

Draft for Public Comment Period

This Draft of the City of Toledo's Analysis of Impediments to Fair Housing Choice and Action Plan is intended for public comment.

Comments, questions, and suggestions of any kind are welcome.

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CITY OF TOLEDO

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

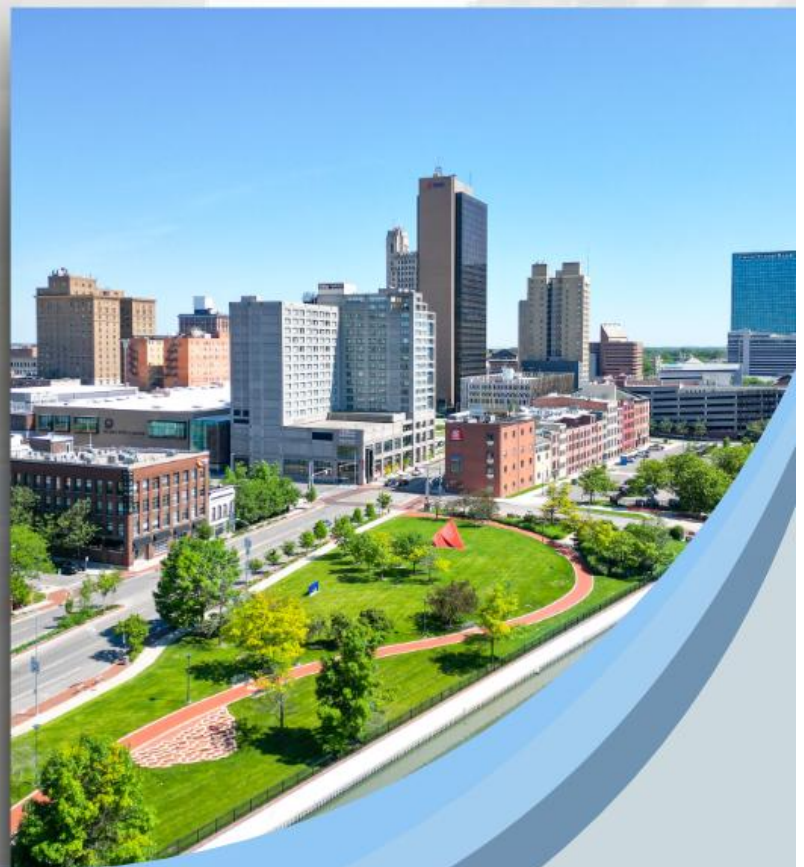


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Introduction

Title VIII of the Civil Rights Act of 1968, commonly known as the Fair Housing Act,¹ states: “it is the policy of the United States to provide, within constitutional limitation, for fair housing throughout the United States.” This Act (and subsequent amendments) prohibits discrimination in the sale, rental, or financing of housing, or in the provision of brokerage services, including discriminatory advertising or otherwise making unavailable or denying a dwelling to any person because of race, color, religion, sex, national origin, disability or familial status. The Fair Housing Act further provides that the authority and responsibility for administering the Act falls on the Secretary of Housing and Urban Development (HUD). The Act goes on to state that the Secretary shall “administer the programs and activities relating to housing and urban development in a manner that affirmatively furthers the policies of the [Act],” and that all executive departments and agencies shall administer their programs and activities related to housing in a manner that affirmatively furthers the purposes of the Act, including any Federal agency having regulatory or supervisory authority over banking institutions.

In addition to prohibiting intentional, overt discrimination, the Act lays the groundwork for HUD and jurisdictions funded by it to “affirmatively further fair housing.” This means taking meaningful steps, in addition to addressing discrimination, to overcome patterns of segregation and foster inclusive communities free from impediments that reduce access to opportunity based on a person’s protected status.

Nationally, the enforcement of the Act is the responsibility of HUD’s Department of Fair Housing and Equal Opportunity (FHEO). Supervising the Community Development Block Grant (CDBG) and Home Investment Partnership Program (HOME) programs fall on HUD’s Office of Community Planning and Development (CPD). The CDBG and HOME programs require that each municipality receiving these grant dollars under Title I of the Housing and Community Development Act to affirmatively further fair housing and fair housing planning by conducting an Analysis of Impediments to Fair Housing Choice as part of its five-year Consolidated Plan process. Grantees, such as the City of Toledo, are also required to take appropriate actions to overcome the effects of any identified impediments.

This report is an assessment of the nature and extent of fair housing concerns and the impediments to fair housing choice that the residents of Toledo encounter. The City’s last Analysis of Impediments to Fair Housing Choice (AI) was conducted in 2020. This AI has been conducted in conjunction with the City’s Five-Year Consolidated Plan. Both documents are planning documents for the 2020-2025 program years.²

¹ See 42 U.S.C. 3601, et seq.

² Program years run from July 1 through June 30th. Thus, the AI and Consolidated Plan will cover the period of July 1, 2025 through June 30, 2030.

The Status of Civil Rights and Fair Housing in America

At the outset, it is important to note that Civil Rights and the Fair Housing Act face a precarious moment in the United States. At the time of writing this Analysis, The Fair Housing Center faced the cancellation of grants intended to educate the local community on fair housing laws. The grant cancellations occurred as part of an action to reduce or eliminate programs that the new federal administration deemed to be no longer a priority. This was a surprising action amid an ongoing housing crisis and issues discussed in this Analysis.

Importantly, HUD very recently issued a new proposed regulation that would curtail or eliminate almost entirely the requirements of Affirmatively Further Fair Housing.³ This action is at odds with the plain text of the Fair Housing Act itself, which demands affirmative action to pursue the goals of the Fair Housing Act. Whether this proposed rule will be adopted remains to be seen, but the message is clear: Affirmatively Further Fair Housing is at odds with the goals of the current administration.

To put this moment into perspective, it is important to recall the history that led to the passage of the Fair Housing Act. In the late 1960s, our nation advanced a civil rights movement, culminating in advocacy to enact a “Fair Housing Act.” The law would open the doors of opportunity for all Americans by making it illegal to discriminate in housing. Prior to its passing, the law was stalled in Congress. It was not until after Dr. King’s assassination, as the nation erupted in riots and protests, that Congress mustered the courage to enact the Fair Housing Act in April 1968. Arguably, Dr. King sacrificed his life for its passage.

Today, the Fair Housing Act protects all Americans from discrimination — families with children, persons with disabilities, all racial categories, colors, and religions. Everyone is a member of a protected class under the law. The Act prohibits sexual harassment in housing and ensures basic accommodations and accessibility for persons with disabilities. From zoning to evictions, the law safeguards basic civil rights protections for every American.

Arguably, the Act is the most personal of all civil rights laws. Your home — where you live — powerfully impacts every aspect of your life, from your access to job opportunities, education, transportation, health and safety.

Since its passage, the Fair Housing Act has routinely enjoyed bipartisan support. Ronald Reagan signed a 1988 amendment to the law to extend its protection to families with children and persons with disabilities. In his signing statement, Reagan noted its importance as part of a larger strategy to ensure access to housing for all Americans: “Today we address, at last, the other important obstacle to homeownership and rental: discrimination. Discrimination is particularly tragic when it means a family is refused housing near good schools, a good job, or simply in a better neighborhood to raise children.”

The importance of the law is just as significant today. Although our nation has made progress on many fronts, housing discrimination and segregation persists. In 2012, HUD conducted a nationwide study, testing housing applications 8,000 times across 28 metro areas. It found that although “the most blatant forms of housing discrimination ... have declined since the first national paired-testing study in 1977,” minority home seekers still are often “told about and

³ <https://www.federalregister.gov/documents/2025/03/03/2025-03360/affirmatively-furthering-fair-housing-revisions>.

shown fewer homes and apartments than [comparable] whites.”

These trends are not getting better. The most recent Census data shows the Toledo area, for example, remains highly segregated. The National Fair Housing Alliance reports that nationwide complaints of discrimination have increased. There were 34,150 fair housing complaints received in 2023, compared to 33,007 complaints received in 2022. The nation saw a noticeably steep increase in the number of harassment complaints, particularly harassment based on color or race, which skyrocketed by 470.59 percent and 114.97 percent, respectively. A separate 2022 study on bias in the appraisal of home values found that appraisers devalued homes in Black neighborhoods in 113 metro areas by \$162 billion.

Persons with disabilities, too, often face barriers to housing, and today disability discrimination is the most frequent fair housing complaint. Most Americans will, at some point in their life, develop disabilities. One in four Americans currently has a disability, and access to a home can be a life and death question. Fair housing agencies often assist families facing potential homelessness due to intentional discrimination or because a housing provider refuses to accommodate disabilities.

At the same time, during a housing crisis, with prices skyrocketing, and more and more families pushed out of a tight market, fair housing becomes even more critical. These trends most powerfully impact marginalized communities who more frequently face discrimination. These developments also increase homelessness, which in turn creates a vicious cycle of poverty and strains federal and local resources.

The Fair Housing Act is a powerful and critical tool to help address the housing crisis and make Dr. King’s dream a reality. But as with any law, the Act is meaningless without enforcement. This is why the law requires HUD to provide nonprofit fair housing agencies with funding to investigate and help victims of housing discrimination.



More importantly, the fundamental premise of America is civil rights. Unlike most countries, we are not a nation founded on a region, culture, or language. We are founded on a Constitution, a nation of laws. The primary purpose of these laws — the primary purpose of America itself — is to guarantee its citizens certain rights — to vote, practice their religion, and pursue happiness, employment, and housing — all without discrimination.

Dr. King’s vision was an American vision, one that includes every citizen, for a system of laws and norms that opens the doors to wherever you wish to live. The ultimate betrayal of that vision is to undermine civil rights and fair housing.

This Analysis of Impediments comes at a critical time that calls for support of fundamental American civil rights. The facts and analysis provided in this report must be taken even more seriously now.

About the Consultant

The Fair Housing Center (the Center or TFHC) is a nonprofit civil rights agency dedicated to eliminating housing discrimination, promoting housing choice, advocating for anti-discriminatory housing policies, and creating inclusive communities of opportunity. The agency primarily serves Lucas and Wood Counties by undertaking education, outreach, investigation, and enforcement activities.

Since its founding in 1975, the Center has operated as one of the most progressive and effective proponents of fair housing, leading national efforts and setting precedents that have markedly improved the quality of life for millions of Americans.

Founded on the principles of community, tolerance, and justice, The Center was established to assist victims of housing discrimination. The Women of the Old West End, The League of Women Voters, and several other concerned citizens and community groups organized to fight blockbusting and other discriminatory practices that were destroying Toledo's neighborhoods.

Throughout its 50-year history, the Center has been a leader in fair housing enforcement, having investigated more than 13,000 complaints of discrimination and recovered in excess of \$35 million in damages for victims and neighborhood reinvestment. Enforcement efforts focus broadly on housing discrimination related to the sale or rental of housing, unfair or predatory lending policy and practices, and discriminatory insurance policy and practices.

Its staff has conducted workshops for fair housing organizations, government agencies, and housing industry professionals such as HUD, the Ohio Civil Rights Commission, the Federal Reserve Bank, the Center for Community Change, the Alliance of Allied Insurers, the National Fair Housing Alliance and a host of other fair housing, community, and housing industry organizations. In the late 1990s and early 2000s, the Center entered partnerships with companies including State Farm, Allstate, Nationwide, Liberty Mutual, and Farmers Insurance. Through these agreements, insurers improved their underwriting guidelines, which previously had a disparate impact on African American and Latino neighborhoods. The partnerships have resulted in more than \$10 million in investments in Toledo's urban communities. In addition, the Center's staff has been called upon by the US Congress to submit testimony regarding discriminatory housing practices.

Notable Cases Brought by The Fair Housing Center

Fair Housing Center v. First Federal Savings & Loan (1978)

TFHC and the Greater Toledo Housing Coalition filed the country's first challenge under the Community Reinvestment Act with the Federal Home Loan Bank Board. The protest filed against First Federal Savings and Loan prompted fair lending awareness among the banking community and resulted in a conditioned approval of the lender's application.

Shellhammer v. Lewallen (1983)

TFHC investigated and litigated the nation's first sexual harassment housing complaint. The complaint, successfully litigated by C. Thomas McCarter, clearly established sexual harassment as a violation of the Fair Housing Act.

The Old West End Association v. Buckeye Federal Savings & Loan (1987)

The standards for establishing a prima facie neighborhood redlining complaint were decided in this case, which was successfully litigated by Steve Dane.

Fair Housing Center v. Lexington Apartments (1988)

This case set a national precedent by providing free rental units for the homeless.

Fair Housing Center, et al. v. Nationwide Insurance Companies (1993)

The first complaint filed against an insurance company based on testing evidence. The complaint was settled in 1998.

National Fair Housing Alliance v. State Farm Insurance (1996)

TFHC joined the National Fair Housing Alliance to settle systemic complaints filed with HUD against the nation's largest homeowners' insurance agency. This precedent-setting agreement has changed the way homeowners' insurance is written throughout the country.

National Fair Housing Alliance v. Wells Fargo (2013)

TFHC joined the National Fair Housing Alliance and twelve additional fair housing organizations to enter into the first-ever agreement regarding the equal maintenance and marketing of Real Estate Owned (REO) homes following the 2008 housing crisis. The complaint alleged that Wells Fargo's properties in white neighborhoods were better maintained and marketed than properties in African-American and Latino neighborhoods. Toledo received \$1.4 million in community relief funds, which TFHC used to establish the MLK Inclusive Communities Program. In an effort to preserve homeownership, the program included financial assistance for foreclosure prevention, a partnership with the Land Bank for roof replacements, and a partnership with the Ability Center for home accessibility modifications.

The Fair Housing Center v. KeyBank (2016)

TFHC uncovered inequities in KeyBank's lending patterns, resulting in an agreement to expand access to homeownership and banking services in Toledo's traditionally underserved communities. This long-term effort will help ensure that low-to-moderate income neighborhoods and communities of color have the chance to pursue the American Dream. The plan addresses our community's needs through a multifaceted approach that includes \$3 million in funding to Community Development Financial Institutions (CDFIs).

Part 1: Background and Community Profile

The Fair Housing Act, Affirmatively Furthering Fair Housing, and the Analysis of Impediments

Equal access to housing — being free to live in the housing of one's choice — is vital to meeting essential needs and pursuing personal, educational, employment, or other goals. Recognizing fair housing as essential, federal, state, and local governments have established fair housing as a right protected by law.

In 1968, Congress passed a law that provided broad protections for marginalized groups in the United States. The Civil Rights Act of 1968 was signed into law on April 11, 1968, one week after the assassination of Rev. Dr. Martin Luther King Jr. and has been held as a cornerstone of human rights since. Article Eight of the Act is known as the Fair Housing Act.

Fair Housing protections aim to provide individuals of the same income level equal opportunity to housing choice, regardless of their membership in a protected class. After the federal Fair Housing Act was passed, states and municipalities developed their own Fair Housing laws and code sections to expand those protections to other groups of people not given federal protection. Below is a list of the bases of discrimination prohibited within the City of Toledo:

Federal:

- Race
- Color
- National Origin
- Sex
- Religion
- Familial Status
- Disability

State of Ohio:

- All Federal Categories
- Military Status

City of Toledo:

- All Federal and State Categories
- Sexual Orientation
- Source of Income
- Gender Identity

Fair Housing laws generally prohibit actions based on a person's membership in a protected class, such as the following:

- Representing an available dwelling unit as unavailable
- Refusal or denial for sale or lease of a dwelling
- Discriminatory lending and insurance practices
- Discriminatory advertising of a dwelling
- Steering people towards or away from communities, neighborhoods, or sections of a housing complex
- Discriminatory terms or privileges in the sale or lease of a dwelling
- Discrimination in the provision of services and facilities related to a dwelling
- In any way "making housing unavailable" based upon a protected basis

Ohio's Fair Housing laws include all the same prohibitions but add protection for military status. Additionally, while the federal Act makes allowances for the Mrs. Murphy Exemption (a multi-family dwelling of four or less units, in which the owner- landlord resides, may discriminate on the aforementioned grounds, except advertising), Ohio makes no such concession, regardless of the number of units or residency status of an owner-landlord.

The Toledo Municipal Code follows the general provisions given by the federal Fair Housing Act and the Ohio Revised Code but also adds protections for sexual orientation and gender identity.⁴

Since the passage of the Fair Housing Act, other legislation has been put into effect to expand fair housing protections.

Under President Ronald Reagan, the Fair Housing Amendments Act was signed into law in 1988. This act broadened authority granted to HUD to promote and effectively execute the Fair Housing Act. The Fair Housing Amendments Act also increased the responsibility and strengthened the enforcement role placed on the U.S. Department of Justice.

Under the Fair Housing Amendments Act, design and construction elements were identified to be incorporated into most multi-family properties built for first occupancy after March 13, 1991, in order to ensure that new properties are readily accessible to and usable by individuals with disabilities.

In 1994, President Clinton signed Executive Order 12892 entitled, "Leadership and Coordination of Fair Housing in Federal Programs: Affirmatively Furthering Fair Housing." The order was signed in an effort to advance the promotion of fair housing through all federal programs and activities related to housing and urban development. The Order

⁴ Although the City of Toledo has identified these groups for additional fair housing protections, how one would enforce these provisions is not clear.

reiterated the role of the Secretary of Housing and Urban Development to include the furthering of fair housing; it also underscored the responsibility of the head of each executive agency to ensure “its programs and activities relating to housing and urban development are administered in a manner to affirmatively further the goal of fair housing.” However, the concept of “affirmatively furthering fair housing” did not emanate from President Clinton’s Executive Order 12892. Rather, it is derived from the Fair Housing Act itself, which states that the Secretary of Housing and Urban Development shall “administer the programs and activities relating to housing and urban development in a manner affirmatively to further the policies of this title.”

In 2015, President Obama’s administration sought to strengthen the affirmatively furthering fair housing rule. It added rules and systems that could help verify that housing plans improved the fair housing outcomes for residents.

In 2020, President Trump rolled back the Obama-era attempt to strengthen the affirmatively furthering rule by eliminating the additional processes established by Obama’s administration. When promulgating the rollback, Trump tweeted, “I am happy to inform all the people living their Suburban Lifestyle Dream that you will no longer be bothered or financially hurt by having low income housing built in your neighborhood,” and “...Your housing prices will go up based on the market, and crime will go down. I have rescinded the Obama-Biden AFFH Rule. Enjoy!”

At that time, The Fair Housing Center proposed, and the City of Toledo adopted a local law that would ensure that Toledo always remains committed to affirmatively furthering even if the federal government’s support sways. The local law essentially mirrors the requirements of the previous rules that the Trump administration sought to undermine, thus ensuring a consistent commitment in the local community. The local Toledo law can be seen here: https://codelibrary.amlegal.com/codes/toledo/latest/toledo_oh/0-0-0-160387.

In the following Biden administration, HUD sought to reestablish the previous trajectory for the affirmatively furthering rules. The Biden administration, however, did not ultimately publish new regulations that would have further strengthened these important rules.

Looking ahead, it is likely that the Trump administration will again attempt to eliminate or significantly reduce any rules related to affirmatively furthering fair housing.⁵ If this occurs, the local law cited above will continue to ensure Toledo’s ongoing commitment.

⁵ The “Project 2025” document, for example, advocates that the Trump administration eliminate the rule: “Repeal the Affirmatively Furthering Fair Housing (AFFH) regulation reinstituted under the Biden Administration.” See pg. 509.

Direct Discrimination in the Toledo Area

Much of the discussion surrounding fair housing involves what is prohibited by the Act. The HUD Fair Housing Planning Guide defines impediments to fair housing as any action, omission, or decision taken, which restricts housing choices or the availability of housing choices, because of a person's membership in a protected class.

The Fair Housing Center receives the largest quantity of fair housing complaints made by consumers in the Toledo market. HUD and the Ohio Civil Rights Commission (OCRC) are other major recipients of complaints by those who allege housing discrimination. As a non-profit, community-based organization, TFHC often serves as the initial contact for consumers who believe their rights have been violated. Upon receiving a fair housing complaint, TFHC commences an investigation, which may involve interviewing witnesses, testing, conducting research, completing a site visit, and/or coordinating with other organizations, among other activities. Our investigations often provide substantiating evidence that the alleged behavior or practice has or is occurring. On the other hand, our investigations may not turn up corroborating evidence to support the allegation of discrimination.

Consumers alleging housing discrimination always have the right to file complaints with HUD or OCRC, who have a Memorandum of Understanding regarding the enforcement of the Fair Housing Act. As a substantially equivalent state agency, HUD contracts with OCRC under the Fair Housing Assistance Program (FHAP). As a FHAP agency, OCRC investigates allegations of housing discrimination for HUD, either directly or as cases are referred to them by HUD. All cases filed with OCRC based on federal protected categories are forwarded to HUD for information and monitoring purposes.

Following is an overview of TFHC's intakes and allegations from 2021 – 2024, reflecting only cases within the City of Toledo:

Basis of Discrimination	2021		2022		2023		2024		Total	
Color	2	2%	1	1%		0%	1	1%	4	1%
Disability	71	60%	80	69%	88	83%	77	76%	316	72%
Familial Status	3	3%	2	2%	2	2%	2	2%	9	2%
National Origin	2	2%	2	2%		0%	1	1%	5	1%
Race	31	26%	24	21%	12	11%	12	12%	79	18%
Religion	1	1%		0%		0%		0%	1	0%
Sexual Orientation/ Gen ID		0%		0%		0%	1	1%	1	0%
Sex	8	7%	7	6%	4	4%	6	6%	25	6%
Source of Income							1	1%	1	0%
Total new cases	118		116		106		101		441	

Persons impacted	7,367	3,668	5,394	3,054	19,483
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Systemic Cases	20	17%	28	24%	9	8%	14	14%	71	16%
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Referrals	2,235	2,275	1,694	1,471	7,675
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Race/Ethnicity	2021		2022		2023		2024		Total	
African American	54	46%	48	41%	47	44%	45	45%	194	44%
White	41	35%	32	28%	37	35%	37	37%	147	33%
Asian American			1	1%		0%	2	2%	3	1%
Other (1)	1	1%	4	3%	10	9%	3	3%	18	4%
White & African Amer	5	4%	2	2%	3	3%		0%	10	2%
Hispanic	10	8%	1	1%	3	3%	3	3%	17	4%

Discrimination Issue	2021		2022		2023		2024		Total	
Appraisal				0%		0%		0%	0	0%
Design & Construction			2	2%		0%		0%	2	0%
HOA	1	1%		0%	1	1%		0%	2	0%
Harassment				0%		0%		0%	0	0%
Insurance			1	1%		0%	1	1%	2	0%
Lending	1	1%		0%		0%		0%	1	0%
Rental	115	97%	110	95%	104	98%	99	98%	428	97%
Retaliation				0%		0%		0%	0	0%
Sales	1	1%	2	2%	1	1%	1	1%	5	1%

Zoning			1	1%		0%		0%	1	0%
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From 2020 through 2024, TFHC opened 441 new cases to investigate allegations of housing discrimination within the City of Toledo. Of these, Disability was the number one basis of discrimination at 72 percent, followed by Race at 18 percent and Sex at six percent.

Rental complaints are the most prominent category of discrimination complaints, with 97 percent of our caseload focused on rental cases. Real estate sales cases are only one percent.

Also noteworthy is the race and ethnicity of TFHC’s clients. African-American/Black individuals accounted for 44 percent of all City of Toledo clients, with Whites accounting for 33 percent — only four percent of TFHC clients identified as Hispanic.

Purpose and Methodology of Analysis

This Analysis of Impediments to Fair Housing Choice (“Analysis of Impediments” or “AI”) was developed by The Fair Housing Center in conjunction with the City of Toledo.

Jurisdictions that receive federal dollars, directly or indirectly, are required by the Department of Housing and Urban Development to complete an AI. The Analysis of Impediments process is prescribed and monitored by the federal Department of Housing and Urban Development and the State of Ohio’s Department of Development. Specifically, to receive HUD Community Planning and Development formula grants, a jurisdiction must (i) certify its commitment to actively further fair housing choice; (ii) maintain fair housing records; and (iii) conduct an Analysis of Impediments to Fair Housing Choice.

An AI is a comprehensive review of barriers that inhibit residents from acquiring the housing of their choice based on federal, state, and local protected classes: race, color, national origin, religion, sex, familial status, disability, military status, gender identity, and sexual orientation.

The examination looks at issues in our community through a fair housing lens, including: community characteristics and demographics; income and poverty; transportation; employment; and public and private policies that impact protected groups and vulnerable populations, such as zoning, code enforcement, and real estate practices, among others.

Emerging, persisting, and worsening impediments discussed within these categories include the continuing effects of redlining and other forms of systemic discrimination; the indicators of low opportunity and health risks in neighborhoods of color; and the corresponding lack of housing mobility among occupants in neighborhoods of color. Other significant housing concerns are also illustrated, such as lead hazards; barriers faced by persons reentering the community after incarceration; and the emerging issue of discrimination based on source of income. The text also calls for affirmative programming and counseling to improve and inform housing choice and highlights the need for legislative changes to ensure the effectiveness of this programming.

The Analysis of Impediments is used as a catalyst for the City to develop and implement a Fair Housing Action Plan. The Fair Housing Action Plan will identify strategies that will be implemented in order to curtail and/or eliminate the impediments identified in the Analysis. The Analysis drives the Fair Housing Action Plan, which is the guiding document outlining the concrete steps that the City and its partners will take to address the impediments.

Compliance with HUD Requirements

The scope of this Analysis of Impediments adheres to the recommended content and format included in Volumes 1 and 2 of The Fair Housing Planning Guide, published by the Office of Fair Housing and Equal Opportunity at the U.S. Department of Housing and Urban Development (HUD). This AI also complies with Toledo Municipal Code §135.04.

HUD mandates that jurisdictions receiving federal funding for community development activities assess the status of fair housing in their community. As a direct recipient of Community Development Block Grant (CDBG) funds, the City of Toledo is required to prepare an Analysis of Impediments every five years, and report the findings and progress in its annual Consolidated and Performance Evaluation Report (CAPER) at the end of each program year. The City of Toledo's last AI was adopted in 2020. This AI is a comprehensive update of the 2020 AI, and will cover the Consolidated Plan period of July 1, 2025 through June 30, 2030. The scope, analysis, and formatting used in this AI adhere to recommendations contained in HUD's Fair Housing Planning Guide.

Community Characteristics

Toledo Historic Profile

The City of Toledo sits in Lucas County in northwestern Ohio, approximately 75 miles east of the Ohio-Indiana border. Toledo, which serves as the county seat, is located at the northernmost tip of Lucas County, approximately 60 miles south of Detroit, Michigan. Toledo covers an area of 81 square miles and borders Lake Erie to the east and the state of Michigan to the north. The Maumee River geographically divides Toledo, with the bulk of the city located to the west of the river and a smaller portion of the city situated to the east of the river.

According to the U.S. Census Bureau's 2020 Decennial Census, Toledo had an estimated population of 270,871.⁶ As such, the population density in Toledo is comparable to other mid-sized cities in the Midwest, with approximately 3,365 people per square mile.⁷ By contrast, Cincinnati, which has a comparable, albeit larger, population than Toledo (309,317) has a population density of 4,249 people per square mile. On the other hand, Dayton, which had slightly less than 140,000 residents according to the latest Census data, has a population density of approximately 2,380 people per square mile.

Toledo was first inhabited by many groups of Indigenous people, including the Wyandot tribe. The first Europeans in the area arrived in 1615 with French explorer Etienne Brule. The French established trading posts in the area later in the 1600s, but settlers did not begin migrating into the area until approximately 1795. After suffering defeats at the Battle of Fallen Timbers, native Indigenous tribes ceded their control over parts of Ohio, including the area now known as Toledo, to the United States. European settlers continued to flock to the area, though the War of 1812 caused many to leave. Eventually, the Miami and Erie Canal was authorized for construction, which would ultimately connect with a series of other canal projects to provide commercial access from the Great Lakes all the way to the Gulf of Mexico.⁸

Canals were vital to early commercial development throughout the Great Lakes region, helping facilitate the shipment of goods by utilizing the lakes and surrounding waterways. As such, many modern towns and cities developed from small outposts located along these canals and waterways. Toledo evolved from a merger of the towns of Port Lawrence and Vistula in 1833, with the name being derived from the ancient city of Toledo, Spain, in hopes of making the area

⁶ According to the 1-Year Estimates Data Profiles from the U.S. Census Bureau's American Community Survey, which is conducted annually rather than every decade, Toledo had an estimated population of 266,289 in 2022. See <https://data.census.gov/table/ACSDP1Y2022.DP05?t=Age%20and%20Sex:Older%20Population&g=160XX00US3977000>

⁷ Akron, Ohio has a similar population density to that of Toledo, with an estimated 3,075.40 people per square mile. However, according to the 2020 Census data, Akron's total population was 190,469, which is significantly lower than that of Toledo.

⁸ See https://en.wikipedia.org/wiki/Wabash_and_Erie_Canal (providing a historical overview of the Wabash and Erie Canal project, which was the longest canal ever built in North America at more than 460 miles long).

more economically competitive. Although Toledo was not the location of the final canal terminus, the city and surrounding region would greatly benefit from being positioned along the Maumee River and Lake Erie. Rapid development led to the City of Toledo, Ohio to be incorporated in 1837, and while the city was initially known for its shipping prowess, it would quickly develop into a railway hub.

By the 1880s, Toledo's borders had expanded, and railroads had already begun replacing canals as the preeminent mode of commercial transportation. Toledo, once again benefiting from its geographic proximity to many major cities, developed into a rail transportation hub. Numerous industries began to take advantage of the area's resources, including furniture makers, breweries, and glass manufacturers. As immigrants moved to the area to find work in Toledo's rapidly growing industry, the city's population steadily increased. By the turn of the Twentieth Century, Toledo had become one of the largest cities in Ohio, boasting a robust manufacturing economy that attracted a growing and diverse population of workers.

Toledo's initial population surged largely due to an influx of European immigrants from countries such as Hungary, Poland, Italy, Czechoslovakia, Greece, and Germany, who helped fuel the early expansion of Toledo's industrial economy. However, the outbreak of World War I caused immigration rates from European countries to decline, which created a labor shortage in Toledo's factories due to increased wartime demand. This labor shortage would make Toledo an attractive destination for Black Americans seeking to escape the Jim Crow south, with the number of Black residents in Toledo more than tripling from 1915 to 1930.⁹

Like most major cities in the United States, Toledo experienced the deleterious effects of the Great Depression, with more than 50 percent of the workforce being unemployed in 1931.¹⁰ However, several projects designed to reemploy residents, such as expansions of the Toledo Museum of Art and the Toledo Zoo, along with the industrial boom associated with World War II, helped reinvigorate Toledo's economy. Prospering throughout the 1950s and '60s, Toledo's population would reach a peak of 383,105 in 1969.¹¹ With a gradual but steady decline in manufacturing, coupled with a population shift away from the central city and towards outlying areas, Toledo's population would begin a long decline in the 1970's. From 1970 to 1998, it is estimated that Toledo lost nearly 25 percent of its population, or 72,000 people.¹²

Like many Rust Belt cities, Toledo has been harshly impacted by de-industrialization, struggling

⁹ See Ahmed Elbenni, *Great Migration transformed Toledo as blacks from South sought better life*, Toledo Blade (Feb. 1, 2021) ("Between 1910 and 1930, the number of black residents in Toledo ballooned by more than 336 percent, soaring from 1,877 to 13,260 – about 4.6 percent of the overall population of 290,718. By 1970, Black people represented 14 percent of Toledo's population. Today, that number is closer to 30 percent."), available at: <https://www.toledoblade.com/a-e/culture/2021/01/31/great-migration-transformed-toledo-as-blacks-from-south-sought-better-life/stories/20210122120#:~:text=Between%201910%20and%201930%2C%20the,is%20closer%20to%2030%20percent.>

¹⁰ <https://www.lucascountyhealth.com/wp-content/uploads/2016/07/Toledo-Consolidated-Plan-FY2010-2015.pdf>

¹¹ <https://www.lucascountyhealth.com/wp-content/uploads/2016/07/Toledo-Consolidated-Plan-FY2010-2015.pdf>

¹² *Id.*

to maintain the industrial and business base that once existed.¹³ At its height, Toledo was home to six companies listed in the Fortune 500, with only Owens Corning now remaining.¹⁴ However, in recent years, Toledo – especially its downtown district – has seen renewed revitalization, with significant development expanding cultural and recreational opportunities to serve residents and attract new and returning visitors.

Some recent highlights include:

- In June 2023, Metroparks Toledo opened the Glass City Metropark as part of a multi-year project, the Glass City Riverwalk, that will transform Toledo's riverfront between the Anthony Wayne Bridge (SR2) and the Veterans' Glass City Skyway (I-280) on both sides of the Maumee River.¹⁵ In its first year of being open to the public, Glass City attracted nearly 500,000 visitors and received awards from the National Recreation and Park Association and the Ohio Parks and Recreation Association.¹⁶
- Another major transformation occurring in Toledo in 2023 was the opening of the Glass City Center, a \$70 million dollar expansion and renovation of the former Seagate Centre.¹⁷
- The City of Toledo was awarded \$20 million in grant funds from the U.S. Department of Transportation to support the Connecting Toledo Neighborhoods to Opportunity project, which aims to improve infrastructure, roadway safety, and pedestrian mobility in the Junction and Uptown neighborhoods.¹⁸ Importantly, one key initiative of this project is improving connectivity between the Junction neighborhood and downtown Toledo in order to begin redressing longstanding negative impacts from discriminatory infrastructure planning.¹⁹

¹³ A March 25, 2013 article published in the Toledo Blade noted that "[O]nce considered a major hub in 1900 and then a powerhouse of business through the 1950s and early 1970s, Toledo now ranks among American cities with the highest concentrations of poverty and has struggled for years to keep companies and residents from fleeing to the suburbs." See Ignazio Messina, Toledo's decline misses rock bottom, Toledo Blade (March 25, 2013) Available at:

<https://www.toledoblade.com/local/2013/03/24/Toledo-s-decline-misses-rock-bottom/stories/20130323149>

¹⁴ *Id.* However, it should be noted that other notable Fortune 500 companies are headquartered in neighboring municipalities and employ many Toledo residents, such as Dana Incorporated, which is headquartered in Maumee, Ohio and maintains operational facilities in Toledo. See <https://www.dana.com/contact/locations/>.

¹⁵ The Glass City Riverwalk, *About GCR*, www.gcrtoledo.com/about (Accessed July 8, 2024).

¹⁶ Metroparks Toledo Blog, *Glass City Metropark Receives National Innovation Award* (May 20, 2024) <https://metroparkstoledo.com/discover/blog/posts/glass-city-metropark-receives-national-innovation-award/>

¹⁷ Jonathan Monk, *Go 419: Glass City Center to host open house to showcase \$70 million renovation*, WTOL 11 (January 5, 2023) <https://www.wtol.com/article/news/community/go-419/glass-city-center-to-to-showcase-70-million-renovation-saturday/512-4955ce46-a39f-4fdc-be0d-5914666f5fb7>

¹⁸ City of Toledo, *USDOT Awards Toledo \$20 Million for Infrastructure Improvements in Junction, Uptown* (June 24, 2023), <https://toledo.oh.gov/news/2023/06/24/usdot-awards-toledo-20-million-for-infrastructure-improvements-in-junction-uptown>

¹⁹ *Connecting Toledo Neighborhoods to Opportunity: From Redlining to Green Streets*, City of Toledo RAISE Grant Application, page 1 (2023) https://cdn.toledo.oh.gov/uploads/documents/2023_RAISEGrantApplication_ConnectingToledoNeighborhoodstoOpportunity.pdf#asset:317292@1

- In March 2024, the City of Toledo also announced an award of \$28 million in federal grant funds to support a project promising major improvements to the Front Street and Main Street corridors of East Toledo, seeking to enhance connectivity between these neighborhoods and the downtown riverfront and Glass City Metropark.²⁰



²⁰ City of Toledo, *City of Toledo Secures \$28 Million Federal Grant for East Toledo Infrastructure Project* (March 11, 2024) <https://toledo.oh.gov/news/2024/03/11/city-of-toledo-secures-28-million-federal-grant-for-east-toledo-infrastructure-project>

Demographic Profile

According to the most recent U.S. Census conducted in 2020, the City of Toledo had an estimated population of 270,871²¹ -- decreasing more than 16,000 residents since the 2010 Census (estimated total population 287,208).²² The decline in population follows a consistent trend in Toledo's overall population count, which has steadily decreased since its peak in 1970.²³ According to the 2000 Census, Toledo had an estimated population of 313,619.²⁴ Thus, in the past two decades alone, Toledo has lost approximately 42,748 residents.

Likewise, Lucas County has also experienced an ongoing decline in its overall population, albeit at a much slower rate than the City of Toledo. According to the 1970 U.S. Census, Lucas County had a population of 483,551.²⁵ By 2000, Lucas County's population had decreased to 455,054.²⁶

Most recently, in 2020, Lucas County had a total population of 431,279 – representing a loss of 23,775 residents over the past two decades.²⁷ While both Lucas County and the City of Toledo (the county seat) have witnessed consistent declines in total residential population since 1970, the population trends experienced by other villages and townships in the county has differed, with some localities growing in residential population rather than shrinking, as illustrated in the chart below.

²¹ U.S. Census Bureau, 2020 Census Demographic and Housing Characteristics File (DHC) – Total Population, P1; <https://data.census.gov/table/DECENNIALDHC2020.P1?g=160XX00US3977000>

²² U.S. Census Bureau, 2010 Census DEC Summary File 1 – P1; <https://data.census.gov/table/DECENNIALSF12010.P1?g=160XX00US3977000>

²³ Toledo's population in 1970 was 383,062 before declining by nearly 70,000 residents by the turn of the century, an 18 percent decline.

²⁴ U.S. Census Bureau, *Population Estimates for States, Counties, Places and Minor Civil Divisions: Annual Time Series, April 1, 1990 Census to July 1, 2000 Estimate* (Published on internet November 1, 2005), available at: https://www2.census.gov/programs-surveys/popest/tables/1990-2000/2000-subcounties-evaluation-estimates/sc2000f_oh.txt

²⁵ U.S. Bureau of the Census, *Preliminary Estimates of the Intercensal Population of Counties 1970-1979* (April 1982), <https://www2.census.gov/programs-surveys/popest/tables/1900-1980/counties/totals/e7079co.txt>

²⁶ U.S. Census Bureau, *Population Estimates for States, Counties, Places and Minor Civil Divisions: Annual Time Series, April 1, 1990 Census to July 1, 2000 Estimate* (Published on internet November 1, 2005), available at: https://www2.census.gov/programs-surveys/popest/tables/1990-2000/2000-subcounties-evaluation-estimates/sc2000f_oh.txt

²⁷ U.S. Census Bureau, 2020 Decennial Census – Profile of General Population and Housing Characteristics, DP1 (Lucas County, Ohio); [https://data.census.gov/table/DECENNIALDP2020.DP1?t=Populations%20and%20People&g=050XX00US39095,39095\\$06000000&y=2020&d=DEC%20Demographic%20Profile&tp=false](https://data.census.gov/table/DECENNIALDP2020.DP1?t=Populations%20and%20People&g=050XX00US39095,39095$06000000&y=2020&d=DEC%20Demographic%20Profile&tp=false)

Village / Township Name ²⁸	2000 Population Estimate	2020 Population Estimate	Population Change (2000 – 2020)
Maumee City	15,237	13,896	-1,341
Monclova Township	6,767	14,827	+ 8,060
Oregon City	19,355	19,950	+595
Ottawa Hills	4,564	4,790	+226
Springfield Township	24,123	26,957	+2,834
Swanton Township	3,354	2,822	-532
Sylvania Township	44,253	50,679	+6,426
Washington Township	3,574	3,055	-519
Waterville Township	9,469	7,036	-2,433

According to the most recent data from the U.S. Census Bureau’s 2022 American Community Survey, there are roughly 93 male residents per 100 female residents.²⁹ Moreover, the overall median age in Toledo is 36.6, with the median age for male residents being slightly younger (35.4 years old) compared to the median age for female residents (38.2 years old).³⁰ As of 2020, Toledo had 69,374 residents between the ages of 0-19 years old, representing roughly 25.6 percent of the total population.³¹ At the other end of the spectrum, there are approximately 59,025 residents at or above the age of 60 years old, representing roughly 21.8 percent of the total population.³²

Notably, Toledo’s population has approximately 34,015 children between the age of 0-9 years old, comprising approximately 12.56 percent of the total population.³³ Children falling within this age demographic are especially vulnerable to lead poisoning, raising a particular public health concern given that a high percentage of Toledo’s aging housing stock likely contains hazardous lead-based paints.³⁴ The public health concerns relating to lead-based paint hazards within Toledo’s residential housing stock will be discussed in more detail later in this Analysis.

²⁸ Data for this table was sourced from U.S. Census Bureau, *Population Estimates for States, Counties, Places and Minor Civil Divisions: Annual Time Series, April 1, 1990 Census to July 1, 2000 Estimate* (Published on internet November 1, 2005) and U.S. Census Bureau, 2020 Decennial Census – Profile of General Population and Housing Characteristics, DP1 (Lucas County, Ohio).

²⁹ U.S. Census Bureau, 2022 American Community Survey 1-Year Estimates, available at: <https://data.census.gov/table?t=Age%20and%20Sex:Populations%20and%20People&g=160XX00US3977000>

³⁰ *Id.*

³¹ U.S. Census Bureau, 2020 Census Demographic Profile – Profile of General Population and Housing Characteristics, DP1, <https://data.census.gov/table?g=160XX00US3977000&d=DEC%20Demographic%20Profile>

³² *Id.*

³³ *Id.*

³⁴ Around 85 percent of buildings in Toledo were constructed prior to 1980, with one out of every three housing units in Toledo having been built before 1940. See City of Toledo, *Comprehensive Housing Strategy*, Appendix 1 - “Task 3 Memo: City Housing Profile,” page 23 (2021)

Race

As noted in previous iterations of this Analysis, there is a trend evident in Toledo's population records which reveals that increases in the City's African American/Black population (hereafter identified as "Black") has historically coincided with declines in the White residential population.³⁵ This trend persists, as evidenced by data provided in the recent American Community Survey 5-year Estimates:

ACS Survey Year (Toledo)	Percentage of White/Non-Hispanic	Percentage of Black (alone or in combination with any other race)
2022	66.7% (180,108)	32.7% (88,195)
2021	66.9% (181,558)	32.3% (87,731)
2020	67.4% (185,550)	31.4% (86,388)
2019	67.5% (186,801)	31.1% (85,903)
2018	67.9% (188,816)	30.7% (85,455)

As the table above shows, the majority of Toledo's population identifies as White/Non-Hispanic (66.7 percent), with the next largest racial demographic being residents identifying as Black (either alone or in combination with any other race) accounting for 32.7 percent of the total population. The next largest racial demographic group in Toledo are individuals identifying as Latinx/Hispanic, accounting for approximately 8.9 percent of the total population (24,076 residents total).³⁶

In comparison to Ohio's overall racial composition, Toledo enjoys a significantly more diverse population. According to the 2022 American Community Survey, Non-Hispanic Whites accounted for 77.2 percent of the total population of Ohio, whereas Black people made up only 12.2 percent of the population and those of Latinx/Hispanic ethnicity comprised just 4.2 percent of the total population. In contrast, Toledo's Non-Hispanic White population accounted for 66.7 percent of the total population while its Black and Latinx/Hispanic populations comprised 32.7 percent and 8.9 percent, respectively. Thus, the percentage of Toledo's population identifying as either Black or Latinx/Hispanic population is more than double that for the statewide population.

Additionally, Lucas County has a slightly larger Non-Hispanic White population than Toledo, at 67.1 percent of the total population. On the other hand, Blacks make up only 18.7 percent of the total population of Lucas County, and Latinx/Hispanic accounts for an additional 7.7 percent of the total population.³⁷ Similar to Toledo, the population of individuals identifying as Black (either

³⁵ See 2015 A.I., page 20

³⁶ See U.S. Census Bureau, 2022 ACS 5-Year Estimates Data Profiles – ACS Demographics and Housing Estimates, DP05;
<https://data.census.gov/table/ACSDP5Y2022.DP05?t=Race%20and%20Ethnicity&g=060XX00US3909577000&d=ACS%205-Year%20Estimates%20Data%20Profiles>

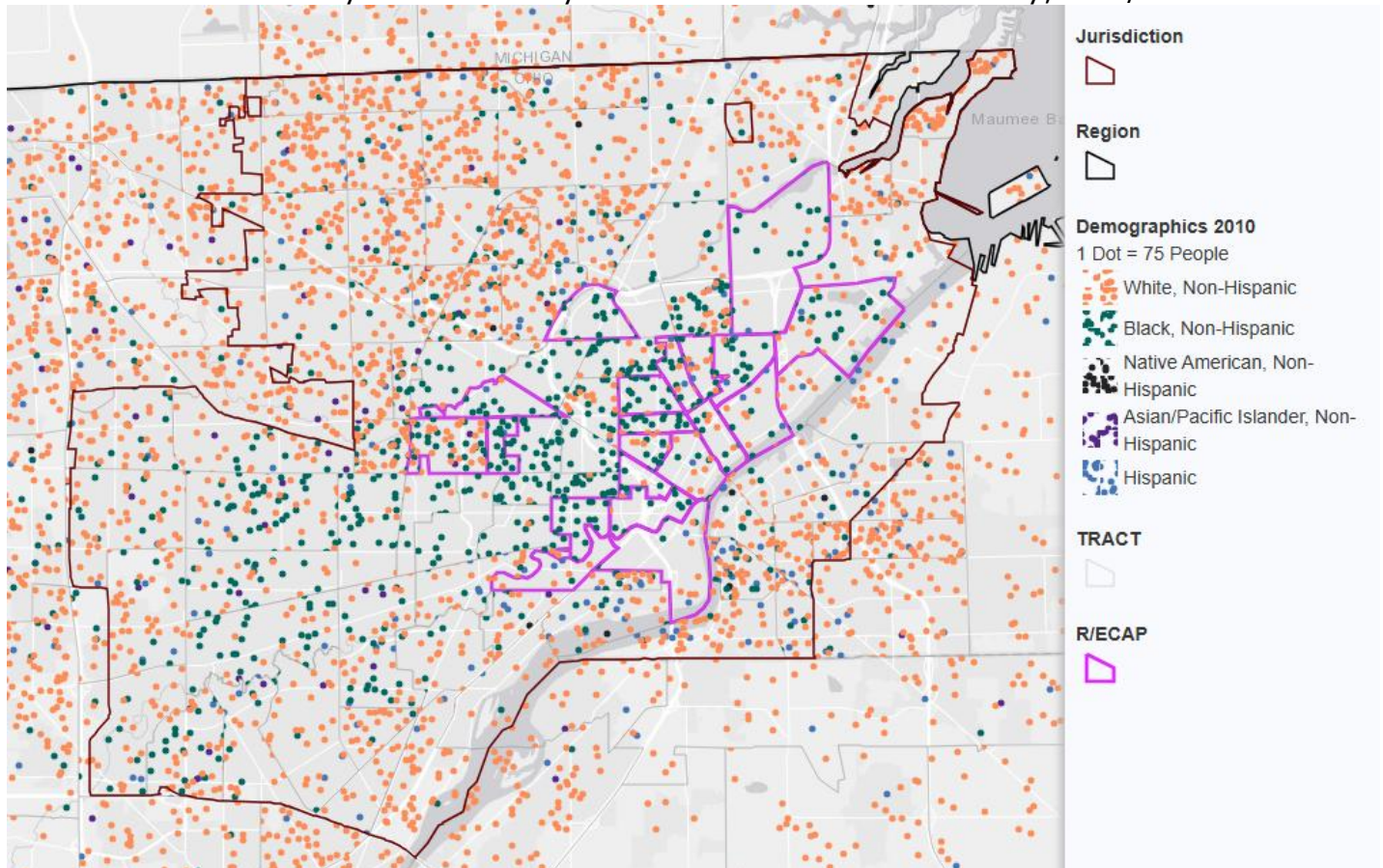
³⁷ Data based on 2022 American Community Survey 5-Year Estimates Data Profile (Lucas County).

alone or in combination with one or more race) has increased in Lucas County year after year, while the overall percentage of Non-Hispanic White individuals slightly decreasing:

ACS Survey Year (Lucas County)	Percentage of White/Non-Hispanic	Percentage of Black (alone or in combination with any other race)
2022	67.1% (288,327)	22.6% (97,232)
2021	67.6% (291,285)	22.4% (96,529)
2020	67.9% (292,316)	22.2% (95,413)
2019	68.6 % (295,844)	21.9% (94,508)
2018	68.9% (297,943)	21.8% (94,213)

Segregated Living Patterns

As illustrated by the dot density map below,¹⁷ the City of Toledo continues to experience significant segregation by race. The orange dots represent White residents. The green dots represent Black residents. The concentrations of Black residents are predominantly located in Toledo's urban core, and also in what are defined as Racially and Ethnically Concentrated Areas of Poverty, or R/ECAPS.¹⁸



Unfortunately, these segregated living patterns can be traced back to government policies and practices that began during the New Deal era, when the Home Owner's Loan Corporation (HOLC) created "Residential Security" maps

¹⁷ The data documentation for the HUD maps utilized herein can be found at www.egis.hud.gov/affht.

¹⁸ HUD defines a R/ECAP as a census tract where the number of families in poverty is equal to or greater than 40% of all families, or an overall family poverty rate equal to or greater than three times the metropolitan poverty rate, and a non-white population, measured at greater than 50% of the population.

that determined whether government mortgage programs, such as the Federal Housing Administration's low interest/low down payment loans, were available in particular neighborhoods. This practice, known as redlining, rated neighborhoods based on certain risk factors such as the demographic makeup of the area. Areas colored in red meant that loans in that area were considered high risk.

Green areas ("Best") were considered most desirable for mortgage lending and were rated 'A.' These neighborhoods were typically located in newer, affluent suburbs or on the outskirts of cities. According to the FHA Underwriting Handbook of the time, green areas represented in-demand, up-and-coming neighborhoods where "professional men" lived. The neighborhoods were explicitly homogenous, lacking "a single foreigner or Negro."

Blue areas ("Still Desirable") were rated 'B.' According to the FHA Underwriting Handbook, these neighborhoods had "reached their peak" but were still thought to be stable due to a low risk of "infiltration" by non-white groups.

Yellow areas ("Definitely Declining") were given a 'C' and were also older neighborhoods considered to be "in decline," which typically meant that the neighborhoods were more integrated or that people of color had begun to move to the area. They were considered risky due to the "threat of infiltration of foreign-born, negro, or lower grade population."

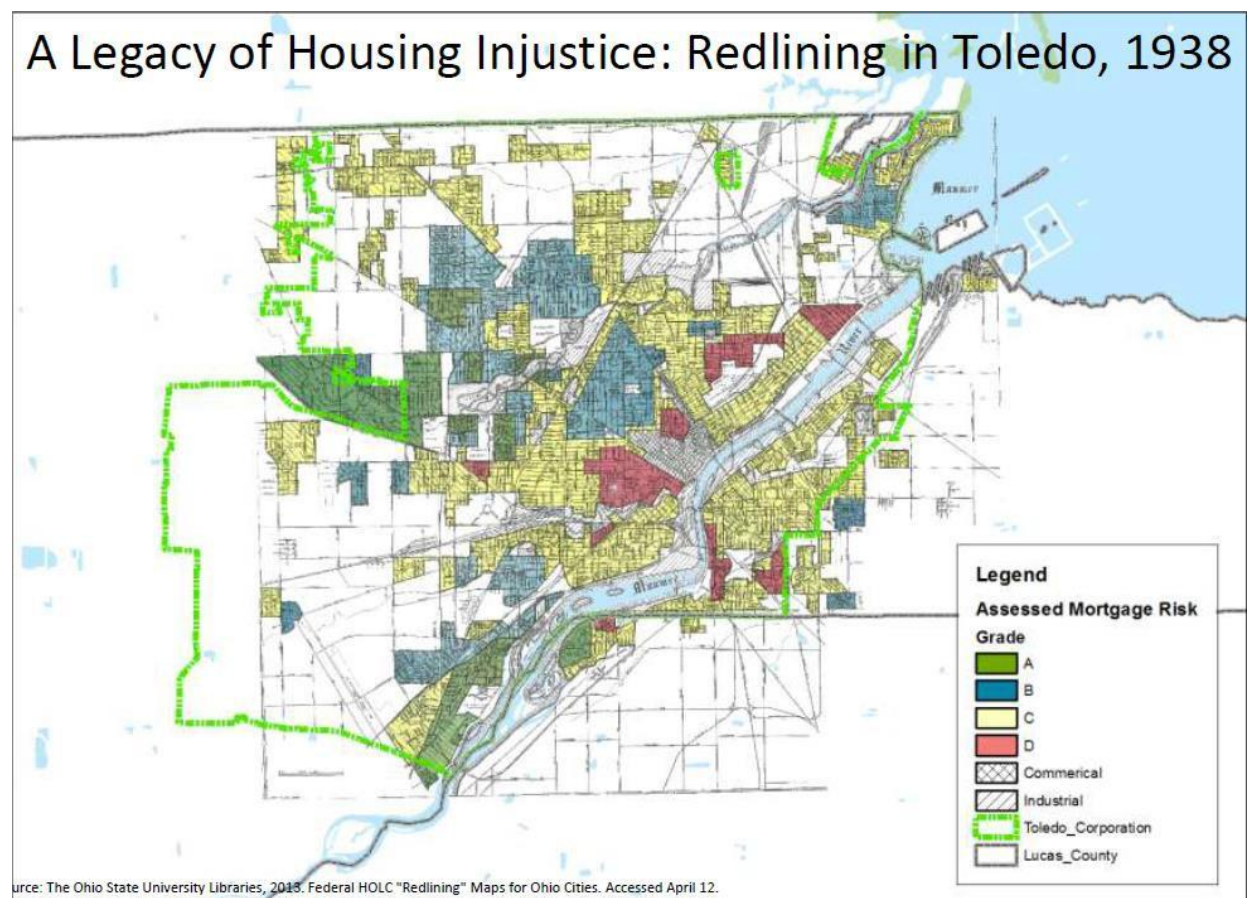
Red areas ("Hazardous"), given a 'D' grade, were considered the riskiest for mortgage lending. These neighborhoods tended to be in the older sections of a city and were most likely neighborhoods of color. These neighborhoods were described by HOLC as having an "undesirable population" and were ineligible for government-backed mortgage loans.

In the Preface to his book, *The Color of Law*, Richard Rothstein discussed the common perception that racial segregation is *de facto*, the result of private practices and the desire to live with others similar to ourselves. Mr. Rothstein noted that while *de facto* segregation accounts for some of the problem, it is submerged by a more far-reaching truth:

[U]ntil the last quarter of the twentieth century, racially explicit policies of federal, state, and local governments defined where whites and African Americans should live. Today's residential segregation in the North, South, Midwest, and West is not the unintended consequence of individual choices and of otherwise well-meaning law or regulation but of unhidden public policy that explicitly segregated every metropolitan area in the United States. The policy was so systematic and forceful that its effects endure to the present time. Without our government's purposeful imposition of

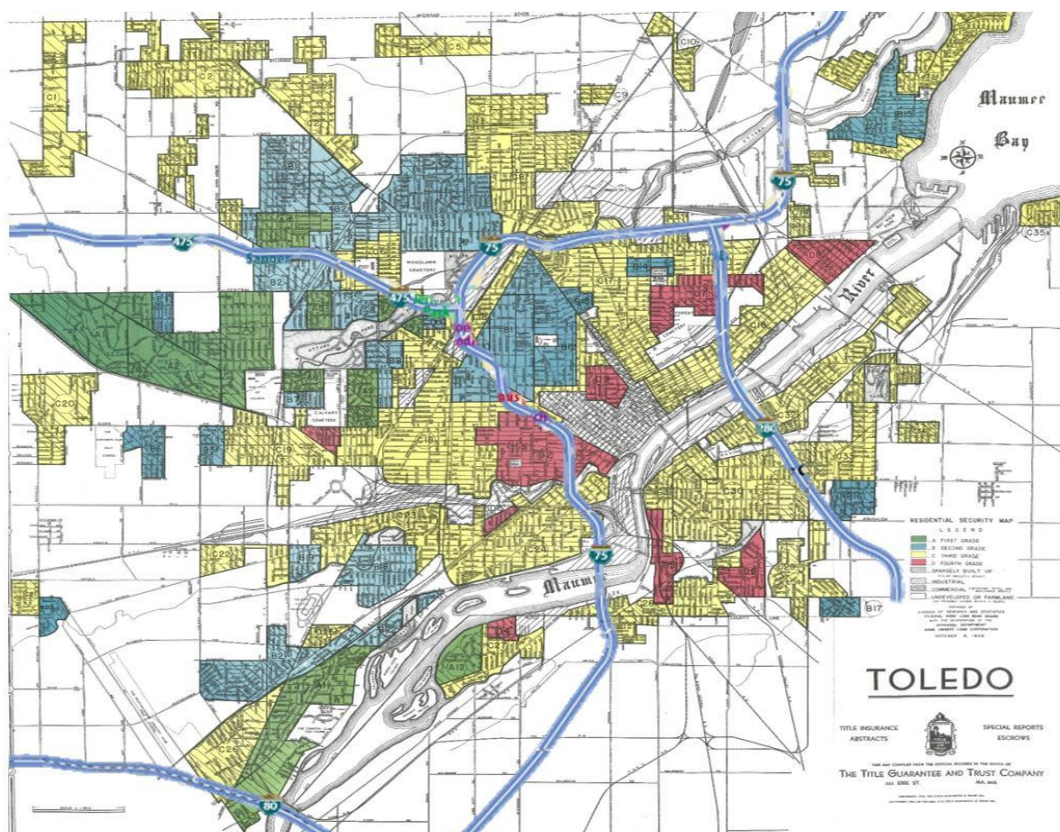
racial segregation, the other causes -- private prejudice, white flight, real estate steering, bank redlining, income differences, and self-segregation -- still would have existed but with far less opportunity for expression. Segregation by intentional government action is not de facto. Rather, it is what courts call de jure: segregation by law and public policy.¹⁹

As you can see from the HOLC map of the City of Toledo from 1938 (below), Toledo did not escape the long-term effects of redlining. In present day Toledo, Black people still predominantly reside in the yellow and red areas, which make up what we typically think of as Toledo's urban core. It is also noteworthy that most of the R/ECAPS identified in the dot density map (above) are also located in these historically disinvested neighborhoods.



¹⁹ Rothstein, Richard. *The Color of Law: A Forgotten History of How Our Government Segregated America*. Liveright Publishing Corporation, a Division of W.W. Norton & Company, 2017, pgs vii-viii.

Redlining maps had impacts in other areas, as well. Initially, public housing was unlikely to be built in yellow or red areas, as such housing was constructed with the white, middle-class family in mind. Later, as President Eisenhower rolled out the Federal-Aid Highway Act of 1956, yellow and redlined neighborhoods were often targeted for demolition to make room for the new Interstate highways crisscrossing the country. As illustrated on the map below, which is an overlay of the current interstate highways running through Toledo onto the 1938 HOLC redlining map, Toledo does not seem to have escaped this trend, especially with the construction of I-75. Whether I-75 was constructed to avoid specific neighborhoods or target others is a matter of interpretation. What is obvious is that the construction of I-75 was not a matter of plotting the most obvious course from Point A to Point B.



The intentional policies and practices that lead to disinvestment and segregation in Toledo (and nationwide) can only be undone or remediated using intentional policies and practices. The City's 2020 Consolidated Plan and this Analysis of Impediments identify government and community-based strategies to reduce the lingering effects of residential segregation and discrimination and move the needle toward diverse and equitable neighborhoods of opportunity for all.

National Origin

An estimated 8,894 residents, approximately 3.3 percent of Toledo's population, are foreign-born, meaning they were born outside of the United States to non-American parents. The table below, using ACS 2022 Five-Year Estimates, shows the distribution of place of birth among Toledo residents.³⁸ According to the Pew Research Center in March of 2019, Toledo is home to less than 5,000 undocumented immigrants, accounting for 0.5 percent of the total foreign-born population.³⁹ This number has remained relatively steady over recent years, with Toledo ranking 165th out of 182 Metropolitan Statistical Areas (MSAs) evaluated for the number of undocumented immigrants.

Place of Birth	2022 total
Total Population	269,962
US Native	261,068
Born in US	259,049
Born in Ohio	205,318
Born in another state	53,731
Foreign-Born	8,894

According to a report by New American Economy, immigrants in Toledo have contributed significantly to the local economy, with their population continuing to grow.⁴⁰ The report, published in partnership with Welcome Toledo-Lucas County (TLC) and the Toledo Regional Chamber of Commerce, highlights the more than \$200 million impact that Toledo immigrants make in the community, including contributions of more than \$30 million in federal taxes and more than \$19 million in state and local taxes in 2017. The immigrant community members have partially offset population loss in Toledo and Lucas County, positively impacting the local economy.

According to the ACS 2022 Five-Year Estimates, the following countries account for the bulk of Toledo's immigrant population:⁴¹

- Mexico: 14.8%
- China: 6.2%

³⁸ U.S. Census Bureau, *Selected Characteristics of the Foreign-Born Population by Period of Entry Into the United States*, 2018-2022 American Community Survey 5-Year Estimates, (2022), <https://data.census.gov/table/ACSST5Y2022.S0502?q=Immigration,%20Toledo%20Ohio>

³⁹ Pew Research Center, *Estimates of U.S. unauthorized immigrant population, by metro area, 2016 and 2007*, (2009), <https://www.pewresearch.org/race-and-ethnicity/feature/unauthorized-immigrants-by-metro-area-table/>

⁴⁰ New American Economy, *New Data Shows Toledo and Lucas County Immigrants are Offsetting Local Population Loss*, (August 21, 2019), https://www.newamericaneconomy.org/wp-content/uploads/2019/08/G4G_Toledo.pdf

⁴¹ Data Based on 2022 American Community Survey 5-Year Estimates Data Profile (Lucas County).

- Philippines: 5.2%
- Canada: 4.4%
- Lebanon: 4.3%
- Germany: 3.9%
- India: 3.3%

Further, of the 8,894 foreign-born residents in Toledo, 53.2 percent are naturalized U.S. citizens, while the remaining 46.8 percent are not U.S. citizens but reside in Toledo legally, with green cards or various types of visas. As of 2022, 98.5 percent of Toledo residents were U.S. citizens, which is higher than the national average of 93.5 percent.⁴² In 2021, the percentage of U.S. citizens in Toledo was 98.3 percent, meaning that the rate of citizenship has been increasing.

Immigrants play a major role in key industries vital to Toledo's economic stability. In 2017, they made up 3.7 percent of the area's population but had an outsized impact on many industries, representing more than 9 percent of STEM workers, 9 percent of education workers, and nearly 8 percent of construction workers.

Workforce Statistics for Toledo's Foreign-Born Residents:

- 4.5% of the working-age population
- 4.6% of the employed labor force
- 9.1% of STEM workers

As of 2017, 52.2 percent of immigrant households in the city owned their homes, compared to 51.6 percent of U.S.-born households. Their total annual rent paid was \$14.5 million.

⁴² Data USA, Toledo, OH, (2022), <https://datausa.io/profile/geo/toledo-oh>

English Proficiency

To address the needs of individuals with limited English proficiency, President Clinton signed Executive Order 13166 on August 11, 2000, titled "Improving Access to Services for Persons with Limited English Proficiency (LEP)".⁴³ This Executive Order requires all federal agencies evaluate the services they provide, identify any need for LEP services, and develop and implement systems to provide these services so that LEP populations can have "meaningful access" to the programs or services. Furthermore, the Executive Order requires that recipients of federal financial assistance also provide meaningful access to their LEP applicants and beneficiaries.

In Toledo, the percentage of the population speaking a language other than English at home remains significant. According to ACS Five-Year Estimates, 6.2 percent of Toledo's population, or 15,770 individuals, speak a language other than English at home. In 2016, 6.9 percent of the population spoke a language other than English at home. The percentage has remained relatively stable, indicating a consistent presence of multilingual households in the city.⁴⁴

Among them, 4,296 individuals (1.7% of the total population) speak English "less than very well." As such, the City of Toledo is required to provide access to its programs and services to LEP populations. Spanish continues to be the most prevalent language other than English spoken at home, representing three percent of the population or 7,533 individuals. Notably, nearly 26% of those who speak a language other than English at home speak Spanish.

The linguistic landscape of Toledo is as follows:⁴⁵

Language	Population	Percent of Total Population	Speaks English less than "very well"
English Only	236,753	93.80%	(x)
Language other than English	15,770	6.20%	4,296
Spanish	7,533	3.00%	1,955
Other Indo-European languages	3,042	1.20%	642

⁴³ Exec. Order No. 13166, 3 C.F.R. 159 (2000)

⁴⁴ U.S. Census Bureau, *Language Spoken at Home*, 2018-2022 American Community Survey 5-Year Estimates, (2022), <https://data.census.gov/table/ACSST5Y2022.S1601?q=language%20spoken%20at%20home,%20Toledo%20OH>

⁴⁵ U.S. Census Bureau, Limited English Speaking Households, 2018-2022 American Community Survey 5-Year Estimates, (2022), <https://data.census.gov/table/ACSST5Y2022.S1602?q=language%20spoken%20at%20home,%20Toledo%20OH>

Asian and Pacific Islander languages	2,064	0.80%	920
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Other languages	3,131	1.20%	779
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Limited English Speaking Households	Total	Percent of Total Population	Limited English-Speaking households	Percent of Limited English-speaking households
All Households	117,618	(x)	(x)	(x)
Spanish	4,526	3.80%	656	14.50%
Other Indo-European Languages	2,011	1.70%	177	8.80%
Asian and Pacific Island languages	1,248	1.10%	176	14.10%
Other languages	1,683	1.40%	254	15.10%

To effectively reach and assist these LEP groups, The Fair Housing Center translated its key brochures and advertisements into Spanish, Arabic, and Chinese in 2017. Furthermore, TFHC added a translation tool to its website to enhance access for a broader range of LEP individuals. These resources are aimed at ensuring that all residents, regardless of English proficiency, have access to information and services provided by TFHC. Brochures may be found on TFHC's website: <https://toledofhc.org/resources/>

Age

The following table breaks down Toledo's population by age group, using data from the American Community Survey (ACS) 2022 and 2017 Five-Year Estimates.⁴⁶

Age Group	2022 total	Percent of Total	Percent Change Since 2017
Under 5 Years	17,439	6.50%	-8.96%
5 to 9 years	17,503	6.50%	-7.27%
10 to 14 years	17,279	6.40%	0.09%
15 to 19 years	18,308	6.80%	-1.69%
20 to 24 years	20,287	7.50%	-9.16%
25 to 29 years	21,597	8%	-7.84%
30 to 34 years	20,954	7.80%	8.47%
35 to 39 years	16,614	6.20%	5.49%
40 to 44 years	15,270	5.70%	-7.23%
45 to 49 years	14,856	5.50%	-13.23%
50 to 54 years	15,922	5.90%	-11.21%
55 to 59 years	16,854	6.20%	-9.36%
60 to 64 years	17,018	6.30%	4.04%
65 to 69 years	14,213	5.30%	8.82%
70 to 74 years	10,371	3.80%	25.16%
75 to 79 years	6,179	2.30%	-8.10%
80 to 84 years	4,432	1.60%	-0.43%

⁴⁶ U.S. Census Bureau, *Age and Sex*, 2018-2022 American Community Survey 5-Year Estimates, (2022), <https://data.census.gov/table/ACSST5Y2022.S0101?q=Age,%20Toledo%20Ohio>

85 years and over	4,866	1.80%	-14.88%
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According to the U.S. Census Bureau's 2022 population estimates, 23 percent of Toledo's residents are aged 18 and younger. The population under five years is 6.5 percent of the total.⁴⁷ This is significant because a large number of older housing units in the city increases the risk of health problems, such as lead poisoning, particularly for young children. To address these risks, the City is implementing an amended lead-based ordinance requiring all residential rental properties and family childcare homes built before 1978 to obtain lead-safe certificates. This requirement is being phased in over five years.

The median age in Toledo is 35 years old, which is lower than the Ohio average of 39 years old. The age group experiencing the most notable change is the 45-54 bracket, accounting for 5.9 percent of Toledo's total population in 2022, which saw a substantial decline from 6.4 percent in 2017. Similarly, the 25-29 age group, representing eight percent of the population in 2022, experienced a modest decline from 8.4 percent in 2017.

Senior citizens aged 55 and older make up a sizable portion of Toledo's population, at just over 26 percent. One of the most remarkable demographic trends is the growth in the 65-74 age group, which has increased by 22.7 percent, according to the 2017 and 2022 population estimates.⁴⁸ This indicates a growing senior population, highlighting the need for housing that accommodates seniors who wish to age in place while managing the health and disability issues that often come with aging.

As illustrated by the population percentage change from 2017 to 2022, Toledo is experiencing a decline in its younger population and an increase in its senior population. The demographic shift toward an aging population presents additional housing challenges, particularly for seniors who wish to age in place. Ensuring safe, affordable, and accessible housing is crucial to support Toledo's aging residents. AARP notes that 90 percent of older adults wish to age in place, but numerous physical and health changes can limit mobility and accessibility around the home.⁴⁹ Nationally, 48.5 percent of households with older adults have difficulty using one or more housing features.⁵⁰ This emphasizes the importance of designing homes that meet the needs of older people and ensuring that the housing stock evolves to support Toledo's aging population.

⁴⁷ Data Based on 2022 American Community Survey 5-Year Estimates Data Profile (Lucas County).

⁴⁸ See 2015 A.I., pg.32

⁴⁹ Lynnette Khalfani-Cox, *Can you Afford to Age in Place?*, AARP, (2017), <https://www.aarp.org/money/budgeting-saving/info-2017/costs-of-aging-in-place.html#:~:text=According%20to%20an%20AARP%20study,home%20or%20assisted%20living%20facility>

⁵⁰ U.S. Census Bureau, *Old Housing, New Needs: Are U.S. Homes Ready for an Aging Population?*, American Housing Survey, (2020).

Disability

Toledo has a higher rate of residents with disabilities, both mental and physical, when compared to the state average of Ohio (17.7% among Toledo residents versus 14% in Ohio).⁵¹ Therefore, expanding accessible housing and neighborhood design is an important priority for making Toledo more equitable and inclusive to all the City's residents. The table below shows the rate among Toledo's civilian, non-institutionalized persons with disability status by age group.

Age Group	Group Total	With Disability	Percent with Disability
Civilian noninstitutionalized population	267,262	46,924	17.60%
Under 5 years	17,439	196	1.10%
5 to 17 years	44,515	5,354	12.00%
18 to 34 years	70,542	6,922	9.80%
35 to 64 years	95,761	19,412	20.30%
65 to 74 years	24,176	7,414	30.70%
75 years and over	14,829	7,626	51.40%

According to ACS Five-Year Estimates, 17.6 percent of Toledo's civilian, noninstitutionalized population lived with some sort of permanent disability in 2022. This is a very slight increase from the 2017 Five-Year Estimates, which represented that 17.3 percent of Toledo's residents had a disability.⁵² As shown in the table above, the likelihood of experiencing a disability increases with age. With an aging population in Toledo, it is foreseeable that the rate of disability will continue to rise.

Disability status is intricately linked with housing disparities, often exacerbated by economic deprivation. Access to affordable, accessible housing near employment opportunities is central to ensuring equality of opportunity, resources, and well-being, especially for adults of color who have experienced lifelong effects of segregation. Problematic state and federal housing policies have spatially concentrated economically deprived disabled people, especially from minority groups, leading to longer wait times and fewer housing options in programs like Section 8 for those with mobility disabilities.

Data from HUD's AFFH mapping tool for Toledo illuminates the considerable number of individuals living with various disabilities.

⁵¹ U.S. Census Bureau, *Disability Characteristics*, 2018-2022 American Community Survey 5-Year Estimates, (2022), <https://data.census.gov/table/ACSST5Y2022.S1810?q=disability,%20Toledo%20Ohio&g=160XX00US3977000>

⁵² See 2015 A.I., pg. 33

- Hearing difficulty: 24,381
- Vision difficulty: 14,289
- Cognitive disability: 36,665
- Ambulatory difficulty: 46,563
- Self-care difficulty: 16,343
- Independent living difficulty: 30,904

These statistics underscore the direct correlation between poverty and the incidence of disability. Individuals living with disabilities often face a reduced capacity or inability to work, resulting in lower earnings. Consequently, those who are already at a disadvantage due to their mental or physical limitations are further limited by the resources and opportunities available in areas of concentrated poverty.

Though it makes sense that those living with a disability might be subject to lower earnings — due to a possibly reduced capacity or inability to work because of a disability — the issue remains that concentrated areas of poverty inherently have fewer resources and opportunities at their disposal. Put differently, those people who are already at a disadvantage due to their mental or physical limitations may be further limited by living in an area of poverty, which is, in itself, a place of limited opportunities.

Research by Abigail Lindsay and Jaque King (2022), highlights that the home environment is critical to improving the quality of life and independence for individuals with mobility challenges, regardless of disability age of onset.⁵³ However, seven million Americans with disabilities pay more than 30% of their income on rent, and four million Americans with disabilities pay more than 50% of their income on rent. Individuals with disabilities often have limited employment options and face barriers to education and support services that contribute to higher levels of poverty.

Housing discrimination based on a person's disability presents itself in a variety of forms. In Toledo, disability discrimination is seen in cases where a person with a disability needs reasonable accommodations or modifications to their home, housing community, or to a policy governing such community to enjoy their dwelling to the same extent as a person without such a disability. According to the 2022 Fair Housing Trends Report, there were 16,758 complaints of discrimination against a person with a disability, which constituted 53.68 percent of all cases brought to The Fair Housing Center.

Despite advocacy efforts to ensure that individuals with disabilities have a right to fair housing, those with physical disabilities remain disproportionately impacted by the lack of accessible and affordable homes compared to individuals without disabilities. Racist housing policies, an inadequate stock of accessible homes, and severely limited housing assistance have led to a shortage of homes for individuals with disabilities in the lowest-income brackets.

⁵³ Abigail Lindsay and Jaque King, *Evaluating housing concerns for people with physical disabilities: Barriers, best practices, and policy implications*, National Institute on Disability, (2022), <https://disabilityhealth.medicine.umich.edu/sites/default/files/downloads/Evaluating-housing-concerns-for-ppl-with-disabilities.pdf>

Sex, Gender Identity, & Sexual Orientation

This section examines the sex, gender identity, and sexual orientation demographics of Toledo's population, highlighting key issues related to earnings, LGBTQ+ protections and housing market friendliness. According to ACS 2022 estimates, Toledo's population consists of approximately 51% female and 49% male.⁵⁴ These numbers are based on sex assigned at birth and do not account for individual gender identities. According to the latest median earnings estimates for full-time, year-round workers, women in Toledo earn 85 cents to every dollar made by men in the city. This is slightly better than the national median estimates, which show women earning 81 cents for every dollar earned by their male counterparts.⁵⁵

Toledo is considered a friendly housing market for the LGBTQ+ community, earning a score of 94 out of 100 in the Human Rights Campaign's 2023 Municipal Equality Index (MEI).⁵⁶ The Municipal Equality Index gives points for non-discrimination housing, employment, and public accommodations policies and laws specifically pertaining to LGBTQ+ protections.

Toledo's breakdown in the 2023 MEI includes:

- Non-Discrimination Laws: 30/30
- Municipality as Employer: 22/28
- Municipal Services: 7/12
- Law Enforcement: 22/22
- Leadership on LGBTQ+ Equality: 8/8

Although federal and state fair housing laws do not currently protect gender identity and sexual orientation, the Toledo Municipal Code does, defining "Gender identity or expression" as a person's gender-related identity, appearance, expression, or behavior, whether or not that gender-related identity, appearance, expression, or behavior is different from that traditionally associated with the person's physiology.⁵⁷ However, the protections under the Toledo Municipal Code are rarely enforced. To date, there are few or no prosecuted cases pursuant to the Municipal Code section pertaining to LGBTQ+ protections. Additionally, enforcement staff at The Fair Housing Center report that their complainants who make claims based on gender identity and sexual orientation discrimination receive little to no reaction upon reporting it to city authorities and, thus, are left with no recourse.

⁵⁴ U.S. Census Bureau, *Age and Sex*, 2018-2022 American Community Survey 5-Year Estimates, (2022), <https://data.census.gov/table/ACSST5Y2022.S0101?g=160XX00US3977000&tid=ACSST5Y2022.S0101>

⁵⁵ U.S. Census Bureau, *Earnings in the Past 12 Months (in 2022 Inflation-Adjusted Dollars)*, 2018-2022 American Community Survey 5-Year Estimates, (2022), <https://data.census.gov/table/ACSST5Y2022.S2001?q=median%20earnings,%20Toledo%20Ohio&g=160XX00US3977000>

⁵⁶ Human Rights Campaign Foundation, *Toledo, Ohio Municipal Equality Index Scorecard*, (2023), <https://hrc-prod-requests.s3-us-west-2.amazonaws.com/MEI-2023-Assets/MEI-2023-Toledo-Ohio.pdf>

⁵⁷ Toledo, OH., *Employment, Real Estate Discrimination ch.554 & 554.01 (12-15-20)*

Family Status

According to ACS 2022 Five-Year Estimates, Toledo has 117,618 households with an average household size of two people and an average family size of 3 people.⁵⁸

Total Households	117,618	
Married-Couple Household	33,261	28.30%
With Children Under 18 years	10,908	9.30%
Cohabiting Couple Household	11,181	9.50%
With children under 18 years	4,969	4.20%
Male Householder	30,192	25.70%
With children under 18 years	1,850	1.60%
Female Householder	42,984	36.50%
With children under 18 years	10,735	9.10%

Of the 117,618 households, married-couple households represent 28.3 percent, with a smaller percentage (9.3%) having children under eighteen. Relative to this, female-headed households without a spouse or partner constitute the largest segment at 36.5 percent, with a similar proportion (9.1%) having children under eighteen. The single-parent dynamic significantly impacts housing stability and quality. Single-parent households, especially those led by women, face greater financial burdens due to their single income. This often limits their ability to move to safer, higher quality neighborhoods, affecting their children's opportunities for better education and development.

As discussed in the Sex, Gender Identity, & Sexual Orientation section, the median earnings for women in Toledo are approximately 85 cents to every dollar made by a man in the city.⁵⁹ Such income disparities limit housing options and contribute to higher poverty rates among female-headed households. In Toledo, the poverty rate for women is 26.2%, significantly higher than for men. Income differences are not the sole driver of disparities in outcomes. A second adult in the home contributes considerable time and energy towards childcare, allowing for more balanced and attentive child-rearing.

Furthermore, the economic benefits of two-parent households are substantial. Households with two adults can typically afford higher-quality housing and provide a more stable environment for children. Research shows that a significant number of economically disadvantaged families are

⁵⁸ U.S. Census Bureau, *Selected Social Characteristics in the United States*, 2018-2022 American Community Survey 5-Year Estimates, (2022), <https://data.census.gov/table/ACSDP5Y2022.DP02?q=Family%20Status,%20Toledo%20Ohio>

⁵⁹ Data based on 2022 American Community Survey 5-Year Estimates Data Profile (Lucas County).

single-parent households, which inherently lack the financial stability two-parent households can offer.⁶⁰ It's noted that the percentage of American children living with married parents has dramatically decreased from 77 percent in 1980 to 63 percent in 2019.

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Household Income (Median Income in Dollars)	
Household	\$45,405
Families	\$56,943
Married-Couple Families	\$82,704
Non-family Households	\$31,863

Grandparents play a crucial role in Toledo's family structure with 4,997 grandparents living with their grandchildren, and about 44.4 percent of them bearing primary caregiving responsibilities. Approximately 70 percent of grandparents who are primary caregivers are female.⁶²

Research highlights that substandard housing conditions significantly affect children's emotional and behavioral development. Issues such as leaking roofs, broken windows, and nonfunctioning heaters create environments that contribute adversely to a child's growth. Specifically, children exposed to these conditions exhibit higher rates of emotional and behavioral problems. This is particularly pertinent in Toledo, where prevalent poverty rates among women and the prevalence of single-parent households increase the likelihood of living in such inadequate housing.

Population of Housing Units Below Poverty Level	
Toledo	24.40%
Ohio	13.30%
The U.S.	12.30%

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According to a detailed study focusing on low-income children in urban areas, poor housing quality was identified as the most consistent and strongest predictor of emotional and behavioral

⁶⁰ Rebekah Levine Coley, Tama Leventhal, Alicia Doyle Lynch, and Melissa Kull, *Poor Quality Housing is Tied to Children's Emotional and Behavioral Problems*, MacArthur Foundation, (September 2013).

⁶¹ U.S. Census Bureau, *Income in the Past 12 Months, 2018-2022 American Community Survey 5-Year Estimates*, (2022), <https://data.census.gov/table/ACSST5Y2022.S1901?q=Household%20income,%20Toledo%20Ohio>

⁶² Data based on 2022 American Community Survey 5-Year Estimates Data Profile (Lucas County).

⁶³ U.S. Census Bureau, *Poverty Status in the Past 12 Months 2018-2022, American Community Survey 5-Year Estimates*, (2022) <https://data.census.gov/table/ACSST5Y2022.S1701?q=poverty%20level%20%20Toledo%20OH>

issues.⁶⁴ Children in families that frequently move due to housing instability tend to perform worse academically, suffering from lower test scores and reduced overall academic achievement. This instability often forces families to prioritize housing costs over other critical investments in their children's development, such as extracurricular activities, food, and medical care.



⁶⁴ Rebekah Levine Coley, Tama Leventhal, Alicia Doyle Lynch, and Melissa Kull, *Poor Quality Housing is Tied to Children's Emotional and Behavioral Problems*, MacArthur Foundation, (September 2013).

Community Profile

Education

School Enrollment

The chart below, taken from the 2022 ACS 5-Year Estimates, indicates that overall school enrollment declined from 2017 to 2022.⁶⁵ This reduction in enrollment can be primarily attributed to the overall decrease in Toledo's youth population rather than specific attendance issues. While the number of students enrolled in nursery school and preschool dropped by 14.58 percent and kindergarten enrollment decreased by 14.14 percent, the total number of high school students saw a slight increase of 3.35 percent. College or graduate school enrollment experienced a notable decline of 12.50 percent.⁶⁶ These shifts suggest that various educational levels are being impacted differently, likely influenced by economic factors such as the rising cost of tuition and demographic changes in the region.

Grade Level	2017 Total Enrolled	2017 Percent of Total Enrolled	2022 Total Enrolled	2022 Percent of Total Enrolled	Percent Change 2017- 2022
Population 3 year+	72,553	100.00%	66,697	100.00%	-8.06%
Nursery School, Preschool	3,915	5.40%	3,344	5.00%	-14.58%
Kindergarten	4,296	5.90%	3,689	5.50%	-14.14%
Elementary School (Grades 1-8)	28,160	38.80%	26,688	40.10%	-5.22%
High School (Grades 9-12)	14,430	19.90%	13,946	20.90%	3.35%
College or Graduate School	21,752	30.00%	19,030	28.54%	-12.50%

Educational Attainment

According to the 2022 ACS 5-Year Estimates, the educational attainment of Toledo residents aged 25 years and older shows both strengths and areas for improvement compared to national

⁶⁵ U.S. Census Bureau, *School Enrollment*, 2018-2022 American Community Survey 5-Year Estimates, (2022), <https://data.census.gov/table/ACSST5Y2022.S1401?q=school%20enrollement%20Toledo%20Ohio>

⁶⁶ See 2015 A.I., pg. 38

averages.⁶⁷ A significant portion of Toledo residents, 33 percent, have attained a high school diploma or equivalency, surpassing the national average of 26.4 percent. Conversely, Toledo lags behind the national figures for higher education degrees. Only 13.4 percent of Toledo's population have earned a bachelor's degree compared to the national average of 20.9 percent, and 6.8 percent have a graduate or professional degree, significantly lower than the national average of 13.4 percent. These disparities highlight the need for focused efforts to enhance higher education attainment in Toledo, which is crucial for the city's socioeconomic development and competitiveness.

Educational Attainment	Category Total	% of Toledo's Population	% of U.S. Population
Population 25 years +	179,146	(x)	(x)
Less than 9th Grade	5,874	3.30%	4.70%
9th-12th grade, no diploma	15,489	8.60%	6.10%
High School Graduate (includes equivalency)	59	33.00%	26.40%
Some College, no degree	44,871	25.00%	19.70%
Associate's degree	17,603	9.80%	8.70%
Bachelor's Degree	24,074	13.40%	20.90%
Graduate or Professional Degree	12,193	6.80%	13.40%

School Proficiency

School proficiency can be measured by a variety of different metrics, such as average test scores, year-to-year improvement (or learning rates), and graduation rates, among others. However, most measures tend to give the same overall results. Toledo demonstrates lower-than-average educational opportunities, as evidenced by all three methods of measurement. Students in Toledo experience significantly lower learning rates compared to both the national average and districts with similar socioeconomic statuses, and the trends in test scores for Toledo reveal a declining trajectory in educational opportunities. The report notably points out that Toledo's socioeconomic status is far below the national average.

Derived from the Stanford Education Data Archive (SEDA), the data presented by the Educational Opportunity Project are based on standardized accountability tests in Math and Reading Language Arts (RLA) administered to public-school students in grades 3-8 from 2008-09 through 2017-

⁶⁷ U.S. Census Bureau, *Educational Attainment*, 2018-2022 American Community Survey 5-Year Estimates, (2022), <https://data.census.gov/table/ACSST5Y2022.S1501?q=Education,%20Toledo%20Ohio&g=010XX00US>

18.⁶⁸ The test scores from these assessments reveal three critical aspects of educational opportunity in America: average test scores, learning rates, and trends in test scores. Below is a table comparing Toledo and the greater Metropolitan area’s performance relative to the national average and highlighting the disparities in educational opportunities.

Comparing School Districts	Average Scores	Test Learning Rates	Trends in Test Scores
Toledo Public Schools	-1.73	-14.80%	-0.07
Anthony Wayne	2.06	9.60%	0.08
Perrysburg	1.9	14%	0.1
Sylvania	1.33	8.50%	0

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- Average Test Scores: Toledo's average test scores are 1.73 grade levels below the national average. Meanwhile, they are 0.19 lower than those of districts with similar socioeconomic statuses.
- Learning Rates: Students in Toledo learn 15% less per grade than the U.S. average and 8% less than students in districts with similar socioeconomic statuses.
- Trends in Test Scores: Test scores decreased by an average of 0.07 grade levels each year from 2009 to 2018. The decline in average scores in 0.06-grade levels is less than the decline observed in districts with similar socioeconomic statuses.

There is a strong correlation between racial segregation and school achievement gaps. A report by the Stanford Center for Education Policy Analysis describes how segregation impacts achievement gaps. The report identifies a significant factor driving these disparities: the difference in average school poverty rates between White and Black student’s schools. They identify this as racial economic segregation, which essentially exacerbates conditions by clustering minority students in high-poverty schools, which are generally less effective than their lower-poverty counterparts.⁷⁰

⁶⁸ Reardon, S. F., Fahle, E. M., Ho, A. D., Shear, B. R., Min, J., Kalogrides, D., & Kane, T. J. (2024). Stanford Education Data Archive (Version SEDA 2023). Retrieved from <https://purl.stanford.edu/xt779fj2637>.

⁶⁹ Educational Opportunity Project, Exploring Educational Opportunity in Lucas County, OH, Stanford University Education Data Archive, (2024), <https://edopportunity.org/explorer/#/split/none/counties/avg/ses/all/8/41.62/-83.77/39095,41.616,-83.768>

⁷⁰ See Stanford Education Data Archive (Version SEDA 2023).

2025 Analysis of Impediments, City of Toledo
Prepared by the Fair Housing Center

In Toledo, this phenomenon is evident. Data from the Ohio School Report Cards and the Educational Opportunity Project show that minority students predominantly attend schools with lower proficiency rates and higher poverty levels. For instance, the 2023 Ohio School Report Cards from Ohio's Department of Education sheds light on the performance disparities within Toledo Public Schools.⁷¹

Ohio School Report Cards	Overall Rating	Achievement	Progress	Gap Closing	Graduation	Early Literacy
Toledo Public Schools	2.5 Stars	2 Stars	4 Stars	3 Stars	1 Star	1 Star
Anthony Wayne Local District	4.5 Stars	5 Stars	3 Stars	5 Stars	5 Stars	4 Stars
Perrysburg	5 Stars	5 Stars	5 Stars	5 Stars	5 Stars	4 Stars
Sylvania	4.5 Stars	4 Stars	5 Stars	4 Stars	4 Stars	4 Stars

Furthermore, these three lowest-graded public districts account for half of all public-school students enrolled in the area and serve a large number of Black students.⁷²

% Enrolled	Toledo Schools	PublicAnthony Wayne Local	Perrysburg	Sylvania
American Indian or Alaskan Native	0.10%	0.30%	NC	0.20%
Asian or Pacific Islander	0.40%	2.00%	6.00%	3.00%
Black, non-Hispanic	46.50%	1.80%	2.30%	6.10%
Hispanic	14.20%	2.10%	8.50%	5.90%
Multiracial	11.70%	1.20%	4.70%	8.30%
White, non-Hispanic	27.10%	92.60%	78.40%	76.70%
Students with Disabilities	22.00%	11.90%	11.70%	13.60%

⁷¹ Ohio Department of Education. *Ohio School Report Cards*, Toledo City (2023), <https://education.ohio.gov/getattachment/Topics/Data/Report-Card-Resources/Traditional-Report-Card-User-Guide.pdf.aspx?lang=en-US>

⁷² Ohio Department of Education. *Ohio School Report Cards*, Toledo City (2023), <https://education.ohio.gov/getattachment/Topics/Data/Report-Card-Resources/Traditional-Report-Card-User-Guide.pdf.aspx?lang=en-US>

				%
				24.50%
Economic Disadvantage	86.70%	11.60%	9.30%	%
English Learner	1.60%	0.50%	1.00%	2.50%

Residential segregation compounds differences in family resources, isolating minority families in higher-poverty neighborhoods. This isolation means that, even among families with similar incomes, Black and Hispanic households tend to reside in poorer neighborhoods than their White counterparts. Living in economically disadvantaged neighborhoods means that Black and Hispanic students predominantly attend higher-poverty schools. These institutions often have less experienced, less skilled, and less qualified teachers compared to low-poverty and predominantly White schools.

Additionally, disparities in school funding, influenced by inequitable distribution of resources or insufficient compensatory school finance systems, mean minority-serving schools often receive fewer resources. For example, the Performance Index for Toledo Public Schools is only 54.1%, indicating that 45.6% of students score at the "Limited" level, with minimal representation in the "Advanced" and "Accomplished" categories. As the Center for Education Analysis puts it⁷³

"This implies that high-poverty schools provide, on average, less educational opportunity than low-poverty schools. Segregation matters, therefore, because it concentrates Black and Hispanic students in high-poverty schools, not because of the racial composition of their schools."

Historical housing practices like redlining are evident in today's educational disparities. Redlining refers to the systemic denial of mortgages, loans, and other financial services to specific neighborhoods based on race. Despite being outlawed in 1968 by the Fair Housing Act, the ramifications of redlining persist. Formally redlined areas exhibit higher rates of property vacancy, lower property values, and ongoing racial and economic segregation, negatively affecting school funding and resources.

Research highlights that income-based disparities are the greatest contributors to academic achievement gaps. High-income districts benefit from greater property wealth, leading to overspending in their schools, while low-income districts suffer from underfunding. This trend is intertwined with racial inequality, as Black middle-class neighborhoods are often geographically close to low-income neighborhoods, unlike their white counterparts.

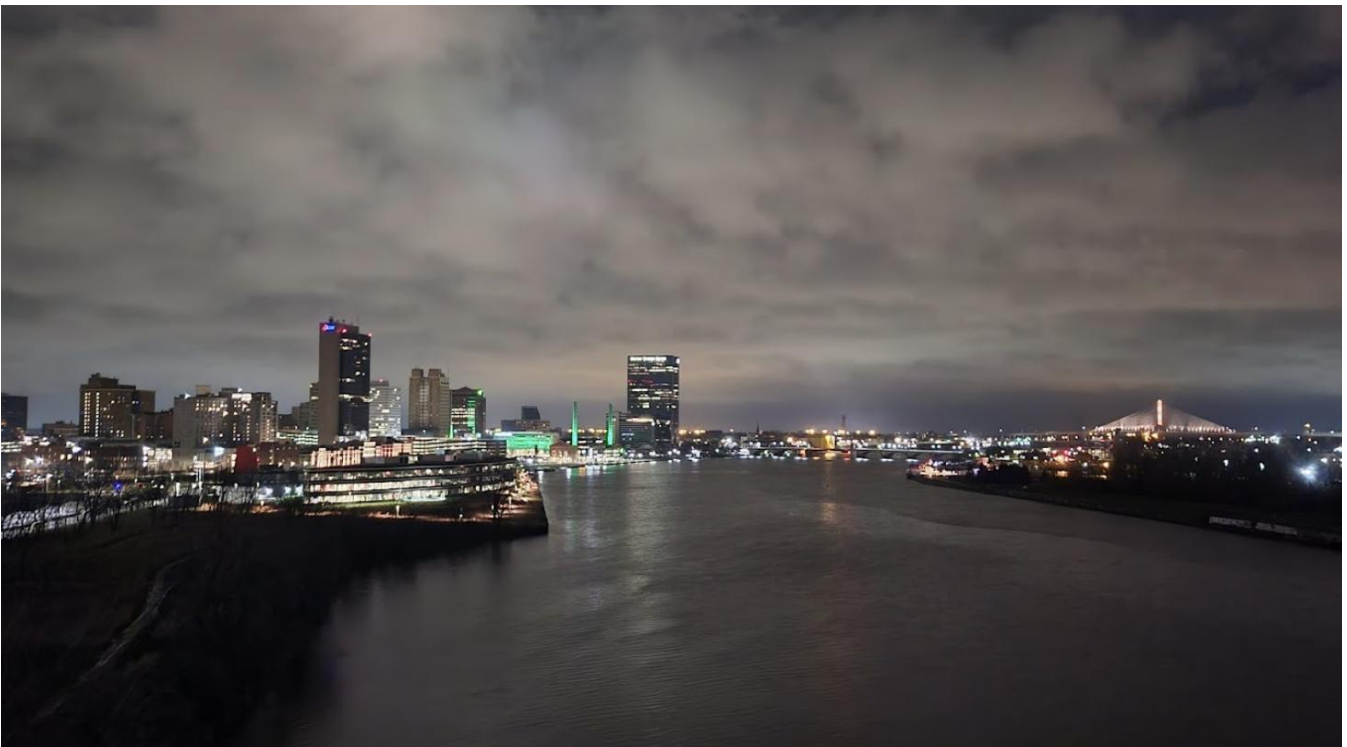
The convergence of these factors results in fewer educational opportunities for students in high-poverty, minority-concentrated schools. Research shows that schools with elevated levels of racial segregation, predominantly composed of minority students, often have lower academic attainment, particularly in reading, math, and science. This achievement gap is primarily due to income-based segregation, as minority students typically attend socioeconomically disadvantaged schools.

⁷³ Sarah Sedivy, Systematic Barriers to Success: The Impact of Redlining on Modern Educational Outcomes in Omaha Public Schools, University of Nebraska, (5-2023).

Following these historical and socioeconomic trends, desegregation efforts — though educationally beneficial — have waned since their peak in the late 1960s and 1970s after the *Brown v. Board of Education* decision. Despite evidence showing significant reductions in racial achievement gaps during the 1970s and 1980s, schools today remain highly segregated both by race and class. Current desegregation efforts lack broad and sustained national policy support and tend to be limited and decentralized. In major districts, particularly those serving substantial numbers of Black students, segregation has significantly increased.

The research conducted by sociologists Sean Reardon at Stanford University and Ann Owens at the University of Southern California analyzed historical and recent school segregation trends.⁷⁴ Their graph shows the average White-Black Segregation from 1991 to 2022. We observe that Black-White segregation grew by 25% between 1991 and 2019.⁷⁵ Furthermore, White-Black segregation in the largest 100 school districts increased by 64% from 1988 to 2019.

The current state of racial economic segregation means that high-poverty schools, attended predominantly by minority students, offer fewer educational opportunities than their low-poverty, predominantly White counterparts. Closing the racial achievement gap requires not only school integration but also the integration of neighborhoods. Therefore, efforts to improve educational equity in Toledo and similar cities must focus on creating vibrant, diverse, and integrated communities that support equal educational opportunities for all students.



⁷⁴ Jill Barshay, School Segregation 70 Years After Brown V. Board of Education, FutureED, (May 6th, 2024), <https://www.future-ed.org/school-segregation-70-years-after-brown-v-board-of-education/>

⁷⁵ Owens and Reardon, *Average White-Black Segregation, 1968-2022*, The State of Segregation: 70 Years after Brown, (2024).

Employment

Employment Status	Percent Labor Employed	Force	Percent Force Unemployed	Labor	Total Population Estimate	Percent Total Population
Population Age 16+	61.90%		3.30%		214,229	100%
Civilian Labor Force	56.80%		5.10%		132,711	61.80%
Armed Forces					257	0.10%
Not in Labor Force					81,677	38.10%

Toledo saw significant growth in its employment rates from 2017 to 2022.⁷⁷ Even though the city's civilian labor force (both employed and unemployed) decreased by 2.2 percent in the five-year time span, 5.4 percent more people were working in Toledo in 2022 than in 2017. By contrast, employment increased nationally but was helped by the fact that the total U.S. civilian labor force also changed between 2017 and 2022.

As stated above, wage inequality in Toledo continues, as women in 2022 earned approximately 85.16 cents to every dollar made by a man in the city.

Occupation Breakdown

Occupation Breakdown	Toledo	Lucas County	Ohio	U.S.
Management, business, science, and arts	28.50%	34.80%	40.90%	41.00%
Services	20.50%	17.70%	15.60%	16.80%
Sales and Office	21.10%	20.80%	19.40%	20.50%
Natural Resources, construction, and maintenance	7.10%	7.10%	7.50%	8.70%
Production, transportation, and material moving	22.80%	19.60%	16.70%	13.10%

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⁷⁶ U.S. Census Bureau, *Selected Economic Characteristics*, 2018-2022 American Community Survey 5-Year Estimates, (2022),

https://data.census.gov/table/ACSDP5Y2022.DP03?q=Employment%20rate&g=040XX00US39_060XX00US3909577000

⁷⁷ See 2015 A.I., pg. 43

⁷⁸ Data based on 2022 American Community Survey 5-Year Estimates Data Profile (Lucas County).

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Industry Breakdown

Industry	Toledo	Lucas County	Ohio	U.S.
Agriculture, forestry, fishing, hunting, and mining	0.50%	0.50%	0.90%	1.60%
Construction	4.60%	5.10%	5.90%	6.90%
Manufacturing	16.20%	16.00%	14.90%	10.00%
Wholesale Trade	2.80%	2.90%	2.20%	2.40%
Retail Trade	12.70%	11.80%	11.30%	11.00%
Transportation, warehousing, and utilities	6.40%	5.90%	6.00%	5.80%
Information	1.50%	1.50%	1.40%	1.90%
Finance and Insurance, Real Estate, Rental, and Leasing	3.60%	4.40%	6.40%	6.70%
Professional, Scientific, Management, Administrative, and Waste Management	8.40%	9.20%	10.20%	12.10%
Educational Services, Health Care, Social Assistance	23.90%	24.80%	24.20%	23.30%
Arts, Entertainment, Recreation, Accommodation, and Food Services	11.30%	10.00%	8.40%	9.00%
Other Services	4.90%	4.60%	4.40%	4.70%
Public Administration	3.20%	3.30%	3.90%	4.70%

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⁷⁹ Data Based on 2022 American Community Survey 5-Year Estimates Data Profile (Lucas County).
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Class of worker

Class of Worker	Toledo	Lucas County	Ohio	U.S.
Private Wage and Salary	85.30%	84.40%	82.40%	79.50%
Government	10.70%	11.20%	12.50%	14.30%
Self-Employed	3.90%	4.30%	4.90%	6.00%
Unpaid Family Workers	0.20%	0.10%	0.20%	0.20%

⁸⁰

Toledo's workforce makeup is reflective of its position in a midwestern state. Toledo's second-most occupied industry is manufacturing. The same is true for Lucas County and Ohio. This is not an unexpected result, as states in the US Midwest tend to provide many manufacturing jobs. In Toledo, companies like Jeep, Chrysler, and Libbey Glass contribute to manufacturing's large share of the Toledo workforce. The same was not true of the US, as most industry areas were a little more evenly spread than the city, county, or state. The most occupied jobs in Toledo, Lucas County, Ohio, and the US were: education, health care, and social assistance services. This finding is also unsurprising because the job need for these areas is not regionalized. Educators and healthcare workers are needed everywhere.

Estimates provided by the ACS for class of workers make it appear as though worker-type distribution is nearly the same across the US. However, a deeper look into these categories would likely reveal something different. For instance, private wage and salary workers comprise nearly 80 to 85 percent of the workforce in all jurisdictions. However, the breadth of the category encompasses entry-level minimum wage jobs, blue-collar median wage earners, and salaried white-collar earners of the top tax bracket. The types of workers that make up Toledo's nearly 85.3 percent in this category likely earn a lower average per year than the national average of the 79.5 percent that makes up the US in this category.⁸¹ Wages and earnings in Toledo will be further discussed in the Income & Poverty section of this report.

⁸⁰ Data Based on 2022 American Community Survey 5-Year Estimates Data Profile (Lucas County).

⁸¹ Data based on 2022 American Community Survey 5-Year Estimates Data Profile (Lucas County).

Transportation

Commuting Patterns

According to the American Community Survey five-year estimates for 2022, the following trends were observed among workers aged 16 and older in Lucas County.⁸²

Commuting to Work (Workers 16 years and older)

Car, Truck, Van (drove alone)	78.90%
Car, Truck, or Van (carpooled)	11.20%
Public Transportation (excluding taxicab)	1.60%
Walked	2.30%
Other Means	1.40%

The National Association for State Community Services Programs analyzed how access to transportation for low-income individuals and families has become limited.⁸³ The majority of low-income households reside in rural areas and central cities, while basic amenities are increasingly located in the suburbs. This geographic discrepancy poses a significant challenge for low-income households in Lucas County. Limited transportation options can exacerbate housing problems, such as:

- **Higher Transportation Costs:** Living in car-dependent neighborhoods can lead to higher transportation costs. Households in these areas may spend up to 25 percent of their income on transportation, compared to just 9 percent in more walkable neighborhoods with better transit options. (U.S. Department of Housing and Urban Development)
- **Reduced Access to Employment and Services:** Newly emerging jobs are often located further away from central cities, making it difficult for low-income workers to access jobs, training, and services such as childcare. Moreover, many minimum wage jobs require working evening or weekend hours, but traditional transportation systems often do not operate during these times. (National Association for State Community Services Programs)

⁸² U.S. Census Bureau, *Selected Economic Characteristics*, 2018-2022 American Community Survey 5-Year Estimates, (2022), <https://data.census.gov/table/ACSDP5Y2022.DP03?q=Employment%20rate%20&g=160XX00US3977000>

⁸³ Madelaine Criden, *The Stranded Poor: Recognizing the Importance of Public Transportation for Low-Income Households*, National Association for State Community Services Programs, (2008), <https://nascsp.org/wp-content/uploads/2018/02/issuebrief-benefitsofruralpublictransportation.pdf>

- **Economic Inequality:** Public transportation can reduce social and economic inequalities by enhancing mobility for residents, many of whom lack cars and need assistance finding jobs outside their primary residential area. Such jobs serve as an important source of income for those with limited employment opportunities. Public transportation lowers household expenses by freeing up income for other uses. (National Association for State Community Services Programs)

According to HUD, transportation is the second-largest annual expenditure for most households after housing. In many small and mid-sized cities, limited transportation options can mean reduced access to jobs, public spaces, and essential goods and services.⁸⁴ These constraints isolate communities economically and socially, hindering efforts to improve living standards and economic mobility.



⁸⁴ HUD, *Connected Communities: Linking Affordable Housing and Transportation*, Office of Policy Development and Research (2014), https://www.huduser.gov/portal/pdredge/pdr_edge_research_071414.html

Housing Profile

The Toledo Housing Stock and Owner-Occupancy

In 2022, there were 132,054 total housing units standing in Toledo. Occupied units accounted for 88.9 percent of the total housing stock, while the remaining 11.1 percent were vacant. Of the occupied units in Toledo, 52.5 percent were owner-occupied, and the remaining 47.5 percent were renter-occupied.⁸⁵

In 2023, the Toledo area saw yet another decrease in owner-occupied housing, with estimates that 52.1% of housing is owner-occupied. This is part of an overall long-term trend of an increase in renters and a decrease in owner occupancy. This was noted in the City of Toledo's prior study to create a larger strategy for housing in the Toledo area, available here: http://toledofhc.org/wp-content/uploads/2025/03/CityOfTol_Housing_FINAL_PGS_ScreenQuality_small_Appendices-1.pdf.

This overall trend of decreasing homeownership rates is a significant development for the Toledo area overall, as it has now reached a point where half of the population are tenants, and many of the owners of the rental homes where tenants live are located outside of Toledo.

At the time of the writing of the 2015 AI, the Lucas County Land Bank was using Attorney General settlement funds to take on and demolish vacant properties.⁸⁶ By the latter half of 2019, however, those funds had mostly dried up, and the Land Bank had acquired a waiting list, which it estimated would take three to four years to whittle down enough to allow for new acquisitions. This will likely be the case until the Land Bank can acquire a new source of funding to resume its activities. For now, however, this means that many vacant properties will continue to stand and deteriorate.

Home Values

The Toledo median home value in 2022 was \$98,800. Toledo's housing stock continues to list at affordable prices, especially when contrasted with the 2022 national median home value of \$281,900. Toledo is frequently considered one of the most affordable cities of its size in the US, and owner-occupied housing prices largely contribute to its reputation. Rent in Toledo is also considered to be at the lower end, with median rent coming in at \$854 per month, contrasted with the national median rent rate of \$1,268 per month.⁸⁷

Financial Burden

Financial experts consider housing costs to be a burden when they exceed 30 percent of the occupant's monthly income. This includes all expenses associated with housing, such as rent, mortgage payments, utilities, and property taxes. The table below shows the monthly owner costs as a percentage of household income for Toledo and at the national level.

⁸⁵ U.S. Census Bureau, *Selected Housing Characteristics*, 2018-2022 American Community Survey 5-Year Estimates, (2022), <https://data.census.gov/table/ACSDP5Y2022.DP04?q=Home%20values,%20Toledo%20Ohio&g=010XX00US>

⁸⁶ See 2015 A.I., pg. 48

⁸⁷ Data based on 2022 American Community Survey 5-Year Estimates Data Profile (Lucas County).

Housing Units with mortgage ⁸⁸	Toledo, OH United States	
Less than 20.0 percent	52.40%	47.30%
20.0 to 24.9 percent	13.60%	15.30%
25.0 to 29.9 percent	8.20%	10.10%
30.0 to 34.9 percent	6.90%	6.70%
35.0 percent or more	18.80%	20.60%
Housing Units without a mortgage ⁸⁹	Toledo, OH United States	
Less than 10.0 percent	41.90%	46.00%
10.0 to 14.9 percent	20.90%	19.20%
15.0 to 19.9 percent	11.20%	10.70%
20.0 to 24.9 percent	7.80%	6.50%
25.0 to 29.9 percent	4.30%	4.10%
30.0 to 34.9 percent	2.00%	2.80%
35.0 percent or more	12.00%	10.80%

In Toledo, 56.1 percent of all currently occupied, owner-occupied units had a mortgage. The median household income for these units was \$60,783. The median cost per month of an owner-occupied property was \$805 without a mortgage payment and \$1,126 with a mortgage payment. In homes with a mortgage, 74.2 percent of owners were paying below 30 percent of their monthly income towards their housing, meaning that they were not considered to be financially burdened by their housing costs. The same was true for 76.9 percent of owners without a mortgage. The median home value for owner-occupied units in Toledo was \$98,800.⁹⁰

In rental housing, 47.6 percent of Toledo renters were paying 30 percent and less of their monthly income towards housing, while 52.4 percent were paying rates that were considered a financial burden. The median household income for renter-occupied units was \$31,958, with the median rent being \$854 per month. Nationally, the numbers were similar, with 49.4 percent of renters

⁸⁸ U.S. Census Bureau, *Financial Characteristics for Housing Units With a Mortgage*, 2018-2022 American Community Survey 5-Year Estimates, (2022), <https://data.census.gov/table/ACSST5Y2022.S2506?q=Home%20values,%20Toledo%20Ohio&g=010XX00US>

⁸⁹ U.S. Census Bureau, *Financial Characteristics for Housing Units Without a Mortgage*, 2018-2022 American Community Survey 5-Year Estimates, (2022), <https://data.census.gov/table/ACSST5Y2022.S2507?q=Home%20values,%20Toledo%20Ohio&g=010XX00US>

⁹⁰ Data based on 2022 American Community Survey 5-Year Estimates Data Profile (Lucas County).

being financially unburdened and 50.6 percent being burdened.⁹¹

Though housing in Toledo is significantly cheaper than the national mean, it is likely that the number of people still burdened by housing costs at city and national levels are nearly equal because of the difference in wages. As will be discussed in the Poverty and Income section of this analysis, Toledo's median annual household income is far below the national median. Toledo workers do not earn income at the same level and rate as workers across the country. Therefore, housing must be cheaper for anyone to afford it. Still, there is a sizable portion of residents in Toledo (over half of all renters, for instance) who are burdened by housing costs.

Age of properties

Toledo has a much older housing stock than what is available nationally. According to ACS 2022 estimates, while only 36.7 percent of the US housing stock was built in 1979 or earlier, the same is true for a significant 84 percent of all of Toledo's housing stock. Further, homes built in 1979 or earlier present a significant risk of lead and asbestos hazards. In Toledo, 84 percent of all housing units were built in 1979 or earlier. The same is true for only 55 percent of the nation's housing stock. The table below shows the percentage of housing units from the years they were built.⁹²

Age of properties	Toledo, OH	United States
Built 1939 or earlier	32.10%	12.00%
Built 1940 to 1949	9.70%	4.60%
Built 1950 to 1959	17.90%	9.90%
Built 1960 to 1969	11.40%	10.20%
Built 1970 to 1979	12.90%	14.60%
Built 1980 to 1989	6.00%	13.20%
Built 1990 to 1999	5.10%	13.20%
Built 2000 to 2009	2.90%	13.50%
Built 2010 to 2019	1.90%	8.20%
Built 2020 or later	0.10%	0.60%

Older homes may present a variety of challenges, including the aforementioned risk of lead and asbestos hazards. Older homes often need more substantial and frequent repairs, which might place a financial burden on homeowners. Additionally, most older homes are not accessible,

⁹¹ Data based on 2022 American Community Survey 5-Year Estimates Data Profile (Lucas County).

⁹² Data based on 2022 American Community Survey 5-Year Estimates Data Profile (Lucas County).

which carries implications for persons with disabilities as well as senior citizens who wish to age in place.

Housing Conditions

Substandard housing conditions have been overwhelmingly noted in community focus groups as a primary barrier to accessing adequate housing. These conditions have resulted from poorly maintained rental properties and chronic disinvestment in the urban core, contributing to neighborhood disinvestment and limiting the availability of quality housing options that are safe, healthy, and habitable. Further, poorly maintained homes negatively impact the surrounding neighborhood by reducing property values, contributing to crime, creating health and safety hazards, and diminishing neighborhood pride.

While housing conditions have an impact on the entire community, some people are disproportionately affected. People with a criminal history, eviction record, or other impediments that make it difficult to qualify for housing are often forced to live in places that are not safe, healthy, or habitable. They are reluctant to complain about poor housing conditions or make maintenance requests because they fear landlord retaliation (eviction) or do not believe they will be able to find other housing.

The United States has the world's largest incarcerated population, with nearly 1.5 million people in prison and as many as one in three Americans having a criminal record. Disproportionately, Black and Latino people, people with disabilities, and members of the LGBTQ community are overrepresented in the criminal justice system.

Formerly incarcerated individuals typically return to low-income communities where affordable and accessible housing is scarce. There is a national shortage of seven million rental units that are affordable and available to extremely low-income households.⁹³ Having a criminal record creates an additional barrier to accessing this limited housing, placing these individuals at greater risk of housing instability, homelessness, and, ultimately, recidivism. Research has shown that returning inmates without stable housing are twice as likely to re-offend compared to those with stable housing.

The lack of affordable housing is a significant cause of homelessness nationwide. Ohio, in particular, has seen record levels of evictions as housing costs become increasingly unaffordable, especially for those with the lowest income. Evictions are both a result of and a cause of deeper poverty, leading to increasing homelessness, particularly among families with children.⁹⁴ Many families in Ohio are cost-burdened, risking eviction because they live paycheck-to-paycheck on wages that barely cover necessities.

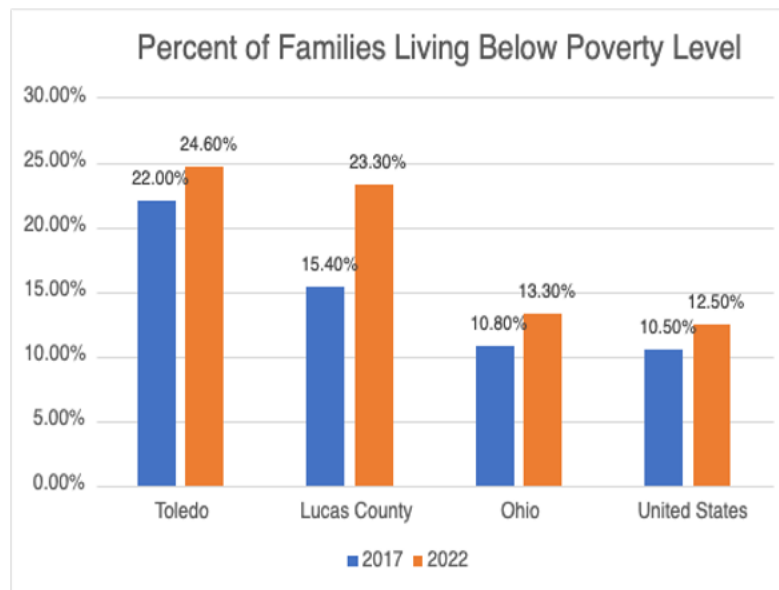
⁹³ Kimberly Johnson, *Housing Access for People with Criminal Records*, NLIHC, (2020), https://nlihc.org/sites/default/files/AG-2020/6-07_Housing-Access-for-People-with-Criminal-Records.pdf

⁹⁴ Leading Families Home, *How Evictions Lead to Homelessness in Ohio*, (Jul 13, 2020), <https://www.lfhtoledo.org/how-evictions-lead-to-homelessness-in-ohio>

Income & Poverty

ACS estimates from 2017 and 2022 show significant changes in income and poverty levels in Toledo. In 2017, Toledo's mean household income was \$48,634 per year.⁹⁵ By 2022, this had increased to \$58,034. The mean non-family income in 2017 for Toledo was \$34,499, which grew to \$42,106 by 2022. The mean family household income grew 18.8 percent in the time span, and the mean non-family income grew 21.0 percent in the same time span. Despite this growth, Toledo's mean household income remains below the national average, which was \$105,833.⁹⁶

Even with the increase in income, the poverty levels in Toledo have worsened. In 2017, the poverty rate in Lucas County was 15.4%.⁹⁷ By 2022, the poverty rate had risen to 23.3%. Similarly, Toledo saw an increase in the poverty rate, from 22.0% in 2017 to 24.6% in 2022. The state of Ohio also experienced an increase in poverty, with the rate rising from 10.8% in 2017 to 13.3% in 2022. Nationwide, the poverty rate went up from 10.5% in 2017 to 12.5% in 2022.⁹⁸



This data indicates that while income increases have occurred, especially at the household level, they have not been sufficient to reduce poverty rates. Toledo's significantly higher poverty rate likely means that wages and salaries are not sufficient to afford a comfortable lifestyle, even when given cheaper living expenses than state and national averages. This suggests that economic gains may not be evenly distributed, and a significant portion of the population continues to struggle economically.

⁹⁵ See 2015 A.I., pg.51

⁹⁶ Data based on 2022 American Community Survey 5-Year Estimates Data Profile (Lucas County).

⁹⁷ See 2015 A.I., pg. 51.

⁹⁸ Data based on 2022 American Community Survey 5-Year Estimates Data Profile (Lucas County).

Income Distribution



Of the four populations represented on the graph above, Toledo has the highest percentages on the low-income end of the scale and the lowest percentages on the high-income end of the four listed jurisdiction types.⁹⁹ In particular, 9.6% of Toledo's population earns less than \$10,000, compared to 5.2% in Ohio and 4.9% in the United States. Similarly, 8.3% of Toledo's population earns between \$10,000 and \$14,999, which is higher than the percentages for Lucas County, Ohio, and the United States.

As income levels rise, Toledo's percentages drop noticeably. For example, only 1.6% of Toledo's population earns \$200,000 or more, in contrast to 5.7% in Lucas County, 7.6% in Ohio, and 11.4% nationally. These figures suggest that Toledo experiences higher rates of poverty and lower rates of wealth than the county, state, and national averages.

Income Type	United States	Ohio	Toledo	Lucas County
With earnings	77.6	75.6	72.9	74.6
Mean earnings (dollars)	107,743	93,282	60,110	83,600
With Social Security	31.2	31.9	29.9	31.1
Mean Social Security income (dollars)	22,683	21,672	18,848	21,026

⁹⁹ U.S. Census Bureau, *Mean Income in the Past 12 Months (in 2022 Inflation-Adjusted Dollars)*, 2018-2022 American Community Survey 5-Year Estimates, (2022)
https://data.census.gov/table/ACSST5Y2022.S1902?q=Income%20distribution&g=040XX00US39_060XX00US3909577000
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With retirement income	23.1	25.4	20.8	23.9
Mean retirement income (dollars)	32,050	29,646	23,936	28,564
With Supplemental Security Income	5.1	5.7	8.5	6.6
Mean Supplemental Security Income (dollars)	11,137	11,244	11,195	11,103
With cash public assistance income	2.7	2.6	3.6	2.9
Mean cash public assistance income (dollars)	4,243	3,907	4,174	4,156
With Food Stamp/SNAP benefits in the past 12 months	11.5	12.2	22.4	16.5

The income type data reveals that Toledo lags behind Lucas County, Ohio, and the United States in several economic metrics. Toledo has the lowest percentage of households with earnings of 72.9% and the lowest mean earnings of \$60,110.¹⁰⁰ Furthermore, a higher percentage of Toledo's households rely on public assistance programs, with 8.5% receiving supplemental security and 22.4% relying on food stamps/SNAP. These figures highlight the economic challenges faced by many residents in Toledo, indicating a heavier reliance on support systems compared to Lucas County, Ohio, and the national averages.



¹⁰⁰ Data based on 2022 American Community Survey 5-Year Estimates Data Profile (Lucas County).
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Part 2: Status of Impediments in the Previous Analysis

Based on the 2020 Analysis of Impediments, TFHC and representatives from the City of Toledo identified the following areas that required particular attention and action to remedy barriers to Fair Housing. Below is a list of each identified barrier, the proposed action to remove the barrier, and a brief explanation of the status of work to remove the barrier.

Fair Housing Issue: Criminal History Screening
Prior Goal: Ban the box policy.

Measurable Objectives	City Department Responsible	Other Institutions	TFHC's role	Deadline
Complete initial meeting	City staff should consult with the City Council and then schedule an initial meeting to evaluate	RCNO	TFHC will attend initial meeting	First half of FY 2020
Develop schedule for next steps in evaluation	Leadership, meetingspace, encouragement	RCNO, other groups as determined	TFHC will provide technical assistance and support	Second half of FY 2020
Draft legislation	City's law department will assist		TFHC may provide review and technical assistance	Second half of FY 2020
Introduce legislation to City Council	City Council and Mayor's office seeks introduction			First quarter of 2021
Complete hearings and final council vote on the issue	City Council	RCNO and other groups to provide public support	TFHC may provide support and technical assistance	First quarter of 2022

Status: A ban the box policy was never introduced before City Council.

Fair Housing Issue: Criminal History Screening

Prior Goal: Set-aside affordable housing opportunities.

Measurable objectives	City Department Responsible	Other Institutions	TFHC's role	Deadline
Complete initial meeting	City staff to schedule meeting and review potential for unit set asides with LMHA	Lucas Metropolitan Housing Authority (LMHA)	TFHC will attend initial meeting	First half of FY 2020
Develop schedule for next steps in evaluation	City staff to provide assistance and followthrough to ensure progress	LMHA	TFHC may provide assistance in determining next steps	Second half of FY 2020
Determine number of hard units and vouchers to be set aside	In consultation with LMHA, determine a projection for potential set aside of units and vouchers	LMHA		Second half of FY 2020
Set target time for roll out of set aside	City staff to track	LMHA	TFHC may also monitor	First quarter of 2021

Status: Vouchers were set aside by LMHA for the reentry population, though this project has had limited success and more support and resources could help this effort.

Fair Housing Issue: Criminal History Screening

Prior Goal: Private housing provider compliance

Measurable objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Develop and review plans for outreach	Provide support to TFHC	LMHA	With available resources, will perform outreach	Second half of FY 2020
Develop and implement plans for enforcement	Provide support to TFHC		With available resources, enforce Fair Housing laws	Second half of FY 2020

Status: Significant improvements in private housing provider compliance occurred in this period. The Fair Housing Center was successful in a number of cases, including a case publicized in the local media. At the same time, HUD provided more guidance on these issues which was immensely helpful in private housing provider compliance.

Fair Housing Issue: Homeownership: Lending and Insurance

Prior Goal: Encourage private lenders to provide credit opportunities in minority and low-income neighborhoods

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Develop and review plans for outreach	Provide support to TFHC		With available resources, will perform outreach	Second half of FY 2020
Develop and implement plans for enforcement	Provide support to TFHC		With available resources, enforce Fair Housing laws	Second half of FY 2020

Status: TFHC was successful in providing local resources to the community, including a training on Community Reinvestment Act compliance. However, the area has not seen an increase in credit opportunities for minority and low-income neighborhoods. This work should be a priority in this compliance period.

Fair Housing Issue: Homeownership: Lending and Insurance
Prior Goal: Address insurance discrimination issues

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Develop and review plans for outreach	Provide support to TFHC		With available resources, will perform outreach	Second half of FY 2020
Develop and implement plans for enforcement	Provide support to TFHC		With available resources, enforce Fair Housing laws	Second half of FY 2020

Status: The Fair Housing Center was successful in litigating a public records request to force the Ohio Fair Plan to provide its data showing access to insurance in Ohio. The case was litigated before the Ohio Supreme Court. However, due to limitations in time and resources, The Center has not been able to undertake an in-depth analysis of the data, nor has it had the opportunity to request more information from the Ohio Fair Plan. Aside from this project, The Center has handled some insurance discrimination cases.

Fair Housing Issue: Homeownership: Lending and Insurance

Prior Goal: Coordinate with local banks to create a loan product to address credit needs in minority neighborhoods

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Complete initial meeting	City staff should consult with TFHC to identify appropriate next steps for outreach and models from other cities		TFHC will attend meeting	Second half of FY 2020
Develop schedule for next steps in evaluation	Research models from other cities for coordination to encourage improved loan products		TFHC may assist with technical support as needed	Second half of FY 2020
Convene meetings with banks as appropriate	Discuss potential product collaborations with banks		TFHC can be available if needed	First half of 2021
Set time frame for roll out of new loan products	Consults with banks to determine timeframe		TFHC reviews, discusses with city	First half of 2021

Status: This goal was not met in the compliance period. A number of banks do have attractive loan products for needs in minority neighborhoods, but the true needs of the areas have not been met yet.

Fair Housing Issue: Accessibility for persons with disabilities

Prior Goal: Enforce current visitability and accessibility rules

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Collect information on current enforcement efforts	City staff may help provide information on current enforcement of accessibility rules		TFHC will help collect information	Second half of FY 2020
Develop and review plans for outreach	Provide support to TFHC		With available resources, will perform outreach	Second half of FY 2020
Develop and implement plans for enforcement	Provide support to TFHC		With available resources, enforce Fair Housing laws	Second half of FY 2020

Status: This local law is working, as necessary. However, it is important to note that very few single family houses are built and/or under construction in the Toledo municipality. If this changes, further monitoring of this law should occur.

Fair Housing Issue: Accessibility for persons with disabilities

Prior Goal: Encourage developers to increase accessibility

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Review current advocacy efforts	Consult with Ability Center	Ability Center	TFHC may engage in discussion as well	First half of FY 2020
Develop schedule for next steps in evaluation	Consult with Ability Center in this schedule	Ability Center		Second half of FY 2020
Draft legislation or other policy	Completed in consultation with Ability Center	Ability Center		Second half of FY 2020
Set timeframe for implementation of legislation or policy	Completed in consultation with Ability Center	Ability Center		First quarter of 2021

Status: The Ability Center created a project called the Universal Design Coalition, to encourage private housing providers to engage with visitability laws. This project is ongoing.

Fair Housing Issue: Source of income discrimination and voucher mobility

Prior Goal: Enact local source of income discrimination protections

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Review status of local ordinance with Council	City to conduct this review		TFHC will attend initial meetings as needed	First half of FY 2020
Determine barriers to implementation of legislation	City to complete this review with Council	Possibly LMHA	TFHC can assist in discussions	Second half of FY 2020
Develop plan to address barriers if needed with clear timeframe for progress	City in consultation with others	LMHA	TFHC to assist	Second half of FY 2020
Complete vote to approve legislation	City Council			First quarter of 2021
Complete hearings and final council vote on the issue	City Council		TFHC to provide support	First quarter of 2022

Status: Accomplished. The next step is for the City to ensure enforcement of the law.

Prior Goal: Enforce Fair Housing protections

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
TFHC to enforce Fair Housing Act	City to provide assistance and resources as appropriate to support enforcement work		TFHC will implement its enforcement work through direct client representation and in other matters	Ongoing

Status: The Center has continued to receive funding from the City of Toledo and HUD to enforce fair housing laws.

Fair Housing Issue: Increase awareness of fair housing rights and responsibilities

Prior Goal: Engage in education and outreach activities

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Conduct fair housing trainings and presentations	Department of Neighborhoods will distribute information to CDBG partners as appropriate	Northwest Ohio REALTORS® (NOR), Property Investors Network (PIN), Real Estate Investors Association (REIA)	TFHC will coordinate and manage	Ongoing, reported quarterly
Distribute fair housing educational materials	Department of Neighborhoods will distribute information to CDBG partners as appropriate	Northwest Ohio REALTORS® (NOR), Property Investors Network (PIN), Real Estate Investors Association (REIA)	TFHC will coordinate and manage	Ongoing, reported quarterly
Place advertisements and seek media coverage of fair housing issues		Local media outlets, including print, television, radio, and digital	TFHC will coordinate and manage	Ongoing, reported quarterly
Participate in outreach events			TFHC will coordinate and manage	Ongoing, reported quarterly
Post fair housing information on website and social media	Mayor's office will share content as appropriate		TFHC will coordinate and manage	Ongoing, reported quarterly

Status: The Center has continued to receive funding from the City of Toledo and HUD to provide education and outreach for fair housing laws.

Fair Housing Issue: Voucher Mobility

Prior Goal: LMHA should adopt the Poverty Race ResearchAction Council's recommendations to increase voucher mobility

Measurable objectives	City Department Responsible	Other Institutions	TFHC's role	Deadline
Landlord development	Department of Neighborhoods will distribute information to CDBG partners as appropriate	LMHA, Northwest Ohio REALTORS® (NOR), Property Investors Network (PIN), Real Estate Investors Association (REIA)	Advocacy for policies that support the HCV program, provide education to housing providers	Ongoing, reported quarterly
Target population outreach	Department of Neighborhoods will distribute information to CDBG partners as appropriate	LMHA	Advocacy for policies that support the HCV program, provide education to housing providers	Ongoing, reported quarterly
Pre-search counseling	Department of Neighborhoods will distribute information to CDBG partners as appropriate	LMHA	Connect clients to resources through the Landlord Tenant Mediation Program	Ongoing, reported quarterly
Housing search assistance	Department of Neighborhoods will distribute information to CDBG partners as appropriate	LMHA	Connect clients to resources through the Landlord Tenant Mediation Program	Ongoing, reported quarterly
Post-move support	Department of Neighborhoods will distribute information to CDBG partners as appropriate	LMHA	Connect clients to resources through the Landlord Tenant Mediation Program	Ongoing, reported quarterly
Explore Small Area Fair Market Rents (SAFMRs)	Department of Neighborhoods will distribute information to CDBG partners as appropriate	LMHA	Advocacy for policies that support the HCV program	Ongoing, reported quarterly

Status: LMHA has undertaken a number of the suggested actions but more work remains.

Fair Housing Issue: Land Use and Zoning

Prior Goal: Change policies to welcome the development of affordable, group, permanent supportive, and recovery housing

Measurable objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Review current policies and recommend changes	Plan Commission	Mental Health and Recovery Services Board (MHRSB)	Provide input on policy revisions	First half of FY 2020
Present proposed changes for approval	Plan Commission, City Council	MHRSB	Advocate for policy changes during public hearings	Second half of FY 2020
Consider neighborhood input on proposed projects that negatively impact historically disinvested areas	Plan Commission, City Council	MHRSB	Advocate for policy changes during public hearings	Ongoing, reported quarterly
Grant reasonable accommodations when applicable	Plan Commission, City Council	MHRSB	Advocacy and support for persons requesting accommodations	Ongoing, reported quarterly
Educate the public about the City's reasonable accommodation policy	Plan Commission, Department of Neighborhoods	Ability Center	Educate tenants and landlords	Ongoing, reported quarterly

Status: The Fair Housing Center and other organizations proposed a change to local laws. The City has not adopted this change yet after neighborhood groups expressed opposition, due to "NIMBY" opposition from some neighborhood groups.

Fair Housing Issue: LGBTQIA+

Prior Goal: Adopt changes to policies and practices to ensure adequate protections for LGBTQIA+ individuals

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Establish an effective enforcement process to address complaints	City Council	Equality Toledo	Provide input on policy changes	Second half of FY 2020
Present proposed changes for approval	City Council	Equality Toledo	Advocate for policy changes during public hearings	Second half of FY 2020
Utilize enforcement process to address complaints	City administration	Equality Toledo	Advocacy and support for victims of discrimination	Ongoing, reported quarterly

Status: The City has adopted local laws to prohibit discrimination based on sexual orientation. The U.S. Supreme Court has also more recently recognized sex discrimination to include sexual orientation and gender identity. However, the City has not worked to ensure enforcement of the local law, which could become an issue, especially now that the current federal administration has expressed opposition to such efforts.

Fair Housing Issue: Homelessness and Affordable Housing

Prior Goal: Coordinate with private and government partnersto create affordable housing and advance No Barriers Housing

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Identify incentives to encourage affordable housing development	City administration, Department of Neighborhoods	LISC, LMHA	Advocacy for projects that support local housing needs	Ongoing, reported quarterly
Direct discretionary funds toward affordable housing	Department of Neighborhoods, City Council		Advocacy for projects that support local housing needs	Ongoing, reported quarterly
Provide administrative support for the "No Barriers Housing" initiative	Department of Neighborhoods, City administration	Toledo Lucas County Homelessness Board (TLCHB), MHR SB, LMHA, Lucas County Commissioners	Participate in committee meetings	Ongoing, reported quarterly
Provide financial support for the "No Barriers Housing" initiative	Department of Neighborhoods, City Council	TLCHB, MHR SB, LMHA, Lucas County Commissioners	Advocacy for funding that supports local housing needs	Ongoing, reported quarterly

Status: The City undertook a number of new affordable housing developments with more opening soon.

Fair Housing Issue: Housing Conditions

Prior Goal: Change policies and practices to ensure access to housing that is safe, healthy, and habitable

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Enforce housing code violations	Department of Neighborhoods	Housing Court	Connect clients to resources through the Landlord Tenant Mediation Program	Ongoing, reported quarterly
Secure staff and resources needed to implement the lead ordinance	City administration, Department of Neighborhoods	TLPPC, Health Department	Advocacy for effective implementation	First half of FY 2020
Effective enforcement of the lead ordinance	City administration, Department of Neighborhoods	TLPPC, Health Department	Education and outreach to tenants and housing providers	Ongoing, reported quarterly
Eliminate barriers to accessing grant funding for home rehab/repairs	Department of Neighborhoods		Advocacy for policy changes that improve access to housing assistance	Ongoing, reported quarterly

Status: The City enacted a lead poisoning prevention law and is working to enforce it, now after a number of lawsuits aimed at postponing the law have failed.

Fair Housing Issue: Public Transportation

Prior Goal: Lead efforts to adopt and expand the county-wide transportation system

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Outreach to suburban jurisdictions to encourage participation	City Council, City administration	Toledo Area Regional Transit Authority (TARTA), Lucas County Commissioners, Chamber of Commerce, CATR, Ability Center	Advocacy for expansion of transportation	Ongoing, reported quarterly
Support sales tax ballot initiative to increase funding and expand TARTA services	City Council, City administration	TARTA, Lucas County Commissioners, Chamber of Commerce, CATR, Ability Center	Advocacy for expansion of transportation	Ongoing, reported quarterly
Offer alternative transportation options	City administration	TARTA, Lucas County Commissioners, Chamber of Commerce, CATR, Ability Center	Advocacy for expansion of transportation	Ongoing, reported quarterly

Status: This effort was successful in transitioning to a county-wide transportation system. Now, the City should use its influence to ensure TARTA studies equitable access to public transit and the need for county-wide paratransit.

Fair Housing Issue: Impediments in Rental Housing

Prior Goal: Address the eviction crisis in Toledo

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Educate tenants and housing providers about rights and responsibilities	Department of Neighborhoods will distribute information to CDBG partners as appropriate	LAWO	Assist clients through the Landlord Tenant Mediation Program	Ongoing, reported quarterly
Provide emergency housing and financial assistance for those displaced due to eviction	City Council, Department of Neighborhoods	2-1-1, Pathway, Catholic Charities, Salvation Army, TLCHB, LMHA	Connect clients to community resources	Ongoing, reported quarterly
Increase legal representation for tenants in Housing Court		Legal Aid of Western Ohio (LAWO)	Assist clients through the Landlord Tenant Mediation Program	Ongoing, reported quarterly
Stricter enforcement of housing code violations	Department of Neighborhoods	Housing Court	Assist clients through the Landlord Tenant Mediation Program	Ongoing, reported quarterly

Status: The City undertook a number of efforts to reduce evictions, especially during the pandemic. Now that funding for rental assistance has dissipated, the City should reengage efforts to identify strategies to reduce the eviction rate.

Fair Housing Issue: Impediments in Rental Housing

Prior Goal: Ensure access to reasonable accommodations and modifications to improve housing accessibility

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Educate tenants and housing providers about rights and responsibilities	Department of Neighborhoods will distribute information to CDBG partners as appropriate	Ability Center	Conduct trainings, distribute educational materials, place advertisements	Ongoing, reported quarterly
Enforce Fair Housing Act violations		Ability Center	Assist victims, conduct investigations, file complaints	Ongoing, reported quarterly
Provide funding for accessibility modifications	Department of Neighborhoods	Ability Center	Advocacy for funding that supports housing needs	Ongoing, reported quarterly

Status: The Center has been highly successful in a number of reasonable accommodation cases. The local market has often adapted to agree to grant accommodation requests where reasonable.

Fair Housing Issue: Access to Water Services

Prior Goal: Adopt policy and practice improvements through Water Affordability and Consumer Protection Committee

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Review and revise consumer policies and programs as needed	Department of Public Utilities, City administration, City Council	United Pastors for Social Empowerment (UPSE), Junction Coalition, Freshwater Future, Ohio Environmental Council	Participate in committee meetings and offer input	Ongoing, reported quarterly
Collect and analyze data related to water access and affordability	Department of Public Utilities, City administration, City Council	UPSE, Junction Coalition, Freshwater Future, Ohio Environmental Council	Participate in committee meetings and offer input	Ongoing, reported quarterly
Educate consumers about assistance programs	Department of Public Utilities, City administration, City Council	UPSE, Junction Coalition, Freshwater Future, Ohio Environmental Council	Connect clients to community resources	Ongoing, reported quarterly
Outreach to residents and neighborhood groups to seek input on water access and affordability	Department of Public Utilities, City administration, City Council	UPSE, Junction Coalition, Freshwater Future, Ohio Environmental Council	Advocacy for policies that support housing needs	Ongoing, reported quarterly

Status: The City adopted several important improvements to access to water services. These included improvements to access to water services for tenants and options to avoid a termination. However, the City has not enforced rules regarding the resale of water services, and should ensure these provisions are enforced.

Part 3: Identified Impediments

Citizen Participation

To inform the process of identifying impediments to Fair Housing, The Fair Housing Center conducted a citizen participation process. This process is in addition to the formal public comment period that will follow promulgation of this Analysis of Impediments by the City of Toledo in compliance with HUD's guidelines.³⁵

TFHC created and distributed an online community survey. The survey was sent by email to TFHC's distribution list, posted on social media outlets, and shared with the City of Toledo and several community groups.

TFHC created and distributed an online survey via Fillout, and collected community responses from August 19, 2024, through October 24, 2024. The survey was sent via email through TFHC's distribution list, posted on TFHC's social media channels and website, and shared from local news organizations, gaining approximately 201,000 impressions. In total TFHC collected eighty-five complete responses and 88 partial responses. Out of the eighty-five completed responses, we received 74 responses from individuals, and 11 responses on behalf of organizations in Greater Toledo.

TFHC also conducted three focus groups open to the community. The first was held at the Mott Branch Library, the second at the LaGrange Branch Library, and the third at the Birmingham Branch Library. The focus groups were advertised via TFHC's social media channels, TFHC's email distribution list, and a press release sent out to the media, gaining approximately 500,000 impressions.

TFHC had a total of 27 attendees across the focus group sessions, representing various sectors of the community including residents of Toledo, real-estate professionals, representatives from community organizations, and government officials. At the focus group sessions, TFHC CEO and General Counsel George Thomas delivered a presentation on barriers to fair housing choice, explaining what barriers are and giving examples of specific barriers previously identified in the 2020 Analysis of Impediments. Participants were then asked a series of questions to help identify those barriers in our community.

The series of questions focused on barriers to fair housing choice in general, barriers to rentals homes, barriers to home ownership opportunities, and barriers to securing insurance policies. The focus groups were asked about specific barriers such as criminal history screenings, accessibility, sources of income, zoning and land use, housing conditions, transportation, and access to utility services.

Below is a summary of the comments organized by topics.

Affordability and Rising Costs

Affordable housing and rising costs of rentals homes were cited as a main barrier to access adequate housing. Many participants noted that steep rental prices, along with initial costs such as security deposits, can crush many people with low or average incomes. These money issues limit where people can live, as many cannot afford both the monthly rent and the deposits they need to pay upfront. For renters without much savings or with unsteady paychecks, these initial expenses alone can rule out many places to live.

There was discussion about how the shortage of affordable housing worsens this problem even more. With few affordable housing options available, low to moderate-income individuals are forced into competition with one another. This competition often forces those individuals who cannot secure affordable housing to either live outside their means and struggle to make rent payments on more expensive homes, or they are left to rent lower-cost, lower-quality homes – homes that, often, are not well-maintained. At times, individuals must resort to looking for housing farther afield, creating issues with transportation and employment. These long commutes increase their travel costs and lower their overall quality of life.

Many families struggle to save money for the future because of these money problems. Housing costs eat up a significant amount of what people earn, leaving them with little cash to put aside for emergencies, school, or a down payment on a home. This means many individuals cannot work towards homeownership, which is one of the best ways families build wealth and gain financial stability. In a study done by the National Association of Realtors (NAR), NAR Chief Economist Lawrence Yun stated, “A monthly mortgage payment is often considered a forced savings account that helps homeowners build a net worth about 40 times higher than that of a renter.” The same study found that this is especially true in communities that have historically faced unfair treatment in the housing market.

Participants also cited that yearly rent hikes often add to their money troubles. Even small increases can become too much to handle for people who don't earn much, like young families, individuals making minimum wage, retirees and others living on fixed incomes. These regular rent increases leave renters with less spending money each year and, in many cases, no other affordable places to live, making it harder for them to find stable housing.

The prohibitive costs of housing also lead to instability. When rent goes up every year, tenants might have to move often because they cannot keep paying. This shakes up their lives and makes communities less stable. Having to move all the time can negatively affect kids' schooling, break down community bonds, and make it harder to get and maintain important services.

These financial constraints and lack of homes hit hardest on groups that have faced unfair treatment in housing before: people of color, families with children, and those

with disabilities. These groups often have less money and wealth overall, which cuts down their housing choices even more when rents are high and rising higher. The manner in which the housing market works sustains already unfair differences, making it hard for some people to find fair, stable, and affordable places to live.

Income and Employment

Many participants also noted that community members struggle with high-income expectations and stringent employment requirements set by landlords. For people and households with irregular income sources such as seasonal work, part-time jobs, or working in the gig economy, it may be extremely difficult to meet the landlords' expectations concerning income requirements. A lot of landlords require the tenant to earn two to three times the amount of money that is paid for rent on a month-to-month basis. Landlords claim this is done to ensure that the tenant will always be able to afford rent. However, this requirement excludes a great number of lower-income households who cannot meet such high thresholds even when they are very able to pay rent through budgeting or through other forms of income support.

Participants also identified that it is difficult to find good-paying jobs, which makes this problem even worse. Quite a few low-income households reside in areas that are characterized by a scarcity of jobs that offer a good wage, consistent hours, or opportunities for career advancement. The available jobs may not pay enough to meet the rental income requirements of landlords, especially in areas where the housing market is more expensive. This economic disadvantage creates an environment where even well employed individuals are regularly priced out of the housing market.

The community talked about stringent income requirements which potentially limit residents' access to affordable housing, disproportionately excluding those who rely on public assistance, supplemental income or other non-traditional means of financial support. Many landlords do not consider these additional sources of income or may discount them, further limiting the accessibility of housing for people with disabilities, single-parent households and elderly residents living on fixed incomes.

This effectively limits the ability to choose among a full range of housing options for a broad spectrum of households and serves to segregate housing opportunities by socioeconomic status. It is systemic racial and economic discrimination that has cordoned these individuals into areas that lack essential social and economic amenities crucial to development. Moreover, this scenario sustains the vicious web of poverty in society and constricts the opportunities for poor people to raise their social status, as households that do not qualify for income-based housing are often forced to accept substandard housing in affordable areas.

Furthermore, such income requirements disproportionately impact the very communities that have faced longstanding economic and social barriers. When landlords focus on wealth, they also strengthen the disparities and in so doing, cause discrimination among potential tenants who, without such restrictions, would be able to access housing that is appropriate to them, in terms of quality and belonging.

Discrimination and Bias:

A large number of individuals who responded to our survey discussed that, in the housing market, discriminatory methods are the ones still occurring and creating huge barriers when it comes to the issue of non-discriminatory housing. This is especially true for those who are victims of racial, disability, familial and income discrimination. Such actions are for the most part largely responsible for the difficulties associated with affordable and secure accommodation.

The concern of people with disabilities is again addressed. There are cases where landlords often turn down applicants with disabilities or claim that they cannot make modifications or accommodations for the disabled persons to get in or out of the authorized building or compound, such as constructing devices like ramps or opening the gates to allow a service animal in. Consequently, such applicants end up being accommodated in housing that is unsuitable for them.

Housing Conditions

Substandard housing conditions were identified as one of the greatest impediments to accessing adequate housing that was indicated by respondents. These issues are largely generated from poorly maintained rental properties and disinvestment in urban core neighborhoods. This combination leads to widespread neighborhood blight, which severely restricts the availability of safe, healthy, and habitable housing options.

Poorly maintained homes impact entire neighborhoods in the form of lower property values, increased crime, health and safety hazards, and a general feeling of diminished community pride. These impacts lend urgency to the requirement for solutions to address deteriorating housing conditions.

One of the prevalent themes was that there was insufficient enforcement of city housing codes. Concerns were expressed regarding discriminatory code enforcement, as private owner-occupied homes were scrutinized and enforced more tightly than bank-owned REOs, and there was more enforcement in white neighborhoods compared to communities of color.

It was also often mentioned that out-of-town investors added to poor housing conditions. These types of buyers will often choose profit over neighborhood vibrancy, allowing their properties to fall into disrepair and neglect. Proposed solutions included limiting the number of investor-owned properties or adding a requirement of investors living within the city limits to promote a feeling of in-town accountability.

Those who have barriers to accessing housing, such as a criminal history or a record of eviction, are disproportionately affected by substandard housing. Many times, the only available option for these residents is to live in homes that are either unsafe, unhealthy, or poorly maintained. Because many tenants fear retaliation by landlords, including eviction, or believe that alternative housing is unobtainable, they do not report poor conditions or request needed maintenance.

Although property maintenance is the most direct method of improving housing conditions, it is often prohibitively expensive -- especially for older and deteriorating housing stock. Assisting property owners with funding to make necessary repairs has been identified as a critical need. Many of the participants mentioned the massive increase in demolition activity by the Lucas County Land Bank. While demolitions eliminate blighted properties, many suggest a focus on property rehabilitation or replacing demolished structures with affordable housing to prevent a proliferation of vacant lots.

Others suggested that properties sold by Land Bank come with restrictions: owner-occupation for some number of years, coupled with incentives such as tax abatements.

Accessible Housing for Individuals with Disabilities

In two out of the three focus groups, the most discussed topic was the lack of accessible housing for people with disabilities. A major barrier to accessible housing choice, it limits directly the places where people with disabilities can live, affects negatively the quality of their available housing choices, and diminishes their ability to participate fully in their communities.

One of the key issues the community identified was the critical shortage of accessible housing units or residences that offer basic accommodation, which are required under the FHA. For many people with disabilities, these accommodations are not amenities but absolute necessities to perform everyday functions and live independently. Without them, such common daily activities as entering and exiting a house, using a restroom, or cooking a meal become particularly challenging. That shortage effectively limits the pool of housing options for disabled people, either forcing them to choose from among a small number of units or into sharing accommodations that might be inappropriate or unsafe.

This constraint also reduces people's ability to choose homes in neighborhoods with opportunities to access resources such as employment opportunities, quality schools, health care services, transportation, and community amenities. They may be forced to live in less desirable areas or substandard housing simply because these are the only settings that have units that marginally meet their access needs. Such segregation creates cycles of exclusion and discrimination, thus keeping people with disabilities away from opportunities that would otherwise enable them to integrate fully and thrive in their communities.

That lack of available housing also presents economic challenges. Most homes need retrofitting for accessibility, which is usually too expensive for most tenants to undertake. Some landlords also refuse to make necessary modifications, even when they are required by the Fair Housing Act to make them. This puts many residents with disabilities into a difficult position: either accept non-compliant housing or risk being homeless while searching for suitable options.

Further, the shortage of housing presents actual implications for independence and quality of life. Accessible housing allows people with disabilities to gain independence, thus decreasing their reliance on carers or institutional settings. In conditions of an acute shortage of accessible housing, people with disabilities have no option but to live in high-dependency settings, which significantly restricts individual freedom and opportunities for economic and social participation. A lack of autonomy can also have adverse impacts on mental health, self-esteem, and overall well-being.

For families with members who have disabilities, inaccessible housing exacerbates already existing challenges. Most parents and caregivers will be put to task by searching for homes that will suit the needs of the whole family, thus adding to financial and emotional stress. Families may be forced to make compromises, such as choosing to live farther from work or school, in trying to secure housing that meets the needs of their family members.

From a systemic perspective, it contributes to the perpetuation of inequalities in housing access and further entrenches marginalization of people with disabilities, socially and economically. Further, it reflects broader societal injustices because many housing developers do not prioritize accessibility while constructing or renovating housing. Such disregard gives rise to chronic barriers to equity — evidently violating the rights of the disabled to equal housing opportunities. It is only through proactive steps at increasing the supply of units meeting accessibility requirements, full compliance with the Fair Housing Act, and incentives for property owners and developers to make accessibility features a priority that this shortage can be effectively met. Only with guarantees of housing options that are inclusive and accommodate the needs of people with disabilities can communities move toward the realization of fair, integrated housing markets with equally meaningful choices available to all.

Technology Barriers

Participants in the survey discussed technological barriers to fair housing choice, and how reliance on app-based procedures by property managers can create substantial obstacles for certain demographics, especially older tenants, those who have disabilities, and people without reliable internet access or familiarity with advanced technologies. While it seeks to streamline activities such as paying rent, submitting maintenance requests, or availing oneself of property management services, it can exclude or annoy the tenant who does not have the tools or ability to navigate them at all.

For the elderly tenants, this new reality can be very much worse. Older adults may not be as familiar with current technology and may not have the know-how to make the systems function for them. Where they used to be easy tasks such as mailing a rent check or calling up the property manager, today renting becomes a matter of navigating through apps or websites. Hence much frustration and stress arise. All this leads to missed rent payments, late fees, or delays in fixing maintenance issues, leaving elderly tenants at potential risk of eviction or substandard living because of unaddressed repairs.

Likewise, participants discussed that tenants who do not have reliable internet service or digital devices will face similar challenges. Already limited in their options with regards to housing, most low-income households may simply not have the access or ownership of provisioned devices that allow for constancy of access to the internet. The digital divide is compounding existing inequalities of such tenants who fail to satisfy their housing obligations and communicate with property management. It creates frustrating conditions, such as the one where tenants rely on the use of public Wi-Fi at their local library or community centers, as access becomes unpredictable in meeting tighter deadlines for tasks like rent payment.

These technologies prevent stability and housing choices, hitting harder on populations whose systemic challenges already push them out of the housing market. Those not able to use app-based systems would have no option but to face housing insecurity or rely on old processes which place them at a disadvantage compared to tech-savvy renters, creating a bifurcated system in which the privilege of modern conveniences and efficient property management services becomes out of reach for the majority.

I. Housing Opportunity

The following two sections are divided into Housing Opportunity and Housing Terms and Conditions. This demarcation developed organically through the process of identifying impediments, with Housing Opportunity referring to the ability to access housing, and Housing Stability referring to issues related to the ability for persons to equitably use and enjoy housing.

Criminal History Screening

Background

The 2020 AI identified criminal history screening as one of the most pervasive forms of discrimination nationally and in the Toledo area. Since then, HUD adopted additional guidance, discussed further below. The problem has since improved, but only slightly. Criminal history screening remains one of the most significant barriers to housing choice.

Most housing providers screen applicants based on their past criminal record. But frequently, this screening process includes a review of criminal issues that bear no relevance to whether the tenant-applicant is qualified to rent the unit. Some housing providers screen out applicants for minor misdemeanors that are wholly unrelated to whether they are qualified to live as a tenant in the property.

The U.S. Department of Housing and Urban Development issued guidance on criminal history screening and Fair Housing Act liability in April 2016.³⁶ The guidance explains that minorities are convicted disproportionately and therefore screening out these applicants based on criminal history may violate the Fair Housing Act:

Across the United States, African Americans and Hispanics are arrested, convicted, and incarcerated at rates disproportionate to their share of the general population. Consequently, criminal records-based barriers to housing are likely to have a disproportionate impact on minority home seekers. While having a criminal record is not a protected characteristic under the Fair Housing Act, criminal history-based restrictions on housing opportunities violate the Act if, without justification, their burden falls more often on renters or other housing market participants of one race or national origin over another (i.e., discriminatory effects liability). Additionally, intentional discrimination in violation of the Act

³⁶ U.S. Department of Housing and Urban Development, *Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions* (April 4, 2016), available at https://www.hud.gov/sites/documents/HUD_OGCGUIDAPPFHASTANDCR.PDF.

occurs if a housing provider treats individuals with comparable criminal history differently because of their race, national origin, or other protected characteristics (i.e., disparate treatment liability).

National statistics on this issue show the breadth of this issue as a disparate impact on minorities:

Nationally, racial and ethnic minorities face disproportionately high rates of arrest and incarceration. For example, in 2013, African Americans were arrested at a rate more than double their proportion of the general population. Moreover, in 2014, African Americans comprised approximately 36 percent of the total prison population in the United States, but only about 12 percent of the country's total population. In other words, African Americans were incarcerated at a rate nearly three times their proportion of the general population. Hispanics were similarly incarcerated at a rate disproportionate to their share of the general population, with Hispanic individuals comprising approximately 22 percent of the prison population, but only about 17 percent of the total U.S. population. In contrast, non-Hispanic Whites comprised approximately 62 percent of the total U.S. population but only about 34 percent of the prison population in 2014. Across all age groups, the imprisonment rates for African American males are almost six times greater than for White males, and for Hispanic males, it is over twice that for non-Hispanic White males.³⁷

Housing providers must be careful not to screen out applicants based on criminal history without evidence that the alleged crime actually occurred and truly presents a "demonstrable risk to resident safety and/or property and criminal conduct that does not."³⁸ Furthermore, housing providers should include an individualized assessment of "relevant mitigating information beyond that contained in an individual's criminal record" which will have "a less discriminatory effect than categorical exclusions that do not take such additional information into account."³⁹

In order to study these trends in the Toledo area, The Fair Housing Center worked with Bowling Green State University to complete a study on this issue. The study included interviews with housing providers as well as available data on the disparate impact of criminal history screening policies on racial minorities. The report of the study is available here:

<http://toledofhc.org/wp-content/uploads/2025/02/Teslovich-Cousino-Prusha-An-Assessment-of-Fair-Housing-Standards-for-Those-with-Criminal-Histories-in-the-Greater-Toledo-Area-2.pdf>

The study found:

“The findings suggest that criminal screening policies among housing providers in Northwest Ohio vary greatly. There is no standard length of criminal history considered, with many providers choosing to screen full adult criminal histories while others review only the most recent three years. Further, some local criminal screening policies are out of compliance with Department of Housing and Urban Development (HUD) guidelines, with some providers creating preset categorical exclusions regarding certain types of crimes without the consideration of mitigating factors. Lastly, the demographic data analyzed displays a stark racial disparity within the prison population in Lucas and Wood counties, showing an almost 5-to-1 disproportionate arrest rate for Black residents when compared with White residents. Together, these findings suggest that because Black Americans are more likely to have a criminal history, they are more likely to face discrimination based on criminal history screening. Coupled with the findings that all housing providers surveyed use criminal screenings and that many do not follow established HUD criminal screening guidelines, it is probable that Black Americans and other marginalized populations will face stronger impediments to accessing fair, quality, affordable housing than others in Northwest Ohio.”

In short, criminal history screening disparately impacts minorities, therefore housing providers should:

1. Use a tailored policy that only excludes individuals with certain types of convictions and distinguishes between criminal conduct that indicates a demonstrable risk to resident safety and/or property and criminal conduct that does not; and
2. Provide an individualized assessment of relevant mitigating information beyond that contained in a criminal record instead of relying on categorical exclusions that do not take such information into account.

In more recent years, a number of positive developments have arisen aiming to address these issues. First, in 2022, HUD released new guidance on how administrative agencies that process civil rights complaints, such as the Ohio Civil Rights Commission, should investigate criminal history screening cases.¹⁰¹ This guidance was helpful because it provided agencies with an appropriate path to address criminal history screening through civil rights complaints, whereas they had previously struggled with understanding how to

¹⁰¹ See

<https://www.hud.gov/sites/dfiles/FHEO/documents/Implementation%20of%20OGC%20Guidance%20on%20Application%20of%20FHA%20Standards%20to%20the%20Use%20of%20Criminal%20Records%20-%20June%2010%202022.pdf>.

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investigate and process these cases. This has resulted in an increase in the number of cases where the complainant facing criminal history screening can find a successful resolution of their claims.

Next, in 2022, HUD released guidance intended for more general audiences and housing providers to help them adjust their policies and avoid discriminatory practices as they consider criminal history screening.¹⁰²

Very recently, in 2024, Ohio adopted a process for people with a criminal history to obtain a certificate of qualification for housing. This process allows ex-offenders to ask a Court to confirm that, while they do have a criminal history, they should be qualified for housing. With this certificate, the housing provider also avoids liability in the event of a lawsuit based on the housing provider's failure to screen out dangerous persons with a criminal record.¹⁰³

Local efforts to address criminal history screening

In Toledo, the Reentry Coalition of Northwest Ohio, the Fair Housing Center, and others advocated for changes to the Lucas Metro Housing Authority's Admissions and Continued Occupancy Plan in order to reduce barriers for ex-offenders seeking affordable housing and align its policies with HUD's guidance as described above. This advocacy took place throughout the last Analysis of Impediments reporting period of 2015 to 2020. Finally, in December 2019, LMHA adopted amendments to its ACOP consistent with recommendations requested by the Reentry Coalition and others.

More recently, LMHA amended its policies for screening of Housing Choice Voucher applicants to mirror the improvements it previously made for the public housing program.

In addition, The Fair Housing Center has created a model policy for housing providers to use that helps them avoid discrimination in criminal history screening, easily available on its website. The Center has also provided a number of trainings on this issue. Finally, the Center has been successful in litigating a number of criminal history cases in recent years.

However, many housing providers still screen applicants based on criminal history in violation of the Fair Housing Act. This issue continues to be one of the most critical Fair Housing concerns in the Northwest Ohio area. Countless persons in need of housing are unable to access decent and affordable housing

¹⁰² See

https://www.hud.gov/sites/dfiles/FHEO/documents/FHEO_Guidance_on_Screening_of_Applicants_for_Rental_Housing.pdf.

¹⁰³ See R.C. 2953.26.

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opportunities because of past criminal offenses that bear no relation to their current qualifications as a tenant.

Local ban the box policies

To address screening based on criminal records, many local governments have adopted “ban the box” policies or laws. These policies include bans on screening out applicants for employment as well as housing.

According to the National Employment Law Project, 35 states, the District of Columbia, and over 150 cities and counties have adopted “ban –the box,” sometimes called “fair-chance,” policies of some kind, which protect employment applicants and in many cases housing applicants as well. Many of these policies apply only to the state’s own hiring practices but demonstrate a growing movement to address this issue through local government. States that have adopted these laws include:

Arizona (2017),	Nebraska (2014),
California (2017, 2013, 2010),	Nevada (2017),
Colorado (2012),	New Jersey (2014),
Connecticut (2016, 2010),	New Mexico (2010, 2019),
Delaware (2014),	New York (2015),
Georgia (2015),	North Dakota (2019),
Hawaii (1998),	Ohio (2015),
Illinois (2014, 2013),	Oklahoma (2016),
Indiana (2017),	Oregon (2015),
Kansas (2018),	Pennsylvania (2017),
Kentucky (2017),	Rhode Island (2013),
Louisiana (2016),	Tennessee (2016),
Maine (2019),	Utah (2017),
Maryland (2013),	Vermont (2016, 2015),
Massachusetts (2010),	Virginia (2015),
Michigan (2018),	Washington (2018), and
Minnesota (2013, 2009),	Wisconsin (2016).
Missouri (2016),	

According to the National Employment Project, three-fourths of the U.S. population live in a jurisdiction that has banned the box.¹⁰⁴

As reported in the prior AI, Seattle, Washington enacted a progressive local Fair Housing law that prohibits housing providers from screening applicants based on

¹⁰⁴ Beth Avery, National Employment Law Project, *Ban the Box: U.S. Cities, Counties and States Adopt Fair-Chance Policies to Advance Employment Opportunities for People with Past Convictions* (2019), available at <https://s27147.pcdn.co/wp-content/uploads/Ban-the-Box-Fair-Chance-State-and-Local-Guide-July-2019.pdf>

criminal history and creates liability for housing providers who violate the law.

According to the National Housing Law Project, an increasing number of cities and counties are passing ordinances that prohibit discrimination against individuals with an arrest or conviction record in the housing context. The following cities have passed local ordinances that expand housing opportunities for people who have come in contact with the criminal justice system. These cities include:¹⁰⁵

Richmond, CA
Seattle, WA
San Francisco, CA
New York, NY
Newark, NJ

Urbana, IL
Champaign, IL
Madison, WI
Dane County, WI
Washington, DC

Subsequent to the National Housing Law Project's review of this issue, there has been little change and the Project still reports the same cities. This may be due to the progress completed by HUD on this front, which may have signaled that there was less need for such policies on the local level.

However, HUD's guidance allows for cities to adopt policies that address the issue through local enforcement systems. Toledo should consider a similar local law, amending its local Fair Housing ordinance, and providing similar "ban the box" protections. More specifically, Toledo could adopt some revisions to its local anti-discrimination law that more specifically identify criminal history screening as a prohibited practice consistent with HUD's guidance.

¹⁰⁵ National Housing Law Project, *Local Anti-Discrimination Reentry Policies* (2019), available at <https://www.nhlp.org/initiatives/housing-opportunities-for-people-reentering/lifetime-registered-sex-offenders/>

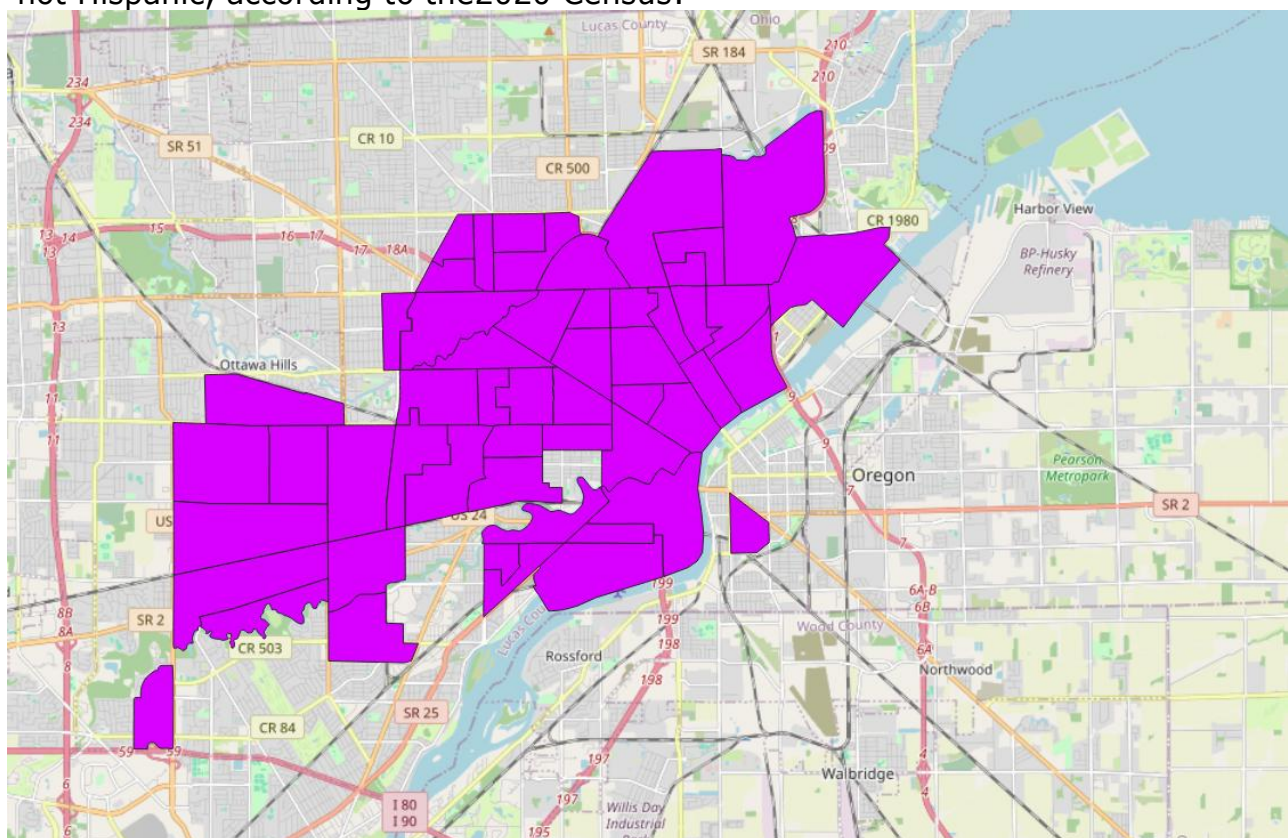
Homeownership: Lending and Insurance

Lending and Appraisal

Patterns of lending disinvestment and redlining based on neighborhood racial composition

Homeownership is a growing critical concern for the Toledo area. As with many cities, the percentage of the population that are renters is increasing. This trend means that the normal trends of accumulating generational wealth through homeownership are starting to disappear. The “American Dream” of homeownership, building equity, saving money by doing one’s own repairs and maintenance, and then passing on wealth to the next generation may be slipping away.

With this trend, it is important to note the racial trends and fair housing implications. Historically, patterns of disinvestment and redlining in census tracts of color have persisted since the Great Recession. The Fair Housing Center has found that the major lenders in the Toledo MSA stopped making a proportional number of their home purchase loans in census tracts identified as predominately minority. The shaded tracts are less than 50 percent white alone, not Hispanic, according to the 2020 Census:



To understand this trend, it is helpful to review the most recently available Home Mortgage Disclosure Act data. This data shows the trends in home loan originations. In Lucas County, these banks are the largest by deposit share:¹⁰⁶

Bank Name	Total Deposits (Thousands of US Dollars)
Fifth Third Bank, National Association	2,526,659
The Huntington National Bank	2,411,586
KeyBank National Association	1,707,807
Waterford Bank, N.A.	1,221,994
Signature Bank, National Association	1,058,988
PNC Bank, National Association	779,027

Across the board, these banks did not provide loans to Black residents at a rate that would consistent with local demographics. Black residents represent 20.7% of the population in Lucas County. Therefore, the expectation should be that Black residents would receive roughly 20% of the home loans originated in the area. But this was not the case, by a wide margin. The tables provide on the following pages provide the relevant origination rates by banks for the most recently available year, 2023.

¹⁰⁶ Data made available from the FDIC, <https://banks.data.fdic.gov/bankfind-suite/SOD/summaryTables?county=Lucas&displayResults=&endDate=2024&instType=all&institutionType=banks&institutionTypeTimeSeries=&lastYear=2024&locations=&pageNumber=1&reportType=stateCounty&resultLimit=25&sortField=NAMEFULL&sortOrder=ASC&stalpbr=OH&startDate=2023&summaryTableLevelTwo=true&totalsType=>.

Fifth Third originated loans for Black families at a rate of 7% less than their demographic share of 20.7%.¹⁰⁷

Fifth Third - 2023 Home Loans Originated	# of Loans Originated	\$ Amount
Loan Originated, 2 or more minority races	1	155,000
Loan Originated, American Indian or Alaska Native	0	0
Loan Originated, Asian	16	3,100,000
Loan Originated, Black or African American	62	5,420,000
Loan Originated, Free Form Text Only	0	0
Loan Originated, Joint	7	1,075,000
Loan Originated, Native Hawaiian or Other Pacific Islander	0	0
Loan Originated, Race Not Available	16	11,540,000
Loan Originated, White	468	49,810,000
Total Loans Originated	570	
Percent of Loans for Black families	13%	
Total loan value		71,100,000
Percent of loan value for Black families		8%

¹⁰⁷ Data made available from the CFPB, https://ffiec.cfpb.gov/data-browser/data/2023?category=counties&items=39095&leis=QFROUN1UWUYU0DVIWD51&actions_taken=1&rac=American%20Indian%20or%20Alaska%20Native,Asian,Black%20or%20African%20American,Native%20Hawaiian%20or%20Other%20Pacific%20Islander,White,2%20or%20more%20minority%20races,Joint,Free%20Form%20Text%20Only,Race%20Not%20Available&getDetails=1.

Huntington Bank originated loans for Black families at a rate of 11% less than their demographic share of 20.7%.¹⁰⁸

Huntington - 2023 Home Loans Originated	# of Loans Originated	\$ Amount
Loan Originated, 2 or more minority races	0	0
Loan Originated, American Indian or Alaska Native	2	440,000
Loan Originated, Asian	18	2,670,000
Loan Originated, Black or African American	76	6,650,000
Loan Originated, Free Form Text Only	0	0
Loan Originated, Joint	9	1,285,000
Loan Originated, Native Hawaiian or Other Pacific Islander	1	315,000
Loan Originated, Race Not Available	157	34,635,000
Loan Originated, White	827	104,355,000
Total Loans Originated	1,090	
Percent of Loans for Black families	9%	
Total loan value		150,350,000
Percent of loan value for Black families		4%

¹⁰⁸ Data made available by CFPB, https://ffiec.cfpb.gov/data-browser/data/2023?category=counties&items=39095&leis=2WHM8VNJH63UN14OL754&actions_taken=1&racess=American%20Indian%20or%20Alaska%20Native,Asian,Black%20or%20African%20American,Native%20Hawaiian%20or%20Other%20Pacific%20Islander,White,2%20or%20more%20minority%20races,Joint,Free%20Form%20Text%20Only,Race%20Not%20Available&getDetails=1/.

KeyBank originated loans for Black families at a rate of 11% less than their demographic share of 20.7%.¹⁰⁹

KeyBank - 2023 Home Loans Originated	# of Loans Originated	\$ Amount
Loan Originated, 2 or more minority races	1	75,000
Loan Originated, American Indian or Alaska Native	1	245,000
Loan Originated, Asian	2	150,000
Loan Originated, Black or African American	18	1,840,000
Loan Originated, Free Form Text Only	0	0
Loan Originated, Joint	3	455,000
Loan Originated, Native Hawaiian or Other Pacific Islander	0	0
Loan Originated, Race Not Available	11	2,515,000
Loan Originated, White	196	23,870,000
Total Loans Originated	232	
Percent of Loans for Black families	9%	
Total loan value		29,150,000
Percent of loan value for Black families		6%

¹⁰⁹ Data made available from the CFPB, https://ffiec.cfpb.gov/data-browser/data/2023?category=counties&items=39095&leis=HUX2X73FUCYHUVH1BK78&actions_taken=1&racess=American%20Indian%20or%20Alaska%20Native,Asian,Black%20or%20African%20American,Native%20Hawaiian%20or%20Other%20Pacific%20Islander,White,2%20or%20more%20minority%20races,Joint,Free%20Form%20Text%20Only,Race%20Not%20Available&getDetails=1.

Although Waterford Bank was one of the largest banks in the Toledo area by deposit share, it did not issue many home loans and issued no home loans to non-white borrowers.¹¹⁰

Waterford - 2023 Home Loans Originated	# of Loans Originated	\$ Amount
Loan Originated, 2 or more minority races	0	0
Loan Originated, American Indian or Alaska Native	0	0
Loan Originated, Asian	0	0
Loan Originated, Black or African American	0	0
Loan Originated, Free Form Text Only	0	0
Loan Originated, Joint	0	0
Loan Originated, Native Hawaiian or Other Pacific Islander	0	0
Loan Originated, Race Not Available	2	360,000
Loan Originated, White	30	7,970,000
Total Loans Originated	32	
Percent of Loans for Black families	0%	
Total loan value		8,330,000
Percent of loan value for Black families		0%

¹¹⁰ Data made available by the CFPB, https://ffiec.cfpb.gov/data-browser/data/2023?category=counties&items=39095&leis=549300Z8EM6P4IUIYG50&actions_taken=1&races=American%20Indian%20or%20Alaska%20Native,Asian,Black%20or%20African%20American,Native%20Hawaiian%20or%20Other%20Pacific%20Islander,White,2%20or%20more%20minority%20races,Joint,Free%20Form%20Text%20Only,Race%20Not%20Available&getDetails=1.

Although Signature Bank was one of the largest banks in the area by deposit share, it did not issue many home loans, and issued only one to a Black family. It is also noteworthy that Signature did not collect racial data, indicating that race was not available, for a sizable portion of their loans.¹¹¹

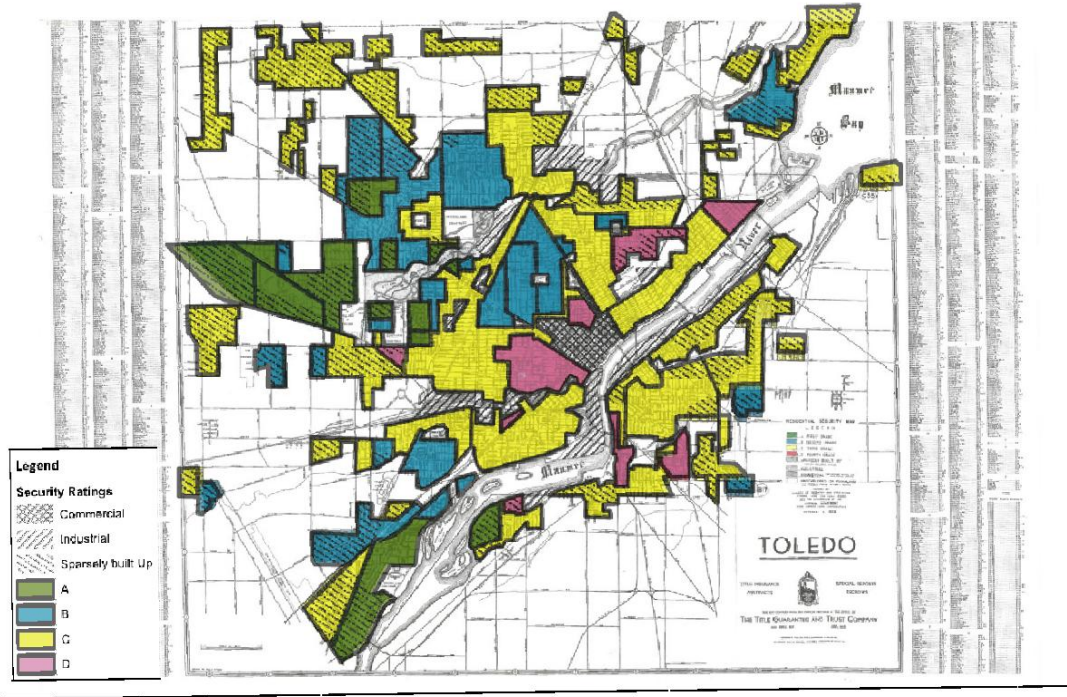
Signature - 2023 Home Loans Originated	# of Loans Originated	\$ Amount
Loan Originated, 2 or more minority races	0	0
Loan Originated, American Indian or Alaska Native	0	0
Loan Originated, Asian	0	0
Loan Originated, Black or African American	1	205,000
Loan Originated, Free Form Text Only	0	0
Loan Originated, Joint	0	0
Loan Originated, Native Hawaiian or Other Pacific Islander	0	0
Loan Originated, Race Not Available	5	3,815,000
Loan Originated, White	13	4,875,000
Total Loans Originated	19	
Percent of Loans for Black families	8%	
Total loan value		8,895,000
Percent of loan value for Black families		2%

¹¹¹ Data made available from the CFPB, https://ffiec.cfpb.gov/data-browser/data/2023?category=counties&items=39095&leis=549300MONA3L2BDK8Q22&actions_taken=1&racess=American%20Indian%20or%20Alaska%20Native,Asian,Black%20or%20African%20American,Native%20Hawaiian%20or%20Other%20Pacific%20Islander,White,2%20or%20more%20minority%20races,Joint,Free%20Form%20Text%20Only,Race%20Not%20Available&getDetails=1.

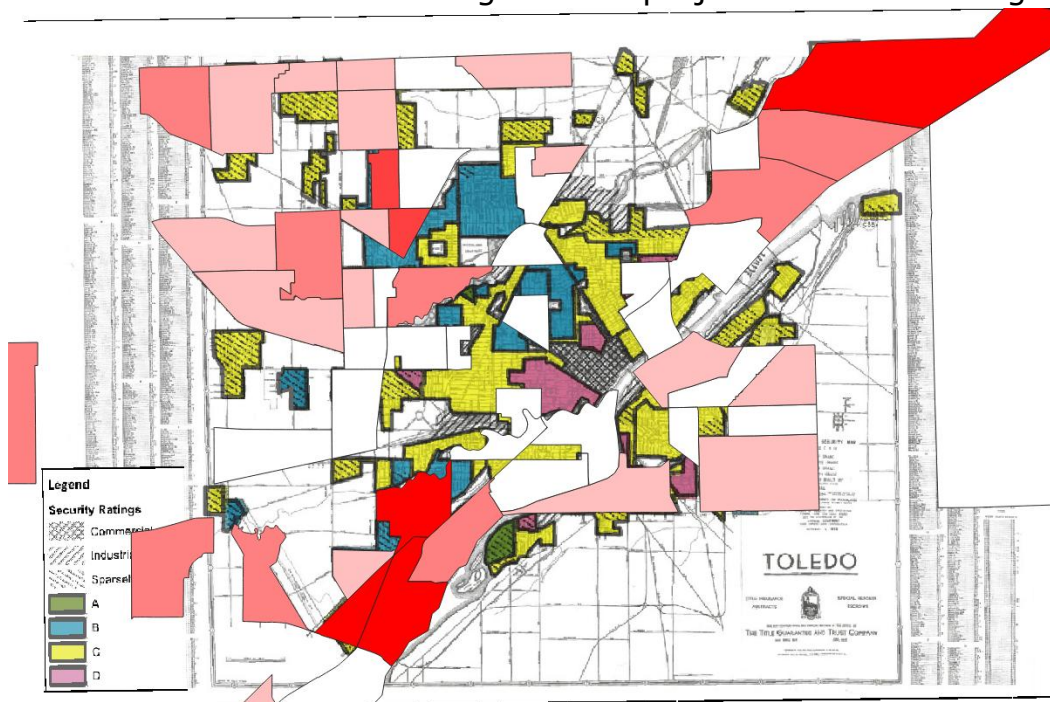
PNC Bank originated loans for Black families at a rate of 13% less than their demographic share of 20.7%.

PNC - 2023 Home Loans Originated	# of Loans Originated	\$ Amount
Loan Originated, 2 or more minority races	0	0
Loan Originated, American Indian or Alaska Native	2	140,000
Loan Originated, Asian	3	365,000
Loan Originated, Black or African American	9	805,000
Loan Originated, Free Form Text Only	1	55,000
Loan Originated, Joint	1	55,000
Loan Originated, Native Hawaiian or Other Pacific Islander	0	0
Loan Originated, Race Not Available	14	12,710,000
Loan Originated, White	130	11,340,000
Total Loans Originated	160	
Percent of Loans for Black families	7%	
Total loan value		25,470,000
Percent of loan value for Black families		3%

HOLC redlining map

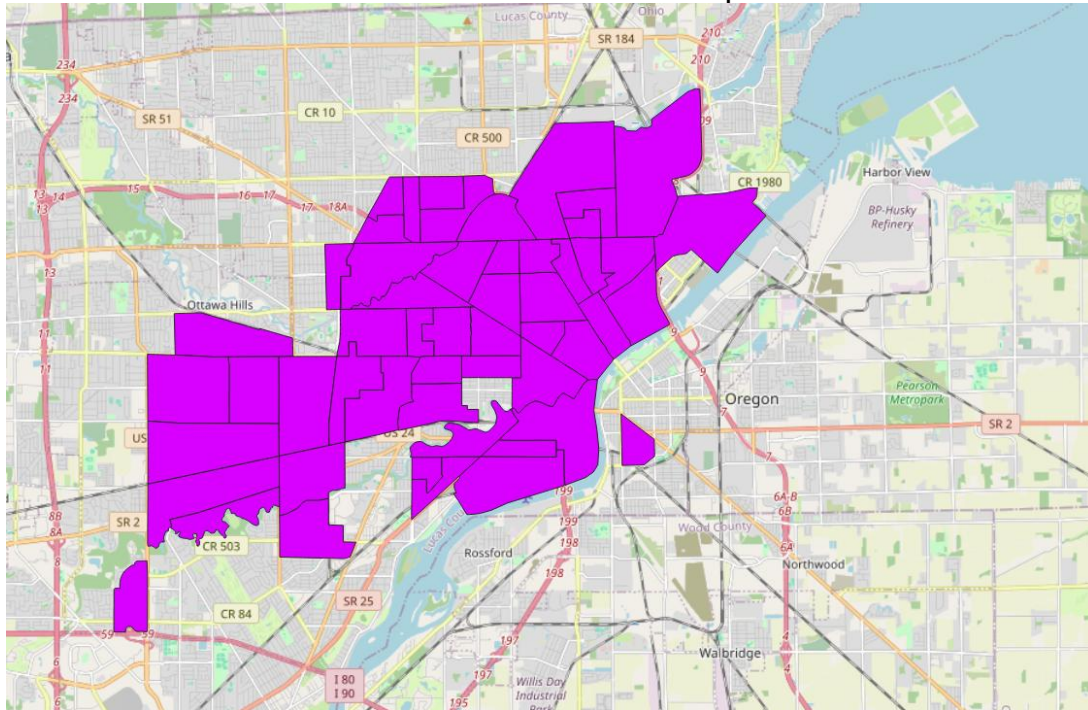


Fifth Third's 2023 home loan origination's projected over redlining map

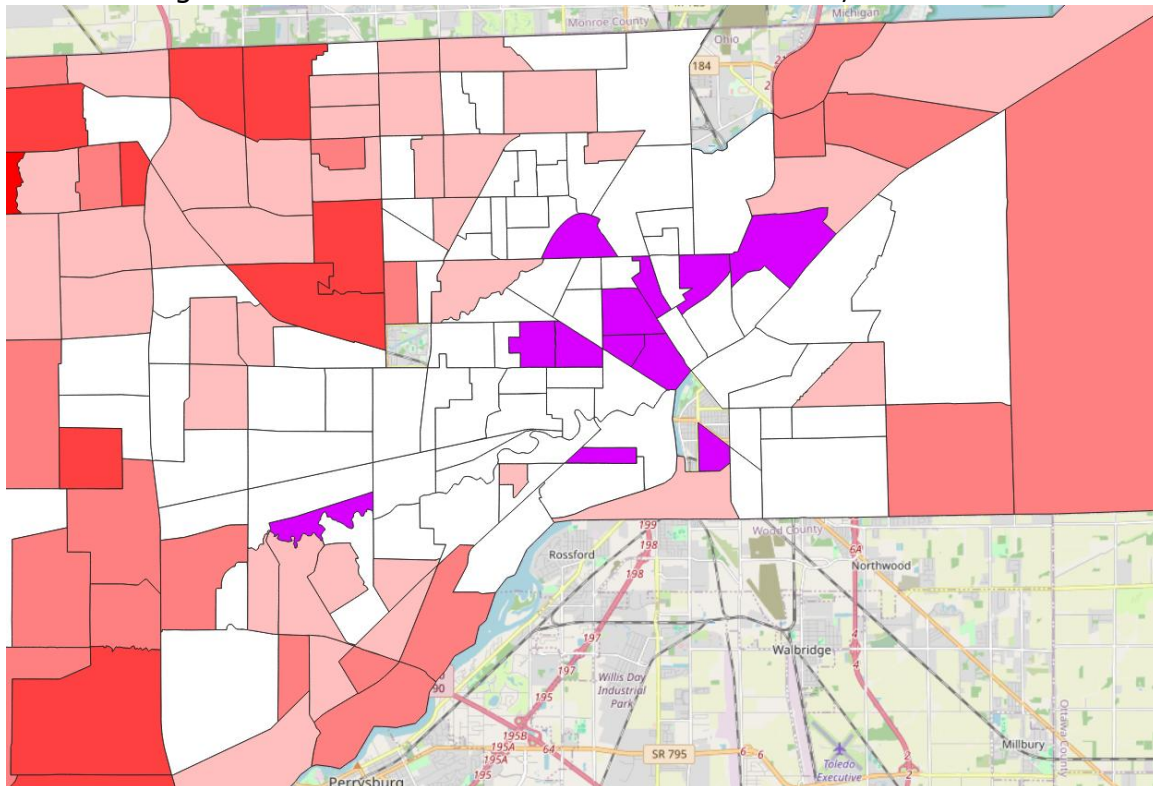


Huntington

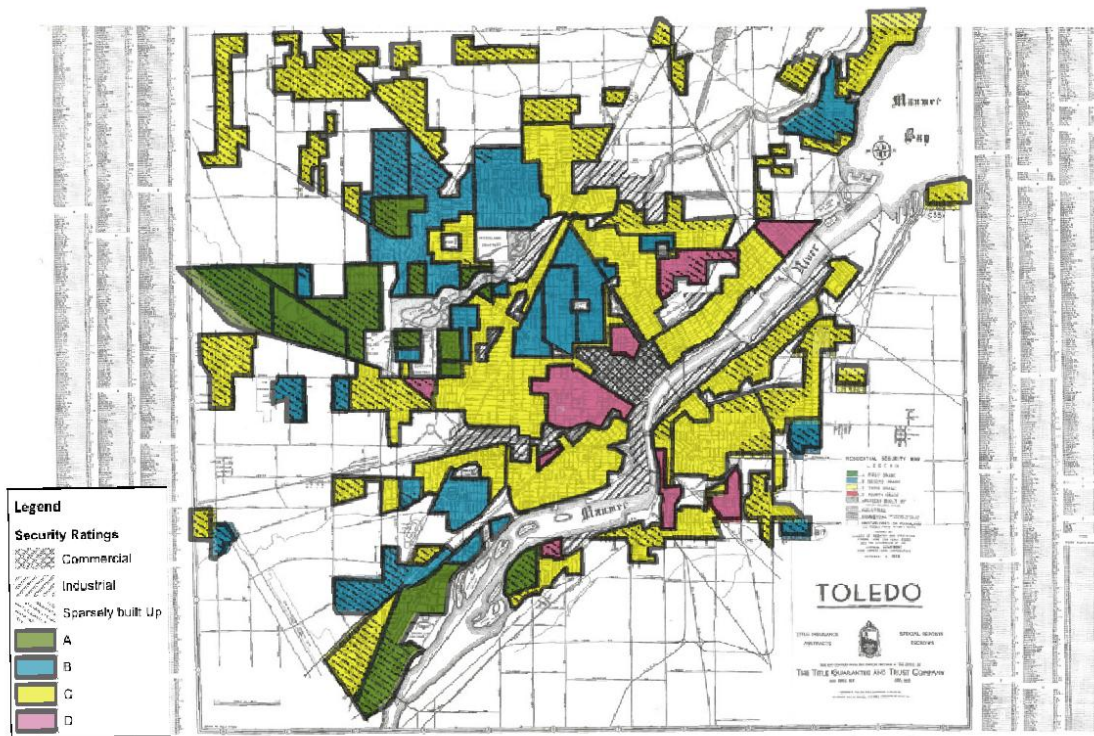
49% or less White Alone not Hispanic



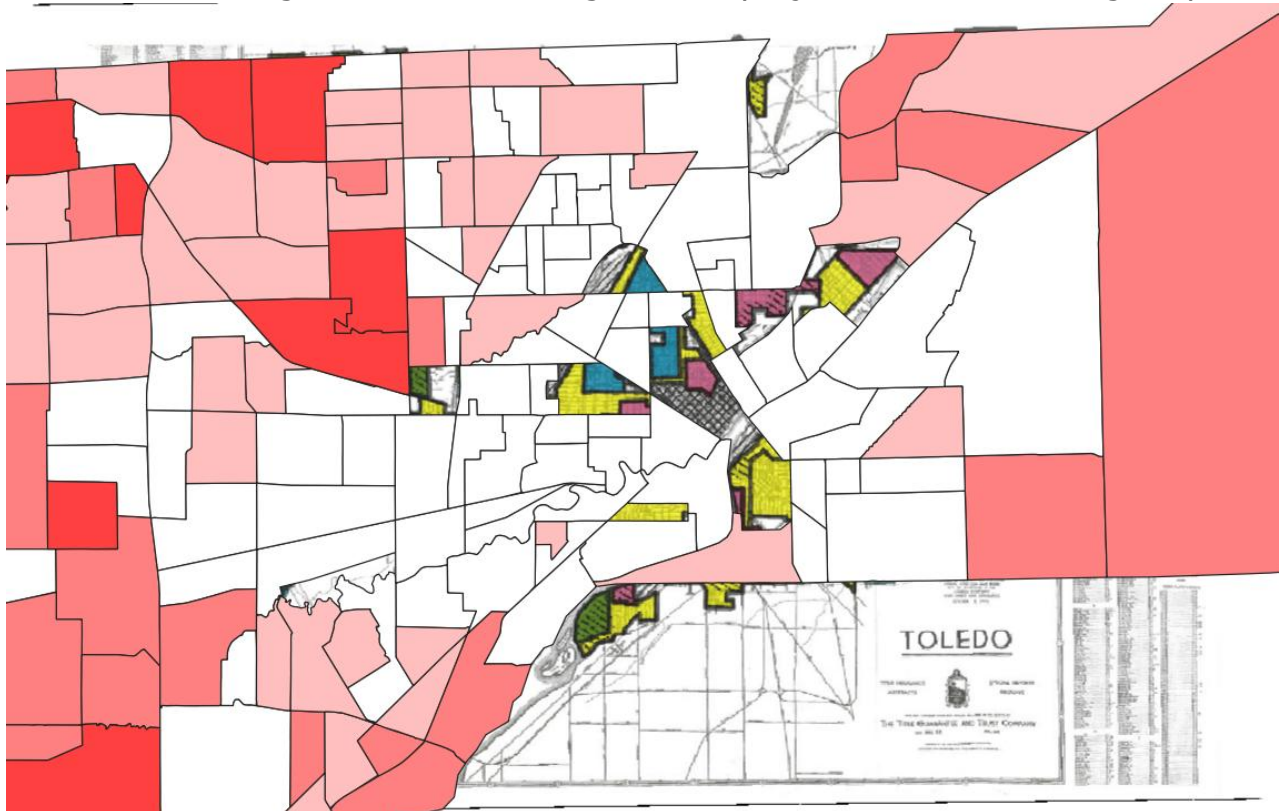
2023 Home loan originations. White shaded tracts saw 1-6 loans; darkest red saw 21-26 loans



HOLC redlining map

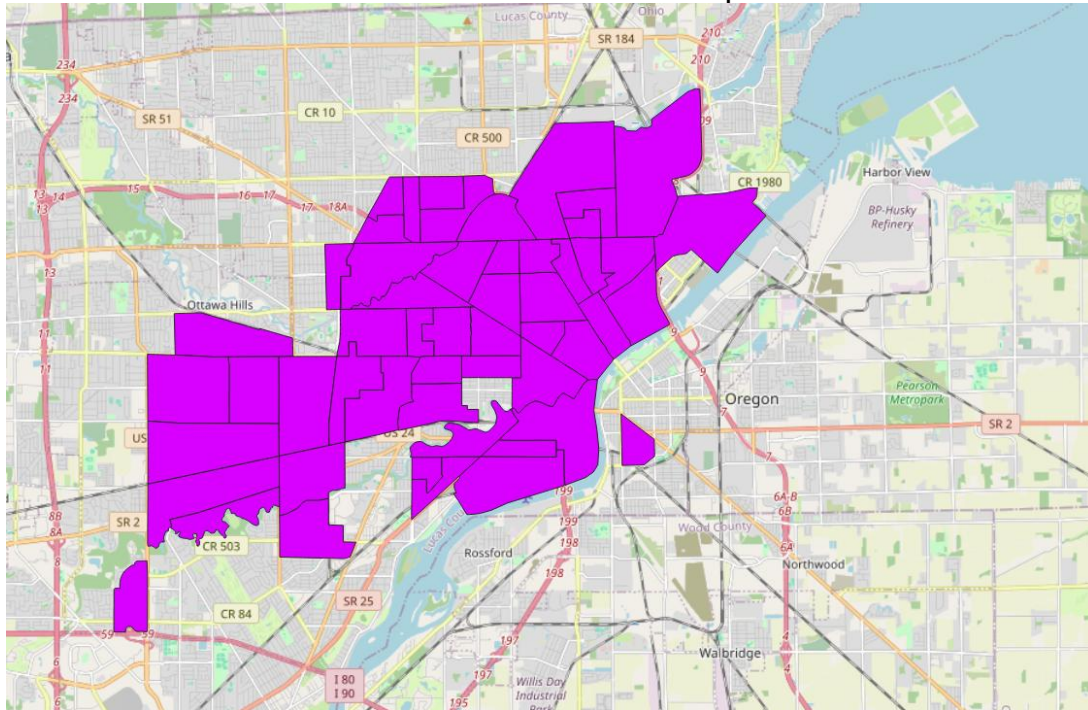


2023 Huntington home loan originations projected over redlining map

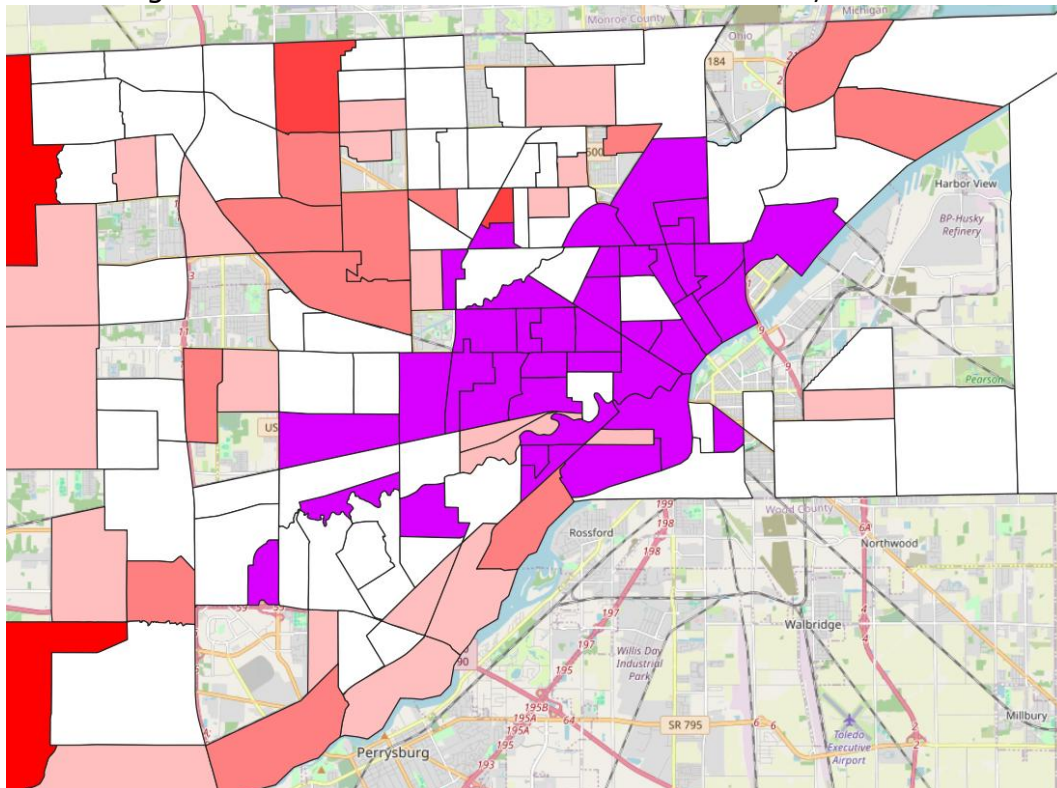


KeyBank

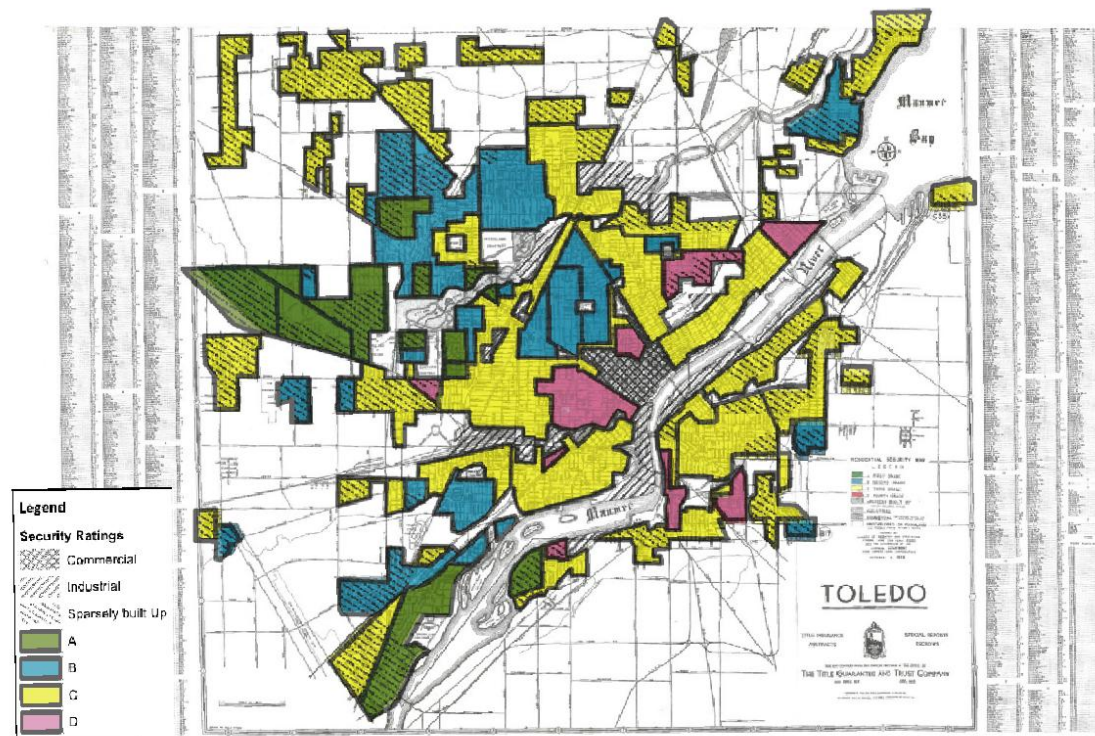
49% or less White Alone not Hispanic



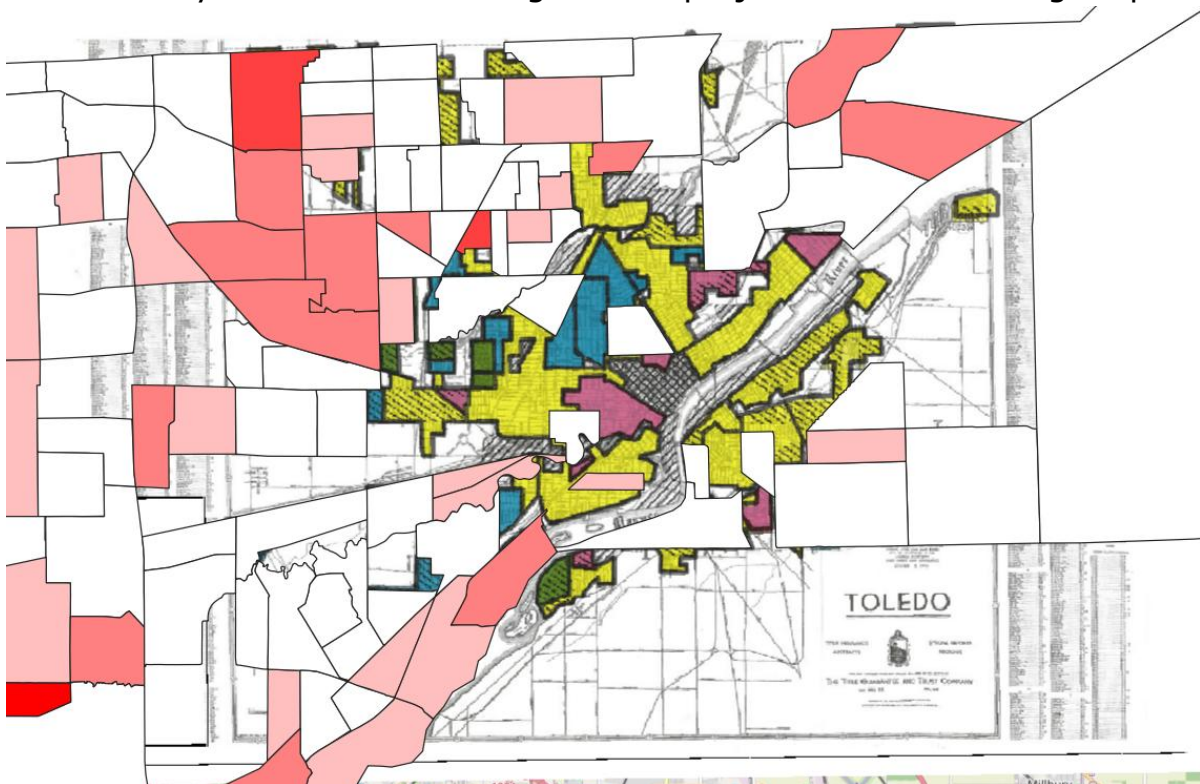
2023 Home loan originations. White shaded tracts saw 1-2 loans; darkest red saw 5-6 loans



HOLC redlining map



2023 KeyBank home loan originations projected over redlining map



Access to home loans is a key issue for the Toledo area as the number of rentals continues to increase along with housing affordability and stability concerns.

The City should strongly consider options to improve access to homeownership. These could include:

- Homeownership fairs to educate the community on access to homeownership.
- Incentivizing banks to increase access to home loans through better marketing and product offerings.
- Encourage banks to better disclose their commitments to the Toledo area. This should include an explanation of how banks are meeting Community Reinvestment Act requirements in the area more specifically.
- To accomplish these goals, the City should consider reviewing how local laws can provide incentives to banks. The National Community Reinvestment Coalition provides examples of local laws that accomplish this: https://ncrc.org/wp-content/uploads/2012/07/summary_responsiblebank.pdf. This includes a local law in Cleveland. The City should consider sending staff and council members to meet with Cleveland officials to discuss how this local law operates in the Cleveland area to evaluate how to accomplish this in Toledo.
- The City should also undertake a more thorough analysis and study of the available HMDA data and lending patterns in the area to better understand these issues.

Insurance

Historically, residents in communities of color have not been given access to replacement cost homeowner insurance. Instead, they were only offered fire policies or market value policies. Since many residents have had the same insurance company and policy for decades, their coverage may be inadequate and may never have been updated. As a result, in the event of a major loss, many residents in communities of color may lack sufficient coverage to rebuild their homes.

Product Availability

Many agents do not disclose the full assortment of policies available to prospective customers and may quote inferior policies in integrated and minority neighborhoods versus the policies quoted in predominately white neighborhoods and suburbs. Consumers may be unaware that other options existed. TFHC has found some evidence of steering to different insurance companies based on the racial composition of a neighborhood.

TFHC continues to receive complaints from customers residing in integrated and minority communities stating that they are being denied access to replacement cost coverage or replacement cost plus coverage due to discriminatory underwriting criteria such as the age of the dwelling, the purchase price, ratios of market value to replacement cost, and/or the square footage of the property. Not only the consumer, but the entire neighborhood and tax jurisdiction experiences a loss when a property cannot be rebuilt due to a shortfall of insurance.

1. Insurance companies that require customers to obtain both auto and home insurance policies prevent many customers from applying. Such policies may have a discriminatory impact on individuals with disabilities and low- and moderate-income communities of color.
2. Insurance company policies which prevent agents from writing policies for individuals who have not had recent coverage can have a discriminatory impact.

Pricing

1. Discounts: Agents may question consumers differently and apply discounts differently based on the characteristics of the applicant and/or the neighborhood where the property is located.
2. Algorithms: Insurance companies use credit and insurance scores to price insurance. Algorithms used to price insurance are not transparent and may

have discriminatory factors incorporated in them. The risk associated with a lower credit score may be overstated for individuals and communities of color.

Inspections

1. Some insurance companies are conducting proportionally more condition inspections in integrated and minority neighborhoods than white neighborhoods.
2. Some insurance companies are cancelling and non-renewing properties due to condition without providing the homeowner with the opportunity to correct the condition. Further, some insurance companies are treating their customers differently in this regard based on the demographic characteristics of the neighborhood. For example, residents in white neighborhoods may receive written notification regarding a concern with their roof and a three-month period in which to correct the problem. In contrast, residents in a minority neighborhood may simply be cancelled or non-renewed without notice.
3. Housing condition criteria has been more strictly enforced in minority neighborhoods than predominately white neighborhoods. The Center has received complaints from residents of minority neighborhoods who have been threatened with non-renewal of insurance policies over insignificant amounts of peeling paint. Also, in one case, The Center found that one company routinely threatened to cancel policies in minority neighborhoods in which airing decks lacked updated railings but did not enforce the rule in white neighborhoods.

Non-Renewal and Policy Cancellations

1. Some insurance companies may arbitrarily non-renew or cancel existing policies of long-standing customers in minority neighborhoods.
2. Some insurance companies may suddenly eliminate entire lines of insurance. In situations in which minority customers have been historically segregated into particular lines of insurance, this can have a discriminatory impact.

Claims

1. The Fair Housing Center has received complaints in which unusually strict documentation standards have been required of residents in urban neighborhoods compared to white suburban areas. For example, after a resident in a minority neighborhood experienced a burglary, an insurance

company refused to cover the loss of a basic television set because the consumer did not have the receipt.

2. Insurance companies have delayed payments of claims for properties in integrated and minority neighborhoods. Persons of color may also be subject to depositions prior to payment and may be forced to hire advocates to help get their claims paid. Complaints to The Fair Housing Center in this area have involved persons of color and/or neighborhoods of color.
3. Non-payment of claims in integrated neighborhoods and communities of color has also been an issue The Center has identified.

Availability of Insurance for homes to receive rehab grants

Many homes needing rehab grants are located in older urban neighborhoods. In some cases, a Catch-22 situation exists in which a home has a significant need for rehab, such as needing a new roof. However, in order to qualify for the grant, the home must be insured and the insurance company will not provide coverage until the roof has been replaced.

Habitational Insurance

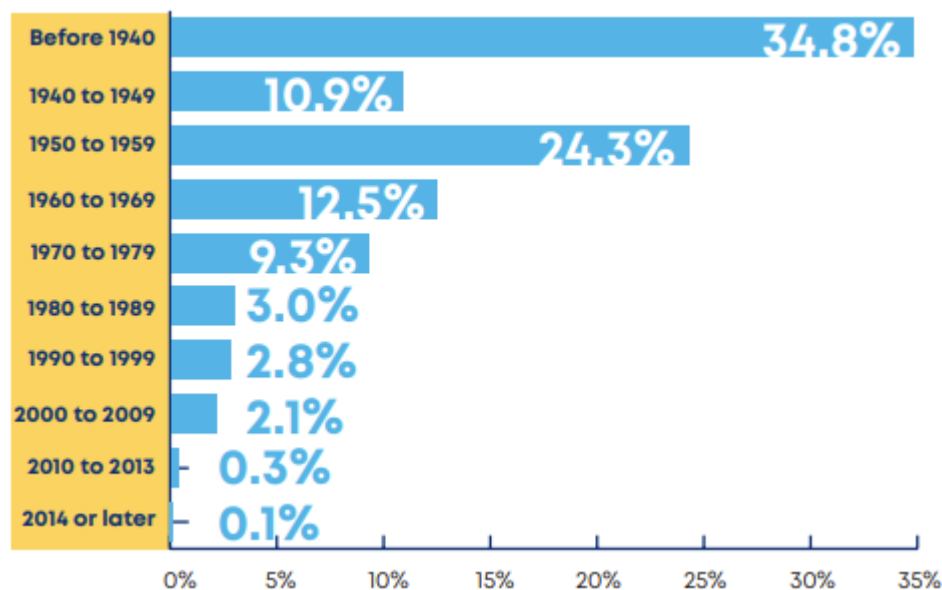
Habitational insurance refers to property and liability coverage for multi-family apartment buildings. Some habitational insurance policies prohibit coverage for properties with Section 8 voucher holders, cap Section 8 residents to a certain percentage of all tenants (e.g., 25 percent) and/or charge higher premiums on properties where Section 8 voucher holders reside. Such policies may have a disparate impact on persons of color, families with children, women, and persons with disabilities.

Availability of Accessible Housing for Persons with Disabilities

As highlighted in feedback received from community outreach events and the survey, there is a significant need for more accessible housing in the Toledo area. Persons with disabilities often have difficulty identifying any locations that have accessible apartment units or accessible houses. This issue was similarly highlighted in the prior analysis of impediments and remains an important concern.

Under the Fair Housing Act, housing constructed after **March 1991**, must comply with the Act's accessibility requirements. These design and construction standards ensure that housing can be accessible for persons with disabilities. But they only apply to multi-family housing built after March 1991.

The vast majority of housing in Toledo was built long before 1991. According to the City's housing study the largest share of housing in the area was built before 1940.¹¹²



¹¹² See

https://cdn.toledo.oh.gov/uploads/documents/Neighborhoods/CityOfTol_Housing_FINAL_PGS_ScreenQuality_small_Appendices.pdf.

Enforcement of existing accessibility rules in Toledo offers an opportunity to increase accessible housing.

Ohio's Existing Building Code

Though Toledo's housing stock is old and most often highly inaccessible, there are opportunities to address this problem. First, under state law, older buildings that undergo significant renovations are also required to include a plan for accessibility even if they were built before 1991.

Section 306 of Ohio's Existing Buildings Code requires certain accessibility improvements when a building undergoes repair, change of occupancy, additions, or alterations. Depending on the scope and level of the alterations or repairs, the contractors completing the work must ensure accessibility.

In many Midwest areas, older warehouses are being renovated to transition them into apartment complexes. This has occurred in the downtown area of Toledo as well. When any such work is undertaken, it is important for the contractors to provide an accessibility plan as required by Ohio's Existing Building Code.

The City could address this easily by working with the City's Building and Code Compliance officials to review the importance of ensuring accessibility plans. Sometimes, Building code officials do not review this portion of plans closely. If the City's leadership emphasizes the importance of this issue, it could help increase accessibility.

Toledo's Visitability Law

In Toledo, local law requires that housing constructed with federal subsidies must be "visitable," meaning that it is accessible within certain standards set forth at TMC 1347.

Specifically, the law provides helpful requirements for new dwelling units that were subsidized with public funds:

"All new one-, two- and three-family dwelling units, which have received a subsidy to building from a governmental body or agency, must comply with the requirements below in addition to the requirements provided in the adopted residential code.

(a) **No step entrance:** Provide at least one no step entrance. The required no step entrance shall be accessed via a visitable route.

- (b) **Doors/openings:** All doors and openings shall have a minimum net clear width of 32 inches.
- (c) **Hallways/corridors:** All hallways and corridors on the main floor shall be at least 36 inches in width.
- (d) **Bathroom/half-bath:** Provide a bathroom or half-bath on the main floor with clear floor space of 30 inches x 48 inches.
- (e) **Bathroom/half-bath walls:** All walls in the required bathroom/half-bath shall have reinforcing/backing in the walls to allow for future installation of grab bars.
- (f) **Wall electrical outlets:** Wall electrical outlets on the main floor shall be mounted at least fifteen inches above the finished floor.
- (g) **Light switches, thermostats, and other controls:** Light switches, thermostats and other control devices on the main floor shall be mounted no higher than 48 inches above finished floor.

The visitability law is particularly important because it applies to single-family homes, whereas the Fair Housing Act's standards only apply to multi-family complexes.

Additional opportunities to address accessibility

In addition to the current visitability ordinance and the Existing Building Code, the City should consider requiring similar accessibility rules in its contracts or grants to developers as well as including these requirements as a condition to receiving tax incentives and similar programs. For example, businesses that benefit from Tax Increment Financing or Opportunity Zone tax incentives should commit to visitability.

Another option is to more specifically incentivize the development of accessible housing in the area. This could include directly financing new affordable housing that is intended for persons with disabilities. An obvious example of this would be new permanent supportive housing for persons with disabilities.

Source of Income Discrimination

Background

Since the passage of the Fair Housing Act, Fair Housing advocates have fought to remove barriers that perpetuate segregation and impede fair housing choice. Despite these efforts, many families, especially low-income families, face significant challenges to securing decent, safe, and affordable housing opportunities. Some neighborhoods, usually those of the highest opportunity, are closed off, and low-income minority families often remain concentrated in central-city areas without the benefit of the community assets that exist in other neighborhoods.

In 1974, HUD began the rollout of the Housing Choice Voucher program. The program intends to give low-income families greater choice in housing by allowing them to participate in the private housing market. Under the program, families receive a voucher for assistance, which they may take to any private landlord. The rental unit must pass a basic housing quality standards review and must be affordable within local fair market rent standards. Once the unit is approved, the landlord receives monthly payments from the local Housing Authority to subsidize rent for the family.

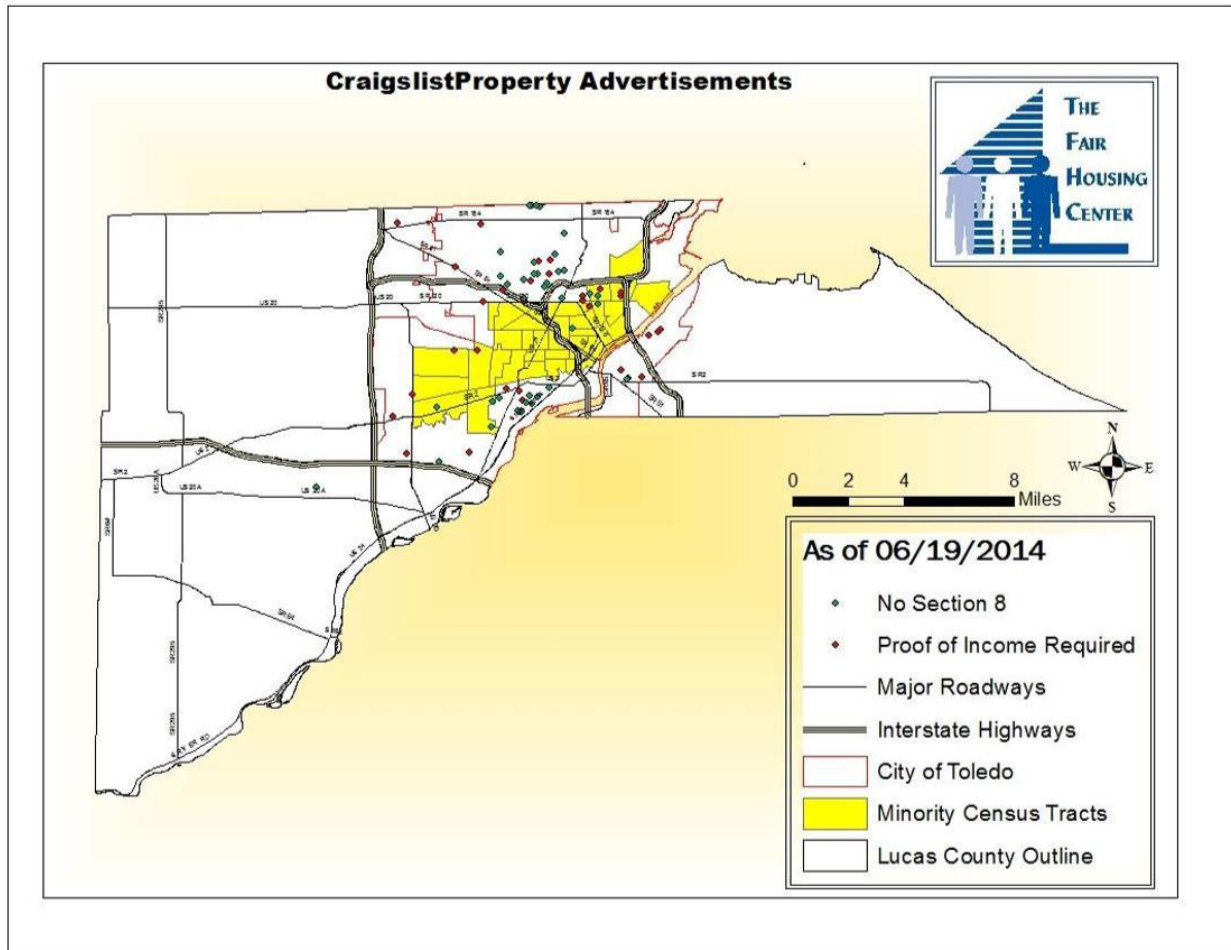
While the Housing Choice Voucher program intends to give low-income families more options in housing, some landlords are unwilling to participate. Many of the historic patterns of housing segregation remain for families with vouchers due to the unwillingness of some landlords to participate in the program.

In the decades following the rollout of the Housing Choice Voucher program, local jurisdictions have implemented source of income discrimination laws. PRRAC provides a comprehensive list of local jurisdictions that have implemented source of income discrimination laws. The laws generally prevent potential landlords from denying an applicant merely because of their source of income, which might include Social Security, Veterans Benefits, Section 8 Vouchers, etc.

A full list of all states, cities, and other jurisdictions that have adopted source of income discrimination laws is available at <https://prrac.org/pdf/AppendixB.pdf>.

These trends were true in the Toledo area as well. This is why the previous 2020-2025 AI identified SOI discrimination as an important barrier. The Fair Housing Center's research on this issue dates back now many years. The map below, for example, shows a sampling of Craigslist advertisements in 2014 over several months that explicitly excluded voucher-holders from available housing units. The majority of the ads are for housing located outside predominantly minority census tracts and in higher-opportunity areas. Voucher-holders whose search for

housing opportunities in these areas receive a strong message -- "You're not welcome here" -- with "here" being higher-opportunity areas largely populated by white residents.



Map created by Jason Clay, FHC volunteer and intern with Craigslist as data gathered by intern Chelsea Meister

Efforts in Ohio and Toledo to address Source of Income Discrimination

In 2009, the City of Wickliffe became the first city in Ohio to ban source of income discrimination in housing. The City of Wickliffe included source of income as a protected class, and thus a basis for potential discrimination, in its local housing discrimination ordinance.¹¹³

Several other Ohio cities have also recently followed suit and banned source of income discrimination in housing. These Ohio cities include Linndale, South Euclid, City of University Heights, and City of Warrensville Heights.¹¹⁴ These ordinances encourage the goals of the voucher system and allows voucher recipients to fully participate in the rental marketplace.

Toledo also followed the national trend of enacting protections for Housing Choice Voucher recipients by prohibiting source of income discrimination. First, Toledo City Council introduced an ordinance to prohibit discrimination based on source of income in 2018. See O-498-18. A number of local publications spoke favorably of the proposal.¹¹⁵

This Ordinance finally passed in 2020. Now, Toledo law makes it a misdemeanor offense to discriminate based on source of income.¹¹⁶

However, Housing Choice Voucher recipients remain concentrated in only certain neighborhood areas. These concentrations generally conform with racial segregation predominant in the Toledo area. Compare the maps provided on the following page that show the strong connection between race and Housing Choice Voucher concentration.

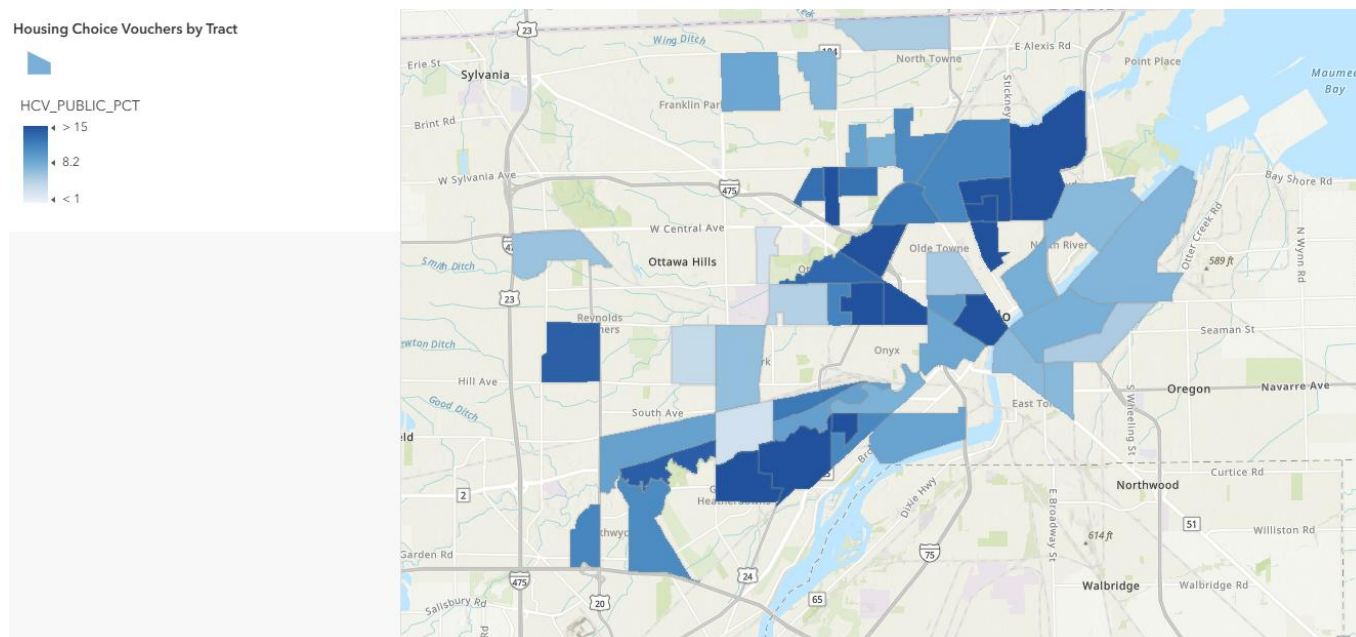
¹¹³ See City of Wickliffe, Ohio Municipal Code Ch. 1103.

¹¹⁴ See Linndale, Ohio Municipal Code Ch. 515; South Euclid, Ohio Municipal Code Ch. 1408; City of University Heights, Ohio Municipal Code Ch. 820, and City of Warrensville Heights, Ohio Municipal Code Ch. 113.

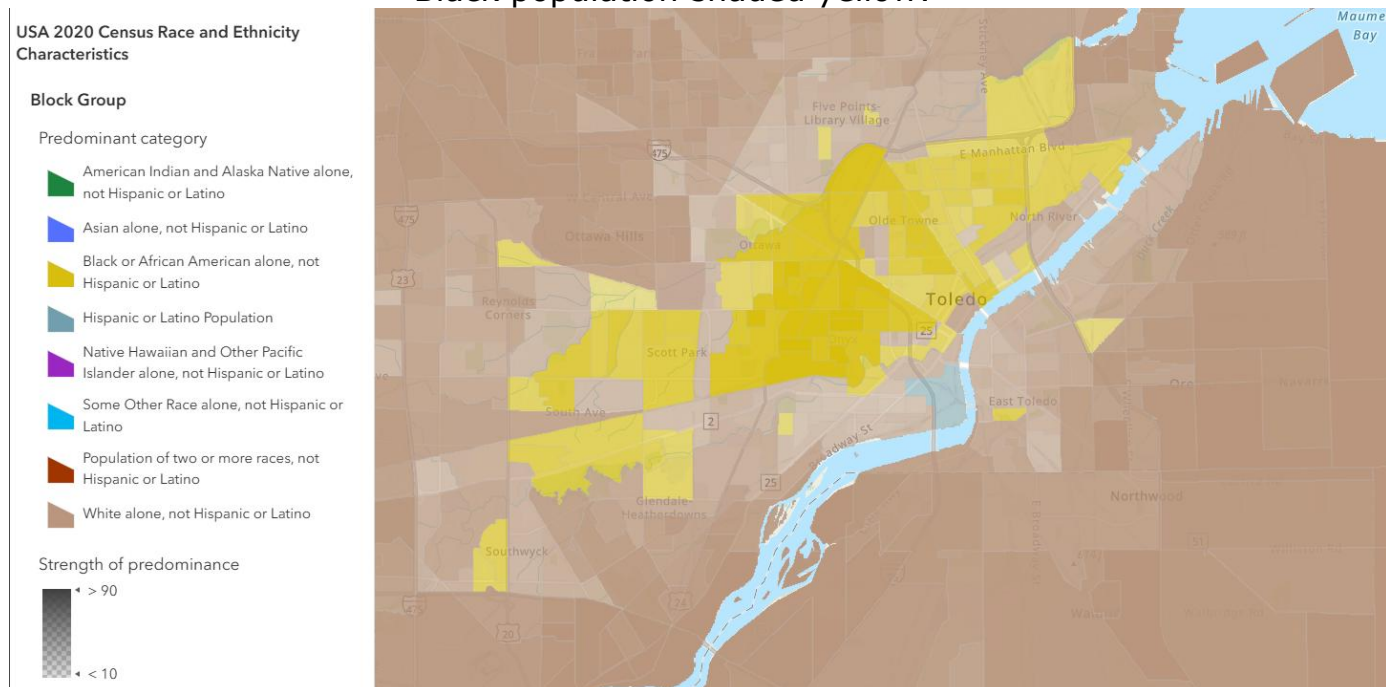
¹¹⁵ See e.g. <http://www.thetruthtoledo.com/story/2019/011619/Perryman.htm>.

¹¹⁶ See Toledo Municipal Code, Chapter 554, https://codelibrary.amlegal.com/codes/toledo/latest/toledo_oh/0-0-0-93855.

This map shows shades census tracts in the Toledo area, shaded blue, where at least thirty Housing Choice Voucher recipients live, according to HUD's most recently available data.¹¹⁷



These trends align closely with racial demographics of the area. This map shows Black population shaded yellow:



¹¹⁷ HUD has made this data available, <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::housing-choice-vouchers-by-tract/about>.

Working with The Fair Housing Center, Bowling Green State University studied this issue as well. The full study and report is available here:

<http://toledofhc.org/wp-content/uploads/2025/02/Toledo-Ohio-Housing-Choice-Voucher-Assessment.pdf>. The study uncovered ongoing discrimination against voucher holders and the disparate impact of this discrimination:

“The main findings [of the BGSU study] include evidence that some landlords openly deny vouchers as valid payment for rentals, and for others that do accept them, voucher users are required to sign a different form of lease than regular renters. The authors also created a record of the demographic makeup of voucher users in Toledo, Ohio, and the United States. The demographics show that certain populations, like Black Americans and people with disabilities, are overrepresented in relation to the general public. The findings overall suggest that marginalized groups experience a disparate impact from potential housing choice discrimination.”

Enforcing local the local law

Currently, most rental housing providers in the Toledo area do not communicate that they discriminate based on source of income, and discriminatory ads are much harder to find, as compared to the research that occurred in 2014. However, The Fair Housing Center still receives reports of individuals facing discrimination based on source of income. The Center will be conducting fair housing testing on this issue.

Though the law has already caused some improvements in the market, enforcement of the law has been extremely limited. While the City has taken some steps to develop a system for enforcement of the law, much progress is still needed.

The City should develop its enforcement systems further and prioritize this next phase in the 2025-2030 Action Plan. It should also set aside funding and staff to educate the public on the importance of SOI discrimination and the City’s local law.

Voucher Mobility

In addition to banning discrimination based on source of income, there are other local policies that can be improved to increase the mobility and opportunities of Housing Choice Voucher recipients. “Voucher mobility” refers to how easily a voucher recipient can find the housing they need and near opportunities like jobs, healthy food, and transportation.

Research gathered by the Poverty Race Research Action Council (PRRAC) explains the importance of voucher mobility in accessing opportunity. In 2022, PRRAC released a study of mobility programs across the U.S., an extremely helpful guide of implementing such programs:

<https://www.prrac.org/pdf/prracHousingMobilitySurvey2022.pdf>.

FIGURE 2. PROGRAM ACTIVITIES CHECKLIST

ACTIVITY	BASIC	STANDARD	ENHANCED
Landlord development	<ul style="list-style-type: none"> • Contact landlords from local publications, databases, and trade groups • Offer responsive, convenient landlord services 	<ul style="list-style-type: none"> • Maintain up-to-date listings in opportunity neighborhoods • Cultivate other opportunities to interact with landlords 	<ul style="list-style-type: none"> • Make personal appeals • Plan a media campaign • Invest in technology to streamline processes • Offer financial incentives
Target population outreach	<ul style="list-style-type: none"> • Promote housing mobility at all points of contact 	<ul style="list-style-type: none"> • Diversify your promotional materials • Hold events to attract interest and attention 	<ul style="list-style-type: none"> • Organize tours to opportunity neighborhoods • Offer financial incentives
Pre-search counseling	<ul style="list-style-type: none"> • Help anticipate mobility barriers at voucher briefings 	<ul style="list-style-type: none"> • Interview and enroll program participants • Offer workshops 	<ul style="list-style-type: none"> • Perform in-depth assessment • Extend individualized support to remediate barriers to mobility
Housing search assistance	<ul style="list-style-type: none"> • Use voucher briefings to arm households with the tools they need 	<ul style="list-style-type: none"> • Provide support at key moments • Offer help with transportation 	<ul style="list-style-type: none"> • Connect landlords with households at events in opportunity neighborhoods • Provide intensive one-on-one assistance
Post-move support	<ul style="list-style-type: none"> • Check in before voucher recertification 	<ul style="list-style-type: none"> • Provide information about resources to support household transition • Check in shortly after move 	<ul style="list-style-type: none"> • Connect throughout the voucher term

PRRAC also provides suggestions for best practices in voucher mobility, here: <https://www.prrac.org/pdf/ExpandingChoice.pdf>. This guidance is directed to public housing authorities to assist them as they implement Housing Choice Voucher mobility programs. The following chart from the publication summarizes

many of these suggestions for Public Housing Authorities to implement.

In addition, public housing authorities have the option of implementing a Small Area Fair Market Rents program. This program bases voucher rental payment standards on Zip Code instead of using county-level data. This approach is preferable because it makes the rental payment standard more accurate for the area where the person lives. This allows voucher recipients to pay more for rents in a higher-opportunity area thus improving the mobility of the voucher recipient.

Considering the heavy concentration of voucher recipients in low-opportunity areas in the Toledo market, LMHA should carefully review suggestions to increase voucher mobility and make a plan to implement these suggestions where possible. In addition, LMHA should strongly consider entering the small area FMR program to further improve voucher mobility.

Land Use and Zoning

Local land use and zoning laws can present significant impediments to fair housing choice and opportunities to affirmatively further the goals of the Fair Housing Act.

Local governments, including Toledo, must ensure compliance with Fair Housing law. In 2016, the U.S. Department of Justice and the U.S. Department of Housing and Urban Development issued a joint statement providing guidance on compliance with the Fair Housing Act related specifically to local zoning and land use laws. See U.S. Department of Housing and Urban Development and U.S. Department of Justice, *Joint Statement of the Department of Housing and Urban Development and the Department of Justice, Local Land Use Laws and Practices and the Application of the Fair Housing Act* (2016) (hereafter “Joint Statement”).¹¹⁸

According to the Joint Statement, examples of state and local land use and zoning laws or practices that may violate the Act include:

- Prohibiting or restricting the development of housing based on the belief that the residents will be members of a particular protected class, such as race, disability, or familial status, by, for example, *placing a moratorium on the development of multifamily housing because of concerns that the residents will include members of a particular protected class*. (Emphasis added.)
- Imposing restrictions or additional conditions on group housing for persons with disabilities that are not imposed on families or other groups of unrelated individuals, by, for example, requiring an occupancy permit for persons with disabilities to live in a single-family home while not requiring a permit for other residents of single-family homes.
- Imposing restrictions on housing because of alleged public safety concerns that are based on stereotypes about the residents’ or anticipated residents’ membership in a protected class, by, for example, requiring a proposed development to provide additional security measures based on a belief that persons of a particular protected class are more likely to engage in criminal activity.
- Enforcing otherwise neutral laws or policies differently because of the residents’ protected characteristics, by, for example, citing individuals who are members of a particular protected class for violating code requirements for property upkeep while not citing other residents for similar violations.

¹¹⁸ The Joint Statement is available at <https://www.justice.gov/crt/page/file/909956/download>.
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Prepared by the Fair Housing Center

- Refusing to provide reasonable accommodations to land use or zoning policies when such accommodations may be necessary to allow persons with disabilities to have an equal opportunity to use and enjoy the housing, by, for example, denying a request to modify a setback requirement so an accessible sidewalk or ramp can be provided for one or more persons with mobility disabilities.

Restrictions on housing for persons with mental health disabilities and persons recovering from a substance use disorder

Toledo currently employs significant restrictions on group homes for persons with disabilities, which invokes outdated and offensive terminology. The Ability Center, The Fair Housing Center, and the Mental Health and Recovery Services Board asked that the City please update its zoning code to comply with fair housing laws and to better serve persons with disabilities. In 2022, the City did consider a potential change to the zoning code after a study conducted by the Plan Commission. Unfortunately, this process did not result in an appropriate policy change and did not change the zoning code. City Council did not proceed with a vote on the law and the outdated zoning laws remain. The complete file for this proposal along with recommendations from community organizations can be found here:

<https://toledo.legistar.com/LegislationDetail.aspx?ID=5845051&GUID=D00C80C5-D1C5-4CBF-812A-5D2CD7DABDAF>.

Toledo should enact the version of the law as suggested by the community groups, here:

<https://toledo.legistar.com/View.ashx?M=F&ID=11248417&GUID=2BDEDA73-BC64-4693-887C-DDD6B0469E5A>.

Attention to issues in neighborhoods that experienced redlining and other forms of discrimination.

Local zoning laws and processes should be mindful of disinvestment in neighborhoods that have historically experienced redlining or other forms of discrimination. For example, residents in some historically disinvested areas may oppose the development of a dollar store or other types of businesses because they feel it will decrease the value of their homes or make it more difficult to

access fresh produce and other opportunities in their neighborhood. The City should take these perspectives into consideration as it contemplates approval of certain kinds of developments in these neighborhoods, and consider whether the proposal is truly consistent with any available neighborhood plans for the area such as those created by the Toledo Design Collective.

Access to healthy food is an important aspect of this work, as food deserts predominantly harm communities of color and make housing opportunities in those areas less favorable while reducing the value of homes in the area. As of the date of writing this AI, the City's Plan Commission is undertaking a study of food deserts as they relate to small box discount stores and actions that we can take to address the issue. The Fair Housing Center presented the request to City Council to address food deserts as an important fair housing issue. The file for this zoning case can be found here: <https://toledo.legistar.com/LegislationDetail.aspx?ID=7030081&GUID=729C36B0-31B6-4D24-8002-26892521C3C3>. Toledo should adopt these recommendations.

Providing reasonable accommodations for persons with disabilities

Toledo's current zoning laws regulate certain group living and group rental situations. These regulations may be acceptable under the Fair Housing Act but do present a point for caution. The City should grant reasonable accommodations for persons with disabilities who may seek group living arrangements.

The Joint Statement explains:

Neutral laws that govern groups of unrelated persons who live together do not violate the Act so long as (1) those laws do not intentionally discriminate against persons on the basis of disability (or other protected class), (2) those laws do not have an unjustified discriminatory effect on the basis of disability (or other protected class), and (3) state and local governments make reasonable accommodations when such accommodations may be necessary for a person with a disability to have an equal opportunity to use and enjoy a dwelling.

Toledo currently provides a reasonable accommodation policy that allows exceptions to current zoning standards at TMC 1111.1809. However, an impediment to fair housing choice may arise where persons are unaware of the availability of this administrative procedure.

LGBT+

Subsequent to the last AI for the 2020-2025 period, HUD has recognized protections based on gender identity and sexual orientation. This guidance essentially follows the Supreme Court's decision in *Bostock* which recognized civil rights protections based on gender identity and sexual orientation in the employment context. This directive is available here:

https://www.hud.gov/sites/dfiles/PA/documents/HUD_Memo_EO13988.pdf.

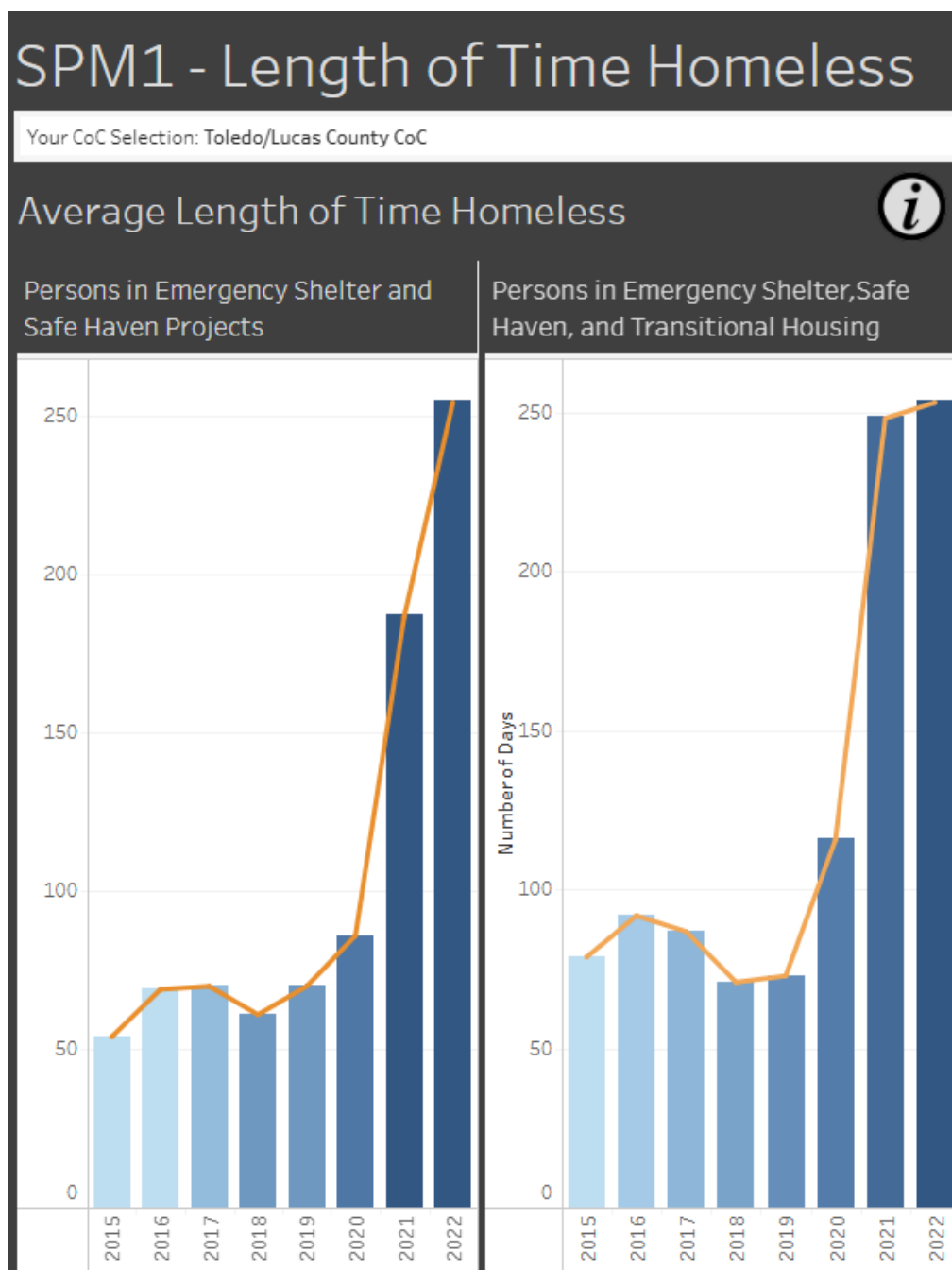
Prior to this change in federal law, the City of Toledo prohibited discrimination based on gender identity and sexual orientation in Municipal Code Chapter 554. But, as explained above, this law is rarely enforced.

If the City develops processes for enforcement of SOI discrimination protections, this will have added benefit for the LGBT community as they also will be able to file discrimination cases locally. This may be particularly important as HUD's willingness to enforce these laws may vary depending on which political party controls the Presidency and Congress. The current federal administration, for example, has taken positions opposed to some civil rights for members of the LGBT community.

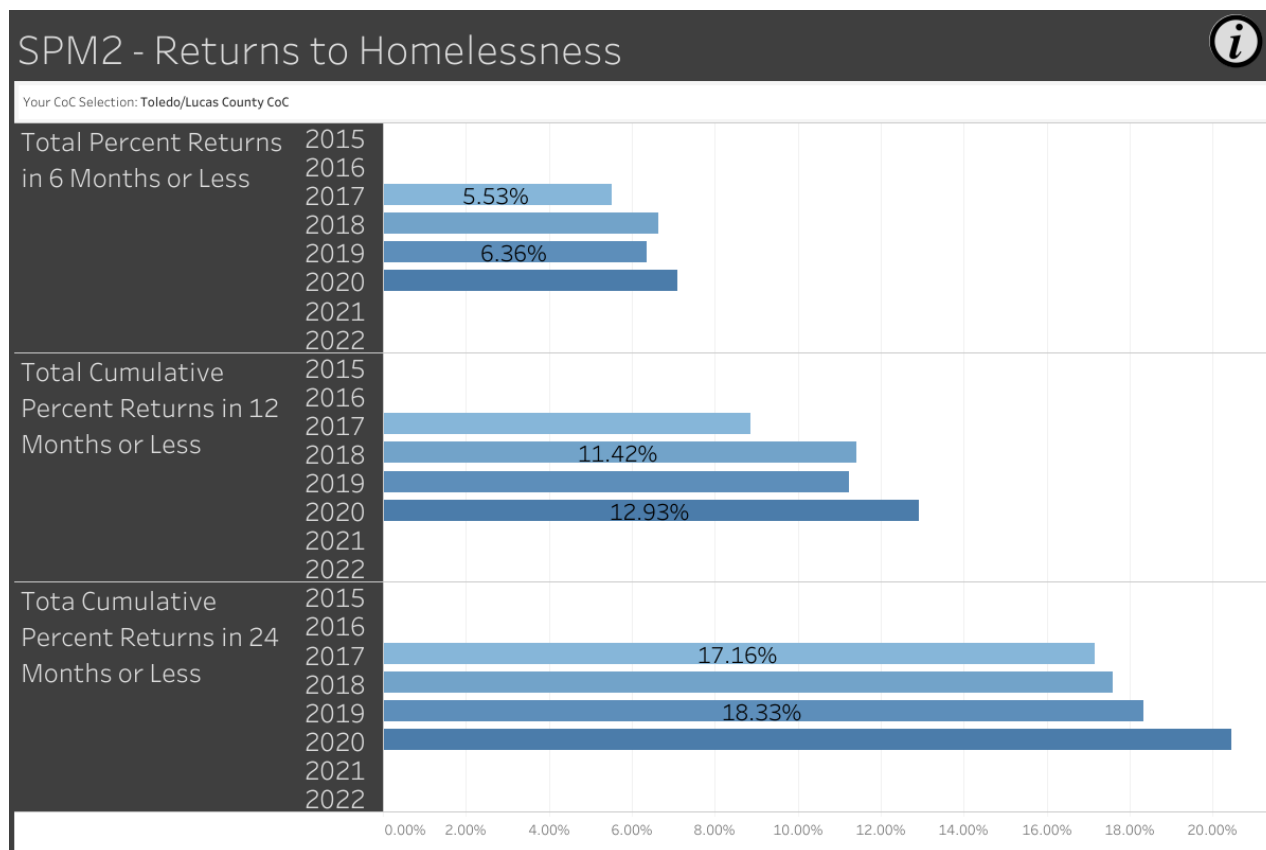
It is important for the City of Toledo to invest appropriate resources to respond to allegations of housing discrimination based on sexual orientation and gender identity. These cases should be thoroughly investigated and prosecuted where appropriate.

Homelessness and affordable housing

Since the previous AI for the 2020-2025 period, issues related to homelessness have grown worse. For example, the length of time someone remains homeless has increased substantially.



The number of persons returning to homelessness has also increased:



Black families are far more likely to face homelessness in the Toledo area. According to data from the Toledo Lucas County Homelessness Board, more than 50% of homeless persons are Black, though Black families represent only 20% of the local population.¹¹⁹

Directing more discretionary resources toward affordable housing

Discretionary funding sources, such as HOME and CDBG, should be evaluated to determine if a larger portion of those funds can be directed toward the development of affordable housing in the Toledo area.

Development of new housing resources must be cognizant of whether the location of the development will truly provide for access to transportation and other resources necessary to help the residents succeed.

¹¹⁹ Data made available at <https://www.homelessdata.com/research-tools/racial-disparity-analysis/>
2025 Analysis of Impediments, City of Toledo
Prepared by the Fair Housing Center

Considering the increase in the number of persons facing repeated and long-term patterns of homelessness, the City should also consider directing funds to affordable housing projects that are specifically aimed to address chronic homelessness.

In addition to HOME and CDBG, the City should set aside funding from its general fund and other sources, and make requests for funding to increase affordable housing in the area.

The City should consider assisting local nonprofits who are interested in developing affordable housing, specifically for the purpose of developing staffing and expertise in affordable housing development. Local governments are sometimes reluctant to fund supportive staffing, but this is crucial for success.

Finally, the City should consider providing funding for a housing problem-solving fund to support access to affordable housing and to overcome barriers to housing. Given the fact that many of the homeless in the area are increasingly facing long-term homelessness, this fund is particularly needed to overcome barriers they face.

Local laws that limit or eliminate access to housing services, and housing development

The construction of new affordable housing, as well as the renovation and rehabilitation of existing housing, would undoubtedly help many residents overcome barriers to fair housing choice. The sections above discussing homelessness and affordable housing as well as sections below covering substandard housing conditions illustrate the need for both affordable housing and rehabilitation of older and deteriorating housing stock.

Despite this urgent need, the City enacted a local law in 2023 that makes housing rehabilitation and affordable housing development significantly more difficult. Ordinance 293-23 created new and complicated processes for any such efforts funded by the City.

Specifically, Ord. 293-23 requires that any projects funded at \$100,000.00 or more must go through a unique new process wherein the “bidder” performing work funded by the City must meet with local building trade union representatives and complete a project labor agreement. The Ordinance reads:

[O]nce the successful bidder ("Bidder") is notified a pre meeting will be held involving the Bidder, the Northwest Ohio Building and Construction Trades Council ("NWOBTC"), the City of Toledo's Director of Diversity & Inclusion and the Director of Finance.

Within 15 days of this pre meeting, the Parties ("Bidder and NWOBTC collectively") shall negotiate a project labor agreement. The purpose of which is to advance the city's procurement interest in cost, efficiency, and quality while promoting labor management stability as well as compliance with applicable legal requirements governing safety and health, equal employment opportunity, labor and employment standards, and other related matters.

The bidding documents for each such construction project

shall contain a written provision requiring the successful bidder, and all of the bidder's contractors and subcontractors, to comply with and adhere to all of the provisions of the project labor agreement negotiated by the Parties for the project.”

The process set forth above immediately proved to be extremely confusing, cumbersome, or simply impossible for local nonprofit organizations to navigate. In effect, it made it impossible for vital services, such as roof replacement, repairs, and even new construction of housing to proceed. Even if the nonprofit could navigate this process, the cost of providing the service would increase exponentially.

There was no notice or opportunity for local organizations impacted by the law to comment or discuss potential implications before it was enacted. The law came as a shock to the area with significant negative consequences for work necessary to uplift blighted and disinvested neighborhood areas.

To make matters worse, the City interpreted the “\$100,000.00” provision to apply even where individual projects cost less than \$100,000, if the recipient had grant income from the City for various related projects that total more \$100,000 or more. This means that even minor repairs or small roof replacement jobs must go through this process, if they add up to more than \$100,000.00 in the aggregate. Effectively, it is impossible for vulnerable community members to get minor repairs from programs funded by the City.

The City should immediately take action to limit or eliminate the harmful impact of this law.

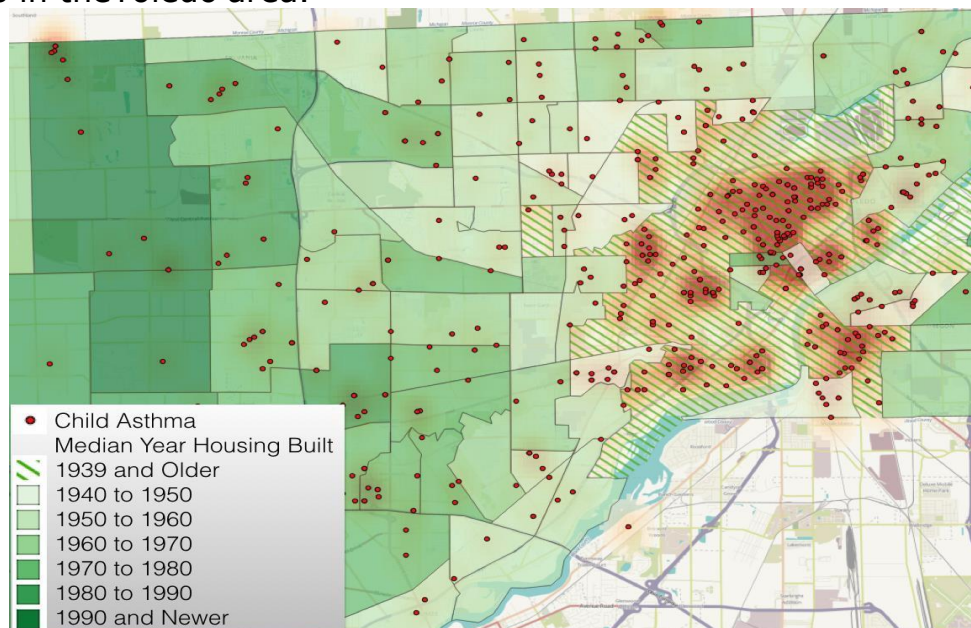
II. Housing terms and conditions

Even when someone has an equal opportunity to find housing, there are often considerable inequities in the terms and conditions for that housing. Indeed, advocacy for the passage of the Fair Housing Act was often built on examples of how housing conditions were far worse in neighborhoods of color as compared to other areas. Part II covers the terms and conditions of housing and the impediments to fair housing choice they create.

Substandard Housing Conditions

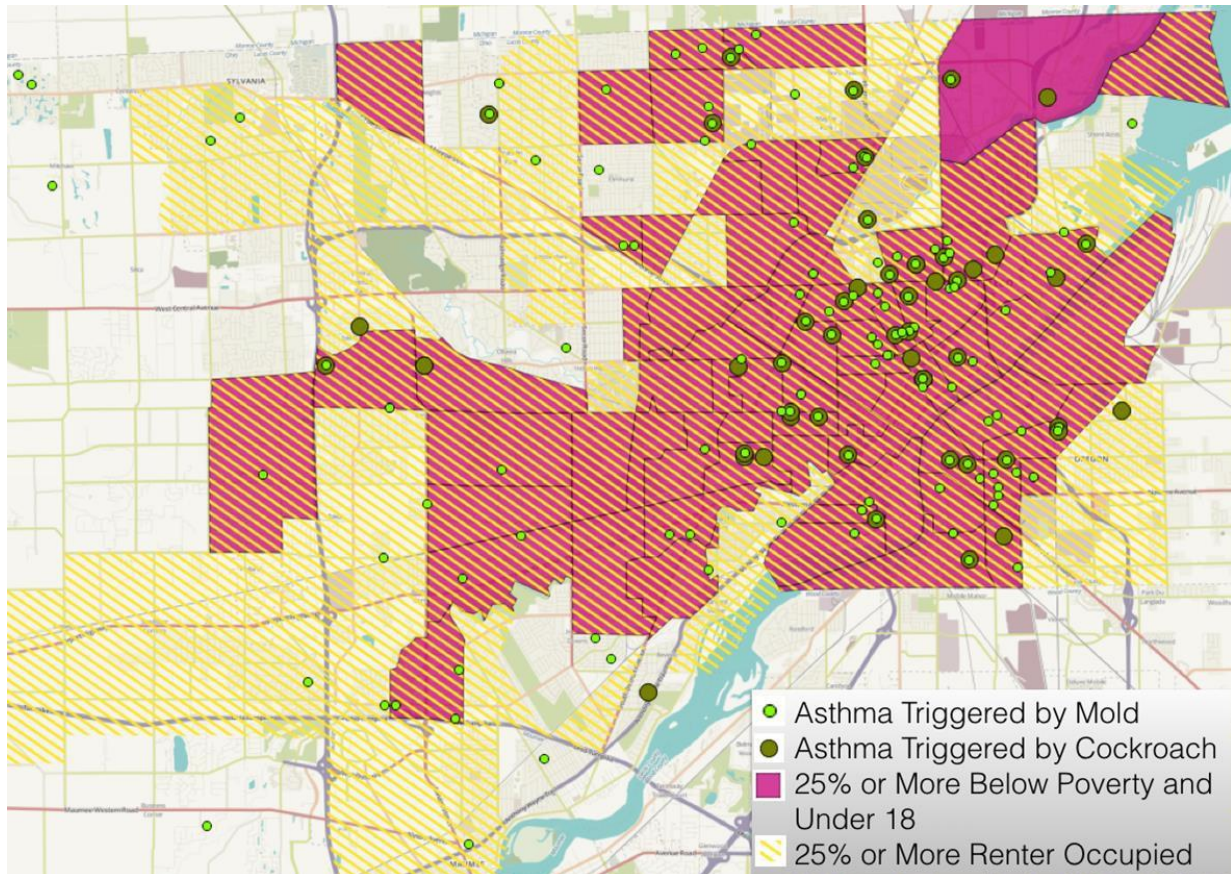
As was true in the 2020-2025 Analysis, it remains true that one of the most prevalent issues identified in feedback from the local community was housing conditions. Residents are often concerned with housing conditions within rental units, and in older housing stock in the Toledo area. This issue presents a critical impediment in Toledo.

Previous research has uncovered that child asthma incidents are much more likely to occur in areas with older housing stock and higher concentrations of minority residents with low income in R/ECAP areas. The following map images of Toledo are taken from a study conducted documenting concentrations of child asthma incidents in the Toledo area.¹²⁰

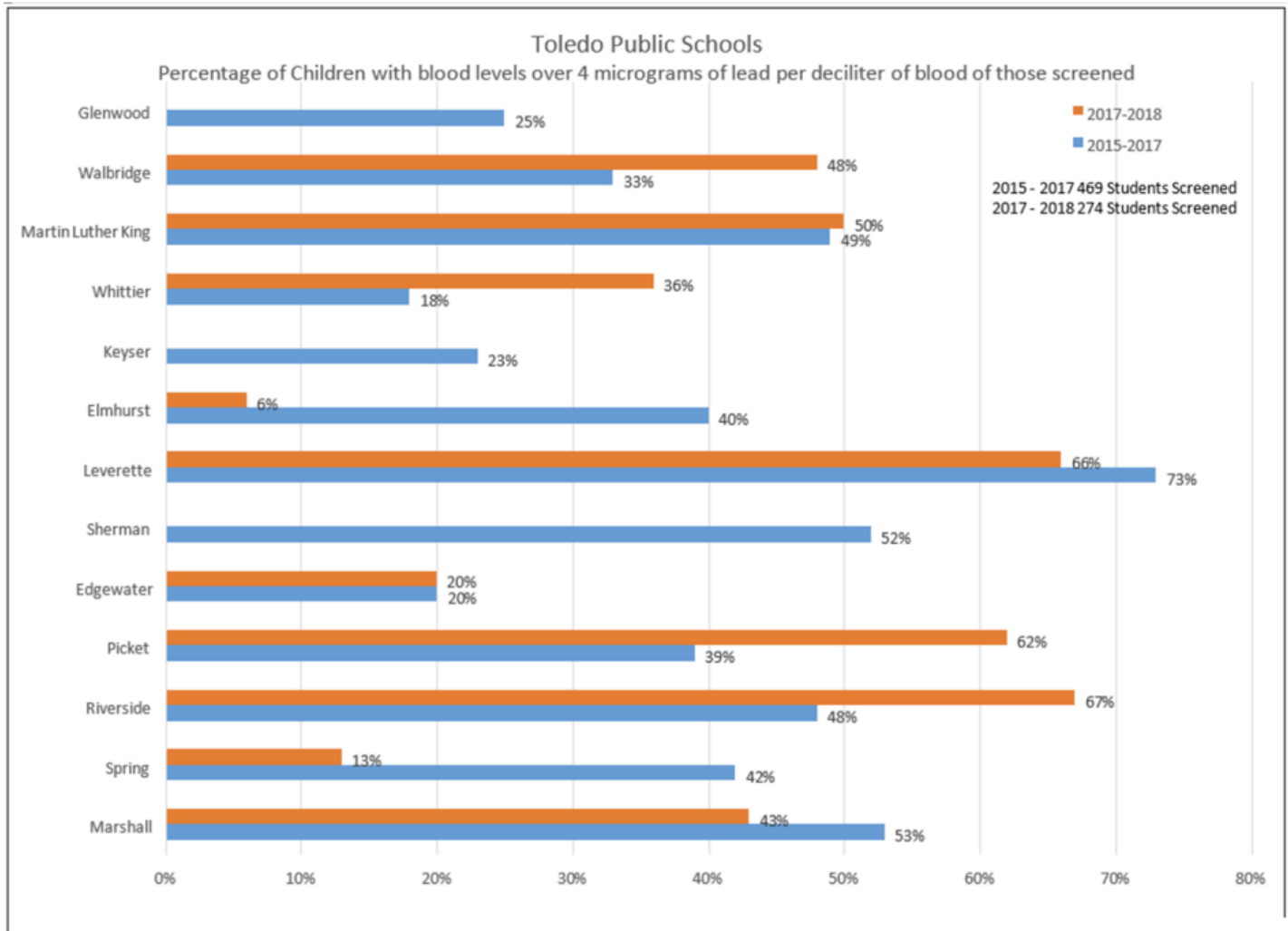


¹²⁰ See Healthy Lucas County, 2016/2017 Community Health Needs Assessment (2017), available at <https://lucascountyhealth.com/wp-content/uploads/2017/10/2016-2017-CHA.pdf>. This research was conducted by Ramalinga Reddy MD, MBA, George Thomas, Esq, Dawn Bolyard, RN, MSN, Nancy Buderer, MS.

This research revealed that child asthma incidents triggered by housing conditions such as mold and cockroaches occur more frequently in central-city neighborhoods where renters with lower-income reside. Child asthma incidents have a ripple effect on families: the child may miss more educational instruction due to sick days at home. Low-income parents often have few or no sick days to take to stay with a child, and may become unemployed as a result.



Local research has shown that schools in these same areas often see extremely high rates of children with elevated blood lead levels:¹²¹



Dr. Marilynne R Wood utmc, Principle Investigator

The fact that schools in the Toledo area would see lead poisoning rates of 60% is shocking and confirms that local efforts to address lead poisoning must be a high priority. Most lead poisoning is caused by deteriorated lead-based paint in older homes, especially in historically redlined and disinvested neighborhoods.

¹²¹ Research conducted by Dr. M. Wood.
2025 Analysis of Impediments, City of Toledo
Prepared by the Fair Housing Center

The lead ordinance

The passage of a new lead ordinance will help address lead poisoning as one of the most significant local impediments to Fair Housing. The City has a unique opportunity to address this impediment by investing the successful implementation of this ordinance. Now, enforcement is key.

Focusing code enforcement on housing conditions as an impediment

Currently, the City only rarely enforces local housing codes to address internal conditions inside rental units. Instead, Toledo focuses housing code enforcement almost exclusively on “external” issues, especially visible issues about which neighbors or other residents may complain. Instead, Toledo focuses housing code enforcement almost exclusively on “external” issues, especially visible issues about which neighbors or other residents may complain. These may include, for example, issues with uncut grass or blighted buildings.

The lack of focus and attention on “internal” housing conditions — most often the issues with which renters are concerned — presents an important impediment to fair housing choice. Housing conditions can powerfully impact the health and living conditions of renters and these issues disparately impact minorities in the Toledo area.

Issues like lead poisoning and asthma are often caused by the lack of maintenance of rental units, and by extension the lack of housing code enforcement to address these kinds of code violations. The City has a significant opportunity to address this impediment by shifting the way that its current housing code enforcement system focuses on “external” nuisances rather than “internal” housing conditions issues. Local housing and building codes undoubtedly give the City authority to investigate and enforce standards to address housing conditions, and many tenants would be more than willing to provide access to their rental units for inspectors to address housing code issues. Many other cities, including cities in Ohio, provide housing code enforcement to address housing conditions that impact the health and safety of renters.

The City should invest in training and development of its code enforcement staff to ensure they have the staffing, resources, and tools they need to efficiently and effectively implement code enforcement.

Importantly, the City undertook a significant study of its code enforcement operations conducted by the Center for Community Progress in 2021. One

finding of the study was that the City does not employ enough code enforcement officers, and a lower number than other cities of comparable size. The City should examine this study closely and implement its recommendations. This study is available here: <http://toledofhc.org/wp-content/uploads/2025/02/2021-01-A-More-Strategic-Equitable-Approach-to-Housing-and-Building-Code-Enforcement-in-Toledo-Ohio-TA-Report-1.pdf>.
<http://toledofhc.org/wp-content/uploads/2025/02/2021-01-A-More-Strategic-Equitable-Approach-to-Housing-and-Building-Code-Enforcement-in-Toledo-Ohio-TA-Report-1.pdf>.

The City's study on code enforcement further supports the same findings provided in this AI. For example, the study found:

"Ensuring Toledo's occupied rental properties meet basic code standards is critical to ensure the health and safety of Toledo tenants and neighborhoods—especially during a pandemic, when 'stay at home' home orders or recommendations literally mean 'housing is health.' Several City Council members report that the most common complaints residents bring to their attention are about substandard rental properties. Community members and key code enforcement staff similarly report that deteriorating rental properties are a significant problem. In addition, stakeholders interviewed believe that a significant percentage of problem landlords are not from Toledo or are corporate owners and therefore difficult to reach by the courts."

This review mirrors the same information The Fair Housing Center has collected anecdotally through its experiences as well as through the survey and focus groups conducted for this AI.

In addition, the current vacant property registry at TMC Chapter 1767 should be enforced to address blight in areas that have traditionally experienced disinvestment. Specifically, the registry should be enforced against mortgage companies that foreclose on houses and then may or may not complete the foreclosure process, leading to abandoned "zombie" liens. Toledo would not need to change its current vacant property registry as it already applies to mortgagees. The code specifically defines registrant as follows:

"'Registrant' means any person who holds legal or equitable title to the building, is a **mortgagee**, a land installment contract vendee/vendor-in-possession, assignee of rents, receiver, executor, administrator, trustee, lessee, agent, or any other person, firm, corporation, limited liability company, partnership, trust or other business association that is directly or indirectly in control of a building subject to the provisions of this section, and as set forth below

including, but not limited to **any mortgagee that has filed an action in foreclosure on the particular premises at issue, until title to the premises is transferred to a third party.** Under this definition, there may be more than one registrant of a building and any owner as defined under Section 1726.01. "Registrant" does not include the State of Ohio or a political subdivision of the State of Ohio, including, but not limited to, the Lucas County Land Reutilization Corporation, the Lucas County Treasurer, or the City of Toledo."

Enforcement of this provision could be accomplished by simply checking whether any foreclosure actions were filed related to a vacant property, and by providing education and outreach to mortgage companies that frequently file foreclosures.

Grants and other resources to assist in addressing housing conditions

The City currently administers programs that provide grants to residents to improve housing conditions, such as HUD's Lead-based Paint Hazard Reduction Demonstration Grant. The City also directs HOME funds into a grant program to assist residents in addressing housing conditions.

It is critically important that these programs are designed, marketed, and directed in a way that allows minority and low-income residents to access these resources, especially those in R/ECAP areas. For example, the City likely has opportunities to reduce requirements and processes necessary to obtain these funds that may be a barrier to residents, such as any requirements that the resident provide that they have an insurance policy for their home.

Direct services to tenants facing housing conditions issues

After the 2020 AI, The Fair Housing Center, as part of its work in addressing fair housing issues, developed a new Housing Conditions and Neighborhood Reinvestment program. This program provides free legal assistance to tenants facing difficult housing conditions issues. This program provides a critical lifeline to tenants where no other local program provides assistance. The program has achieved remarkable results with many housing conditions resolved. The program also aims to empower residents with education on their rights and responsibilities.

Public transportation

Without access to transportation, housing in many areas often has little or no value, and without transportation many residents cannot access the housing they need. For many of the most vulnerable residents in the Toledo area, transportation from their home is necessary to work, to buy groceries, to access healthcare and other necessities. For many of the most vulnerable residents in the Toledo area, transportation from their home is necessary to work, to buy groceries, and to access healthcare and other necessities.

Public transportation has always been a centerpiece of the Civil Rights movement. But in Lucas County, bus services, and paratransit services for persons with disabilities, end at arbitrary boundary lines. Residents that rely on public transit simply cannot easily access jobs and other opportunities in our region.

Now that TARTA has transitioned to a county-wide system, it must undertake efforts to ensure that disparities in access to transportation are also addressed. This includes expanding paratransit services county-wide and ensuring access to jobs and other opportunities in racially segregated areas and for residents with limited access to housing opportunities.

In reviewing transportation equity, it is important to first consider the recent history of developments in access to public transportation in the area. In 2019, Lucas County established a community task force to evaluate the state of public transportation services in the area. Prior to the formation of this task force, the United Pastors for Social Empowerment, a local grassroots organization, had filed a civil rights complaint against the Toledo Area Regional Transportation Authority (TARTA) for failing to comply with Federal Transit Administration requirements under the Title VI of the Civil Rights Act. The task force issued a comprehensive report that provides an overview of current transportation needs and makes recommendations for improvements to the regional transportation system.

The 2019 report underscored the strong need for and value of a robust transportation system in the Northwest Ohio region:¹²²

There is ample evidence to support the notion that a vibrant public transportation system is essential to the success of a region, making positive contributions to the economy and facilitating the participation of residents in all aspects of public life; these include work, social, commercial, and faith activities. Public transit is important for people without access to a personal vehicle, for individuals engaged in recreational activities, and as a tool of

¹²² Katherine Hunt Thomas, and Mallory Tarr, *Transportation Needs Survey Results, Public Transportation in Northwest Ohio*, The Ability Center, (August 2016), https://abilitycenter.org/wp-content/uploads/2022/06/Transit-Study_ACT.pdf
2025 Analysis of Impediments, City of Toledo
Prepared by the Fair Housing Center

economic development. A strong transit system must serve communities in need as well. Decades of research have demonstrated that affordable transportation is a crucial element for upward economic mobility.

The task force identified several significant challenges impacting the sustainability and growth of public transportation. These include:¹²³

- Declining Ridership: Ridership has fallen over 70 percent since its peak in the 1970s and approximately 44 percent since 2007.
- Fragmented Service Area: Two of the nine member jurisdictions have exited TARTA, resulting in lower local tax revenues and a more fragmented service area that does not reliably connect key locations such as shopping centers, medical facilities, and workplaces.
- Aging Fleet: Many vehicles in TARTA's fleet are nearing the end of their lives, with 63 percent eligible for retirement.
- Ineffective Service Delivery: Service delivery is often inefficient and ineffective due to a fragmented service area that fails to fully connect the region's major population and employment centers.
- Cuts and Price Increases: Service cuts and fare increases have created a more expensive and less helpful system.
- Unsustainable Funding: The current funding model is unsustainable, with three unsuccessful campaigns to shift from property tax to sales tax to generate adequate revenue for system improvements.

The 2019 report emphasized the critical role of public transit in supporting the local economy, noting that 87 percent of public transit trips directly impact the local economy.

Seniors, low-income individuals, and persons with disabilities are the core constituencies that rely on public transit services. In Lucas County, the need for public transportation for individuals over the age of sixty-five and persons with disabilities cannot be overstated. The Ability Center of Greater Toledo's 2015 community-wide survey on transit needs found that respondents — primarily older adults, individuals with disabilities, and low-income individuals— reported significant reliance on public transportation for essential activities.

Furthermore, the county task force's report drew attention to the heightened need for public transportation services in Lucas County due to the area's high poverty rate.¹²⁴

¹²³ See The Ability Center (2016).

¹²⁴ See The Ability Center (2016).

With the area's highest rate of poverty, there is no greater need for public transportation than in Lucas County. As of 2022, 24.6 percent of Toledo residents live below the poverty level. The Ohio Development Services Agency's 2018 Ohio Poverty Report highlighted Lucas County as the poorest urban county in the State of Ohio, with a poverty rate of 20.7%.

The Ability Center's 2015 survey highlighted the following transportation usage patterns:

Medical Appointments	33%
Shopping	53%
Work	21%

More than 70 percent of survey respondents reported being late or unable to schedule doctor appointments due to inadequate public transportation, and 46 percent had difficulty getting home from activities. Limited public transportation options pose a significant barrier for many households, particularly those without a personal vehicle. Public transportation can reduce household expenses and enhance residents' access to employment opportunities. Thus, developing a strong, reliable public transportation system is vital to regional development and socioeconomic equity.

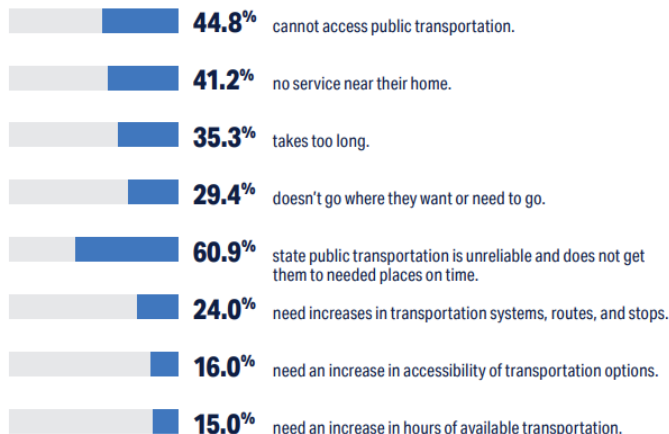
Considering this history and context, the previous AI, for the 2020-2025 period, identified access to transportation as an important impediment to fair housing choice. The AI specifically encouraged the City of Toledo to use its influence to advocate for a County-wide transportation system funded by sales taxes across the county, rather than depending on property taxes for specific areas that opted into the transportation system.

Following the 2020-2025 AI, the City and other stakeholders did advocate for a county-wide transportation system. This effort was successful in 2021 and now TARTA is funded to operate county-wide.

Since then, a number of important developments have arisen. The Ability Center again completed a survey of persons with disabilities in 2022. This time the survey was statewide and produced comparable results to the prior study:¹²⁵

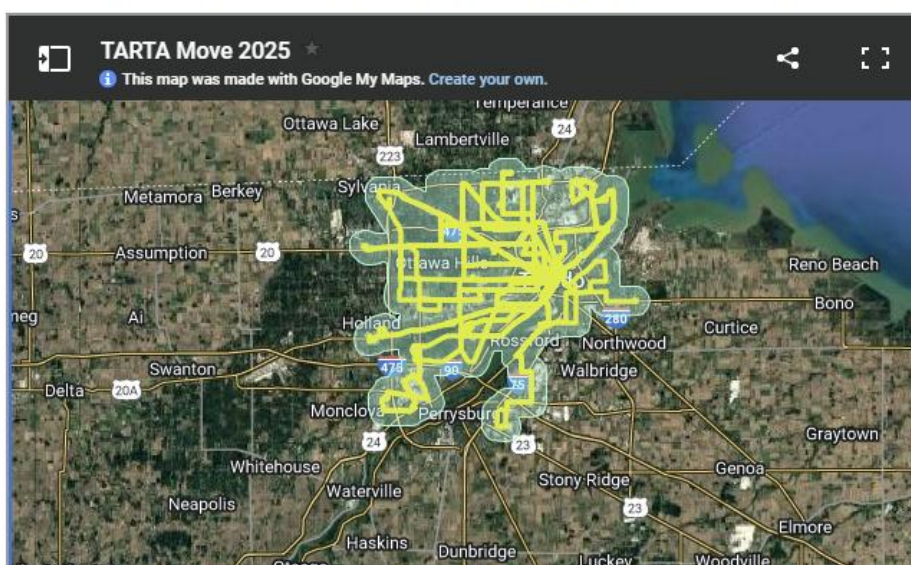
¹²⁵ See <https://abilitycenter.org/wp-content/uploads/2022/12/Ohio-Statewide-Disability-Needs-Survey-Issue-Brief-Transportation.pdf>

Transportation



As it has transitioned to a county-wide service, TARTA's paratransit for persons with disabilities has grown with it. As of January 2025, the service now extends to parts of Oregon as a new TARTA route was added to Oregon.

Service Area Effective Sunday, January 5, 2025



However, TARTA's paratransit services, now rebranded as TARTA Move, are not available county-wide. The services are available only as required by FTA requirements that mandate the service within $\frac{3}{4}$ of a mile of fixed routes.¹²⁶

TARTA also completed a study called "TARTA Next." The intent of the study was to guide the expansion of its services as its funding and geographic service area changed to a county-wide system. Unfortunately, this study does not address transportation equity. It does review ADA compliance, but beyond

¹²⁶ See <https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/frequently-asked-questions>.

this consideration, it does not consider implications for people in poverty, or inequitable access based on race or disability.¹²⁷

TARTA and the Toledo Metro Area Council of Governments completed an action plan for 2021 to 2025, "Step on Board Locally Coordinated Human Service Transportation Plan For the Toledo Urbanized Area 2021-2025." This action Plan specifically sets the objective of making paratransit county-wide.¹²⁸

"Objective 2.2: Expand paratransit service to the entire county through contracting with transportation providers"

Despite this objective, TARTA has not taken steps to expand paratransit county-wide. In effect, it means that persons with disabilities who rely on paratransit are segregated from the rest of society, with more limited housing options, even though they pay taxes for a county-wide system.

In addition, TARTA and the City could invest more funding and resources into ensuring transportation access for other marginalized communities, such as Housing Choice Voucher holders who may rely on public transportation but wish to move to areas with limited public transportation options.

Finally, a survey of bus stops in the Toledo area would likely reveal that many bus stop locations do not comply with the ADA further limiting accessibility for persons with disabilities.

The City of Toledo nominates board members to TARTA, and the City is an important partner with TARTA. This gives the City significant influence on TARTA. The City should use this influence to ensure that TARTA provides equitable access to transportation services throughout the Toledo area. The City could also set aside funding for studies on the issues described above. The City could also set aside funding for studies on the issues described above.

¹²⁷ See <https://tarta.com/wp-content/uploads/2022/10/TARTA-NEXT-Final-Report-10-18-22-WEB.pdf>.

¹²⁸ Available at <http://toledofhc.org/wp-content/uploads/2025/03/Locally-Coordinated-Human-Service-Transportation-Plan-for-the-Toledo-Urbanized-Area-2021-2025-FINAL.pdf>.

Impediments in Rental Housing

The Fair Housing Center investigates allegations of housing discrimination, but as a housing leader in the community, we also receive calls from community members who experience other issues which prevent them from accessing the housing of their choice. The Fair Housing Center has identified impediments in the following areas of private rental relationships through complaints and inquiries from renters in the community and also through outreach surveys and community round table events which were conducted in order to obtain input from the community for this AI. Impediments relating to subsidized housing and the Housing Choice Voucher program are covered in other sections of the AI. TFHC continues to receive more landlord-tenant complaints every year. TFHC completes more than 2,000 intakes every year, the vast majority of which are related to rental-housing.

Applying and qualifying for a rental agreement/lease:

The limited availability of more affordable subsidized housing in the Toledo area means that many renters who qualify for low-income housing have to seek housing in the private rental market. Subsidized housing providers are those that receive some sort of subsidized funding from the federal government, usually through HUD, but also through other programs, such as the Low-Income Housing Tax Credit (LIHTC) program administered by the Treasury Department. Subsidized housing providers are often required to base eligibility and rental amounts on the income of the applicant. Individuals with no income also qualify for certain types of subsidized housing.

Private landlords, on the other hand, are not required to comply with HUD income qualifications or guidelines and have more freedom to set qualifications for applicants seeking to rent their units. Private landlords often have higher income criteria, stricter requirements regarding credit history, and may require a larger deposit in order to rent a property. These issues were identified and discussed in the City of Toledo's 2020 Analysis of Impediments to Fair Housing Choice, and community members continue to report these issues as barriers to obtaining private rental housing.

In the Toledo area, those seeking rental housing are often prevented from accessing housing offered for rent by private landlords because they cannot overcome the strict leasing qualifications. Private landlords may have strict income requirements, and often require applicants to prove that they have income equal to or greater than three times the rent amount. Low-income

applicants or individuals with no income are automatically excluded from a substantial portion of market-rate rental housing because of income requirements.

Private housing providers often require that applicants cannot have any past evictions. In Toledo, eviction records are publicly available on the Toledo Municipal Court website, and potential landlords can easily search the record of past eviction filings against an applicant. Private housing providers often define this broadly and may not consider any applicant who has had an eviction proceeding filed against them in the past, regardless of whether an eviction judgment was granted or the case was dismissed. Toledo Municipal Court records are updated frequently, and eviction records are publicly available less than a week after a landlord files a complaint.

Private housing providers may also require tenants to meet certain credit qualifications. Applicants may be disqualified for failing to pass a credit check, for past due accounts that resulted in judgments, for low credit scores, past bankruptcies, or because of an inability to pay the larger deposit often charged due to negative credit history. Applicants are also often disqualified due to a criminal background, which is often based on the existence of an arrest or citation, regardless of whether a conviction occurred. For more information on impediments to fair housing regarding criminal backgrounds and the re-entry population, this report dedicates an entire section to that issue as a prevalent impediment in this area. Applicants who are disqualified from a private rental because of credit issues or criminal backgrounds often report that they are not able to obtain quality housing.

When these renters cannot access more desirable private rentals because they cannot meet the strict eligibility requirements, they are forced to search for housing providers who will overlook past credit and criminal history issues. Unfortunately, oftentimes this leads tenants to lower quality housing that may cause health problems, such as exposure to lead-based paint, mold, or other hazards. Renters report that they are often reluctant to complain about poor housing conditions because they fear landlord retaliation and eviction, and that alternative housing options will be even worse.

The method that a private housing provider chooses to process rental applications may also serve as an impediment to accessing and qualifying for housing. For example, if a housing provider chooses to only advertise and accept applications, application fees, and deposits through an online website or app rather than in person or in an office setting, then applicants who do not have access to the internet, or who do not utilize traditional banking tools like checking accounts and credit/debit cards, may face additional hurdles and barriers to accessing housing in the private rental market.

Viewing units

If an applicant is able to meet the rental qualifications, their ability or inability to view the unit may still be an impediment to obtaining safe and affordable housing. While some housing providers may choose to offer only online applications, other housing providers may still require applicants to complete a paper application. People who do not drive or who utilize public transportation are limited in their ability to look at available housing and complete applications. Someone who does not have a car simply cannot visit as many units as someone who does. These renters may have no options but to search for alternative housing close to where they presently reside, which limits housing mobility and access to neighborhoods of higher opportunity.

The in-person meeting to view the unit may also be an opportunity for a landlord to make improper assumptions about an applicant or otherwise screen out qualified applicants. It is at this point that a landlord may screen out an otherwise qualified applicant because of their protected status, which violates state and federal fair housing laws. An individual in the middle of a home search, however, may not have the time or energy to contact TFHC, OCRC, or HUD to report suspected discrimination. This is assuming they are aware of the possible discrimination and understand how to enforce their rights. Oftentimes, discrimination is subtle and individuals do not realize their rights are being violated.

Renters in the community are also challenged to access private rentals when landlords do not give them the opportunity to view a unit before signing the rental agreement. TFHC has received numerous reports of situations like this. When a renter has limited housing options, whether because of income and price constraints, limited or no funds for security deposits, past evictions, or credit judgments, they may feel constrained to rent any unit they can find, even without seeing the unit first.

Lease/Rental Agreements

A renter may face barriers to housing in the rental market by the terms of the lease they are offered by the landlord. A renter will often sign a one-year lease when initially renting a unit. A lease for a term like this provides protection to both the renter and landlord, because both are required to comply with the terms of the agreement. Issues may arise when renters do not read and review the terms of the lease before signing. Private landlords may require renter's insurance, charge

pet rent or deposits, or there may be additional fees not discussed in detail prior to the lease signing. Unless unconscionable and/or legally unenforceable, renters are bound by the terms of a lease. Even where lease terms are actually illegal and unenforceable, a tenant may not know or understand that, and such lease provision can still have an effect on whether renters understand and assert their rights.

If a lease is not renewed at the end of the lease term, an automatic month-to-month rental agreement takes effect under Ohio law. A landlord may prefer to continue the rental agreement on a month-to-month basis, as they could then terminate that agreement with just a 30-day written notice to the tenant, so long as the reason for termination does not violate fair housing laws. In this situation, the renter is at a disadvantage, as they will no longer have the security of a lease for a specific term and the landlord may legally end the tenancy at any time. Other times, a private landlord may insist on a new lease at the expiration of the initial lease term, and may charge additional rent or fees should the rental agreement default to a month-to-month tenancy.

As described above, the contractual relationship between a landlord and a tenant tends to benefit the landlord, whether it be by terms or availability of resources, such as access to legal guidance when drafting the terms of the rental agreement between the parties. While tenants may have access to low/no cost legal services during an eviction or when negotiating a reasonable accommodation (both of which are discussed in more detail below), few are likely in a position to consult an attorney prior to entering into the rental contract.

Eviction

“Eviction is not just a condition of poverty; it’s a cause of poverty. Eviction is a direct cause of homelessness, but it also is a cause of residential instability, school instability [and] community instability.”

Matthew Desmond, Author, *Evicted: Poverty and Profit in the American City*

Mr. Desmond estimates that 2.3 million evictions were filed in the U.S. in 2016 – a rate of four per minute. As discussed below, the eviction crisis has not escaped Northwest Ohio.

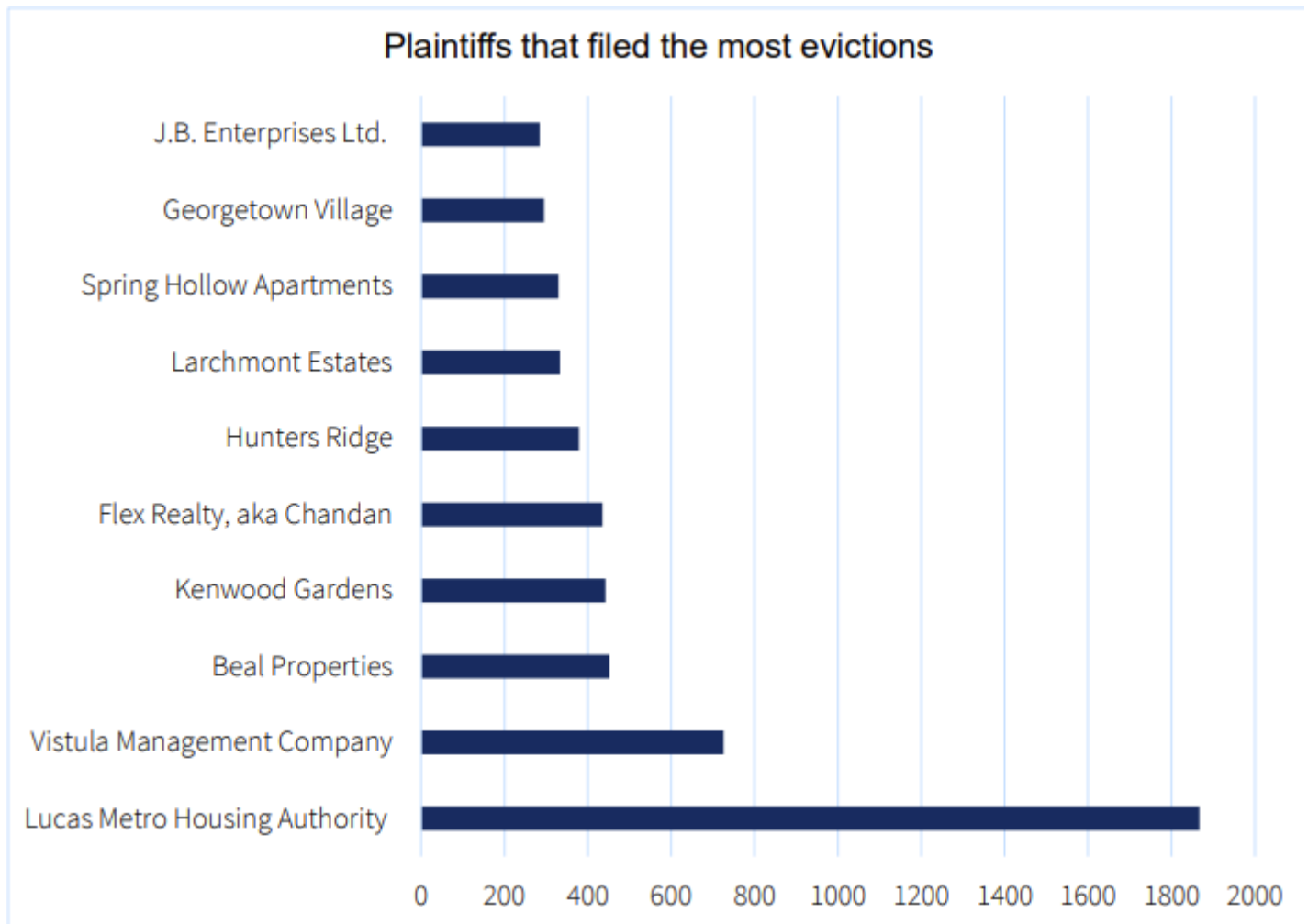
The eviction process lends itself to the imbalance of power. The housing provider, who usually has access to legal counsel and is usually more knowledgeable about the eviction process, has a definite advantage over the tenant, who is generally not represented by counsel and is less knowledgeable about the eviction process.

Ohio Revised Code specifies the procedures that landlords must follow to seek an eviction judgment against a tenant. The landlord is required to provide a written notice stating that the tenant is in default of the rental agreement prior to filing an eviction action in court. When a tenant receives a notice of lease termination, they are often unsure of what the notice means or how to respond. In some instances, renters follow the notice instructions and leave the premises, regardless of whether the notice of lease termination was valid or unfounded. In other instances, a renter will wait for the landlord to file an eviction with the Toledo Municipal Court. After the eviction is filed, a tenant receives notice from the Court and will also be provided information on how to contact Legal Aid of Western Ohio (LAWO) to seek the advice and representation of an attorney. However, LAWO has limited funding and staff, and does not have the capacity to provide representation to all low-income tenants facing eviction. At times, LAWO limits eligibility for representation to those who are facing eviction from subsidized housing providers; other times, LAWO has such a large caseload that they are unable to accept new cases for periods of time.

These issues were also identified in the 2020 AI. Since then, The Fair Housing Center and the University of Toledo’s Urban Affairs Center undertook an in-depth study of this issue. This study is available here: <http://toledofhc.org/wp-content/uploads/2025/02/UAC-Eviction-Study-2.pdf>.

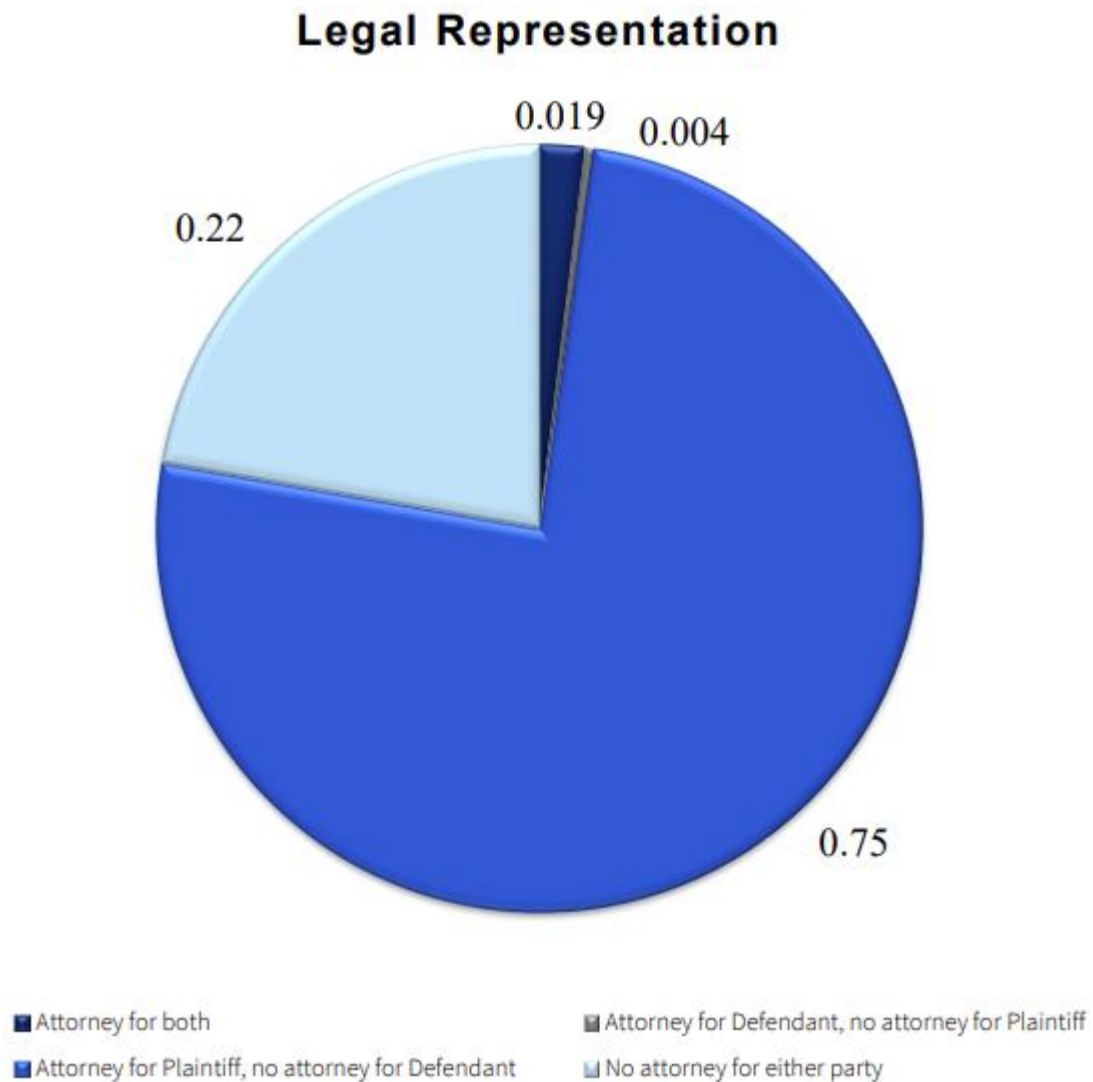
Some of the key findings from the study are provided on the following pages.

One important finding from the study was that federally subsidized housing providers were among the top evictors in the area.



Lucas Metro Housing and Vistula Management Company manage affordable housing in the area. The others listed manage larger or multiple developments of housing that typically market to moderate to lower-income residents.

Another key finding of the study was the lack of legal representation for tenants when facing evictions in Court.



The study also reviewed that tenants often have defenses to the eviction that, if they had legal counsel, an attorney could help the raise in Court to either delay or avoid the eviction entirely. This review was based only on publicly available information on Court's docket, and it did not include potential defenses that could be identified with more information from the tenant. The sample reviewed totaled 308 cases.

The potential defenses that were analyzed were as follows.

1. Unlicensed agent. The plaintiff landlord was acting as a property manager agent of the owner but did not have the required license to act as a real estate broker in Ohio;
2. Different grounds. The notice to the tenant stating the reason for the eviction was different from the reason provided in the complaint for eviction filed in court;
3. No lease attached. The eviction was based on a written lease agreement but the written lease was not attached to the complaint;
4. Untimely filing. The complaint for eviction was filed in court before the end of the period of time identified in the notice to the tenant to vacate the rental unit;
5. Non-conspicuous notice. The notice to the tenant did not contain the statutorily required notice in a manner that was not conspicuous as required by Ohio law;
6. Missing language in notice. The notice to the tenant did not contain the statutorily required language;
7. Notice not signed by plaintiff. The notice to the tenant was signed by a person who was not the plaintiff filing the eviction action;
8. Unrepresented corporation. The eviction was filed by a corporation but the corporation was not represented by an attorney.

Among the 308 cases reviewed, defenses were identified in cases as a percent of total cases as follows:

1. Unlicensed agent. – 11.6%
2. Different grounds. – 3.2%
3. No lease attached. – 0.6%
4. Untimely filing. – 0.6%
5. Non-conspicuous notice. – 8.7%
6. Missing language in notice. – 12%
7. Notice not signed by plaintiff. – 20.1%
8. Unrepresented corporation. – 0.6%

Among the 308 cases, at least one of the above defenses were identified in 103 cases, or in 33% of all cases. This means that the tenant's eviction could have been avoided or at least delayed 33% of the time.

After the eviction study was completed in 2021, a number of developments arose. Importantly, the City enacted a local “right to counsel law.” Ostensibly, this law intends to ensure more legal representation in eviction cases filed in the Toledo Municipal Court. However, it does not provide a guarantee of legal representation for tenants facing eviction. The name “right to counsel” is a misnomer, but the law has had the effect of increasing funding for pro bono legal services in the area and thereby increasing the number of tenants who can receive legal services.

At the same time, trends in evictions have shifted slightly in some respects. In reviewing the publicly available docket for the Toledo Municipal Court, from January 2024 to the end of December 2024, the Court saw 5,636 eviction cases. Among those cases, the docket indicates that the tenant had legal representation in only 276 cases. In other words, only 4% of tenants had legal representation. This is an extremely small portion, but it is an increase from the prior study cited above where only 2% of tenants had legal representation.

Interestingly, in that same time, landlords had legal representation in 5,170 cases of the 5,636 total cases or 92% of the time, and only 8% of plaintiff landlords had no legal representation. This is interesting because the prior study showed that landlords did not have legal representation about 22% of the time. This marks an increase of about 14% in legal representation for landlord-plaintiffs, while representation for tenants increased only 2% since the prior study.

Since the prior study was conducted, it is also important to note that the Toledo Municipal Housing and Environmental Court created new local rules. These local rules allow tenants to request that their eviction records be sealed and requires that landlords file additional forms and provide more information when they file an eviction case. These additional processes necessary to file an eviction case may have pushed some landlords to seek more legal representation as compared to previous years.

In any case, increasing legal services in eviction cases is part of the solution to the eviction crisis, but clearly even doubling this service remains only a drop in an ocean of eviction cases filed every year. A better strategy may be to focus more time and resources on upstream solutions that aim to prevent the evictions from being filed in the first place. In addition, it would likely serve the community well to consider alternative approaches to handling eviction cases that do not necessarily rely on legal representation for the tenant which can be expensive to fund. For example, the Ohio Supreme Court recommends eviction diversion programs where the tenant does not have legal representation. The Ohio Supreme Court’s guidance and recommendations are available here: <https://www.supremecourt.ohio.gov/JCS/courtSvcs/resources/evictionDiversionToolkit.pdf>. The suggestions provided here should be considered by the City and

the Courts for potential implementation.

Reasonable Accommodations/Modifications

Under the Fair Housing Act and Ohio's laws against discrimination, persons with disabilities have the right to request reasonable accommodations to the usual rules, policies, or procedures of housing providers if necessary to accommodate a disability. Similarly, persons with disabilities may also request permission to make modifications to the premises, such as grab bars, ramps, and the like¹²⁹ to allow them to fully use and enjoy the premises. A classic example of a reasonable accommodation is a request that a landlord waive a "no pet" policy to allow a tenant to keep a service or assistance animal.

Subsidized housing providers are often more educated on these responsibilities than private landlords, because subsidized housing providers use guidance from HUD and the federal government and are often better educated on how to comply with the Fair Housing Act than private housing providers.

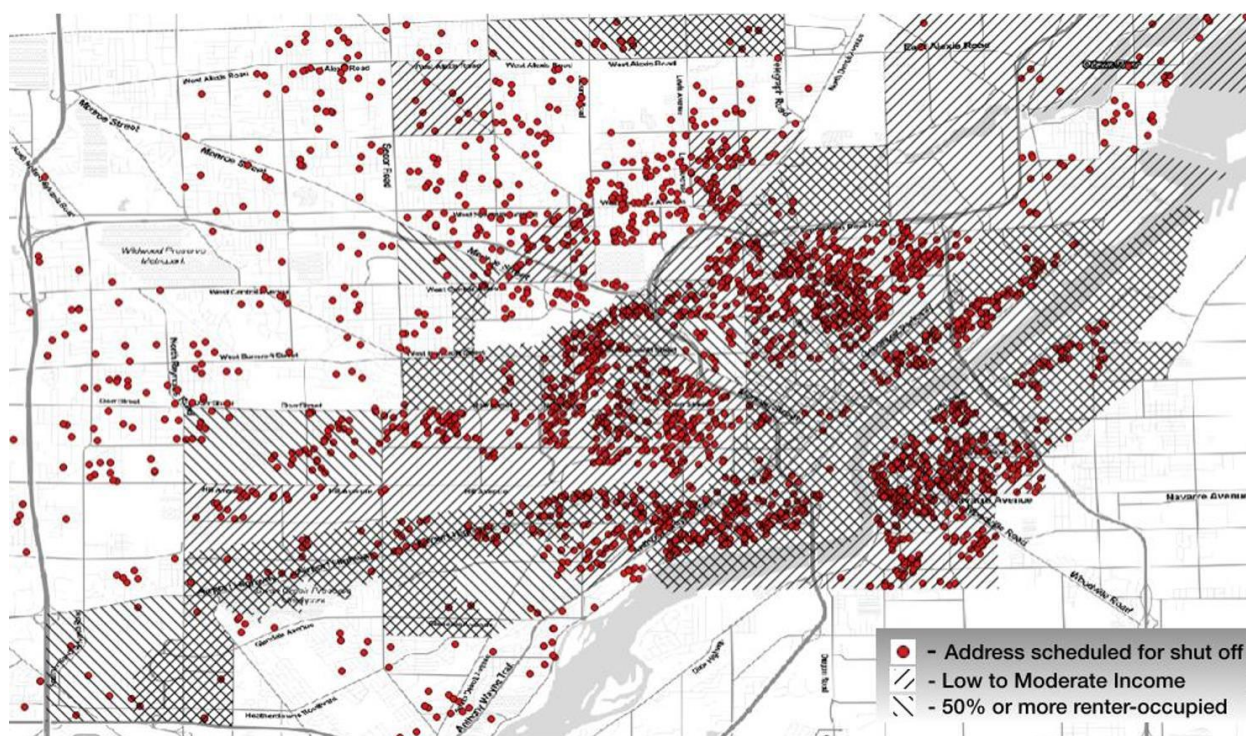
Despite ongoing efforts by The Fair Housing Center to educate housing providers throughout the Toledo area, many private landlords do not realize they are subject to and must comply with the Fair Housing Act. Consequently, renters of private housing may also be unaware of their rights and may therefore be prevented from accessing housing of their choice due to the need for reasonable accommodations or modifications. TFHC developed a detailed resource for housing providers titled *Fair Housing for Housing Professionals*, which can be found on our website at <https://www.toledofhc.org/resources>.

¹²⁹ For a thorough discussion of reasonable accommodations and modifications, please see the HUD/DOJ Joint Statements which can be found at <https://www.hud.gov/sites/dfiles/FHEO/documents/huddojstatement.pdf> and https://www.hud.gov/sites/dfiles/FHEO/documents/reasonable_modifications_mar08.pdf.

Access to water services

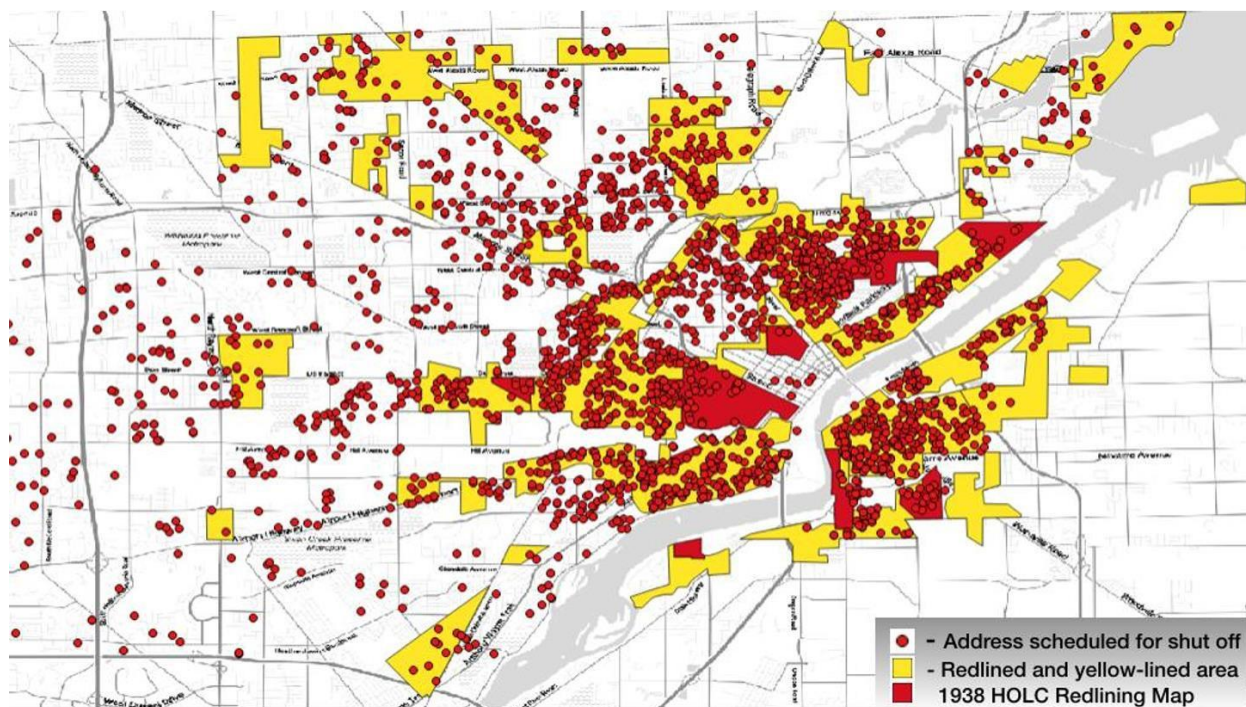
Access to water and other essential utilities necessary to enjoy the benefits of housing is a Fair Housing issue. See e.g., *Kennedy v. City of Zanesville*, No. 2:03-cv-1047 (S.D. Ohio).

In the Toledo area, water accounts scheduled for disconnection of services during a six-month period in 2019 were concentrated primarily in R/ECAP low-income and minority neighborhoods.¹³⁰



¹³⁰ This data was provided through a public records request. The addresses scheduled for shut-off were not necessarily terminated from services. Some residents may have made arrangements to avoid the shut-off after the account was scheduled for termination but before the shut-off occurred.

These accounts scheduled for shut-off are concentrated in the same areas that have experienced historic disinvestment based on redlining.



Recently, the City passed a resolution that recognizes the importance of this issue and creates a committee that will work with the City to address access to water services and other consumer policies for low-income consumers.

This information was previously provided in the 2020-2025 AI. Since then, the City has taken a number of important steps to address inequities in access to water services.

- First, the City made it possible for tenants and landlords to complete a landlord-tenant agency agreement which allows the tenant full access to the account even though the account is in the landlord's name.
- Next, the City passed updates to the local rules regarding termination of water services to ensure processes that protect tenants who are not the account holder.¹³¹
- The City also passed rules to ensure fairness in the way tenants are charged for water services by landlords, as landlords resell water services to tenants.¹³²

¹³¹ See <https://toledo.legistar.com/LegislationDetail.aspx?ID=4553209&GUID=DB538EAF-7388-4D7A-B34F-AC08E80D39C3&Options=ID%7cText%7cAttachments%7cOther%7c&Search=200-20&FullText=1>

¹³² See <https://toledo.legistar.com/LegislationDetail.aspx?ID=5024535&GUID=FB108084-CF43-480E-BFA1-D413B35185F9&Options=ID%7cText%7cAttachments%7cOther%7c&Search=359-21>.

These were significant improvements in creating more equitable access to water services for all Toledoans. Most of these provisions are also functioning very well. The landlord-tenant agency form, for example, has been fully deployed by the City. Importantly, the updates that provided tenants with protections against the termination of water services also appear to be working well. It is now much more difficult for landlords to request that water services be terminated at a property in order to evict the tenant.

However, the City has not yet taken action to enforce the rules regarding the reselling of water services that prevent landlords from engaging in practices that often take advantage of vulnerable communities. Some of these concerning practices as encountered by The Fair Housing Center include the following:

- Landlords charge tenants for water they did not consume. This could be left over charges from a prior tenant, or water consumed by a neighbor.
- Landlords charge tenants excessive fees for water that are unrelated to how much water they consumed.
- Landlords refuse or fail to provide copies of the water bill, so the tenant knows how much water they have consumed.
- Landlords suddenly charge large fees for water services that they claim the tenant accumulated, but the cause of the charges was from a leak that the tenant cannot control and is not responsible for repairing.
- Landlords send bills to tenants living in a multi-family housing complex even though there is no meter at their unit and they are charged for services even when the tenant is away for an extended period and doesn't consume any water. Tenants are left frustrated and uncertain as to why they are charged and for what.

As the cost of water increases, conflicts over access to water, especially for lower-income families will continue to arise. Toledo should take steps to ensure its rules regarding water re-selling are enforced.

Public awareness of rights and responsibilities under Fair Housing laws

Public awareness is one impediment in the identification and enforcement of fair housing laws. Both those seeking housing and housing providers may be unaware that Fair Housing Laws exist and/or how to exercise their rights under those laws.

When an individual believes they may have been the victim of housing discrimination, the first step is to report the incident to the proper authority. The Fair Housing Center (TFHC), the Ohio Civil Rights Commission (OCRC) and HUD work diligently to investigate allegations of housing discrimination in any housing related transactions. In the state of Ohio, an individual must file a charge within one year of the date the act of discrimination occurred.

Private, nonprofit fair housing programs, such as The Fair Housing Center, work in many areas related to housing in order to expand housing choice for individuals. Through educational programs, outreach, advocacy, and enforcement activities, The Fair Housing Center has been a leading force for anti-discriminatory housing policies.

Victims of housing discrimination may also choose to retain legal counsel and file a complaint directly with the courts. In Ohio, one must file a complaint in state court within one year of the date the act of discrimination occurred. An individual must file a complaint in federal court within two years of the date the act of discrimination occurred.

The following links will connect individuals to agencies who handle housing discrimination complaints.

<https://www.toledofhc.org/>

<https://crc.ohio.gov/FilingaCharge/Housing.aspx>

<https://portalapps.hud.gov/FHEO903/Form903/Form903Start.action>

Part 4: Call to Action and Action Plan

Many of the impediments identified in the 2020 through 2025 Analysis of Impediments represent ongoing themes that continue into this Analysis. The progress described in Part 2 above continues in many areas, while this Analysis also identifies and focuses on new impediments.

One striking aspect of this analysis, as was noted in the prior AI, is its connection to the historic HOLC Redlining Map as described in Part 1. Many of the maps displaying current impediments align very closely with the historic Redlining Map. These include housing conditions issues, like lead poisoning and asthma, that result from decades of disinvestment following redlining discrimination, as well as current trends in evictions and home loan originations.

These trends will continue for decades to come without an action plan with identified steps to address these issues. Indeed, HUD's guidance explains that entitlement jurisdictions, like Toledo, should make concrete plans to address the identified impediments:

"The jurisdiction should define a clear set of objectives with measurable results that it intends to achieve. The sole measure of success for FHP is the achievement of results. These objectives should be directly related to the conclusions and recommendations contained in the AI.

For each objective, the jurisdiction should have a set of goals. These might be the completion of one or more discrete actions, or set of actions, which serve as milestones toward achieving each objective."¹³³

HUD's guidance further explains the role of the entitlement jurisdiction, working with its partners, to move forward with actions to address the impediments:

"In order to bring the hard work of planning and analysis to fruition, it is essential that the jurisdiction implement its fair housing actions. The jurisdiction can more readily achieve effective implementation of the actions, if it has:

- Defined objectives with measurable results

¹³³ U.S. Department of Housing and Urban Development, *Fair Housing Planning Guide, Volume 1*, available at <https://www.hud.gov/sites/documents/FHPG.PDF>.

- Designed achievable actions, supported by all key elements in the community and designed to address real fair housing problems;
- Assessed its FHP activities on a regular basis to assure consistent oversight of, and interest in, the efforts of all individuals and organizations engaged in fair housing actions.

Government officials should exercise an appropriate level of leadership, as may be required, to resolve conflicts and oversee the implementation of corrective actions, changes, or additions in fair housing actions.”¹³⁴

¹³⁴ *Id.*

Fair Housing Action Plan

According to HUD's guidance, the plan to address the impediments should:

- List fair housing action(s) to be completed for each objective.
- Determine the time period for completion.
- Identify resources from local, State, and Federal agencies or programs as well as from financial, nonprofit, and other organizations that have agreed to finance or otherwise support fair housing actions.
- Identify individuals, groups, and organizations to be involved in each action and define their responsibilities. Obtain written commitments from all involved, as a formal recognition of their agreement to participate in the effort in the manner indicated. HUD recommends that jurisdictions specify these commitments in the appropriate contracts that may arise in connection with the fair housing actions.
- Set priorities. Schedule actions for a time period which is consistent with the Consolidated Plan cycle.

Consistent with HUD's guidelines, the action plan provided here will help guide the City of Toledo to address the identified local impediments to fair housing.

Action Plan Format and Explanation

The action plan provided on the following pages is organized into charts covering each of the identified goals to address Fair Housing Impediments. Each chart provides objectives as required by HUD's guidelines, City departments with appropriate responsibilities, information about the potential involvement of other partner institutions including The Fair Housing Center, and suggested deadlines for completion. Under each chart, space is provided for discussion. As the City moves forward, this "discussion" space will provide notes on progress made or potential changes, or suggestions for changes, to the action plan.

Criminal History Screening Action Plan:

The City should coordinate with the justice system and The Fair Housing Center to create systems for residents to apply for Certifications confirming their Qualifications for Housing. The community should take advantage of the new availability of CQHs. The City could coordinate with The Fair Housing Center to help residents complete applications for a CQH. The Center could also help coordinate with the Reentry Coalition of Northwest Ohio to evaluate ways to incorporate the CQH into the justice system as a standard part of reentry.

Homeownership: Lending and Insurance Action Plan:

The need to rebuild homeownership in the Toledo area is an important consideration, especially for Black families and communities of color. At minimum, the City should implement the following activities:

- Homeownership fairs to educate the community on access to homeownership.
- Incentivizing banks to increase access to home loans through better marketing and product offerings.
- Encourage banks to better disclosure their commitments to the Toledo area. This should include an explanation of how banks are meeting Community Reinvestment Act requirements in the area more specifically.
- To accomplish these goals, the City should consider reviewing how local laws can provide incentives to banks. The National Community Reinvestment Coalition provides examples of local laws that accomplish this: https://ncrc.org/wp-content/uploads/2012/07/summary_responsiblebank.pdf. This includes a local law in Cleveland. The City should consider sending staff and council members to meet with Cleveland officials to discuss how this local law operates in the Cleveland area to evaluate how to accomplish this in Toledo.
- Develop a program to help local residents with tangled title problems that prevent families from inheriting title from a deceased relative.
- The City should also undertake a more thorough analysis and study of the available HMDA data and lending patterns in the area to better understand these issues.

Availability of Accessible Housing for Persons with Disabilities Action Plan:

As of the date of this Analysis, the City is already undertaking a study of the availability of accessible housing. Once these results became available, the City should use the information to implement these priorities:

- Ensure enforcement of the existing state building code regarding accessibility, especially as it relates to renovations of existing older buildings, such as buildings downtown now being converted to housing.
- Ensure enforcement of the City's local visitability laws.
- Build more accessible affordable housing. The homelessness rate in the area is particularly plagued by chronically long-term homeless persons who highly likely have significant disability, which is also addressed in the section covering homelessness.

Source of Income Discrimination Action Plan:

The City must, at minimum, enforce the adopted source of income discrimination law. The City has already been working with The Fair Housing Center to discuss enforcement of the local law. Next steps should include development of processes to accept complaints, process investigations, and make recommendations to the law department and/or the prosecutors office.

Voucher Mobility Action Plan:

Lucas Metro Housing should adopt best practices for voucher mobility, as discussed above. The City should use its influence, such as its ability to appoint a board member, to ensure that LMH continues the necessary work to ensure increased mobility for voucher holders.

Land Use and Zoning Action Plan:

Changes to local zoning laws can be a powerful tool to remove local barriers to fair housing choice. Considering the discussion provided above, the City should, at minimum, pursue the following tasks:

- Change its local zoning restrictions regarding group homes for persons with disabilities. As described above, the City should adopt the changes previously suggested by The Fair Housing Center.
- Adopt local zoning restrictions on small box stores that contribute to food deserts in disinvested areas.
- Adopt local zoning laws that incentivize the development of healthy food providers.
- Ensure neighborhood plans that have included resident involvement are enforced and adopted as part of the City's zoning processes, such as plans developed by the Toledo Design Collective or other entities that have worked to ensure neighborhood resident involvement.

LGBT+ Action Plan:

The City should ensure enforcement of its local laws regarding nondiscrimination in housing. This will help reduce concerns of discrimination considering recent developments nationally that have been hostile to LGBT civil rights. This can be accomplished with enforcement of the same laws that protect against discrimination based on source of income, Chapter 554 of the Toledo Municipal Code.

Homelessness and Affordable Housing Action Plan:

Development of more affordable housing should be a key priority for the City. The City has expended these efforts in recent years and must continue to do so. The City should include funding for services for residents and develop projects that specifically help the chronically homeless that need services to successfully remain housed.

Local laws that limit or eliminate access to housing services, and housing development Action Plan:

Local laws that have created difficult and sometimes impossible processes for the use of City funds to help low-income and minority neighborhoods must be eliminated as soon as possible. The City must remove laws described above that require a project labor agreement and other processes and requirements even for nonprofit small projects to help low-income families with roofs or small repairs.

Substandard Housing Conditions Action Plan:

Substandard housing conditions continue to be a key concern within the City. The City must:

- Ensure enforcement of local codes, such as the lead poisoning prevention law.
- Increase the budget and staffing for code enforcement as described above.
- Continue programs that help address housing conditions issues with direct assistance to tenants facing substandard conditions in rental units. This includes The Fair Housing Center's Housing Conditions and Neighborhood Reinvestment program.

Public Transportation Action Plan:

Without access to transportation to jobs and amenities, housing can become unattainable. This is particularly true for low-income families who, in the Toledo area, are more likely to be Black or persons with disabilities. The City should advocate:

- That TARTA study how to increase and improve its services specifically for families most reliant on its services, especially low-income persons with disabilities and Black families.
- Increase paratransit services county-wide as discussed above.

Impediments in Rental Housing Action Plan:

Many of the actions listed above will address impediments in rental housing. Considering that an increasing number of Toledo homes are rentals , the City should prioritize this work with continued outreach events, as well as fair housing services such as those provided by The Fair Housing Center.

Access to water services Action Plan:

During the period of the last Analysis from 2020-2025, the City adopted several important changes to local laws to help address barriers to housing related to water services. These changes had a positive impact. However, as described above, one of those changes — protecting against abusive water reselling practices — has not been enforced as required. Through the period of this new Analysis from 2025 through 2030, the City should prioritize enforcement of the water reselling rules.

Public awareness of rights and responsibilities under Fair Housing laws Action Plan:

The City should continue ongoing efforts to support education and outreach work by The Fair Housing Center. Potential new projects may include joint events and presentations in coordination with the City.