housing choice. NHA also evaluated the progress made by Hamilton County to address impediments identified in the previous AI reports.
7. Strategic Plan: NHA worked with community leaders and local stakeholders to develop a strategic plan for addressing fair housing choice as part of the Consolidated Planning process. NHA worked to develop goals that would be realistic and achievable, based on the progress made from previous AI documents.

Report Organization

This *Assessment of Impediments to Fair Housing* will be distinct from its predecessor, because it organizes most information by township rather than municipality, providing a different perspective from the *Assessment of Housing Needs* published in 2013. While the particular perspective of the municipalities is valuable, that organization does not take into full consideration the housing circumstances of unincorporated Hamilton County.

The remainder of this document is organized into six sections and three appendices.

II: Community Profile

III: Housing Profile

IV: Land Use Profile

V: Compliance Data

VI: Mail Survey and Community Input

VII: Fair Housing Impediments, Recommendations and Action Plan

Appendix A: Survey Instruments and Public Presentations

Appendix B: Stakeholder Interviews

Appendix C: Bibliography



The U.S. Department of Housing and Urban Development (HUD) has released a new rule to change the format of fair housing analysis documents. This new rule was published on July 16, 2015. The new format will provide data and tools to state and local governments receiving HUD funding to assess the state of fair housing and set locally determined goals and priorities. This includes providing open data to HUD grantees and the public on patterns of integration and segregation, racially and ethnically concentrated areas of poverty, disproportionate housing needs and disparities in access to opportunity such as quality schools, transportation and other public amenities.

The new rule emphasizes collaboration, regional approaches, community voice, local knowledge and expanding access to opportunity. The new rule will be phased in over time to allow local jurisdictions more time to address fair housing challenges. Hamilton County will need to re-assess its fair housing challenges with the next Action Plan, in 2020.

II: Community Profile

This section of the AI analyzes the demographic makeup of Hamilton County and illustrates the socioeconomic geography to create a background for analysis of the housing and lending profiles that follow in this report. At this time the most comprehensive data set available is the *2014 American Community Survey*, which will serve as the primary source and basis for this statistical study, unless otherwise noted. It should be recognized, however, that these figures represent the demographics of two years ago. Because Hamilton County continues to grow at a dramatic rate, the trends noted in this report may indicate a direction and rate of change, but may also under represent the current conditions.



Population, Demographics and Geography

The townships of Hamilton County, with the municipalities they encompass, are:

Adams	Noblesville (Noblesville)
Clay (Carmel)	Washington (Westfield),
Delaware (Fishers)	Wayne,
Fall Creek (Fishers)	White River
Jackson (Atlanta, Arcadia, Cicero)	

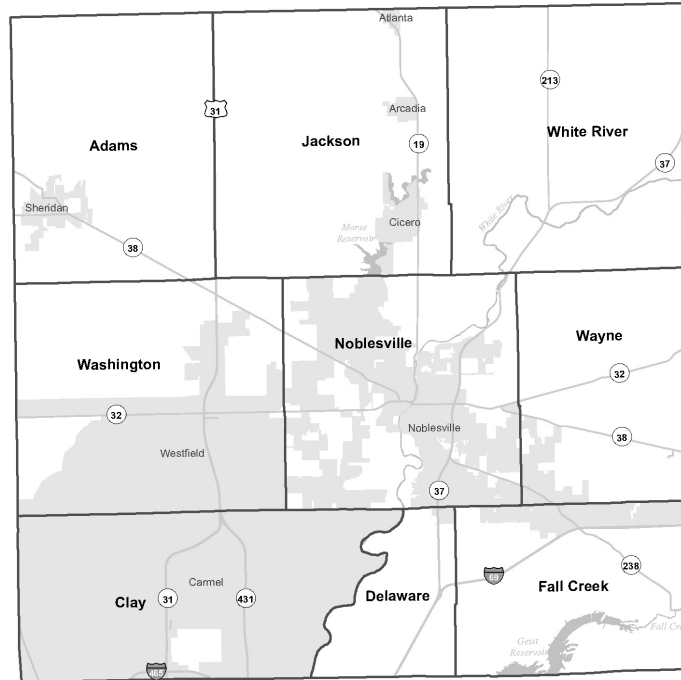


Figure 1 - Map of Hamilton County

While not identified on the map above, the city of Fishers currently occupies most of the area in Delaware and Fall Creek Townships.

According to the 2015 U.S. Census Bureau, the estimated population of Hamilton County is 309,697 as of July 1, 2015. This estimate represents a 2.3% growth over the 2014 estimate of 302,623, and a 12.8% increase over the 2010 decennial census count of 274,569, making Hamilton County the fastest growing county in Indiana.



The 2014 American Community Survey estimates the number of households in Hamilton County at 111,256, with a population of 289,722. Figure 2 shows the distribution of population and housing density in Hamilton County by township, covering the range from rural/agrarian to urban.

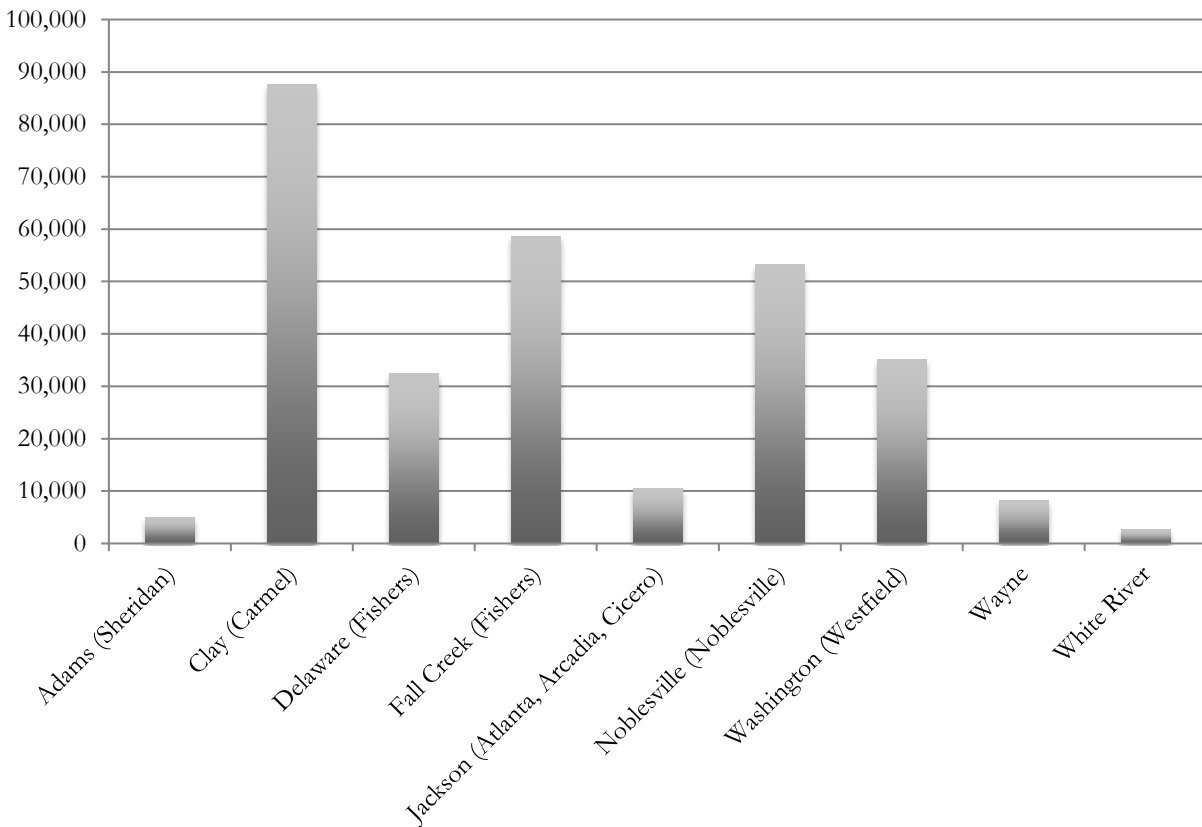


Figure 2 - Distribution of Population by Township - 2014 American Community Survey

Figure 2 illustrates that Clay Township, which encompasses the city of Carmel, has the highest population at 87,636. However, Fishers that encompasses both Delaware and Fall Creek Townships has a larger population when the two township populations are added together with a population of 91,019. Hamilton County government has zoning jurisdiction over only the three least populated townships (part of Adams, Wayne and White River, but Wayne Township has the county's fastest growing population. Figure 3 gives a clear graphic representation of the proportional population distribution among the townships.



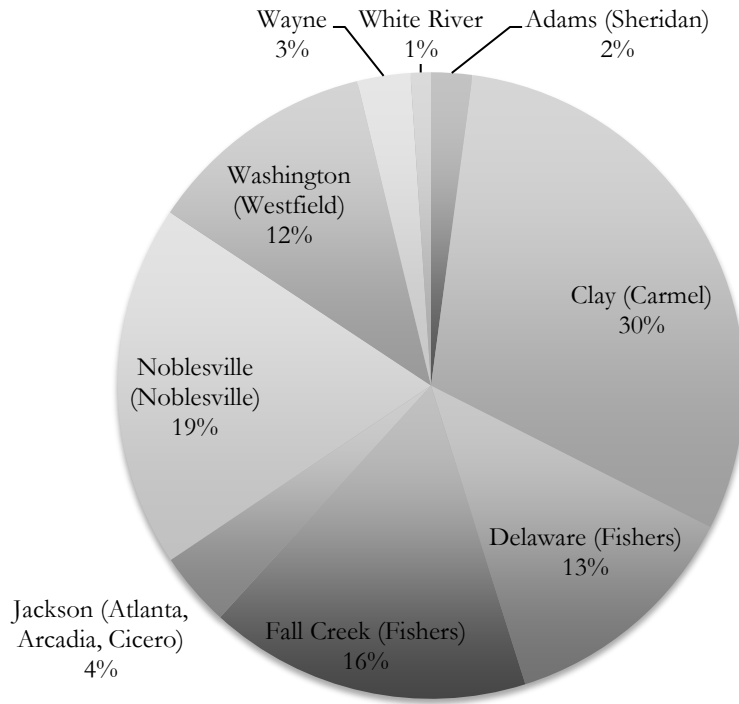


Figure 3 - Distribution of Households by Township

Figure 4 shows the percent of estimated population change in Hamilton County by township from 2000 to 2014. These figures represent the U.S. Census Bureau's counts from 2000 Census and 2010 Census, and the 2014 American Community Survey. The six southernmost townships, those closest to the city of Indianapolis, show the most dramatic growth over the fourteen years represented. Of these, only Wayne Township contains a large area of unincorporated land, though there is some overlap of Wayne Township and the Noblesville zoning jurisdiction. Population growth in the three more remote townships (Adams, Jackson and White River) has remained essentially flat over the same fourteen-year period. The towns of Sheridan, Atlanta, Arcadia and Cicero are located in these northern townships, where also most of the county's agricultural land is found.



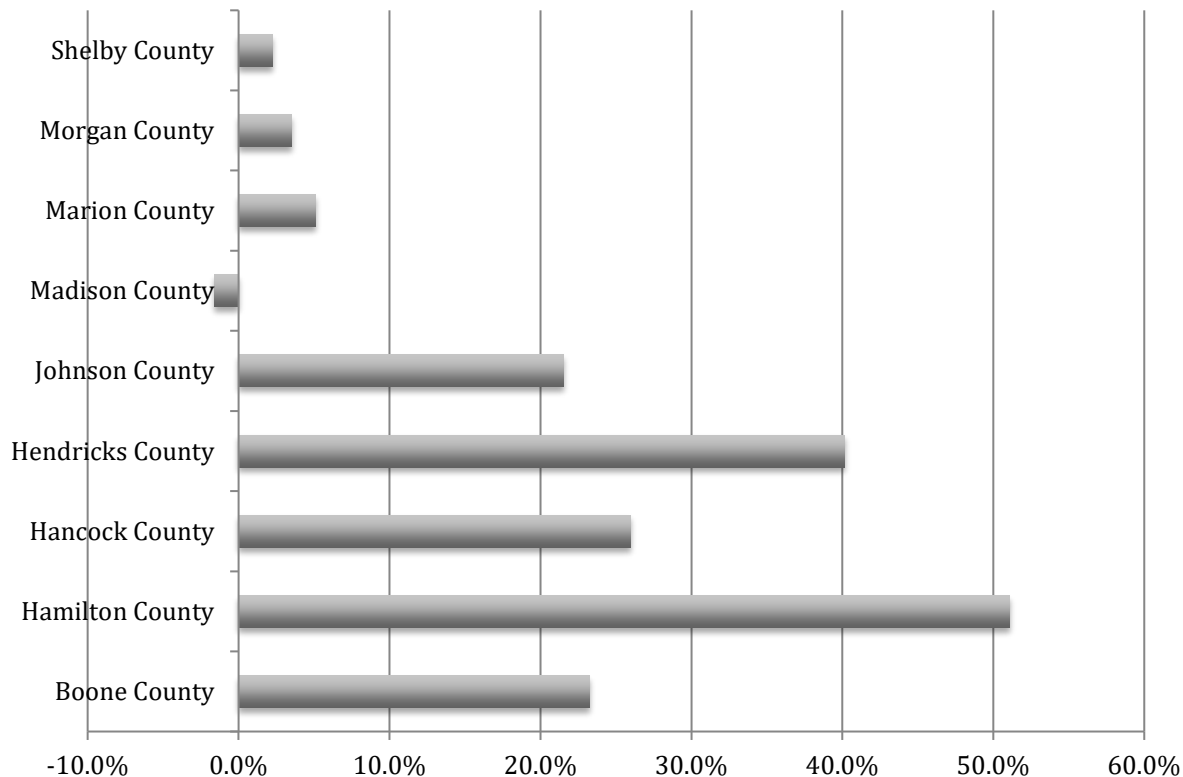


Figure 4 - Population Growth by County – Central Indiana

Hamilton County is part of a nine county region in Central Indiana. According to Savi.org, each of the counties has experienced a growth in population from 2000 to 2012 besides Madison County, with a decrease in population. By far the largest population increase has been seen in Hamilton County, directly north of Marion County and downtown Indianapolis. The map in Figure 5 shows the location of Hamilton County relative to the Marion County/Indianapolis metropolitan area. Hamilton County grew by over 50 percent from 2000 – 2012. Other counties leading in population growth include Hendricks (40 percent), Hancock (26 percent), Boone (23 percent), and Johnson (21 percent). The remaining surrounding counties are experiencing a smaller percentage of population growth.

Five of the nine counties with the largest population growth, Hamilton, Hendricks, Hancock, Boone and Johnson are all driving the growth of the entire Central Indiana Region. Hamilton County is driving the region's growth with a 50 percent increase in its population. Areas of high growth in Hamilton County are townships closer to the urban core of Marion County/Indianapolis. The other four counties with larger growth also border Marion County, with the one county with a decrease in population the furthest from Marion County.



Figure 5 - Map of the Nine County Region of Central Indiana



Race and Ethnicity

A key factor to analyzing the existing impediments to fair housing within a given area is the examination of distribution of racial and ethnic minorities across the region. In some cases, minority concentrations are a reflection of preferences, meaning that minorities may choose to live in certain areas because of access to the types of grocery stores, restaurants, etc. that cater to them. However, in other cases, minority populations are intentionally discouraged from living in certain areas. Housing prices can also affect the ability of some minorities when choosing where to live as these minorities are disproportionally over represented among low-income demographics. Housing affordability and the dispersion of affordable units is discussed in the Housing Profile section of this document.

The 2014 American Community Survey (ACS) estimated the racial composition of Hamilton County at 87.9% White, 3.5% African American, 5.1% Asian, and 3.5% other racial minorities categories found in the survey. These categories include: (1) American Indian and Alaska Native, (2) Asian, (3) Native Hawaiian and Other Pacific Islander, (4) Other, (5) Two or More Races. Slightly over 4 percent of the total population in Hamilton County listed themselves as some other race. Among these other categories the most prevalent was Two or More Races at 2.4%.

The comparison of the racial composition of Hamilton County to that of Indiana as a whole shows the county to be less diverse. Indiana's racial composition estimate by the 2014 ACS is: 84.3% White, 9.1% African American, 1.6% Asian, and 5.0% all other racial categories combined. This comparison shows Hamilton County with a significantly lower presence of African Americans and a significantly higher proportion of Asians.

Comparison to the racial composition of the U.S as a whole shows further disparities. The 2014 ACS estimates for the nation are: 73.8% White, 12.6% African American, 5.0% Asian, and 8.6% all other racial categories combined. The regional nature of racial minority dispersion throughout the nation is an important consideration in comparing national and state figures to Hamilton County, as is the traditional occupations and life styles of minorities in rural and urban settings. Hamilton County still shows a low racial diversity for a rapidly urbanizing area. Additionally, African Americans since the 19th century have had a significant presence in rural Indiana, with one of the earliest and largest Black settlements in Hamilton County. Regardless of the social and cultural pressures motivating their migration away from the county, there is a legacy of Black farming, labor and trade in the area that has not been sustained.

Figure 6 shows the percentage of the population in each township that identifies themselves as White, according to the 2014 American Community Survey.



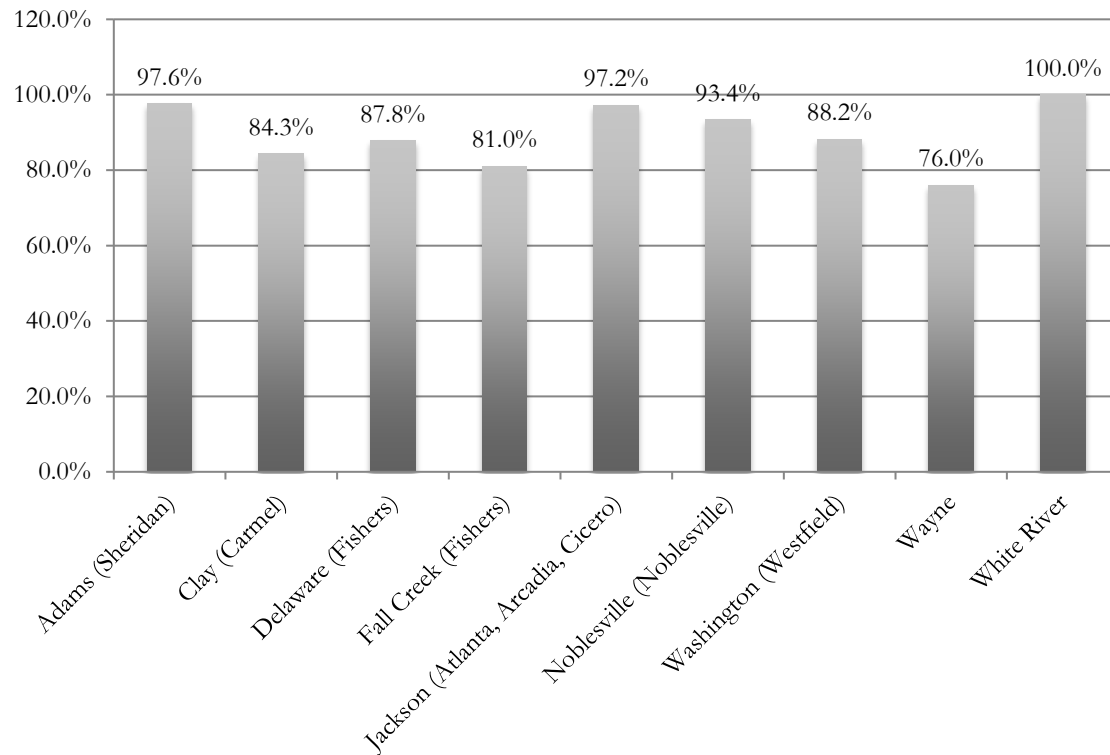


Figure 6 - Percent of Township Identifying Themselves as White

The chart reflects that White residents are the majority of the population in all of nine townships. Three of the townships have White population over 90 percent and 100 percent White River Township's population identifies themselves as White. Wayne Township has the smallest percentage of its population identifying itself as White, yet $\frac{3}{4}$ of the township still identify themselves as White. The three townships with the highest percentages of White populations are northern townships with rural communities. Figure 7 shows the percent of the population in each township identifying them as African American. The urban and suburban areas of the County, found in the central and southern townships have a lower proportion of white residents.



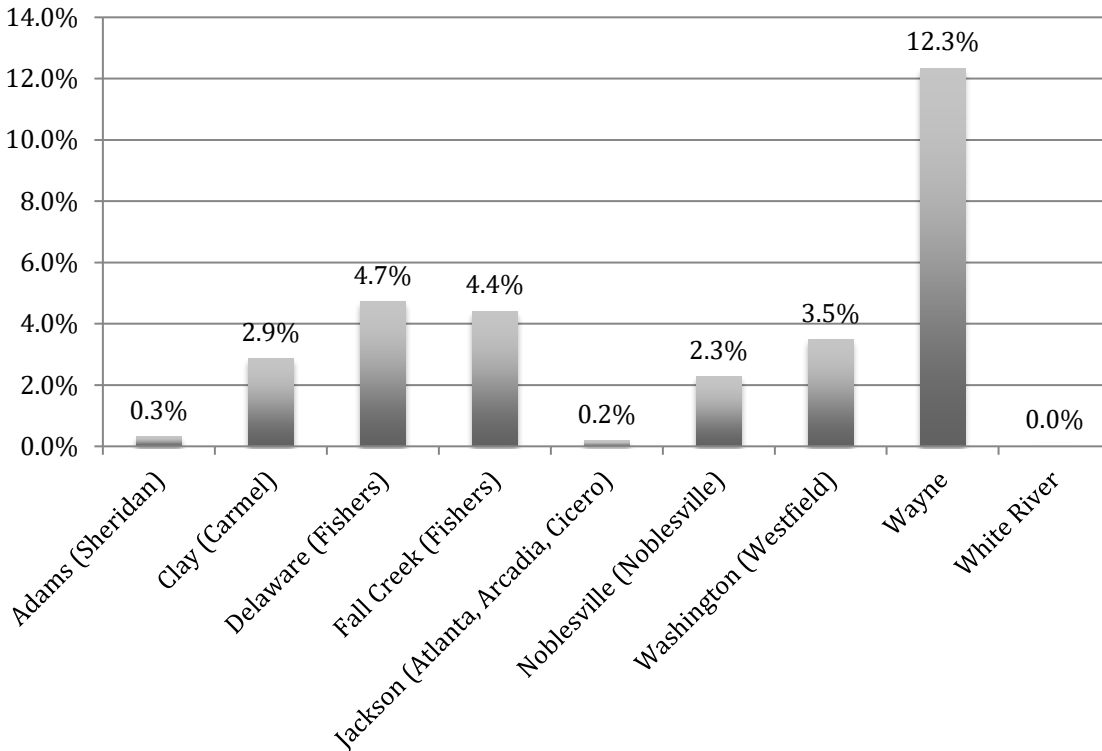


Figure 7 - Percentage of Township Identifying Themselves as Black or African American

Wayne Township, to the east of Noblesville continues to be the most diverse population, with over 12 percent of the population identifying themselves as African American. That is an increase from the 2000 Census when only 0.4 percent of the population identified themselves as African American. In 2000, 1.5 percent of the population of Hamilton County identified themselves as African American and that number has doubled to over 3.4 percent in 2014.

Other Racial Minorities categories are calculated together using the individual 2014 American Community Survey data from the following racial categories: (1) American Indian and Alaska Native, (2) Asian, (3) Native Hawaiian and Other Pacific Islander, and (4) Some Other Race. Clay Township has the highest percentage of its population identifying themselves as Other Racial Minorities when the data is considered from the perspective of the aforementioned categories combined. 10.4 percent of the total township population is one of the Other Racial Minorities. This is an increase from 8.5 percent identifying themselves as Other Racial Minorities in the 2000 Census. Wayne Township has the second highest percent of its population identifying themselves as Other Racial Minorities at 6 percent. Most other townships follow closely behind with ranges from 5 percent to 5.5 percent of the population identifying themselves as Other Racial Minorities. Figure 8



shows the percentage of each township's population identifying themselves as one of the Other Racial Minorities.

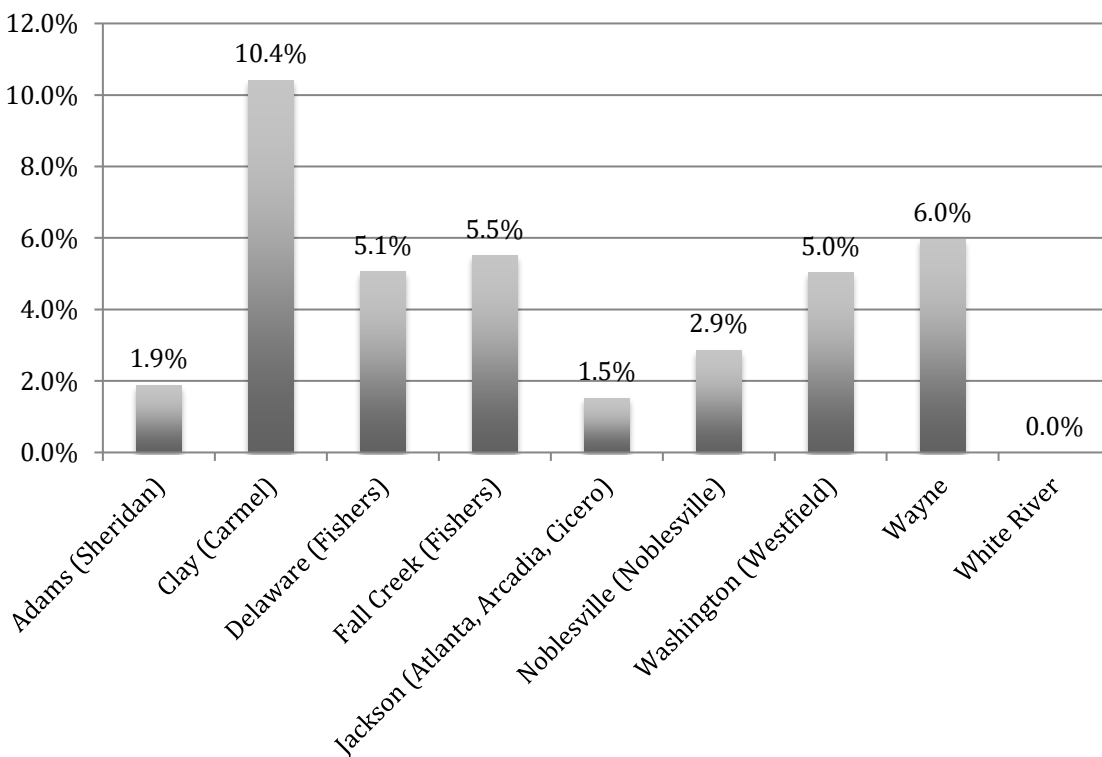


Figure 8 - Percent of Township Population Identifying Themselves as Other Racial Minorities

Ethnicity

Hispanic is an ethnicity category measured by the U.S. Census Bureau, not a racial group. A person who identifies himself or herself as Hispanic must also identify themselves as a race, which may be White, African American or another racial category. With a population estimate of 10,499 in 2014, those who identify as Hispanic (of any race) comprise 3.6% of Hamilton County residents. This is an increase from 2,911 or 1.6 percent of the population identifying themselves as Hispanic in the 2000 Census. Figure 9 shows the Hispanic residents from the 2014 American Community Survey for each township. Wayne and White River Township have the highest percentage of the population identifying themselves as Hispanic.

White River Township also had a 100 percent White population, as described earlier in this document. Those identifying themselves as Hispanic must have also identified themselves as White.



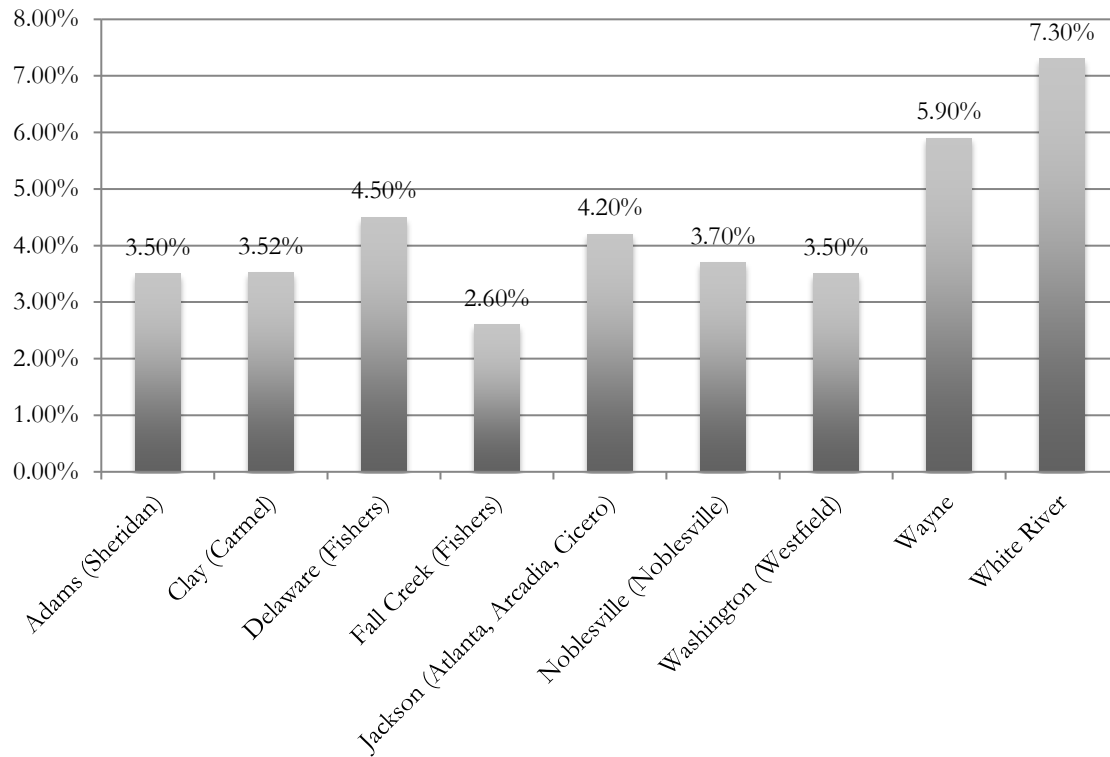
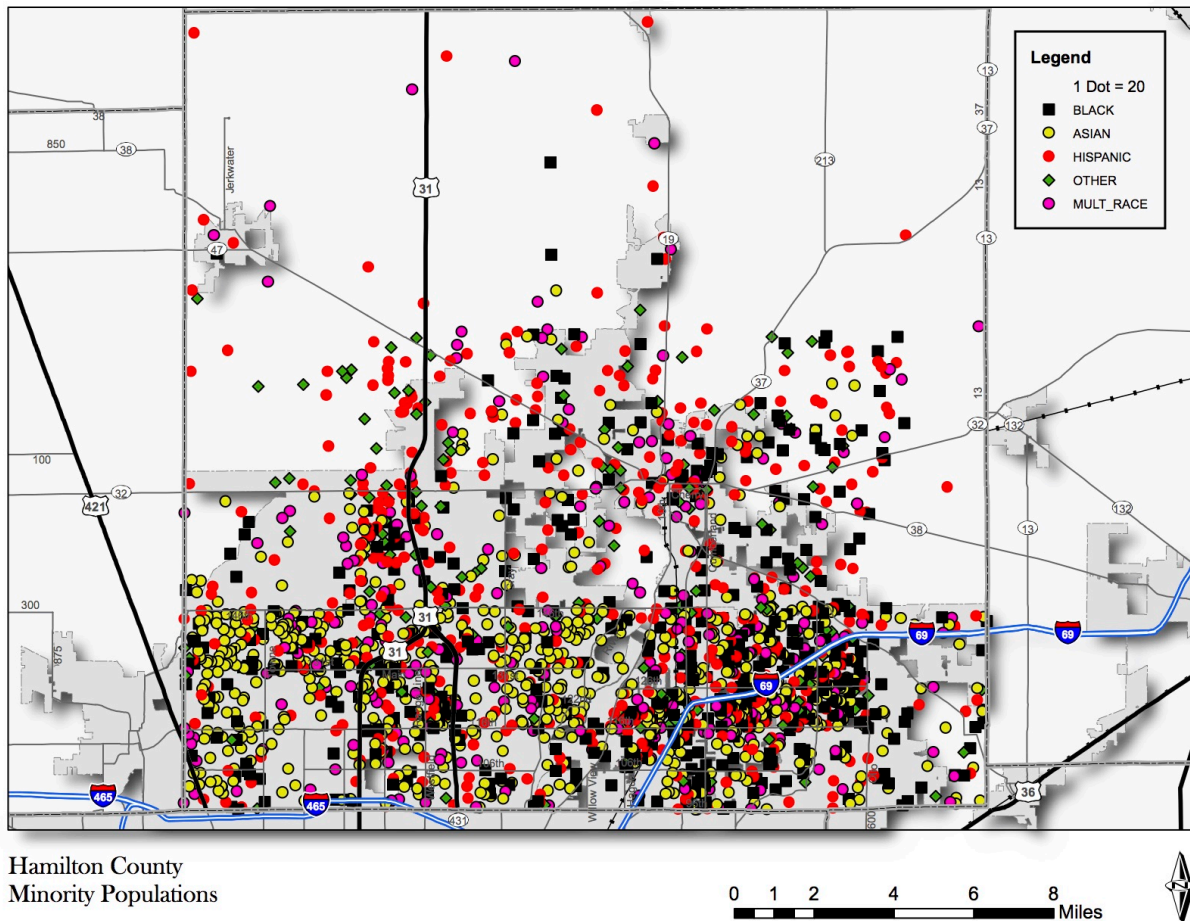


Figure 9 - Percent of Township Population Identifying Themselves as Hispanic





Household Size and Characteristics

A household is defined as all the people permanently residing in a single housing unit, either related or unrelated. The total number of households in Hamilton County increased to 111,256 in the 2014 American Community Survey from 65,933 in the 2000 U.S. Census. That is a 68 percent increase in the 14-year period. The total number of households increased from 38,834 recorded in the 1990 Census, representing an increase of 186 percent increase over the last 24 years.

The following charts and graphs represent the most current data available about households in Hamilton County. Household size and characteristics can be tracked through information collected in the American Community Survey (ACS). The most recent ACS data available is from 2014. Table 1 shows the exponential growth in the urban parts of Hamilton County, with Fall Creek Township, representing parts of the City of Fishers, experiencing a over 1000 percent growth since 1990.



Table 1 - Number of Households by Township – Source: STATS Indiana

	# Households 1990	# Households 2000	# Households 2010	# Households 2014	Percent Change in Households 1990-2014
Adams	1,594	1,767	1,859	2,352	47.6%
Clay	14,951	22,817	30,570	33,774	125.9%
Delaware	3,970	10,772	12,595	14,083	254.7%
Fall Creek	1,489	5,853	16,805	18,491	1141.8%
Jackson	3,059	3,674	3,959	4,287	40.1%
Noblesville	8,903	12,753	18,546	20,828	133.9%
Washington	3,255	6,441	11,672	13,226	306.3%
Wayne	740	908	2,896	3,051	312.3%
White River	873	948	933	1,164	33.3%

The northern townships in Hamilton County that are primarily rural have had the slowest growth in Hamilton County. White River, Adams and Jackson each grew since 1990, but the growth has been small compared to the more urbanized townships in Hamilton County. Of the urban townships, Clay Township had the slowest growth, yet remained the most populated township with 33,744 households.

The townships with the largest increase in household numbers from 1990 – 2014 were Fall Creek, Wayne and Washington. One reason for the large growth in household numbers is that these townships were just beginning to develop tract housing during this time period and the household increases reflect the huge number of new residents in general, moving to these townships during this time period. In the townships where development was more established prior to the 1990s, the smaller increases in household numbers reflect the fact that less overall new development occurred. It is clear that the growth in townships is occurring as part of the growth of the towns of Westfield and Fishers, which is corroborated by new school needs in both Westfield and the Fishers/Hamilton Southeastern areas.

All of the townships experienced significant growth since 1990, with the 6 southern most townships at least doubling in size, and most tripling. The three northernmost townships (Adams, Jackson and White River) all experienced double digit growth, but lag far behind the other townships. This is largely due to the influence of Indianapolis proximity, but also because of the much larger rural and agricultural nature of the northern townships. It stands to reason that these three townships will face growth pressure as development in the lower six townships becomes more difficult, and developers begin to seek opportunities with lower cost land in the northern townships.



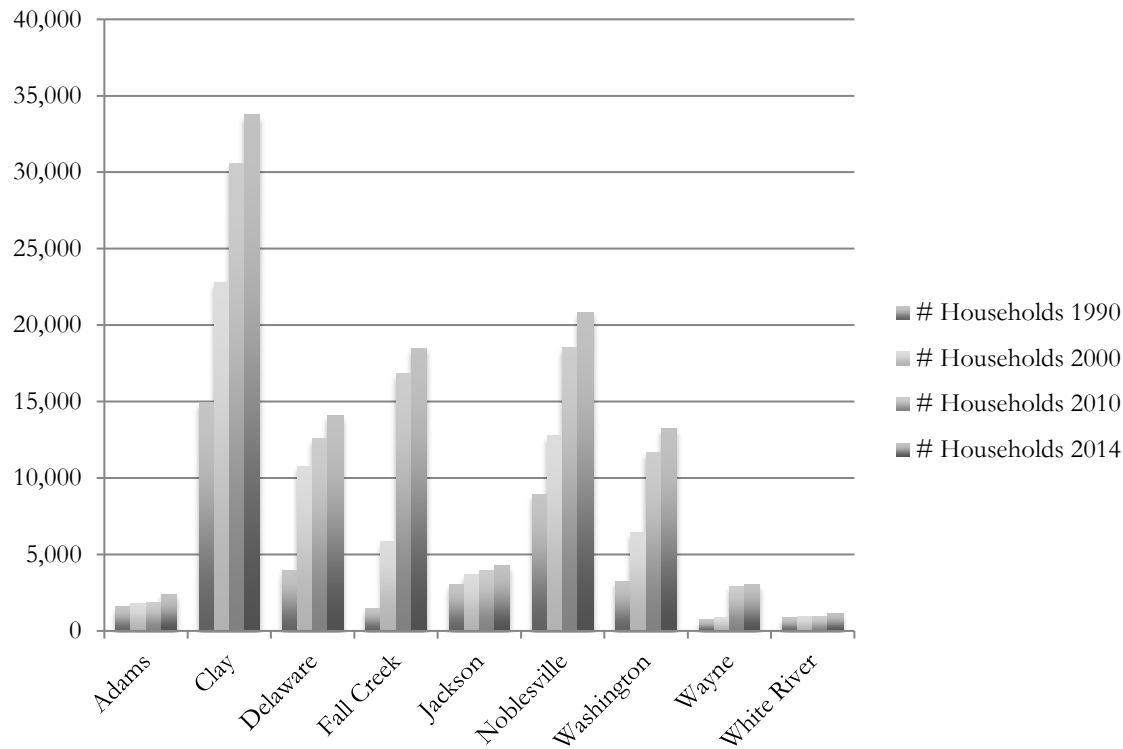


Figure 10 - Number of Households by Township

Household size is an important aspect of a community's demographic when considering housing needs. When redevelopment or new development takes place in a neighborhood, it is important to know what size of apartment or home is most likely to satisfy the needs of future community residents. The challenge encountered during urban redevelopment is the accurate estimation of household sizes to be planned for redeveloped residential areas. Households found in redeveloped communities are unlikely to have the same size and makeup as those that occupied the site prior to redevelopment. This is because it is difficult to predict how this demographic will change because pre-redevelopment statistics will reflect the vacancies, inefficient land use, and financial losses that existed prior to the redevelopment project.

The average household size in the Hamilton County townships has remained relatively steady over the years between 2000 and 2010, as shown Table 2. Six (6) of the nine (9) townships had a decrease in household size between each decennial census. The number of people living in one residence is considered a household. Persons living in a household can be related or unrelated. Family size, in all nine townships, is larger than household size. Families must be related, which is typically spouses and/or children in one residence. With the growth of development, this is a large reason why the average household size decreased, with households increasing faster than the population.



Table 2 - Average Household and Family Size by Township

	Average Household Size 2000	Average Family Size 2000	Average Household Size 2010	Average Family Size 2010
Adams	2.70	3.13	2.61	3.05
Clay	2.81	3.20	2.70	3.17
Delaware	2.62	3.17	2.43	3.05
Fall Creek	2.92	3.22	3.07	3.42
Jackson	2.65	3.02	2.60	2.98
Noblesville	2.66	3.07	2.69	3.13
Washington	2.84	3.26	2.81	3.25
Wayne	2.66	3.01	2.72	3.15
White River	2.71	3.09	2.66	3.02

The households headed by a female in Hamilton County have also increased in all nine townships according to the sample data available from the 2000 Census and the 2010 Census. In Hamilton County, the total number of female head of households increased by 79 percent. Fall Creek township saw the largest increase in female head of households, with 882, but Wayne Township saw a 487% increase in the number of female head of households.

Table 3 - Number of Female Headed Households by Township

	# Female Head of Households 2000	# Female Head of Households 2010	Increase/ Decrease	Percentage Change
Adams	159	186	27	17%
Clay	1,398	2050	652	47%
Delaware	719	1103	384	53%
Fall Creek	327	1209	882	270%
Jackson	307	400	93	30%
Noblesville	1,117	1869	752	67%
Washington	487	1053	566	116%
Wayne	60	352	292	487%
White River	66	66	27	17%

Figure 11 shows the increase and decrease of female head of households by township.



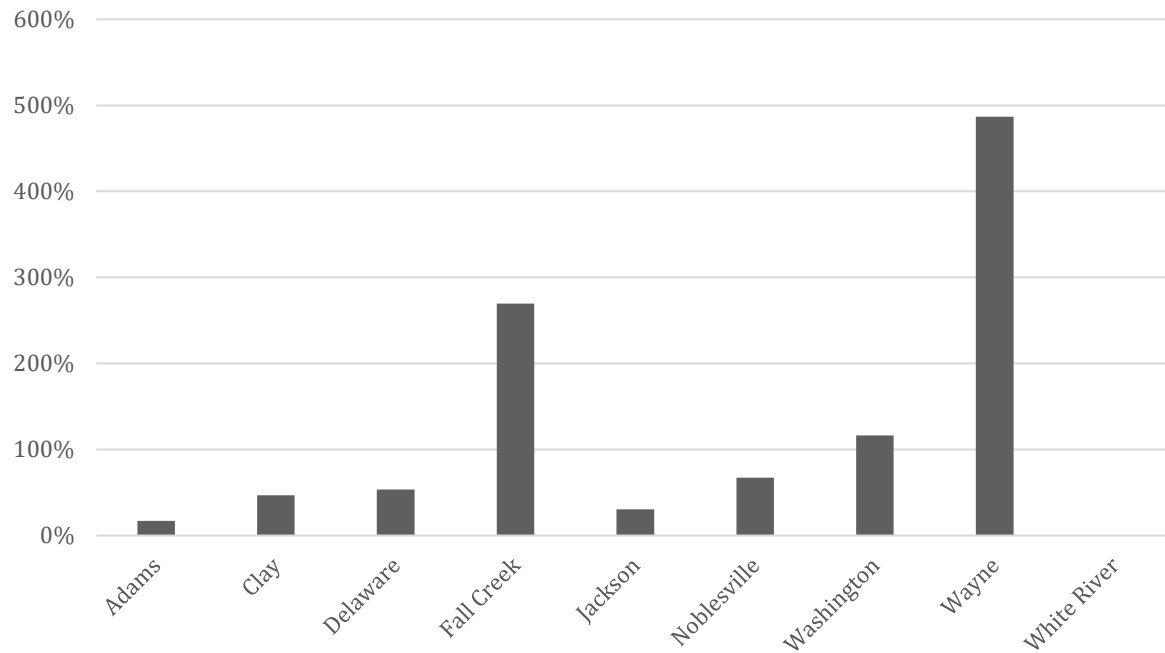


Figure 11 - Percentage Increase or Decrease of Female Head of Households by Township

Table 4 - Non Institutionalized Persons with a Disability by Township

	Adams	Clay	Delaware	Fall Creek	Jackson	Noblesville	Washington	Wayne	White River
Total with a disability	792	5,391	2,132	2,473	974	4,941	2,406	692	557
Under 18 with a Disability	39	669	501	669	133	708	453	80	14
18-64 with a Disability	418	2,128	980	1,109	394	2,610	1,100	410	402
65 years and over with a disability	335	2,594	651	695	447	1,623	853	202	141



In addition to knowing the size of the household, developers need to know the needs of potential clients, specifically those with a disability. For this analysis, Hamilton County will use the 2014 one-year estimates. Based on the population distribution of persons living with a disability, shown in Table Five and Figure 12, a housing provider can determine the need for accessible housing for Hamilton County residents. Clay Township has the biggest population of persons living with a disability. Clay Township, however, has a significantly higher group in the 65 years and older, where Noblesville Township has a larger population under 65.

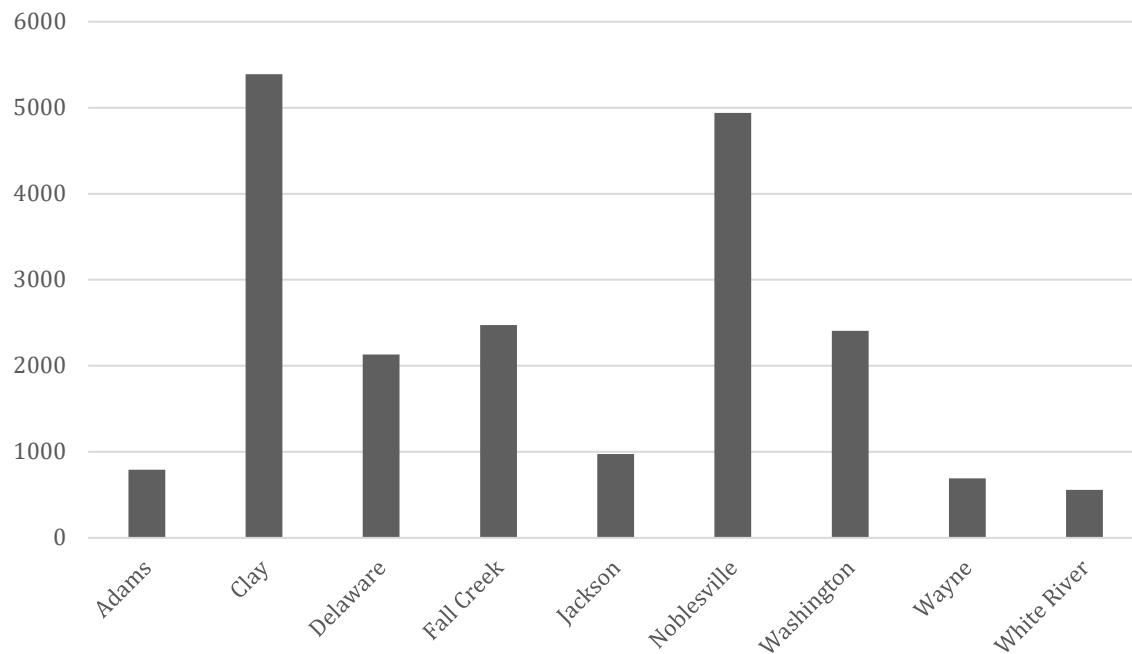


Figure 12 - Total Persons living with a Disability by Township



Economic Status and Income Distribution

Ball State University Center for Business and Economic Research published an economic document called the Indiana Economic Outlook 2014. The document looks at the national and state economic recoveries as well as that of Central Indiana. The introduction to this document includes the following statement:

Central Indiana (roughly the greater Indianapolis region) is comprised of Boone, Brown, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Putnam, and Shelby counties. The region is home to more than 1.76 million persons with a per capita income of \$40,027. Nearly one in three employed Hoosiers work in the region, totaling more than 1.1 million jobs. Since the end of the Great Recession, the region has seen strong population growth of 2.14 percent, per capita income growth of more than 8 percent, and employment growth of 1.8 percent. These are remarkably robust growth conditions, which mark the region as one of the more resilient and growing metropolitan areas in the nation.

As with the demographic information, Hamilton County will examine economic data and income information by township.

One of the first economic factors to measure the success of the economy is to look at the unemployment rate. In May of 2016, Hamilton County enjoyed the lowest unemployment numbers in the entire state, according to DWD, Local Area Unemployment Statistics:

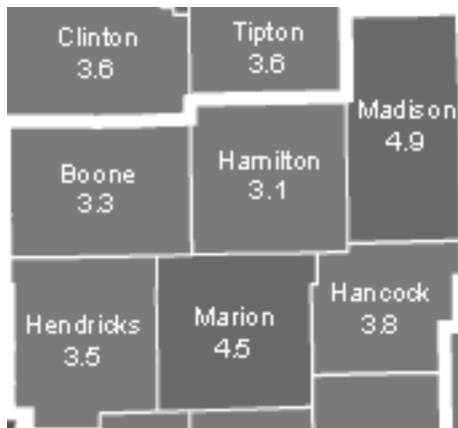


Figure 13; From: <http://www.hoosierdata.in.gov/docs/state/mapin/2016/mapinmth05.pdf>

The data from the US Bureau of Labor Statistics does not currently allow for a distribution of unemployment rate by township, but needless to say that the Federal Reserve considers an unemployment rate of 5.0-5.1 as “fully employed.”

Hamilton County is not currently suffering from any particular unemployment issue at this time.



Table 5 - Median Household Income by Township

	Adams	Clay	Delaware	Fall Creek	Jackson	Noblesville	Washington	Wayne	White River
2014 Median Household Income	\$47,901	\$104,937	\$75,355	\$97,689	\$56,628	\$71,915	\$82,202	\$60,544	\$56,087
2010 Median Household Income	\$52,560	\$98,611	\$74,325	\$104,666	\$59,123	\$69,574	\$84,688	\$56,755	\$70,684

The median household income decreased in Adams, Fall Creek, Jackson, Washington and White River Townships. Clay Township became the highest median household income in the county in the last 4 years.

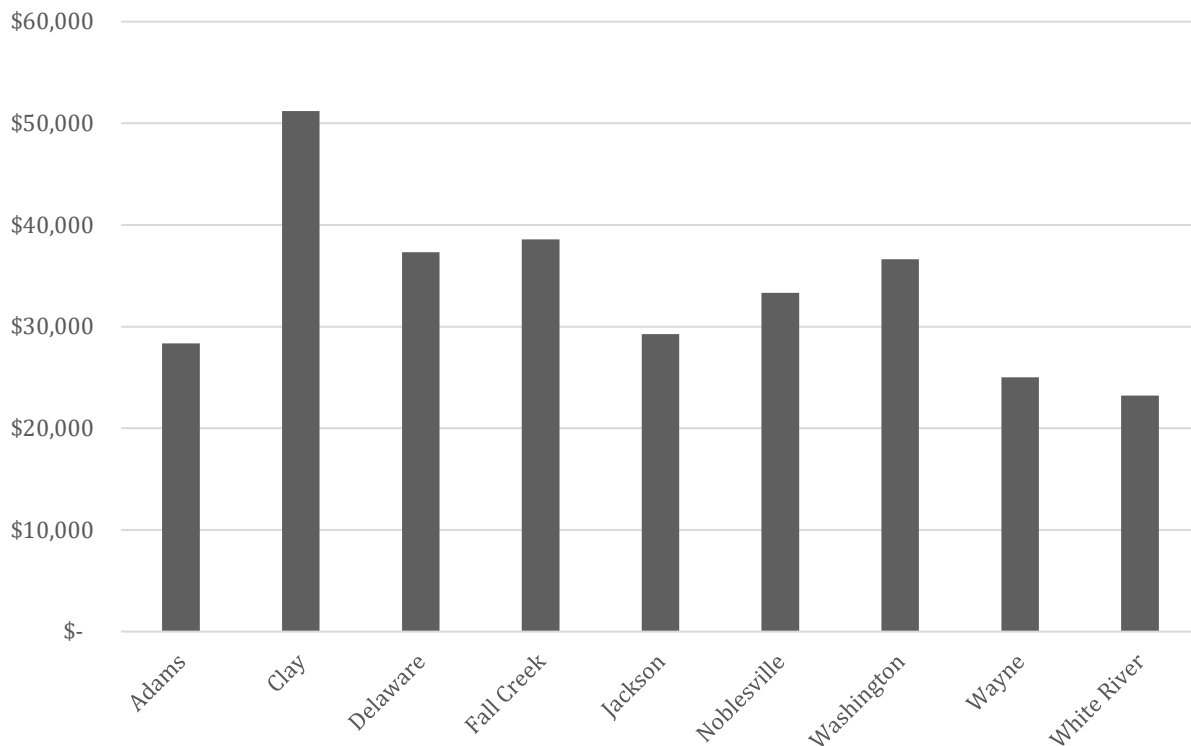
**Figure 14 - Per Capita Income by Township**

Table 15 - Households with Supplemental Security Income by Township

	Adams	Clay	Delaware	Fall Creek	Jackson	Noblesville	Washington	Wayne	White River
Total Households:	1,145	24,616	8,133	19,334	2,479	14,825	11,011	2,607	598
Living in household with Supplemental Security Income (SSI), cash public assistance income, or Food Stamps/SNAP in the past 12 months:									
Public Assistance - In family households:	195	1,273	571	910	349	1,410	628	504	38
Public Assistance - In married-couple family	48	638	209	535	198	522	379	202	38
Public Assistance - In male householder, no wife present, family	42	73	0	0	61	106	28	14	0
Public Assistance - In female householder, no husband present, family	105	562	362	375	90	782	221	288	0
Public Assistance - In nonfamily households	0	0	0	103	0	21	0	0	0

The Supplemental Security Income (SSI) program pays benefits to disabled adults and children who have limited income and resources. SSI benefits also are payable to people 65 and older without disabilities who meet the financial limits. While not every household that receives SSI is living with a disability, many people with a disability use this government assistance to help with daily living. Most of those utilizing SSI are living within Noblesville Township. This is likely due to the aforementioned higher amount of disabled under 65 in Noblesville Township. Only the mean SSI income in need to finish this sentence.

For those able and employed in Hamilton County, the community has a large number of professions/occupations available for individuals to choose from. According to the U.S. Bureau of Labor Statistics, in May 2013 the Indianapolis Metropolitan Statistical Area had a total of 912,810 occupations with an average wage of \$44,740 annually. Table 7 lists the general categories of occupations and the mean annual wage for each category. Management occupations fared the best



with a mean annual wage of \$97,230, while food preparation and serving related occupations fared the worst with a mean annual wage of \$20,250. The numbers in BOLD type are the occupations with decreases in numbers since the last time the *Analysis of Impediments to Fair Housing* was written in 2009 utilizing 2007 statistics. Construction and Production Occupations had the biggest decreases with a 25.0 percent decrease and 46.4 percent decrease, respectively.

Table 6 - Number and Mean Wage by Occupation Type for Indianapolis-Carmel MSA

Occupation Type/Category	# Occupations	Mean Annual Wage
Architecture and Engineering Occupations	14,930	\$71,250
Arts, Design, Entertainment, Sports, and Media Occupations	12,200	\$45,410
Building and Grounds Cleaning and Maintenance Occupations	27,330	\$24,720
Business and Financial Operation Occupations	47,760	\$66,840
Community and Social Services Occupations	9,130	\$46,290
Computer and Mathematical Science Occupations	26,970	\$72,520
Construction and Extraction Occupations	33,290	\$48,540
Education, Training, and Library Occupations	42,450	\$45,850
Farming, Fishing, and Forestry Occupations	640	\$26,920
Food Preparation and Serving Related Occupations	81,320	\$20,250
Healthcare Practitioner and Technical Occupations	64,600	\$72,440
Healthcare Support Occupations	24,710	\$28,320
Installation, Maintenance, and Repair Occupations	35,600	\$44,370
Legal Occupations	6,990	\$77,280
Life, Physical, and Social Science Occupations	10,880	\$62,280
Management Occupations	47,790	\$97,230
Office and Administrative Support Occupations	139,930	\$34,270
Personal Care and Service Occupations	21,160	\$23,580
Production Occupations	35,600	\$33,970
Protective Service Occupations	20,550	\$37,370
Sales and Related Occupations	97,950	\$40,320
Transportation and Material Moving Occupations	86,400	\$33,050



III: Housing Profile

This section of the *Analysis of Impediments to Fair Housing Choice* (AI) analyzes the land use for Hamilton County and evaluates the public policies regarding land use and planning to determine the result in any impediments to fair housing choice.

The AI will analyze data from current and approved plans and policies. Builders and community development experts have closely watched the housing market to see how the needs of the residents of Hamilton County will be in the future. An article in the *Indianapolis Star*, dated May 16, 2016, notes that the housing market in Central Indiana is being driven by Hamilton County's growth, and remains "the area's strongest market, outpacing other suburbs in the number of listings, pending and closed sales and median sales price"

It went on to say that the rising number of "employers along U.S. 31 and I-69 has fueled Hamilton County's home buying market for decades." The region is facing "pent-up demand" which has created bidding wars, and unique challenges for buyers looking for homes under \$200,000. "Homes under \$200,000 are becoming increasingly difficult to find, stymieing some would-be first-time buyers."

Table 7 – Population, Homeownership Rate, Housing Units and Vacancy Rate

Total Households	Total Housing Units	Owner Households	Renter Households	Vacancy Rate
105,578	102,804	83,206	22,372	5.7%

From: <http://nlihc.org/oor/indiana> and <https://egis.hud.gov/cpdmaps/>

Table 7 indicates that Hamilton County enjoys a significant level of homeownership, coupled with a very low vacancy rate compared to other counties both in the state, and in the country. There is significant pressure to move into the county, which is one of the reasons that the median sales price continues to grow. The laws of supply and demand are in full force within the county. In addition, there is a fairly low number of renter households, at 21% of total households, which places it only 4% from being the lowest county in the state. The statewide average for household rental is 31%.¹

¹ Housing statistics and living wage information was compiled by the National Low Income Housing Coalition and the Noblesville Housing Authority.



Housing Affordability

Review of Owner Units

The Hamilton County housing market is considered one of the most aggressive housing markets in the Country. While CNN Money ranked Indianapolis third most affordable city in the United States, Hamilton County is outpacing the median home price in neighboring Marion County by nearly \$115,000 per home (\$222,000 vs \$117,500). The median home price in the first quarter of 2016 was \$222,000 up 2% from the previous year, per the previously noted *Indianapolis Star* article.

The Indianapolis Star continues: “Hamilton County continues to lead the way in homebuilding as well, accounting for 41 percent of the total new housing market in the metro region. The average price of new homes, though, is \$370,334, an inventory that agents say will do little to meet demand of buyers seeking lower prices.”

With the increased median prices, the pricing of these homes continues to pose challenges to residents of the county, and those wishing to move in to the county. It would appear that some residents managed to find a home that meets their needs, though it may not be considered “Affordable Housing.” Affordable housing is not necessarily low-income housing.

By spending more than 30 percent of the gross monthly income, the household is considered to have a housing problem or added cost burden by the U.S. Department of Housing and Urban Development (HUD). By this definition, affordable housing is housing that costs less than 30 percent of a household’s gross monthly income. Households who spend more than 30 percent of their gross monthly income towards housing costs are considered to have a cost burden.

There is a higher level of cost burden, called Severe Cost Burden, where a household spends more than 50 percent of their gross monthly income towards housing costs. This is particularly difficult for these households to prepare or save for any emergency when most of their income goes towards housing. Tables 8 and 9 show the total number of owners and renters with both cost burden and severe cost burden.

By evaluating the number of households with cost burden, Hamilton County can determine if there is a shortage in affordable housing for its population.



Housing Needs Summary Tables

Table 8 - Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	100	55	15	20	190	15	25	20	0	60
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	90	10	0	10	110	0	0	15	10	25
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	110	15	90	35	250	0	20	30	75	125
Housing cost burden greater than 50% of income (and none of the above problems)	1,590	1,320	305	0	3,215	1,320	1,410	1,105	245	4,080



	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	330	1,105	2,130	485	4,050	235	975	2,730	1,644	5,584
Zero/negative Income (and none of the above problems)	300	0	0	0	300	435	0	0	0	435

From: Hamilton County, Indiana 2019-2023 Consolidated Plan

Table 9 - Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	1,895	1,400	405	65	3,765	1,335	1,455	1,180	330	4,300
Having none of four housing problems	559	1,444	4,420	2,365	8,788	434	2,165	7,005	6,155	15,759
Household has negative income, but none of the other housing problems	300	0	0	0	300	435	0	0	0	435

From: Hamilton County, Indiana 2019-2023 Consolidated Plan



Tables 8 and 9 data indicate two disparate trends: a surprisingly low number of renters with greater than 50% of the AMI are cost burdened. This is likely due to the fact that they face a significant challenge to enter the housing market in Hamilton County. Secondly, the number of burdened, and severely burdened owners increases as their AMI does. This is indicated by the highest population of owners with sever cost burden in the higher AMI bracket. This is also indicative of the higher median cost of a home, and even higher AMI brackets not being able to find affordable housing.

Hamilton County's housing market success has created a unique trend among small related families hoping to own or rent housing in the county. It appears that a statistically significant number of families with 50-80% AMI are over extending themselves to live in the community. The "keeping up with the Jones" mentality may be causing a higher cost burden to the 50-80% AMI where there may not be any ability for the 0-30% AMI to even find suitable and affordable housing throughout the county.

In both >30% and >50% Cost Burden categories, the total number of households subject to housing burden is relatively low compared to the total number of households both renting and owning homes. No category exceeds ten percent. This indicates that nearly most residents in Hamilton County are able to find affordable housing, even though as Figures 16, 17 and 18 demonstrate, there are relatively few units indicated as affordable to the different HAMFI brackets.

Figure 16 – Owners Units Affordable to by Income



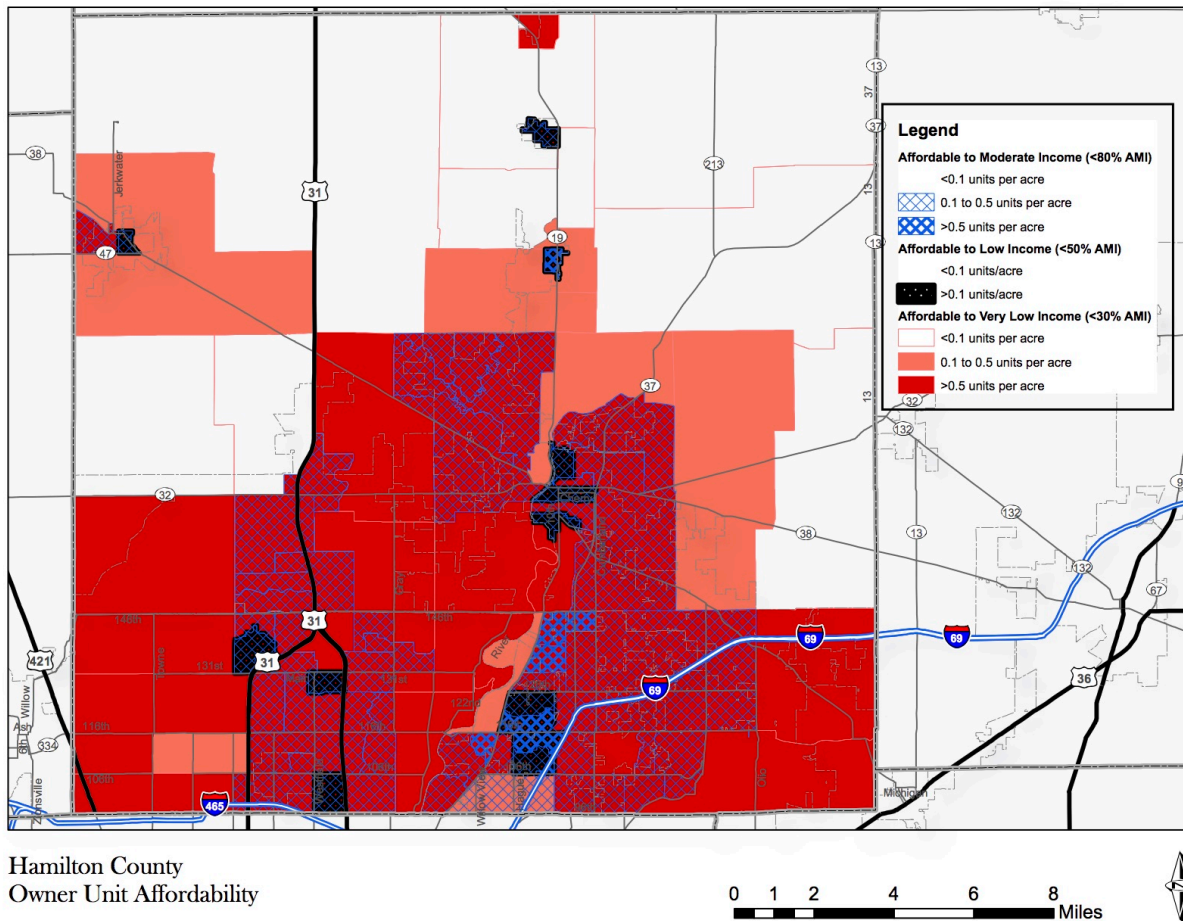


Figure 16 demonstrates that there are very few owner units affordable to those with 50% HAMFI, and the following maps indicate that this largely doesn't change, even as you view the data at 80% and 100% HAMFI.

In summary, the number of available affordable owned units in Hamilton County remains low, due to the continued market pressure and the higher median home values in the county. Residents are either unable to obtain owned housing, preventing them from either moving into, or staying in the county. However, the data suggests that if they are able to find owned housing, they have a higher incidence of incurring a Cost Burden. The data tends to suggest that the 50-80%AMI category may be able to find housing, but when they do, there is a growing percentage that stretch beyond their means.

Review of Renter Units

The question then becomes "Are there units affordable to renters in Hamilton County?" The next three maps, Figures 19-21, show the areas in which rental units are affordable to different income



levels. According to the HUD.gov website, there are only 5 listed properties in Hamilton County providing Affordable Apartments. These properties include 3 family type properties, and two reserved for elderly residents.

Very few units are affordable to households with the lowest incomes, households earning less than 30 percent of the area median income. The maps refer to HAMFI, which means HUD Area Median Family Income. Despite the difference between households and families, the HAMFI refers to the number of people living in one household. The dollar amount of HAMFI is dependent on the size of the household, increasing with the number of people in the household. Table 10 shows the HAMFI income limits by household number for 2015 in Hamilton County.

Table 10 - 2015 Income Limits for Hamilton County

	1 person	2 person	3 person	4 person	5 person	6 person	7 person	8 person
0-30 HAMFI	\$14,350	\$16,400	\$20,090	\$24,250	\$28,410	\$32,570	\$36,730	\$40,890
31-50 HAMFI	\$23,850	\$27,250	\$30,650	\$34,050	\$36,800	\$39,500	\$42,250	\$44,950
51-80 HAMFI	\$38,150	\$43,600	\$49,050	\$54,500	\$58,900	\$63,250	\$67,600	\$71,950

From <http://section-8-housing-income-limits.credio.com/l/885/Indianapolis-IN-HUD-Metro-FMR-Area>

Figure 167 - Percent of Rental Units Affordable to Households by Income



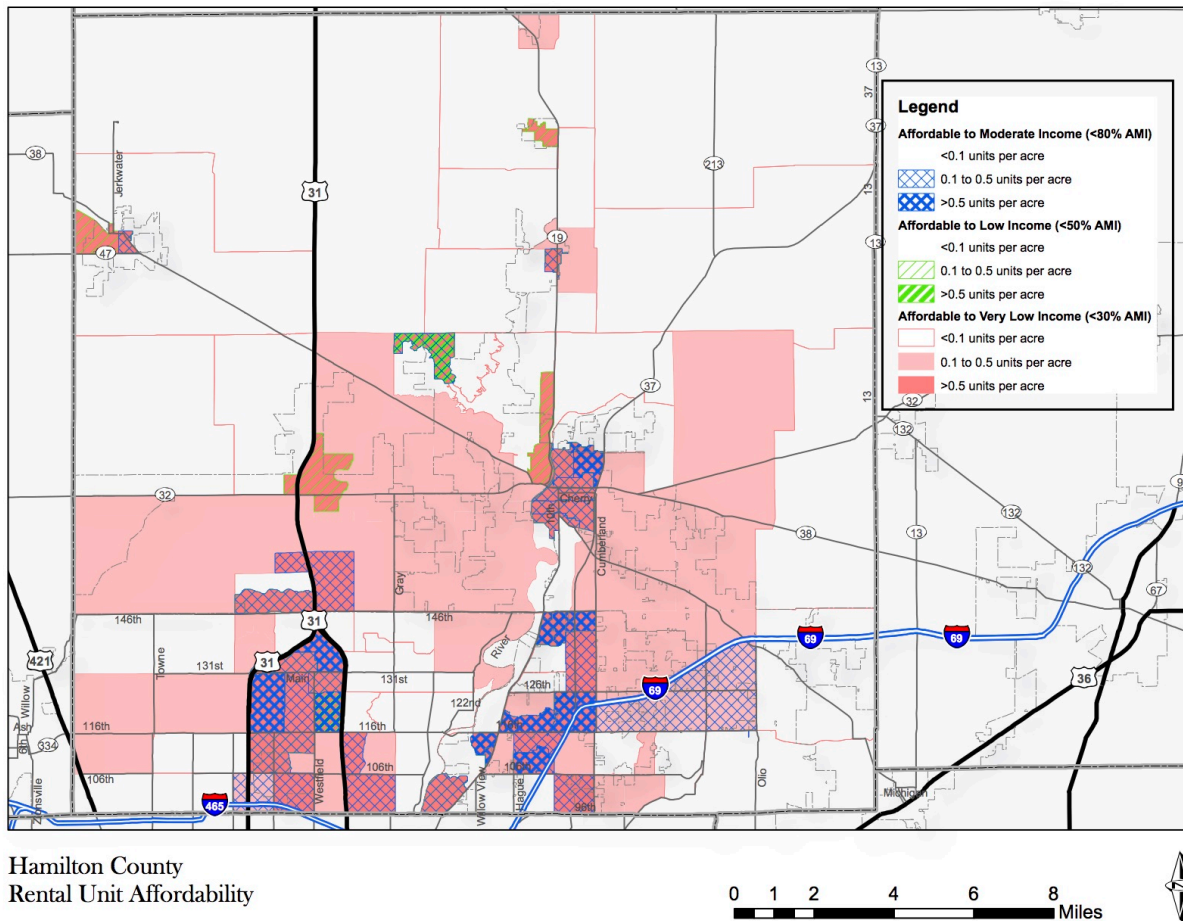


Figure 17 shows how few units are available to those households earning the lowest incomes. Hamilton County does have pockets of availability, but with large rural areas, the availability is limited to areas of higher commercial and residential density. It is easy to focus on the housing area just north of Noblesville, IN, where the Noblesville Housing Authority property resides, along with Princeton Lakes, and Noble Manor, the concentration of rental units is unusually high. This census tract also represents the location of the lowest household income, poverty rate, and the lowest owner occupied housing rates.

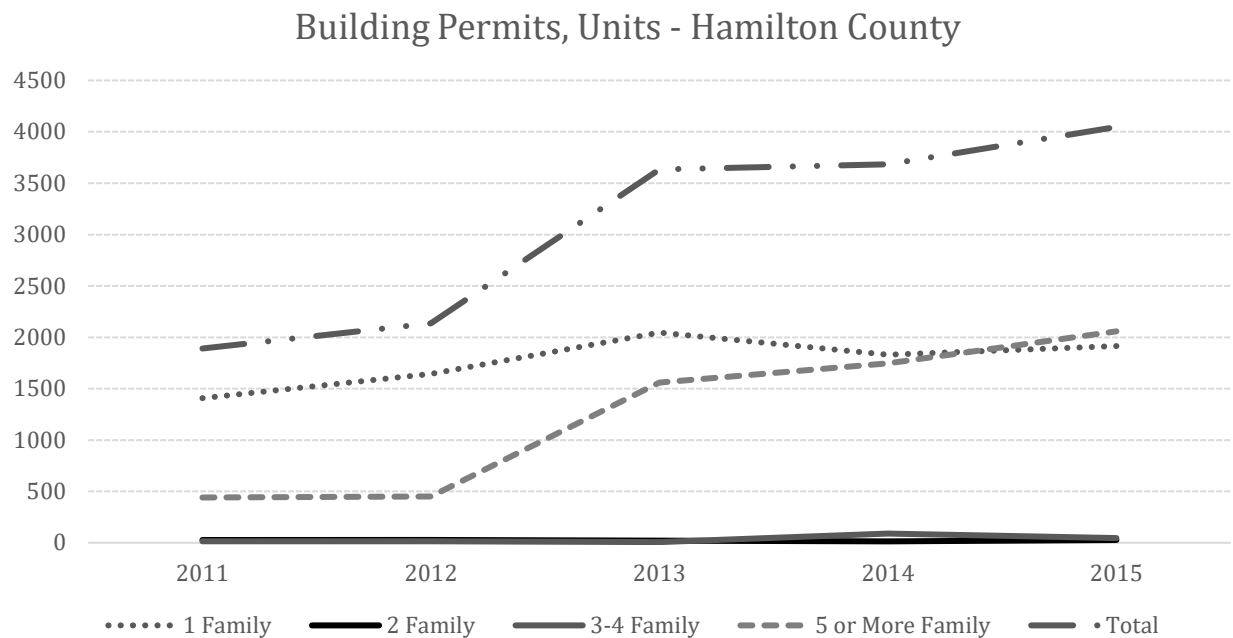
The number of renter units affordable to 80% HAMFI, does improve, but it appears that the need to finish sentence.

Housing Development



The number of new housing permits issued in Hamilton County continued to increase from year to year. Both the number of new building permits for single, double and multi-family permits is increasing rapidly in the last 5 years. Figure 18 shows that new construction is continuing at a high pace, and demo is virtually non-existent. As mentioned earlier, however, *The Indianapolis Star* continues: “Hamilton County continues to lead the way in homebuilding as well, accounting for 41 percent of the total new housing market in the metro region. The average price of new homes, though, is \$370,334, an inventory that agents say will do little to meet demand of buyers seeking lower prices.”

Figure 18 - New Building Permits – By Housing Unit (<http://www.stats.indiana.edu/bp/>)



While the housing stock continues to grow rapidly in multi-family units (largely rental or condo units), the average new price of a new home at \$370,334 and median contract rental price of \$859 for the county is remarkably high considering the increasing supply.



Living Wage²

Recent news and debate have taken place on the need to increase the minimum wage to a living wage. While there are two sides of the debate with many people on each side, it brings to light that the minimum wage is different from a living wage. The National Low Income Housing Coalition conducts an annual study called *Out of Reach*, a study that looks at what an hourly wage needs to be for a household to afford a place to rent without working more than the standard 40-hour workweek.

The study compares the fair market rents for an area to the rents affordable at different wages, including minimum wage, average SSI payments, etc. Fair Market Rents are the 40th percentile of gross rents for typical, non-substandard rental units occupied by recent movers in a local housing market, meaning 40 percent of the rents are less expensive and 60 percent of the rental units are more expensive. The fair market rate increases with the number of bedrooms as part of the housing unit.

Table 11 - Fair Market Rents for Hamilton County - Trend

	Zero bedroom FMR	One bedroom FMR	Two bedroom FMR	Three bedroom FMR	Four bedroom FMR
2016	\$552	\$651	\$809	\$1084	\$1230
2015	\$516	\$637	\$792	\$1056	\$1232
2014	\$506	\$625	\$777	\$1036	\$1209

From: <https://www.huduser.gov/>

The minimum wage in Hamilton County in 2016 is \$7.25 per hour. Working 40 hours per week, a person will earn \$15,080 per year. The rent payment affordable to a single person earning minimum wage is \$377 per month. A person in Hamilton County will need to work 59 hours a week to afford a studio apartment with no bedrooms. For a two-bedroom apartment, a person working minimum wage will need to work 86 hours per week, over double the typical workweek.

The picture is bleaker for recipients of SSI payments. The mean monthly payment from SSI is \$733 per month, meaning the rent affordable to a household or person with only SSI for income is \$220 per month. No apartments in Hamilton County at fair market rent are affordable to persons with only SSI payments as income.

To afford the fair market rents in Hamilton County, a household needs to earn a living wage, or a wage that enables them to work 40 hours per week and only pay 30 percent of their income towards housing. For a two-bedroom apartment in Hamilton County, the living wage needs to be \$15.56 per hour. This represents a wage need to be earned by the entire household to afford a two-bedroom

² Housing statistics and living wage information was compiled by the National Low Income Housing Coalition and the Noblesville Housing Authority.



unit. This does not account for other costs that may be associated with multiple wage earners, such as day care, transportation, etc.

However, in 2016, the Area Median Income (AMI) for Hamilton County is \$66,700 annually. The U.S. Department of Housing and Urban Development (HUD) establishes affordability at 30% of a household's gross monthly income. So the maximum housing costs a household at 100% AMI is \$1,668 per month. Table X shows the maximum housing costs for each income level used by HUD.

Table 12 - Maximum Affordable Housing Cost by Income

HAMFI Income Level	Affordable Housing Cost
30%	\$500
50%	\$834
80%	\$1,334
100%	\$1,668

Households earning minimum wage or SSI need other assistance to afford decent housing, such as rental subsidies or Section 8 Vouchers. These types of programs allow persons to pay just 30 percent of their income towards housing while paying the remaining amount of rent. Thus, if a minimum wage worker needs a two-bedroom unit at \$777 per month, he or she would pay the \$377 towards rent and the subsidy would cover the remaining \$400.

Other programs to help reduce the cost of rents are called the Low Income Housing Tax Credit and the HOME Investment Partnerships Program. These funds come from both the federal government through the State and Local level. The U.S. Department of Housing and Urban Development sets rent levels, which multi-family developments cannot exceed when charging rent. These rents are set to ensure affordability for low-income households.

Table 13 – HOME Rent Limits for Indianapolis MSA, including Hamilton County

	0 BRM	1 BRM	2 BRM	3 BRM	4 BRM	5 BRM	6 BRM
Low HOME Rent Limit	\$552	\$638	\$766	\$885	\$987	\$1,090	\$1,191
High HOME Rent Limit	\$555	\$651	\$809	\$1,084	\$1,230	\$1,405	\$1,520



Table 14 – 2016 Comparison of Median Income vs Affordable Rent in Hamilton County and Indianapolis MSA

	Estimated Renter Household Median Income	Affordable Rent at Household Median Income	Percent of Median Renter Income to Afford 2 Bedroom FMR
Hamilton County	\$47,837	\$1,196	68%
Indianapolis MSA	\$31,393	\$785	103%

From: National Low Income Housing Coalition

Even with the living wage calculations, it becomes clear that because of the estimated renter income in Hamilton County, it would appear that the average renter in Hamilton County is able to afford the two-bedroom Fair Market Rent.

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HMDA Analysis

Information contained in the following tables comes from the online reports available from the Federal Financial Institutions Examination Council (FFIEC). The FFIEC is responsible for the collection and administration of the Home Mortgage Disclosure Act (HMDA) reporting data that financial institutions are required to submit. The most recent data available comes from the 2014 calendar year.

16,635 home loan applications were filed during this time in Hamilton County. These home loan applications fell into one of the following four categories: (1) Government Guaranteed Home-Purchase, (2) Conventional Home-Purchase, (3) Refinancing, and (4) Home Improvement. By far, refinancing loans and conventional home loans are the two largest percentages of the 2014 complete home loan application pool. Applications for loans to refinance an existing home purchase loan made up slightly over 38.96 percent of all applications and conventional home loans made up nearly 44.55 percent of all applications, totaling 83.51 percent. The remaining 16.49 percent of the total home loan applications was comprised of home improvement loan applications (4.72 percent) and government guaranteed loan applications (11.75 percent).

Table 15 illustrates the total number of home loan applications made by loan type. The total applications received are further categorized by final loan status. 69.4 percent of all applications resulted in a loan origination. 13 percent were denied. The remaining applications were deemed incomplete, not accepted or withdrawn.



Table 15 - Number of Loans by Type, Source: HMDA

	Government Guaranteed Home Purchase	Conventional Home Purchase	Refinance	Home Improvement	Total
Loans Originated	1,453	5,800	3,841	455	11,549
Applications Approved, Not Accepted	61	300	226	24	611
Applications Denied	206	439	1,281	240	2,166
Applications Withdrawn	200	741	822	57	1,820
Applications Determined Incomplete	36	131	312	10	489
Total Loan Applications Received	1,956	7,411	6,482	786	16,635

Conventional Home Purchases had the highest rate of loan origination, with 50.22 percent of all applications resulting in a loan. Refinancing loans had the next lower rate of approvals, with 33.26 percent of all applications resulting with a loan. However, both categories had the highest denial rates, reaching only 59.14 percent and 20.27 percent respectfully. Both of these denial rates exceed the origination rates of Government Guaranteed Home Purchase and Home Improvement Loans combined. The reason for such a high denial rate will be examined further in this document.

Applicants seeking home improvement loans experienced loan originations and loan denials with 3.94 percent and 11.08 percent rates respectively. Figure 19 shows the difference in originations versus denials for each loan type.



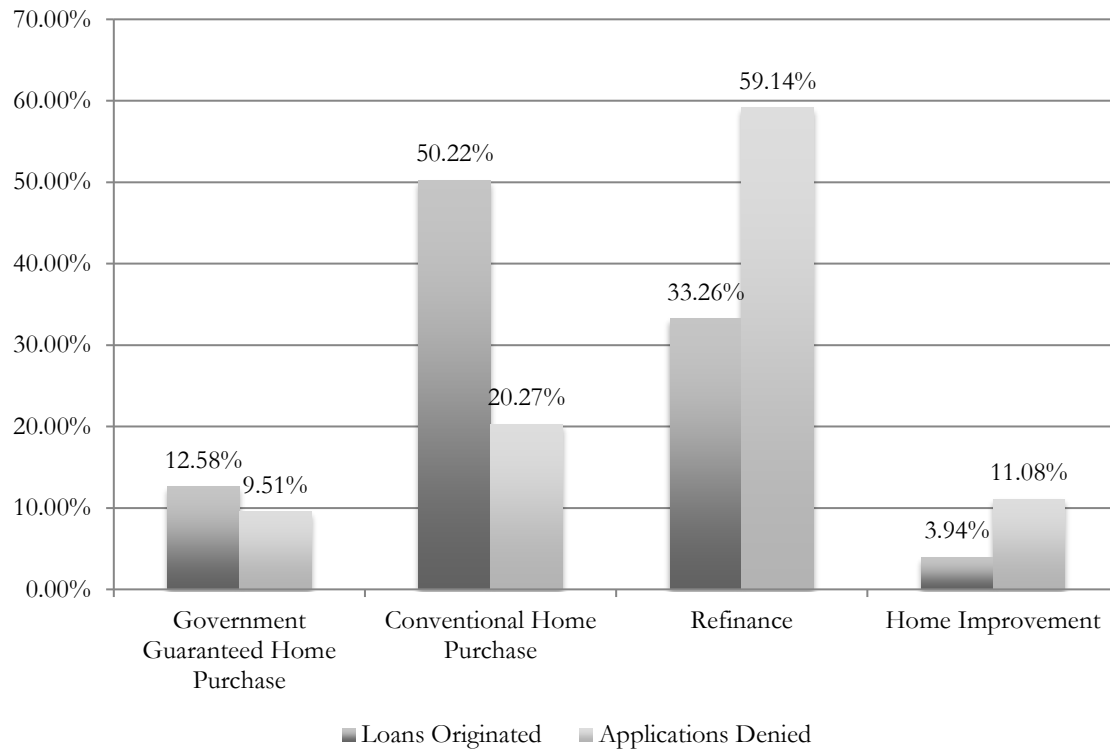


Figure 19 - Percent of Loan Originations and Denials by Type

HMDA denial and acceptance information by specific loan type is only available for the entire Indianapolis Metropolitan Statistical Area. HMDA does provide some information by the type of tract and income level, which can be aggregated for Hamilton County. The remainder of the analysis by type of loan will utilize this information.



-Government Guaranteed Home – Purchase loans-

In 2014, Government Guaranteed Home-Purchase (government guaranteed) loan applications made up 11.75 percent of the total home loan applications in the Hamilton County. A government guaranteed loan is available through and secured by the federal government of the United States. Government guaranteed loans are offered by three different agencies, the Federal Housing Administration (FHA), the Veterans Association (VA) and the United States Department of Agriculture (USDA).

The FHA loan is characterized by a fixed rate mortgage accessible to first-time and low-to-moderate income buyers. It is easier for these buyers to qualify for the FHA loan because it requires a smaller down payment (usually around 3 percent) and the interest rate is typically lower than those available from a Conventional Home-Purchase loan. Government guaranteed loans are only available to purchase homes that will be owner occupied.

The VA offers government guaranteed mortgages to individuals with a history of active military service or those individuals who have survived the death of a spouse that was an active service member. If an individual applicant meets the criteria and can prove the ability to make monthly payments, a VA home mortgage can be obtained with little or no down payment.

The USDA administers the Rural Development Guaranteed Housing loan program that provides mortgages for low-to-moderate income individuals wanting to purchase a home in an area that is designated a Rural Development area by the USDA. Applicants with a less-than-perfect credit history are able to qualify for this loan when they may not be able to qualify for a conventional loan because the USDA guaranteed loans do not require a down payment or mortgage insurance.

1,956 applications were made for government guaranteed loans and 206 were denied. Denials are based on an applicant's rating in one of the following nine evaluation areas:

- debt to income ratio;
- employment history;
- credit history;
- collateral;
- cash accounts;
- quality of information given in application;
- completeness of application;
- mortgage insurance availability; or
- "other."

Table 16 shows the percent of applicants denied government guaranteed loans in the Indianapolis MSA for the year 2014, categorized by race and ethnicity. This information is not available for



Hamilton County and must be aggregated for Hamilton County. A problem with debt to income ratio is cited as the most common reason for denial in this loan type with an average denial rate of 28 percent. The second highest reason for denial in this loan type is cited as a problem with the applicant's credit history with an average denial rate of 26 percent.

The third and fourth most common reason for denial in this loan type is credit application complete and collateral, with average denial rates of 18 and 14 percent, respectively.



Table 16 - Percent of Government Guaranteed Loans Denied by Race and Ethnicity

	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
<i>Race</i>										
American Indian or Alaska Native	33%	0%	0%	0%	0%	33%	33%	0%	0%	100%
Asian	38%	0%	17%	8%	13%	4%	17%	0%	4%	100%
Black or African American	22%	4%	32%	7%	9%	6%	7%	0%	12%	100%
Native Hawaiian or Other Pacific Islander	40%	0%	0%	40%	0%	0%	25%	0%	19%	100%
White	22%	7%	26%	12%	6%	5%	12%	0%	9%	100%
Two or More Minority Races	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%
Joint (White/ Minority Race)	25%	6%	19%	6%	0%	0%	25%	0%	19%	100%
Race Not Available	15%	5%	35%	13%	4%	7%	12%	0%	9%	100%



<i>Average</i>	28%	6%	26%	14%	8%	13%	18%	0%	11%	100%
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	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
<i>Ethnicity</i>										
Hispanic or Latino	25%	8%	25%	14%	5%	11%	5%	0%	8%	100%
Not Hispanic or Latino	22%	7%	27%	11%	7%	5%	12%	0%	9%	100%
Joint (Hispanic or Latino/Not Hispanic or Latino)	30%	0%	22%	0%	6%	17%	6%	0%	11%	100%
Ethnicity not available	20%	4%	30%	14%	6%	5%	12%	0%	9%	100%
<i>Average</i>	27%	6%	26%	13%	6%	10%	9%	0%	9%	100%



Examining the data by race, White applicants comprised 76.32 percent of all applicants for government guaranteed financing, but only accounted for 73.14 percent of the total applicants denied. African American applicants comprised 10.52 percent of all applicants for government guaranteed financing, but accounted for 14.5 percent of all applicants denied financing. A higher proportion of African American applicants were denied government guaranteed financing than the total make-up of the applications by 4 percent. Conversely White applicants made up a lesser proportion of total applicants denied at a rate of 3 percent less. The remaining 12.36 percent of applicants denied a loan equate the proportion of their races combined in the applicant pool.

Applicants that classified themselves as Hispanic made up 4.93 percent of the total government guaranteed applications denied. Out of the 11,618 applications filed in the Indianapolis MSA, Hispanic applicants account for 3.58 percent of applicants. This also shows a disproportionate amount of Hispanics were denied government guaranteed financing. Both Hispanics and African American applications are denied government guaranteed financing at a rate of 38 percent higher than the portion of their race or ethnicity in the total applicant pool.

The data available through the Federal Financial Institutions Examination Council (FFIEC) online reports also allows for applications to be tracked by an applicant's income. Applicants with the lower incomes experienced a higher denial rate than applicants with higher incomes. Credit history continues to be the number one reason for a denial despite income levels. Table 17 shows the reasons for denial by income.

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Table 17 - Percent of Government Guaranteed Loans Denied by Income

	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
Less Than 50% of MSA Median	30%	9%	23%	9%	8%	5%	9%	0%	7%	100%
50 – 79% of MSA Median	22%	7%	25%	12%	6%	8%	12%	0%	9%	100%
80 – 99% of MSA Median	18%	1%	31%	13%	5%	3%	16%	1%	13%	100%
100 – 199% of MSA Median	15%	6%	37%	16%	5%	2%	8%	0%	11%	100%
120% or More of MSA Median	13%	3%	33%	14%	7%	6%	15%	1%	11%	100%
Income Not Available	33%	13%	13%	13%	0%	0%	27%	0%	0%	100%
Average	22%	7%	27%	13%	6%	5%	15%	1%	10%	100%



-Conventional Home-Purchase Loans-

7,411 applications for Conventional Home-Purchase (conventional) loans were submitted in 2014. This makes up 44.55 percent of the total home loan applications. Conventional loans to purchase housing are made by private financial institutions. The terms to qualify for these loans will vary based on the individual underwriting at each institution. Furthermore, the down payment amount and interest rates will vary based on the way an applicant scores on their application. 439, or 20.27 percent, of applicants were denied conventional financing to purchase a home.

The most common reason for a denied conventional loan application cited by the HMDA data tables is debt to income ratios. An average of 24 percent of the total denials for this loan type were made for this reason.

The second most common reasons for a conventional loan application denial were problems with credit history and credit application incomplete. Both reasons averaged 19 percent of the denials.

Table 18 shows the percent of applicants denied conventional home purchase loans in the Indianapolis MSA for the year 2014, categorized by race and ethnicity. This information is not available for Hamilton County and must be aggregated for Hamilton County.

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Table 18 - Percent of Conventional Home Purchase Loans Denied by Race and Ethnicity

	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
<i>Race</i>										
American Indian or Alaska Native	29%	14%	21%	14%	14%	7%	0%	0%	0%	100%
Asian	34%	7%	7%	8%	10%	9%	15%	0%	9%	100%
Black or African American	16%	2%	29%	20%	10%	7%	10%	0%	7%	100%
Native Hawaiian or Other Pacific Islander	14%	14%	0%	29%	0%	0%	43%	0%	0%	100%
White	21%	3%	19%	20%	7%	6%	15%	1%	7%	100%
Two or More Minority Races	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%
Joint (White/Minority Race)	32%	0%	14%	5%	0%	14%	23%	5%	9%	100%
Race Not Available	25%	5%	23%	19%	7%	7%	9%	0%	5%	100%
Average	21%	6%	14%	14%	6%	6%	14%	1%	5%	100%

	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
<i>Ethnicity</i>										
Hispanic or Latino	24%	9%	27%	9%	16%	4%	9%	0%	2%	100%
Not Hispanic or Latino	22%	3%	18%	20%	7%	7%	15%	1%	7%	100%
Joint (Hispanic or Latino/Not Hispanic or Latino)	0%	0%	31%	15%	31%	8%	8%	0%	8%	100%
Ethnicity not available	27%	5%	25%	16%	6%	6%	10%	1%	5%	100%
Average	24%	6%	25%	15%	15%	6%	11%	1%	6%	100%

When examining this information by race, a similar trend of the government guaranteed loans occurs in the conventional market. Whites make up 81.3 percent of the total conventional loan applications while only making up 75.05 percent of the total denials. African Americans make up 3.01 percent of the total applications for conventional loans while making up 5.60 percent of the denials. 2.41 percent of the applicants denied conventional loan applications made were Hispanic. Hispanic applicants comprised 1.73 percent of the total applicants for conventional home financing. Both African Americans and Hispanics make up a higher proportion of the denials while making up a smaller proportion of loan applications.

Credit history and debt to income ratio are the top reasons for denial of conventional loans. The reasons for denial are the same for low to moderate-income applicants, or those earning 80 percent or less of the area median income. For those applicants earning more than 80 percent of the area median family income, debt to income ratio is the number one reason they are denied a conventional loan. This can be due to the requirements for obtaining a convention home loan. Table 19 shows the reason for loan denials at each income level.

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Table 19 - Percent of Conventional Home Purchase Loans Denied by Income

	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
Less Than 50% of MSA Median	31%	7%	25%	14%	6%	4%	8%	0%	4%	100%
50 – 79% of MSA Median	22%	3%	21%	17%	10%	7%	14%	1%	6%	100%
80 – 99% of MSA Median	19%	5%	23%	18%	6%	7%	17%	1%	6%	100%
100 – 199% of MSA Median	23%	1%	14%	21%	11%	8%	13%	0%	9%	100%
120% or More of MSA Median	18%	2%	14%	24%	6%	7%	18%	1%	9%	100%
Income Not Available	28%	4%	30%	15%	7%	2%	9%	0%	4%	100%
Average	24%	4%	21%	18%	8%	6%	13%	1%	6%	100%

- Home Loan Refinancing –

Homeowners looking to refinance their existing mortgages submitted the largest percentage of 2014 total home loan applications in Hamilton County. With 6,482 total applications received in Hamilton County, Home Loan Refinancing (refinancing) applications accounted for 38.9 percent of the total home loan applications. Once again, using the percentages aggregated from MSA data, of the total applicants, 76.85 percent were White, 8.21 percent were African American, and 3.61 percent were individuals that classified themselves as one of the other minority races. Race information was not available for 11.33 percent of the total applicants.

As noted previously in Table 15, of the 6,482 received only 3,841 were actually originated (59.2%). 312 (4.81%) applications were determined incomplete, 822 (12.68%) withdrawn, 1,281 (19.76) were denied, and 226 (3.49%) were approved, but ultimately not accepted. This data is accurate to Hamilton County.

Referring again back to the MSA statistical data, it could be assumed that 20.7% percent were denied based on a poor application score in one of the basic nine evaluation areas. The top two reasons for denial were collateral and credit history.

Out of the 28.60% percent of applicants denied a loan due to a perceived problem with their credit history, 73.77 percent were White, 11.49 percent were African American and 2.53 percent was one of the other racial minorities. African Americans accounted for 8.2 percent of the applications; however, they made up 11.49 percent of the denials based on credit history. This represents a 40 percent difference in the amount of denials over the percent of applications they represent.

This situation is similar for Hispanic applicants. In 2014, those applicants that classified themselves as Hispanic made up 3.37 percent of the total refinancing applications denied.

Collateral and credit history are the top reasons for denial of home refinance loans, but the breakdown by income is the opposite of the conventional loan market. Collateral is the number one reason for loan application denials for both low to moderate income applicants and applicants earning more than 80 percent of the area median income. This can be due to lower property values and discrepancies between what the buyer and the mortgage lender assesses a property. However, there is no definite answer for this reason used at such a high frequency.

Tables 20 and 21 show percentages of the reason for loan denials by race, ethnicity and income level.

Table 20 - Percentage of Refinance Loans Denied by Race and Ethnicity (MSA Data)

	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
<i>Race</i>										
American Indian or Alaska Native	26%	4%	43%	4%	9%	4%	4%	0%	4%	100%
Asian	31%	1%	16%	17%	2%	7%	15%	1%	11%	100%
Black or African American	14%	1%	32%	22%	5%	1%	14%	0%	11%	100%
Native Hawaiian or Other Pacific Islander	40%	0%	40%	0%	10%	0%	0%	0%	10%	100%
White	17%	1%	28%	22%	4%	4%	14%	0%	10%	100%
Two or More Minority Races	14%	0%	14%	0%	14%	14%	29%	0%	14%	100%
Joint (White/Minority Race)	14%	2%	22%	27%	3%	2%	12%	0%	19%	100%
Race Not Available	15%	2%	29%	20%	3%	4%	18%	0%	9%	100%
Average	21%	1%	28%	14%	6%	5%	13%	0%	11%	100%

	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
<i>Ethnicity</i>										
Hispanic or Latino	17%	0%	34%	16%	4%	7%	13%	0%	9%	100%
Not Hispanic or Latino	17%	1%	28%	22%	4%	3%	14%	0%	10%	100%
Joint (Hispanic or Latino/Not Hispanic or Latino)	12%	5%	18%	20%	0%	5%	22%	0%	18%	100%
Ethnicity not available	16%	2%	28%	21%	3%	3%	19%	0%	9%	100%
Average	16%	2%	27%	20%	3%	5%	17%	0%	12%	100%

Table 21 – Percentage of Refinance Loans Denied by Income (MSA Data)

	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
<i>Income</i>										
Less Than 50% of MSA Median	27%	2%	29%	16%	3%	3%	10%	0%	9%	100%
50 – 79% of MSA Median	19%	1%	28%	22%	4%	3%	12%	0%	10%	100%
80 – 99% of MSA Median	16%	1%	29%	22%	4%	3%	16%	0%	9%	100%
100 – 199% of MSA Median	14%	1%	30%	24%	2%	4%	16%	0%	9%	100%
120% or More of MSA Median	10%	1%	26%	28%	4%	3%	17%	0%	11%	100%
Income Not Available	11%	2%	34%	5%	7%	5%	24%	0%	11%	100%
Average	16%	1%	29%	20%	4%	4%	16%	0%	10%	100%

- Home Improvement Loans –

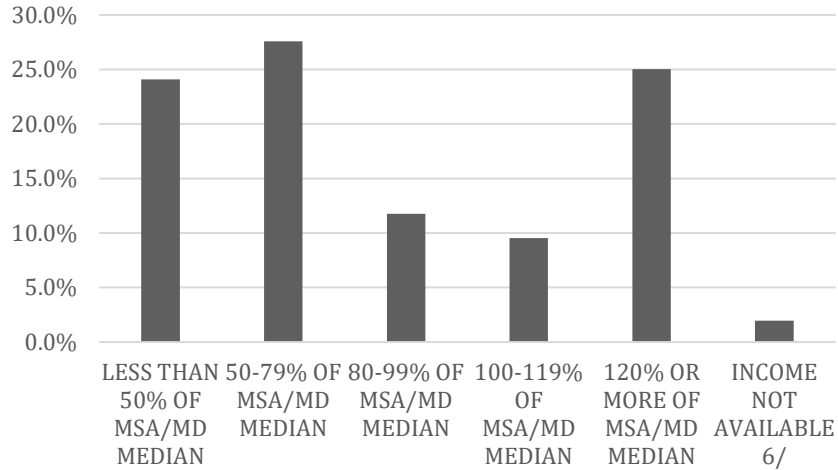
Home Improvement loan applications accounted for 4.7 percent of the total loan applications. According to the 2014 HMDA MSA data, of the total applicants, 76.65 percent were White, 14.35 percent were African American, and 1.83 percent were individuals that classified themselves as one of the other minority races. Race information was not available for 6.75 percent of the total applicants. Of the 786 total applications in Hamilton County for home improvement loans in 2014, 240, or 31 percent, were denied based on a poor application score in one of the basic nine evaluation areas. Home Improvement loans continue to be the least successful to obtain, with only 58 percent loans originated from 786 applicants.

MSA data indicates that credit history (34.8 percent) and debt to income ratio (18.29 percent) account for the largest amount of denials. Out of the applicants denied a loan due to a perceived problem with their credit history, 71.8 percent were White, 15.2 percent were African American and 2.2 percent was one of the other racial minorities. Out of the applicants denied a loan for debt to income ratio, 76.3 percent were White, 12.3 percent were African American and 3 percent were one of the other racial minorities. In both cases, African Americans and other racial minorities experience a higher rate of denial than the proportion of applicants in the total applicant pool.

Applicants that classified themselves as Hispanic made up 3.3 percent of the total home loan applications denied.

When examining the data by income level, credit history is the number one reason for denial. For all incomes reporting, credit history accounts for the denial for at least 46 percent of the applicants. This includes those at the higher income brackets that are considered market rate buyers. Figure 20 below shows the denial rate based on debt to income for each income level.

Figure 20 - Percent of Denials Based on Debt to Income Ratio



A very interesting data point is the very high number of denials for credit history for those with a 120% or more MSA/MD Median. It is reasonable to see that those making less than 79% of the MSA/MD Median income would find it difficult to have a stronger credit score, but those with an income of 120% or more being denied at a higher rate is a bit of an outlier. This is demonstrated by the fact that this income applied for 37 percent of the total Home Improvement loans, which is almost double any of the other income tranches. Tables 23, 24 and 25 delineate the reasons for denial on the basis of race, ethnicity and income.

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Table 23 - Home Improvement Loan Denials by Race

	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
<i>Race</i>										
American Indian or Alaska Native	0.8%	0.0%	0.8%	0.5%	0.0%	4.7%	0.0%	0.0%	0.0%	100%
Asian	2.0%	8.8%	1.0%	0.5%	0.0%	2.3%	3.2%	0.0%	3.0%	100%
Black or African American	12.3%	11.8%	15.2%	12.6%	3.4%	7.0%	6.3%	0.0%	14.7%	100%
Native Hawaiian or Other Pacific Islander	0.3%	2.9%	0.4%	0.0%	3.4%	2.3%	0.0%	0.0%	0.0%	100%
White	76.3%	70.6%	71.8%	76.4%	79.3%	79.1%	82.5%	0.0%	72.1%	100%
Two or More Minority Races	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100%
Joint (White/Minority Race)	0.5%	2.9%	0.7%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	100%
Race Not Available	0.8%	0.0%	0.8%	0.5%	0.0%	4.7%	0.0%	0.0%	0.0%	100%
Average	11.66%	12.13%	11.34%	11.38%	10.76%	12.51%	11.50%	0.00%	11.23%	100.00%

Table 24 - Home Improvement Loan Denials by Ethnicity

	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
Hispanic or Latino	3.3%	17.6%	3.1%	4.5%	3.4%	7.0%	3.2%	0.0%	3.6%	100%
Not Hispanic or Latino	88.3%	76.5%	86.2%	85.9%	82.8%	88.4%	90.5%	0.0%	85.8%	100%
Joint (Hispanic or Latino/Not Hispanic or Latino)	0.3%	5.9%	0.4%	0.0%	0.0%	2.3%	0.0%	0.0%	0.5%	100%
Ethnicity not available	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100%
Average	22.98%	25.00%	22.43%	22.60%	21.55%	24.43%	23.43%	0.00%	22.48%	100%

Table 25 - Home Improvement Loans Denied by Income

	Debt to Income Ratio	Employment History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit Application Incomplete	Mortgage Insurance Denied	Other	Total
Less Than 50% of MSA Median	36.0%	35.3%	24.1%	17.1%	13.8%	18.6%	12.7%	0.0%	24.4%	100%
50 – 79% of MSA Median	27.8%	26.5%	27.6%	20.6%	24.1%	14.0%	15.9%	0.0%	24.9%	100%
80 – 99% of MSA Median	9.5%	11.8%	11.8%	13.1%	17.2%	9.3%	12.7%	0.0%	16.8%	100%
100 – 199% of MSA Median	8.0%	8.8%	9.5%	12.1%	6.9%	16.3%	14.3%	0.0%	7.6%	100%
120% or More of MSA Median	16.5%	17.6%	25.0%	36.2%	37.9%	37.2%	44.4%	0.0%	24.9%	100%
Income Not Available	2.3%	0.0%	2.0%	1.0%	0.0%	4.7%	0.0%	0.0%	1.5%	100%
Average	16.68%	16.67%	16.67%	16.68%	16.65%	16.68%	16.67%	0.00%	16.68%	100%

IV: Land Use Profile

Zoning regulations and planning documents play a large role in the usage of property within Hamilton County. These regulatory requirements determine the type of building, commercial versus residential, and the density of the use. Hamilton County can determine if any regulations hamper housing choice by evaluating the land use and determining if any regulation places undue hardship on any particular protected class.

Zoning Regulations

Zoning ordinances, building codes, and other local policies that serve the public good can have disparate impacts on the housing choice of the protected classes. Zoning ordinances regulate how property can be utilized, maintain the character of a neighborhood and provide for orderly growth. Zoning authority in Hamilton County is divided into nine jurisdictions. As part of this analysis, the examination looked at four of the high growth communities to determine potential impediments for adverse effects on the availability of housing for members of the protected classes.

Zoning ordinances with a single-family zoning district must contain a definition of family. The definition cannot be written to exclude certain family members, families which are not biologically related, or are non-traditional, or have a disparate impact on one of the protected classes. In 1995, the U.S. Supreme Court reviewed *City of Edmonds v. Oxford House, Inc.* where the City of Edmonds cited a halfway house for violating a city ordinance because it was located in a neighborhood zoned for single-family residences. The city ordinance defined “family” as “persons related by genetics, adoption, or marriage, or a group of five or fewer [unrelated] persons.” While the court did not find the city ordinance in violation of the Fair Housing Act, the court ruled the ordinance was not exempt from the Fair Housing Act since it sets a limit for the number of unrelated occupants but not related occupants.

Comprehensive planning is a process that determines community goals and aspirations in terms of community development. The outcome of comprehensive planning is the Comprehensive Plan that dictates public policy in terms of transportation, utilities, land use, recreation, and housing. Comprehensive plans typically encompass large geographical areas, a broad range of topics, and cover a long-term time horizon. This AI looked at each of the high growth metropolitan areas, Carmel, Fishers, Noblesville and Westfield as related to housing growth and housing priorities.

Carmel – The city of Carmel last revised its residential zoning ordinances in the fall of 2012. Residential zoning types do require minimum ground floor area dependent on the residential zoning type and minimum lot frontage depending on the residential zoning type. Only one type of residential zoning, R-5/Residence District, approved in fall 2013, has set landscaping requirements. All other types have no set of design standards or lists building materials.

Fishers – The city of Fishers newly became a City from a Township form of government. Zoning laws are under review by the city of Fishers. Current zoning now follows the township ordinances but will be superseded once the new zoning ordinance is adopted. The new ordinance was not available at the time of publication of this document. Hamilton

County and residents should work to ensure design standards set within the zoning ordinance allow for fair housing choice.

Noblesville – The city of Noblesville published its most recent Unified Development Ordinance in September 2013. The zoning ordinance set design and improvement standards but do not set any specific materials to be used. Zoning provides a variety of housing options and encourages development to fit within the character of the community for which it is developed. This type of requirement is typical of communities to encourage housing to coordinate among its neighbors, particularly if developing housing in areas of a historic nature.

Westfield – The city of Westfield unified development ordinance was last updated in Spring 2015. Chapter 6.3 may present some challenges in providing fair housing choice as it relates to architectural standards. The purpose of this chapter is ensure quality construction for present and future developments; however, if such design standards increase the cost of construction and development, the cost of housing may prevent housing choice for members of the protected classes. Examples include:

- Design standards set for dwellings Perimeter lots may affect housing choice. Some of the design standards include landscaping standards, dormer requirements, overhang requirements, external material types, façade projection or recessions, window types and streetscape diversity.
- Multifamily districts listed in chapter 6 of the zoning ordinance are also not allowed to utilize aluminum or vinyl siding.

Comprehensive Plan

Comprehensive planning is a process that determines community goals and aspirations in terms of community development. The outcome of comprehensive planning is the Comprehensive Plan that dictates public policy in terms of transportation, utilities, land use, recreation, and housing. Comprehensive plans typically encompass large geographical areas, a broad range of topics, and cover a long-term time horizon. This AI looked at each of the high growth metropolitan areas, Carmel, Fishers, Noblesville and Westfield as related to housing growth and housing priorities.

Carmel – The city of Carmel last revised its Comprehensive Plan in March, 2016. The plan divides the city into four major districts, West Carmel, North Central Carmel, East Carmel and South Central Carmel. The Comprehensive Plan, while states it supports different kinds of housing, it does not specifically address fair housing or affordable housing if market demands do not dictate so. Objectives of note include:

- **Objective 1.5:** Local streets should be designed to connect to existing and future neighborhoods so that existing connected streets do not become overburdened.
- **Objective 2.3:** Continue to encourage a variety of housing options to meet the needs of the market place.
- **Objective 2.5:** Enhance a bicycle and pedestrian-connected community through expanded installation of multi-use paths, sidewalks, bike lanes and off street trails.

- **Objective 3.6:** Plan for local and regional transit by encouraging transit opportunities in new development where it would benefit the community.

Fishers – The city of Fishers newly became a City from a Township form of government. Fishers 2040, a comprehensive plan is under development and schedule for release in 2015 according to the Fishers Long Range Planning webpage. However, no planning document was available at the time of publication of this document. Hamilton County and residents should work to ensure fair housing and affordable housing are included as part of this document as community priorities.

Noblesville – The city of Noblesville published its most recent comprehensive plan, PLANoblesville in 2013. Goals related to fair housing of the plan include:

- Provide diverse housing options that are compatible with the established character of the surrounding community.
- Provide a safe and efficient transportation system that connects neighborhoods, employers, and attractions that can be utilized by all ages and abilities.

However, there are some objectives and initiatives under other goals that could be seen as impediments to fair housing and counterproductive to the above goals.

- Use fiscal impact modeling in the development review process to ensure new development can financially support public services.
- Encourage residential development that reflects surrounding residential character and intensity with a focus on providing efficient services and maintaining the urban fabric that is representative of Noblesville.

This may encourage only certain types of housing not affordable to persons with disabilities utilizing SSI, lower income families that may be part of a protected class. They also work in direct conflict to other objectives in the plan that are much more positive toward fair housing choice. The positive objectives include:

- Ensure opportunities for the creation of a diverse housing stock by allowing the construction of various housing types and accessory dwelling units within the same neighborhood, so that residents may remain in the community through all stages of life.
- Expand opportunities for housing partnerships with non-profits and the development community.
- Develop an all modes policy to guide public and private infrastructure investment in a manner that creates a better sense of public space and equal access for multiple modes of transportation.

Depending on which objectives are followed by local government officials, fair housing choice may be very limited or promoted by the City of Noblesville.

Westfield – The city of Westfield was last published in February 2007 making it the oldest comprehensive plan among the four urbanized cities in Hamilton County. The plan is a 20-year plan and in its ninth year. However, some of the growth discussed earlier in this

analysis may have exceeded expectations of this long-term plan, necessitating an update. Some of the objectives that address housing choice include:

- Encourage a mix of housing types and prices that meets the needs of the full range of population in Westfield – Washington Township.
- Encourage diversity in lot sizes and lot layout.
- Include pedestrian facilities in all new developments. In particular, develop improved connections between key destinations such as between residential and commercial areas, and between residences, parks and schools.
- Participate in regional transportation efforts that promote better regional connectivity, such as the IndyGo Bus services.

One of the objectives listed is vague and unclear to its meaning, which could affect fair housing choice, specifically where the city intends to develop affordable housing options as it relates to environmental justice issues. The objective states, “establish appropriate locations for varying housing types.”

Planning and Recording Fees

Each of the municipalities can set their own fee schedule for review of buildings, plats, zoning and variances. The planning fees are typical and do not raise any concerns. Fees are generally equal across the municipalities, with a range that varies by 10-15 percent. Fees for historic districts are higher than general planning fees as there is additional review and cost associated with such review in historic districts.

New fee schedules were available:

- City of Carmel – June 2016
- City of Westfield – December 2013
- City of Fishers – March 2014

Building, Occupancy and Health and Safety Codes

The building standards set within the various municipalities mirrors the articles of the Indiana Administrative Code, including Article 14: Indiana Residential Code (formally the Indiana one and two-family dwelling code). The Indiana Residential Code is based on the International Residential Code drafted by the International Code Council (ICC). The ICC strives to develop building codes that promote safety and respond to national standards such as the Americans with Disabilities Act, and utilize recommendations from national builder’s associations and trade organizations.

Health and Hospital Corporation of Marion County, a municipal organization, is responsible for enforcement of the City’s health and safety code. The health and safety code promotes the physical and mental health of the public through enforcement of minimum standards for residential property and housing. The code follows general practices by the American Public Health Association and the Center for Disease Control.

Public Transportation

The federal government mandates regional efforts in transportation planning. Traffic patterns and types of transportation have an effect on an entire region, ignoring political boundaries. The Central Indiana Regional Transit Authority (CIRTA) is responsible for the development, implementation and promotion of comprehensive transportation systems of various alternatives for central Indiana residents. The CIRTA has a 12-member board with representatives from nine counties, Marion, Hamilton, Hancock, Shelby, Johnson, Morgan, Hendricks, Boone and Madison.

Through the Consolidated Plan consultation process, transportation was listed as a top need to address the concerns of low-income residents. In Hamilton County, 85% of commuters drive alone in a car to work. Transportation costs include the cost of vehicle ownership, maintenance, fuel, registration, and insurance as well as parking (where appropriate). While individual households rarely think about the costs of vehicle ownership and driving, the costs can be quite substantial. A 20-mile commute from Hamilton County to downtown Indianapolis for work would result in 10,400 miles per year, just in getting to and from work.

The Housing plus Transportation Affordability Index uses 30% as a threshold for affordable housing and 15% for the costs of transportation. Even if the percentage is high, most households are cost burdened by housing when transportation costs are included. The Housing + Transportation Affordability Index states that the average annual transportation costs in Hamilton County is \$13,545; with 97 percent of the Hamilton County population paying more than 45 percent of their annual income towards housing and transportation.

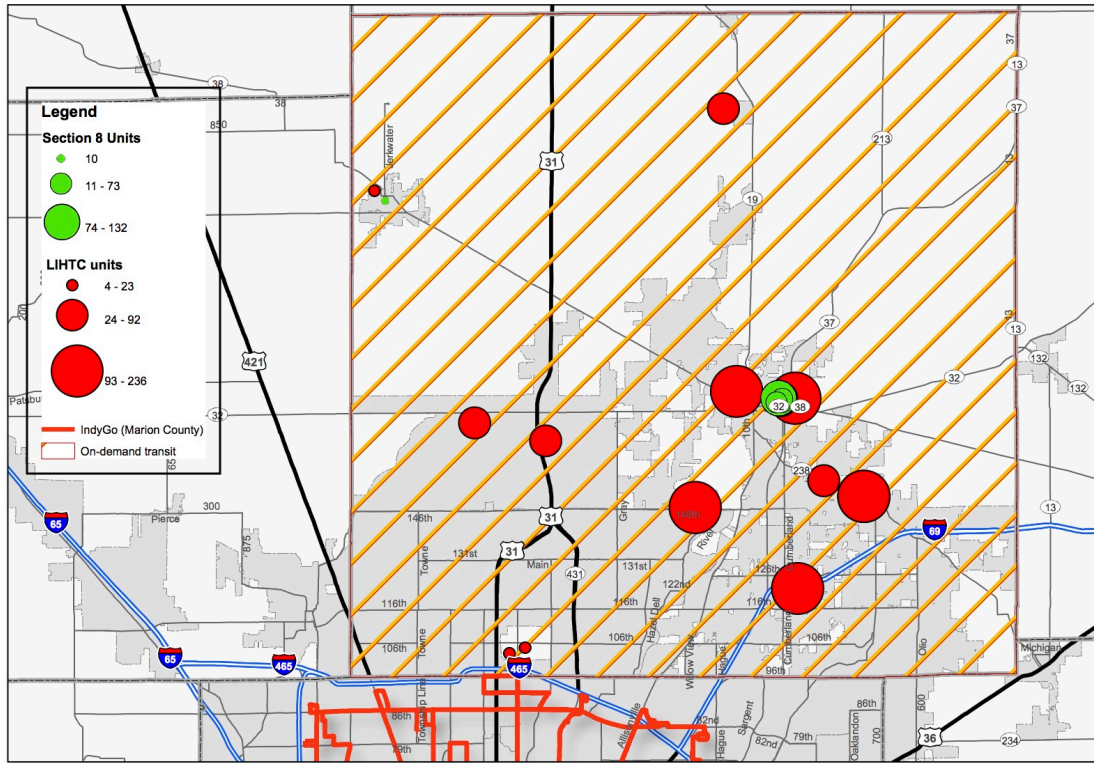
One of the primary challenges in Hamilton County is that it covers many independent City governments, including Carmel, Fishers, Noblesville and Westfield, each with their own transportation and infrastructure improvement plans. Some of the plans for the area include:

- ***The Indy Connect Transit Plan*** - Indy Connect has announced a \$2 million study to further planning and engineering efforts for one of the bus rapid transit lines. The Indy Connect Initiative also works with the public to keep rapid transit on the forefront of policy making.
- ***Hamilton County Thoroughfare Plan*** – Last updated in 2007, recognized with the various jurisdictions within the county, each had control of improvements within its own planning area and would need greater coordination among all transportation planners. The 2007 Hamilton County Thoroughfare Plan Update looks holistically across the entire County, placing an emphasis on regional connectivity; and in such, there may be instances where the 2007 Hamilton County Thoroughfare Plan Update does not match the locally adopted thoroughfare plans. The plan should be updated every 5 to 10 years, however it is now nine years old.
- ***City of Noblesville Southwest Quadrant Revitalization Plan*** – Published in December 2014, the Southwest Quadrant Revitalization Plan is a study and action plan to strengthen the district close to downtown Noblesville. The median assessed value of the area, according to the plan was \$60,300, some of the lowest in the

community. The study calls for greater connectivity and walkability, promoting arts and culture that has already begun in the area, facilitate neighborhood investment, including housing and historic preservation and increase safe movement in the neighborhood by managing traffic flow.

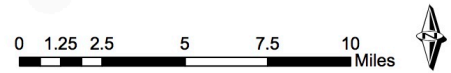
- ***Transportation Plan 2040*** –the City of Fishers estimates the population will reach 131,500 by the year 2040. The city is with a transportation plan to address the growth to address key issues, finding solutions, prioritizing those solutions and optimizing investment for the future. The plan was to be completed and posted online in 2015 but the Noblesville Housing Authority could not locate a copy of the plan on the City of Fishers website.
- ***Roundabouts*** - Carmel has become internationally known for its roundabout network. Since the late 1990's Carmel has been building and replacing signalized intersections with roundabouts. Carmel now has more than 94 roundabouts, more than any other city in the United States. Carmel builds roundabouts because of their safety record, their compatibility with the environments, their aesthetics and their ability to make it easier for pedestrians and bicyclists to navigate. In Carmel, where roundabouts have replaced signals or stop signs at intersections, the number of injury accidents has been reduced by about 80 percent and the number of accidents overall by about 40 percent.
- ***Hamilton County Tax-Funded Transit Plan***: Hamilton County leaders are getting a clearer picture of what a public transit bus system would look like with the support of business and economic development leaders. The system would rely on the red-line rapid bus line from Marion County and the Indy Connect Plan moving forward.

While there are many initiatives in the planning stages, transportation in Hamilton County means single use automobiles to get from place to place. Some communities are more bike friendly than others, yet transportation continues to be on-going issue facing Hamilton County. Figure 21 shows the transportation options available in Hamilton County currently, which is on demand transit. This service, while named “on demand transit” is only available by appointment and has a waiting list.



Hamilton County
 Fixed Route Transit (IndyGo [Marion County])
 On Demand-Paratransit (Hamilton County Express)

Figure 21 - Transit Options in Hamilton County



V: Compliance Data

This section will evaluate the current issues facing Hamilton County that may affect fair housing choice. Items for this evaluation include current court cases, property taxes, current programs, reporting methods and educational programs. This section also provides a valuable self-assessment of the progress made to ensure fair housing choice and evaluate areas of improvement in current or previous programming.

Current Cases

While barriers to affordable housing can come from anywhere, the U.S. Department of Housing and Urban Development (HUD) recognizes universal barriers. Local and state regulations on zoning and building are often the most recognized barriers to affordable housing.

On June 21, 2017, Fair Housing Center of Central Indiana, Inc. (FHCCI) filed a complaint against Hamilton County, Indiana (CDBG recipient) and the City of Noblesville, Indiana (CDBG sub-recipient) with HUD. The complaint alleges that the City of Noblesville violated the Fair Housing Act by implementing two municipal zoning ordinances that discriminate on the basis of familial status, race and national origin. Additionally, the complaint was filed under Title VI of the Civil Rights Act on the basis of race and national origin. The complaint was brought against both the city and the county, but Hamilton County, as the grantee, has the ultimate responsibility for compliance of its sub-grantees, which in this case was the City of Noblesville. According to the complaint, in 2015 the City of Noblesville was awarded \$95,334 in CDBG funds for public infrastructure improvements, namely 2,575 linear feet of sidewalk on Pleasant and Walnut Streets. The complaint indicates that while the 2016 Analysis of Impediments to Fair Housing for Fair Housing “did not find any regulatory impediments to fair housing choice”, that there were in fact two ordinances passed in Noblesville, one in 2008 and one in 2013, that the complainant claims do just that. The 2008 ordinance prohibits rent subsidies to be sought or accepted from any federal, state, or local government and the 2013 ordinance explicitly prohibits subsidized housing.

The parties have since entered into a Voluntary Compliance Agreement on October 8, 2018. As part of the agreement, Hamilton County will convene a Working Group, headed by the Noblesville Housing Authority (in its capacity as administrator of Recipient’s community development funds), and comprised of subrecipient officials (or their designees), township trustees (or their designees), HAND, Inc., and other organizations or government officials that may be deemed appropriate.” The requirements of the Working Group are included in the full settlement agreement which is attached to this Consolidated Plan. The aforementioned ordinances were amended on June 25, 2019.

In addition to the aforementioned regulatory barriers, the consultation process identified several additional barriers to the development of affordable. These include:

- Inadequate supply of affordable housing suggests a history of barriers to new development

- High costs of property acquisition near amenities in the more developed communities of Hamilton County, such as Carmel, Fishers, Noblesville and Westfield
- City architectural standards
- A limited supply of housing units where a Section 8 Housing Choice Vouchers can be used
- A lack of transportation where creation of affordable housing development is less of a financial challenge
- A lack of amenities such as grocery stores in areas where there is less opposition to affordable housing which subsequently renders these locations uncompetitive for LIHTC funds from the state.
- Insufficient state and federal resources for affordable housing programs
- NIMBY-ism (Not-in-my-back-yard)

Property Taxes

In March 2008, the Indiana General Assembly passed bill SJR0001 to limit the amount of property taxes beginning in 2012 for the entire state of Indiana. The limit for homeownership properties will be one percent of the assessed value. The limit for rental properties will be two percent of the assessed value. The limit for commercial properties will be three percent of the assessed value.

Proponents of the new tax law argue the single tax rate across the State of Indiana will eliminate disparities between properties based on location. In Hamilton County, there are 24 different taxing districts. According to the 2016 tax rates available on the Hamilton County Auditor's web page, not every district taxes every property the same and the rates vary by location. Some properties are taxed at a rate as low as 1.5 percent while others are taxed at a rate of 3.2 percent. For a property valued at \$100,000, the variance could equal as much as \$1,500 annually dependent on the location of the property. This is a lower range than the 2.4 percent and 3.8 percent property tax rates in Marion County.

The single tax rate does have potential problems. Higher taxes for rental properties may be passed along to the end consumer, or the lessee of the property, in the form of higher rents. This could have an adverse effect on lower income individuals renting properties with higher property taxes. While not all low-income individuals are minorities, those individuals in the protected classes tend to rent their housing more than own housing. The ramifications of the property tax overhaul may have an adverse effect on the protected classes if those individuals or households are primarily renters.

Government Programs and Education

The Indiana Civil Rights Commission (ICRC) serves as the primary investigative and resolution agency for fair housing complaints for the State of Indiana. The ICRC is contracted by the U.S. Department of Housing and Urban Development (HUD) to investigate fair housing discrimination. The ICRC has substantial equivalence certification, meaning they enforce a fair housing law that provide substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the Fair Housing Act. HUD may refer complaints of housing discrimination to the ICRC as the nearest federal fair housing office is located in Chicago, IL

Complaints may follow an eight-step process; however, most complaints are resolved within the first three steps. Figure 21 demonstrates the complaint and resolution process.

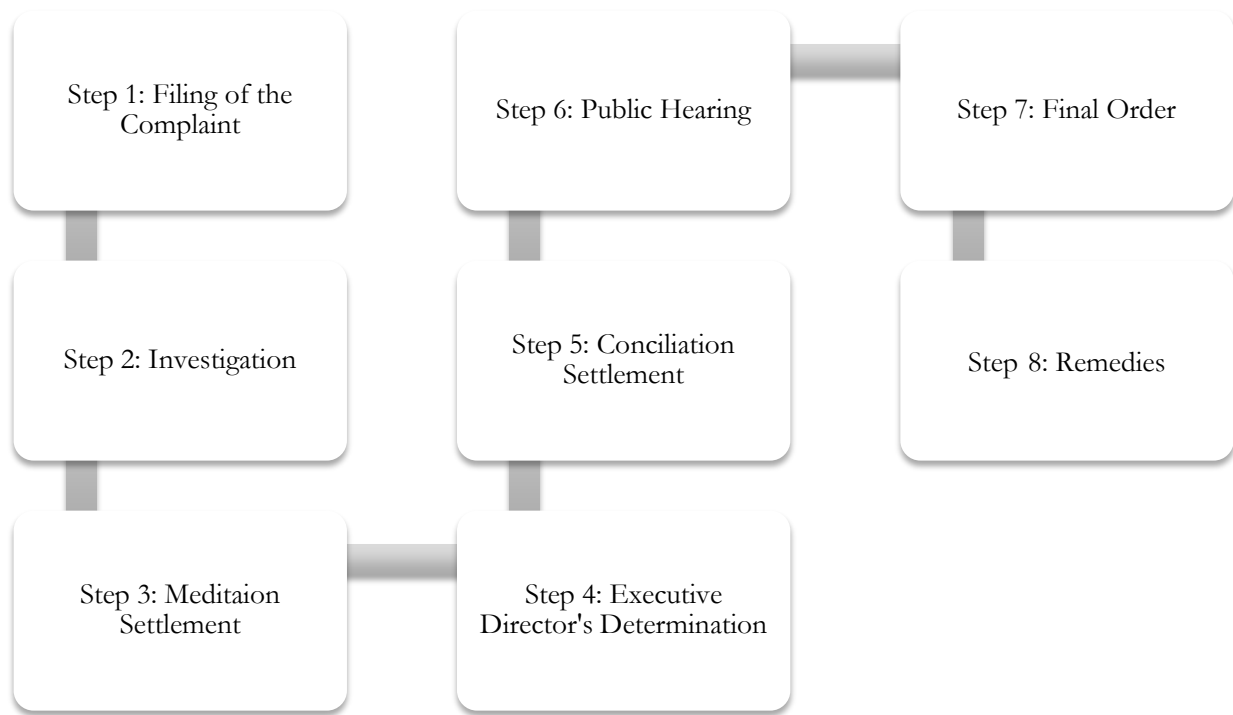


Figure 21 - Complaint Process for the Indiana Civil Rights Commission

A complaint must be filed within 180 days of the date of the occurrence of the discriminatory act. From that point the Indiana Civil Rights Commission (ICRC) conducts a thorough investigation from the point of view of both parties involved within the complaint. The investigator from the ICRC may require a test to be performed as part of the process. Testers are trained individuals whose purpose is to observe what occurs and record their experience relating to the complaint. The test is a controlled method for determining the integrity of the information relating to the complaint. After an investigation, the two parties may submit to a mediation to resolve the problem. This is a voluntary process and if no agreement is reached, the complaint may follow the process above to the public hearing, final resolution and remedies.

According to the 2014 Indiana Civil Rights Commission Annual Report, the ICRC received 1,755 discrimination complaints or inquiries, not limited to housing, for a five county area, including Hamilton County. At the end of the 2014 fiscal year, the ICRC had 56 open cases or aged case relating to housing discrimination. As of January 2016, the ICRC had issued 3 probable cause filings related to housing discrimination; however, none of them were cases involving Hamilton County.

The ICRC also conducts public outreach programs and educational programs. During the 2014 fiscal year, the ICRC conducted 44 different events, workshops and programs across the state, reaching 4,625 people. It is important to note that these sessions were not limited to Hamilton County.

Hamilton County will take prompt and reasonable actions to thoroughly investigate concerns and complaints. Any individual, who believes they have been subjected to discrimination, may file a complaint with the Hamilton County Title VI Coordinator or the Hamilton County Human Resources Department.

Like the ICRC, a complaint must be filed with the Hamilton County Title VI Coordinator within 180 days of the act of discrimination. In the event the discrimination is on-going, the complaint must be filed no later than 180 days after the acts of discrimination discontinue.

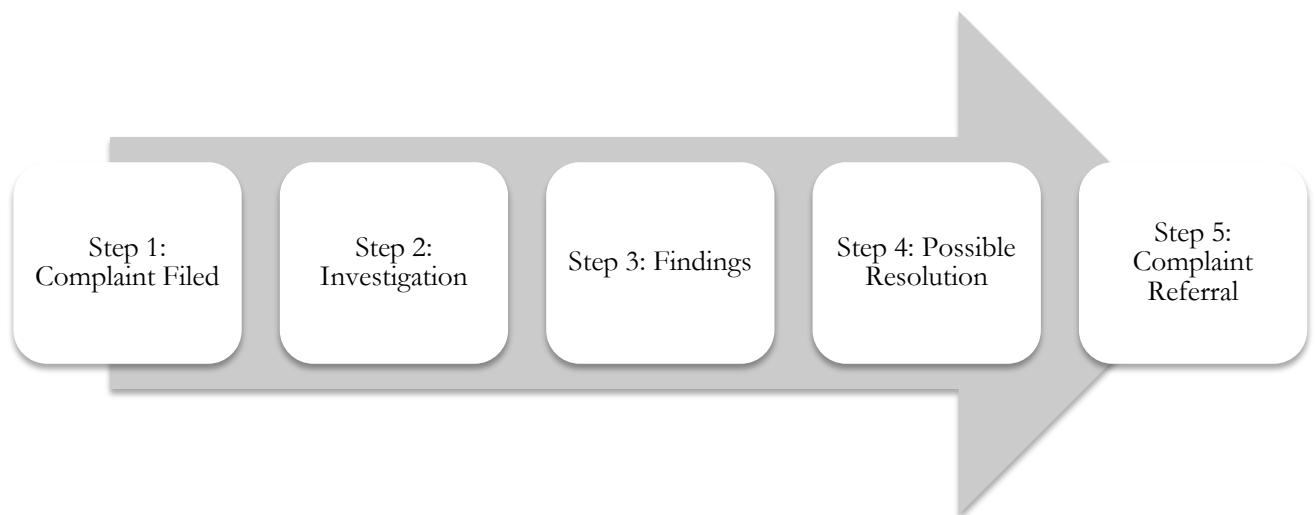


Figure 22 – Fair Housing Complaint Process for the Hamilton County Title VI Coordinator

Complainants’ identities are confidential except to the extent necessary to complete the investigation. If it is necessary to disclose the complainant’s identity to the alleged person who may have discriminated or a third-party, Hamilton County must first obtain the complainant’s written consent. Hamilton County must also obtain the complainant’s written

consent before providing a copy of the complaint to any other individual(s) involved with the investigation.

Appeals of the decisions made by Hamilton County may be filed with the Department of Justice in Washington DC.

Any investigation not within the jurisdiction of Hamilton County is referred to the appropriate federal, state and local investigative organizations.

Advocacy and Testing

The Fair Housing Center of Central Indiana, incorporated in April 2011, is a non-profit organization with a mission to eliminate housing discrimination through advocacy, education, enforcement and outreach. The Fair Housing Center of Central Indiana serves thirteen counties in Central Indiana: Boone, Clinton, Delaware, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Monroe, Morgan, Rush, and Shelby. Other areas of Indiana may be served as budgets allow. The Fair Housing Center of Central Indiana also conducts testing programs to determine the level of housing discrimination in Central Indiana and to use as a way to advocate for more education and training for those in the community.

In May 2014, the Fair Housing Center of Central Indiana released a report about its privately funded testing program and results found in Hamilton County/Indiana. Testing is an enforcement tool used by virtually every private, nonprofit fair housing agency as well as the U.S. Department of Justice. Testing is a controlled investigative procedure in which individuals inquire about a housing unit and collect information about their experience. While some blatant forms of discrimination do exist, it is rare. Testing is important to determine if acts of discrimination are occurring in the community that may not be obvious to the aggrieved party.

During the paired testing, two individuals were matched in every relevant aspect except for the characteristic that is being tested. For example, in a race test a matched pair test would be conducted with a person of color and a White tester making contact with and visiting the same property within a short time period of each other. The testers would have similar characteristics for income, family size and other relevant factors. The matching of testers is important because it removes any financial or business justifications for rejecting the protected group tester. Equally qualified individuals seeking the same kind of housing should receive similar treatment and be given similar information. If there is only one difference (in this case, race), that is likely to be the factor causing any differential treatment.

Testers must ask questions and observe treatment. The eight primary categories FHCCI utilizes for comparison results include:

1. Difference in rental amount
2. Difference in information regarding the availability of units
3. Difference in security deposit amount

4. Difference in move in specials offered
5. Difference in treatment during the onsite appointment
6. Difference in access to the rental application
7. Difference in treatment before or after onsite visit
8. Steering

The FHCCI conducted 5 tests in Hamilton County less the exempted cities. FHCCI selected larger sites or multifamily complexes because of the training and fair housing education typically found with staff. The first round of testing also focused on paired testing of White and Black individuals. Of the five tests, 3 were inconclusive with varying results. FHCCI found two instances in which the Black tester was treated differently than the White tester. The two tests with discriminatory acts occurred in Carmel and in Westfield. The different treatment found:

- Higher rent quoted for the Black tester
- The Black tester is asked to fill an on-line application and the White tester is given two paper applications
- The Black tester did not receive information on a free-month special while the White tester did receive information on a free-month special
- The White tester was told units were available sooner than told to the Black tester
- The White tester received follow-up calls and emails, including a \$250 bonus if they reserved the unit immediate. The Black tester was never contacted.

The FHCCI conducted another five tests comparing White testers and Hispanic/Latino testers. Three of the five tests had inconclusive results with different treatment of both testers. In these cases, both the White tester and Hispanic/Latino tester received differential treatment, favoring neither tester. One of the five tests found no discriminatory treatment. One test located in Westfield found discriminatory treatment. The White tester received information on multiple rental units whereas the Hispanic/Latino tester received information on only one unit.

The resounding conclusion is that more testing should be conducted to get a better picture of what types of treatment is found in Hamilton County.

In late 2018 the Noblesville Housing Authority began the process to solicit information from organizations to start a new and more robust round of testing. The NHA has since been in communication with the Indiana Civil Rights Commission to conduct 75 tests throughout the 220 participating housing providers in Hamilton County. The proposed test would include 50 race tests (African American and Latino) and 25 disability tests. The NHA is looking forward to the results of these tests and the continued execution of similar tests in the future.

Self Evaluation

Hamilton County has included the previous goals of the *Analysis of Impediments to Fair Housing Choice* (AI) as part of its *2019-2023 Consolidated Plan* and congruent Action Plans. Hamilton County has worked to provide funds towards affordable housing projects that address extremely low-income households, persons with disabilities and further fair housing. However, most funding goes to fund infrastructure projects and public services of affordable housing. Hamilton County only has two agencies capable of developing affordable housing, yet only a small portion of the annual budget funds these projects. Stakeholder input varies to explain this phenomenon, including:

- Lack of capacity to implement affordable housing;
- Long term planning required to develop a pipeline for affordable housing development; and
- Systematic design by funders to eliminate Hamilton County from federal investment.

The Analysis of Impediments to Fair Housing evaluated regulations as to zoning and planning regulations and their impact on housing. The Analysis of Impediments did not find any types of zoning that impose limits on housing, such as limits on vinyl siding or appearance of housing and its design. The study has found that the following impediments to fair housing choice exist within Hamilton County:

1. Lack of local capacity and coordination.
2. Lack of public awareness
3. Disparate treatment in the rental market.

To overcome these impediments, Hamilton County has partnered with the Fair Housing Center of Central Indiana and the Indiana Civil Rights Commission. Both the Fair Housing Center of Central Indiana and the Indiana Civil Rights Commission have offered annual training for real estate professionals, including landlords, property managers and real estate agents in Hamilton County sponsored by the Noblesville Housing Authority. Attendance at these trainings ranged from 30 to 50 people at any given year.

The Fair Housing Center of Central Indiana and the Indiana Civil Rights Commission have also served as a testing agency. As discussed earlier in this document, the single test was small in nature and produced mixed results. The Noblesville Housing Authority plans to work with the Indiana Civil Rights Commission to conduct additional testing in 2019.

Consultations with stakeholders confirmed that public awareness and lack of capacity and coordination remain as top issues. Hamilton County must continue to address these issues regarding fair housing. Overall, the progress Hamilton County has made by its own direction has been minimal. The development of the Fair Housing Center of Central Indiana, an advocacy agency for the regions, has initiated much of the progress.

VI: Mail Survey and Community Input

2019-2023 Consolidated Plan and Fair Housing Survey

The *Consolidated Plan* is a document created by the Hamilton County that allocates the Community Development Block Grant (CDBG) from the U.S. Department of Housing and Urban Development. Hamilton County receives approximately \$850,000 annually to serve low income neighborhoods through develop affordable housing, social services, economic development and infrastructure improvements.

The survey process took place during the month of May. Hamilton County utilized an electronic format to solicit input from the community. It was sent through the various electronic newsletters to get representation from low and moderate-income residents or those who represent low to moderate-income households. The Good Samaritan Network, the Noblesville Housing Authority and the Hamilton County Area Neighborhood Development groups all utilized electronic newsletters to send the survey to their client base and stakeholders.

In past years, getting responses from the community regarding affordable housing or community development has been low. In an effort to get more responses, Hamilton County utilized Facebook as a method for increasing response rates among community members. The response rate increased slightly but remained low over all and is not representative of Hamilton County. During the survey period, only 56 people completed a survey. The majority of responses came from people living or working in Noblesville, IN. Sixty one percent of the respondents were homeowners.

Hamilton County designed the survey to test the knowledge of respondents when it came to fair housing knowledge. Since the past Analysis of Impediments to Fair Housing listed lack of public awareness as an impediment, the survey this year was to ascertain what type of education and awareness exists in the County. The survey gave 14 instances of housing discrimination to see if respondents would recognize them as such. Only in two of the cases did respondents not understand the issue as a fair housing violation.

The findings from the survey were:

- 100 percent of respondents knew blatant housing discrimination is illegal – such as refusing to sell a home to a protected class
- While, most respondents understood certain less obvious items as fair housing violations, 64.29 percent did not know that it is a fair housing violation to only advertise a rental unit or listing in only religious publications.
- 53.66 percent of respondents thought exclusively approving new neighborhood plans with house meeting a minimum price point as a fair housing violation
- 30.23 percent of respondents did not see investing public funding for affordable housing in areas of high minority concentration areas as a fair housing violation

Respondents were also asked if they thought any of the following items occurred with great frequency, rarely or never. Respondents, in general, stated they believed the majority of these instances do occur frequently in the community.

- A Hispanic family is steered to purchase a home close to where other Hispanic families are living
- A landlord states that he or she has had several complaints with an African American tenant, but the neighbors have stated no one has complained
- A local government increases its fees for housing development significantly higher than surrounding areas to slow development of large, affordable housing projects
- A landlord states the availability of an apartment for a single mom and her kids is a 2 to 3 month waiting list but a single man has immediate availability for the same size apartment

The conclusion from the survey is that many of the respondents know what fair housing is and housing discrimination is, but say it frequently occurs in the community anyway. Another disturbing trend is that 65.85 percent of the respondents say they do not know where to report such discrimination when they do see it. So when the respondents, who know discrimination happens, see it occur, it is not reported and housing discrimination can continue without consequence.

Final results of the survey are included in the appendices of this document.

Professional/Stakeholder Interviews

The Noblesville Housing Authority conducted face-to-face interviews and telephone interviews with various stakeholders and professionals in the Hamilton County community. A complete list of the people interviewed for this document is included in Appendix D. A number of the people interviewed provided additional resources to collect information and data regarding fair housing choice. This data assisted with the analysis of fair housing choice.

In addition, the interviews confirmed the analysis of the data, suggesting affordable housing development is the biggest impediment to fair housing in Hamilton County. Some of the comments and concerns are listed below. Please note, the following statements are those of stakeholders in the community, not those of the Hamilton County or the Noblesville Housing Authority staff.

Affordable Housing Development

- There is not enough affordable housing in Hamilton County. Low to moderate income households are priced out of Hamilton County, which could have an adverse affect on the protected classes.
- Rental housing appears to be developed for single people only, with only small one-bedroom apartments, discriminating against families who may want to move into the area.
- Most calls about housing to area agencies are calls for help to find affordable places to rent in the community.
- Lack of affordable housing creates a lack of housing choice for people with housing vouchers.

- There is no listing of rental units that accept housing choice vouchers to refer recipients of this type of housing assistance.
- Lack of affordable housing pushes extremely low income households to neighboring communities, increasing the demand and pressure service agencies in those neighboring communities.

Regulatory Requirements

- Approval of plans larger, affordable housing developments meets barriers and challenges for approval, often resulting with no development.
- There is a fear that loss of institutional knowledge and advocates for affordable housing in the community recently is going to have an adverse affect on affordable housing development.
- With the new Fair Housing Assessment requirements in the coming years to Hamilton County, there is concern the community will need to make greater strides to address issues than in the past and the community will struggle to do so.
- Public officials, in an effort to keep the tax base high, are denying requests for affordable housing development, adversely affecting the protected classes.
- Transportation plans have been adopted to expand streets and widen thoroughfares, eliminating homes of lower values. These same plans do not expand on how these affordable housing units will be replaced in another part of the community to ensure there is not a loss of the few affordable housing units available to lower income households.

Suggestions for Furthering Fair Housing

- Developing local laws that give prospective owner occupants and non-profit community organizations greater opportunity to purchase properties for affordable housing development before reaching the general market.
- Developing state policies that promote the investment of other federal and state grants towards housing development in Hamilton County where most housing is out of reach for low and extremely low income households.
- Partnering with neighbor jurisdictions to promote policies that expand fair housing opportunities.
- Create a local ordinance requiring new construction of residential properties to meet disability standards, with doors with 32 inches of clearance, one zero-step entrance and a bathroom on the main floor that can be entered with a wheelchair.
- There needs to be a regional fair housing assessment in the coming years to look at regional issues, since housing in one of the counties in the nine county area affects the rest.
- Introducing a rental-housing registry and inspection process may assist the community with maintaining all housing to be safe and decent for all households.

VII: Fair Housing Impediments, Recommendations and Action Plan

The Analysis of Impediments did not find any regulatory impediments to fair housing choice. However, housing discrimination in Hamilton County comes in more subtle ways, through the lack of affordable housing development, challenges to find ways to report housing discrimination, housing discrimination that still occurs despite knowledge of fair housing laws and changes in leadership and advocacy that will cause a gap in affordable housing development. Hamilton County has a number of positive aspects regarding fair housing choice.

- The Fair Housing Center of Central Indiana and the Indiana Civil Rights Commission, initiates testing programs that can find housing discrimination that is less transparent than other forms.
- The Fair Housing Center of Central Indiana and the Indiana Civil Rights Commission provide regular training programs and serve as advocates for fair housing choice.
- Hamilton County continues to study and make strides towards a new mass transit/public transportation system, connecting to the regional transit systems approved by the Central Indian Regional Transit Authority.

Despite the progress made, some obstacles or impediments to fair housing still exist. The following chart outlines a variety of areas in need of improvement. Impediments and items that may be achievable given the current financial resources have been selected.

The draft of document of this Analysis was available for public comment for a period of 30 days from July 10, 2019 and ending August 9, 2019. Draft copies of the document were available at the Noblesville Housing Authority offices and electronically via the Hamilton County website. The Noblesville Housing Authority received no comments during that time.

Impediment/Challenge	Resolution/Outcome	Date to be Accomplished
Lack of affordable housing affects housing choice and may adversely affect the protected classes.	Fund the development of affordable housing at a greater rate.	Annually for the next three years.
Lack of affordable housing affects housing choice and may adversely affect the protected classes.	Will work with not for profit developers to seek additional funding for the development of affordable housing in Hamilton County.	Annually for the next three years.
Lack of affordable housing affects housing choice and may adversely affect the protected classes.	<p>Advocate on behalf of affordable housing developers in the community to bring state and federal resources to Hamilton County.</p> <ul style="list-style-type: none"> • Publish articles on local work in affordable housing via the paper, web or Facebook • Host monthly or quarterly provider meetings to help with advocacy 	Annually for the next three years.
Lack of affordable housing affects housing choice and may adversely affect the protected classes.	Advocate for the replacement of housing stock removed for transportation growth with housing of similar value or cost to ensure affordable housing is not decreased.	Annually for the next three years.
Lack of affordable housing affects housing choice and may adversely affect the protected classes.	Encourage local units of government to create and complete a rental housing unit registry and annual inspection process to ensure all units for all families are safe and decent places to live.	Annually for the next three years.

Impediment/Challenge	Resolution/Outcome	Date to be Accomplished
Knowledge of fair housing laws and where to report vary in the community.	Continue testing of multi-family communities to ensure property managers are following fair housing laws.	One test in before 2020.
Knowledge of fair housing laws and where to report vary in the community.	Provide educational programming for public officials, particularly those who are newly elected, on fair housing issues.	Annually for the next three years.
Knowledge of fair housing laws and where to report vary in the community.	Establish a website, linked to the main Hamilton County home page, that will promote fair housing and connect residents to places of advocacy and investigative knowledge.	Complete by 2020
Knowledge of fair housing laws and where to report vary in the community.	Continue educational programming to increase awareness in the community.	Annually for the next three years.
Institutional and regional coordination of enforcement and advocacy needs to improve.	Will work with not for profit developers to seek additional funding for fair housing programs and increase the capacity of staff to affirmatively further fair housing, including increasing education, greater communication with other enforcement agencies, outreach to members of the protected classes, development of affordable housing in a meaningful way.	Annually for the next three years.

Hamilton County will use partnerships with State Government, local non-profit housing providers, local public service providers or community development advocacy groups to go beyond the steps listed in this plan to promote fair housing. Hamilton County will support other initiatives by the State of Indiana, the City of Anderson and the City of Indianapolis, all neighboring jurisdictions with their own *Analysis of Impediments to Fair Housing*, to promote fair housing. Such initiatives may include education programs related to fair housing, homeownership training or landlord/tenant legal services. Such additional efforts may be listed in annual reports but the above initiatives and resolutions will be completed by the Hamilton County over the next three years, 2019-2022.