



Analysis Of Impediments 2012 – 2016

City of Hammond
February 2012

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING

City of Hammond

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1.1 Introduction and Purpose

Prevailing and pervasive discriminatory actions by many required the U.S. Congress to pass Title VIII of the Civil Rights Act of 1968. The purpose of this act was to end housing segregation making acts of housing discrimination based on race, sex, national origin, religion, or ethnicity illegal. Congress amended this landmark legislation in 1988 making acts of discrimination against families with children and people with mental or physical illness equally unlawful.

Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, requires that the U.S. Department of Housing and Urban Development (HUD) implement its programs in a manner that "Affirmatively Furthers Fair Housing" (AFFH). In 1989, HUD required CDBG grantees to undertake an Analysis of Impediments to Fair Housing Choice (AI) to meet this requirement. As such all grantees of HUD programs are now required to report on progress in meeting the actions to eliminate fair housing impediments in their Consolidated Plan Annual Performance Report (CAPER).

The Consolidated Plan's Certification to "Affirmatively Furthering Fair Housing" requires entitlement communities to undertake Fair Housing Planning. The Hammond Department of Planning and Development, through its consultant, conducted this analysis to identify impediments to Fair Housing in the City. The City intends to take actions to overcome the effects of any impediments identified through this analysis. The City will further maintain records reflecting the analysis and the actions it takes in this regard.

The purpose of Fair Housing laws extends beyond economics and affordability. It aims to identify discrimination within the housing delivery system that impedes a household's ability to make a personal housing choice that is within their economic means. Impediments to Fair Housing choice are defined as any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict the availability of housing choice. It also includes any actions, omissions, or decisions that have this effect. Discrimination includes discriminatory rental, real estate, and lending practices, Not In My Backyard (NIMBY) attitudes, and exclusionary zoning regulations, that limit housing choices for minorities, families with children, and other protected classes. The Hammond's analysis attempts to examine the impediments to housing choice within above considerations as stipulated in the 1988 Act.

1.2 Definition of Terms

The Fair Housing Act and Title VIII of the Civil Rights Act of 1968 provides descriptive terms to define protected classes. These terms are used to define conditions or better describe them.

The AI report describes these terms in three areas. These specific terms or descriptions may be used throughout this report. The terms are outlined under the heading's of:

1. Housing Problems
2. Objectives of Affirmatively Furthering Fair Housing
3. Fair Housing Protection Provision for Analysis of Impediments

1.2.2 Housing Problems

Specific criteria is used to measure housing related problems as they pertain to the provision of housing. These conditions are commonly used to demonstrate the extent of housing problems.

Households with housing problems are described as those units that:

- meet the definition of physical defects;
- meet the definition of overcrowding; or
- meet the definition of cost burden that exceeds 30%. HUD defines households with housing problems as those which meet non-duplicate counts of one or more of these criteria.

Substandard Conditions

A dwelling that lacks either complete plumbing or kitchen facilities, or both, or is in such poor condition that it is not feasible structurally for financial rehabilitation.

Overcrowding

Living conditions when more than 1 person must utilize living space, not including (bathrooms, halls, utility rooms or storage areas). Extreme living conditions, exists if there are more than 1.5 persons per room.

Cost Burden

The extent to which gross housing costs, including utility costs, exceed 30 percent of gross income, based on data published by the U.S. Census Bureau. A severe cost burden is realized when 50 percent of gross income is spent on housing.

1.2.1 Objectives of Affirmatively Furthering Fair Housing

HUD has developed criteria to measure an agency's compliance with "affirmatively furthering fair housing". This criteria is as follows:

- Promote and expand housing opportunity for racially and ethnically diverse, *inclusive* occupancy patterns in all neighborhoods;
- Reducing or eliminating housing discrimination against renting or selling to protected classes;
- Determining accessibility options for persons with disabilities for public and private housing opportunities;

- Identify impediments within the jurisdiction;
- Outline appropriate actions to overcome the effects of any impediments identified through the analysis;
- Develop an implementation schedule which lists milestones, timetables, and measurable results; and
- Maintain records reflecting the analysis, actions taken, and compliance with the implementation schedule.

1.2.3 Fair Housing Protection Provisions for Analysis of Impediments

The Fair Housing Act and Title VIII of the Civil Rights Act of 1968 provides protection against housing discrimination, in the form of actions or omissions restricting housing choice on the basis of race, color, religion, sex, disability, familial status, or national origin. The Act further defines the following classifications:

1. Protected Classes

- Title VIII of the Civil Rights Act of 1968 prohibits housing discrimination based on race, color, national origin or ancestry, sex, or religion. The 1988 Amendments to the Fair Housing Amendments Act added familial status and mental and physical handicap conditions as protected classes.

2. Familial Status

- A single person
- An expecting woman or a household with children under 18 living with parents
- Legal custodians who might experience housing discrimination

3. Persons with Disabilities

- Federal law defines a 'disability' or 'handicap' as being
 1. A physical or mental impairment which substantially limits one or more of such person's major life activities.
 2. A record of having such an impairment.
 3. Being regarded as having such impairment.

1.3 Description of Process, Participants, and Methodology

1.3.1 Description of Process

To determine the nature and extent of the provision of housing in the City of Hammond, a review of current statistical information, resources, and analysis was required. The initial examination consisted of a review of historical patterns of population, income, housing, employment, education, and other information.

Activities for development of this report included current housing conditions, identifying related issues, proposing recommendations, and structuring an implementation schedule. Requirements of the report also include a corrective plan of action for each impediment identified. Records of the report and actions taken must be maintained by the City for the five years that the report is in effect. The Analysis of Impediments will be shared with all City departments, agencies, and subrecipients who are receiving entitlement funds.

As administrator of the CDBG, HOME, and ESG entitlement funds, the Department of Planning and Development has the responsibility to oversee the process involved to complete the Analysis of Impediments. Due to the extent of work involved, including collecting, organizing, and analyzing data, the Department decided to seek assistance with the preparation of this report.

1.3.2 Participants

Participation for the development of this Analysis required several agencies and organizations. The agencies ranged from legal organizations to entities involved in housing.

1.3.2 Methodology Used

Methodology Used

The methodology used for this Analysis of Impediments report was deliberately extensive to assure input and a thorough examination. At its core it involved the following tasks:

- A review of the City's laws, regulations, and administrative procedures, policies, and practices
- An assessment of how those laws, regulations and codes, etc. affect the location, availability, and accessibility of housing
- An assessment of conditions, both public and private, affecting fair housing choice for all protected classes.
- An assessment of the availability of affordable, accessible housing in the City of Hammond.

Activities to support above activities include:

- Meetings with city departments;
- Interview with local community housing organization;
- Review and evaluation of print information from daily newspapers, newsletters, community newspaper, national reports, and other periodicals;
- Focus group discussion;
- Telephone conference;
- Meetings with Real Estate and Financial industry providers; and
- Meetings with Legal and Fair Housing agency.

1.3.3 Data Collection Methods

Quality of data collection process and data integrity are essential towards the development of the report. For this reason, HUD is selective when it comes to the resource material, method of collection, and information used to formulate the report. HUD accepted methodologies include the following:

1. Interview format

The development process included a number of interviews that span a period of six weeks. Over thirteen agencies, with 16 representatives provided input. The agencies offered several perspectives based on their relative experiences. The agencies included city departments, community groups, financial and lending institutions, housing and development organizations.

2. Review and analysis of collected data

The collection of data was coordinated by the consultant for the report. The Consultant team reviewed all documents to determine relevance, identify patterns and trends, and examined other issues related to the provision of housing in the City of Hammond. Resources used for this process include the following:

- U. S Census data, 2000 and 2010;
- Public housing information;
- Human Relations Commission general case information regarding discrimination complaints filed;
- Greater Northwest Indiana Association of Realtors (GNIAR) Home Sales data;
- Workforce Development Labor employment;
- HMDA and FFIEC; and
- Foreclosure data from Sheriff Tax Sale information.

3. Public Meeting format

An important step in collection of information for the report is solicitation of input from citizens. Community involvement for development of the report is the requirement by HUD, and the initial findings to be presented to the public. Residents are provided the opportunity to review the initial findings, or Draft Report, prior to submission to HUD. During this meeting, residents are afforded an opportunity to submit comments in writing or verbally.

The Analysis of Impediments to Fair Housing 2012-2016-Draft Executive Summary was presented in a public meeting held on January 17, 2012. This was the second meeting for public participation and opportunity to submit comments. The Department of Planning and Development continued to receive comments until time for submission of the Plan to HUD on February 17, 2012.

As part of the public meeting requirement, the City of Hammond Department of Planning and Development advertised and held two public meetings. These meetings were held on December 6, 2011 and January 17, 2012.

4. Data Source

Several sources were used to provide data for this Consolidated Plan. The first is Census figures from 2010 Decennial County. Additional data were collected from the Census Bureau's American Community Survey (ACS). HUD's 2008 CHAS/ACS update and 2011 American Community Survey data, 3-year or 5-year were also used to provide owner, household and other information. Because different sources and data timeframes were used, the total numbers for different assessed topics may slightly differ.

1.3.4 Funding Source

HUD Program guidelines consider costs associated with preparation of the Analysis of Impediments report an eligible expenditure. As such, the Department of Planning and Development used funds from Community Development Block Grant (CDBG) to cover costs for both plans.

1.4 Conclusions and Recommendations

The Analysis and review identifies impediments to fair housing and housing choice in the City of Hammond. These impediments are listed below. Each impediment is followed by a summary of recommended actions to address such impediment. The results of the findings for the 2012 study identifies the most critical impediments to fair housing in the City of Hammond as:

1. Vacant and abandoned properties
2. Foreclosed properties
3. Quality housing
4. Homeownership and financial literacy

1.4.1 Impediments and Recommendations

1) Vacant and abandoned property

Recommendations

- i. Develop vacant property strategies that will:
 - Identify vacant property
 - Identify the owner
 - Develop a treatment for the property on a case by case basis,
 - Place on police watch list (as determined per case)
 - Make repairs in case of vandalism, and board up as necessary
- ii. Assess the merits of a Vacant Property Registration Ordinance.

- iii. Institute an aesthetic improvement and maintenance installation regiment for all vacant land and building sites as a part of City's Curb Appeal Program. These treatments can include:
 - Community garden;
 - Native plant and rain garden; and;
 - Window board up art.
- iv. Expand Adopt a Lot Program

2) Foreclosed properties

Recommendations

- i. Implement vacant property strategy to maintain neighborhood integrity.
- ii. Collaborate with neighborhood and block club organizations to maintain foreclosed properties.
- iii. Acquire dilapidated foreclosed structures, demolish them, and institute a land bank for these properties, for redevelopment or infill opportunity.
- iv. Purchase, rehabilitate, and sell foreclosed homes.
- v. Provide down payment and rehabilitation assistance to purchase foreclosed homes.

3) Quality housing

Recommendations

- i. Expand acquisition of available land for land banking. Solicit investors to purchase land to build infill housing or subdivision development.
- ii. Rehabilitate and modernize existing substandard homes.
- iii. Demolish substandard housing and build infill housing.

4) Homeownership and financial literacy

Recommendations

- i. Establish a robust program to provide foreclosure and financial literacy training to at-risk homeowners.
- ii. Institute partnerships with local lenders to convert high cost and subprime loans to conventional mortgages.
- iii. Partner with community colleges, universities, and other institutions to provide financial literacy training by including a curriculum that supports homeownership preparedness.
- iv. Develop an aggressive marketing strategy through a public/private partnership to promote ease of homeownership in the City of Hammond.

2.1 Demographic Data

2.1.1 Community Profile

The early history of the City of Hammond can be traced to the arrival of German immigrants around 1847. Prior to the arrival of the early settlers, Northwest Indiana was used as a crossroad transportation corridor for Indian tribes and explorers as the main supply route to the West.

Access to Lake Michigan's abundant water supply attracted settlers and business to the area during the growth of industry. Manufacturing production and distribution routes accelerated when George Henry Hammond opened a meat-packing plant. In order to transport meat long distance, George Hammond pioneered the use of refrigeration railcars. His design received a patent in 1869, the year the plant opened. Several years later, the City of Hammond was incorporated on April 21, 1884.

Hammond's appeal may be associated with the City's close proximity to Illinois. The heart of downtown Chicago is within 23 miles of Hammond. The unique character that influences the City of Hammond today is the result of racial diversity, strong ethnic traditions, and unique neighborhoods. These neighborhoods include Robertsdale, North Hammond, South Hammond, Central Hammond, and Hessville.

2.1.2 Population

Population growth resulting from strong manufacturing and industrial growth peaked in 1960. According to the Census, Hammond's population reached 111,698 residents in 1960. Twenty years later, by the 1980's, Hammond and other manufacturing cities experienced an economic downturn. Hammond's population in 1980 plummeted to 93,714. The City experienced typical conditions brought on as a result of the economic downturn, which included significant job loss, local business closures, increased vacant and abandoned property, and decaying infrastructure.

Table II-1
Population

Year	Hammond		Lake County		PMSA	
	Total	% Change	Total	% Change	Total	% Change
1980	93,714	--	522,965	-4.30%	642,781	-
1990	84,236	-10.11%	475,594	-9.06%	604,526	-6%
2000	83,048	-1.41%	484,564	1.89%	631,362	4.40%
2010	80,830	-2.67%	496,005	2.36%	660,348	4.59%

Source: U.S. Census

Outmigration, which began after the peak population in 1960, has continued for the last 40 years. The most significant decline occurred during the decade between 1980 and 1990. The City experienced a loss of over 10% of the population, representing a numerical drop from 93,714 to 84,236.

By the year 2000, the City's population had declined to 83,048. Despite these conditions, the City worked to support business investment and stabilize neighborhoods. After legislation passed in 1993 for the gaming industry, Hammond opened its gaming facility which provided needed jobs and tax revenue. The 2010 Census records the City's population at 80,830.

2.1.3 Population Change by Race and Ethnicity

The City of Hammond is ethnically and racially diverse. The U.S. Census show some gains and losses in ethnic groups over the past thirty years. A percentage of shifts in racial groups may be attributed to ethnic and racial classification expansion by HUD. Classifications by HUD added a number of mixed race categories. As a result, some respondents may identify with more than one racial or ethnic group.

Table II-2
Population By Race and Ethnicity

Year	Population	White	%	African American	%	Hispanic	%
1990	84,236	71,461	84.8%	7,743	9.2%	9,941	11.8%
2000	83,048	60,089	72.4%	12,102	14.6%	17,473	21.0%
2010	80,830	47,984	59.4%	18,224	22.5%	27,563	34.1%
% Change 2000 to 2010		-20.1%		50.6%		57.7%	

Source: U.S. Census

Table II-2 illustrates a breakdown of the three prominent racial groups over the last thirty years. The decrease in the White population in Hammond is significant. Nonetheless, Hammond continues to remain more ethnically diverse than other communities in the area. Recent economic activity and investment by the City is aimed at attracting new residents and expanding diversity.

2.1.4 Age Distribution

Table II-3 provides a comparison of age distribution over the last decade. In the last decade, the overall population in Hammond declined by 2.67%. Two age groups experienced an increase in population according the U.S. Census report. The category experiencing the largest increase was the 45-64 age group, which increased by 3,154. This figure represents a 19.23% increase for this age group. The other age group to experience an increase was the 15-24 group. In contrast, the 65 and over populations declined by 19.83%, or 2,133 individuals.

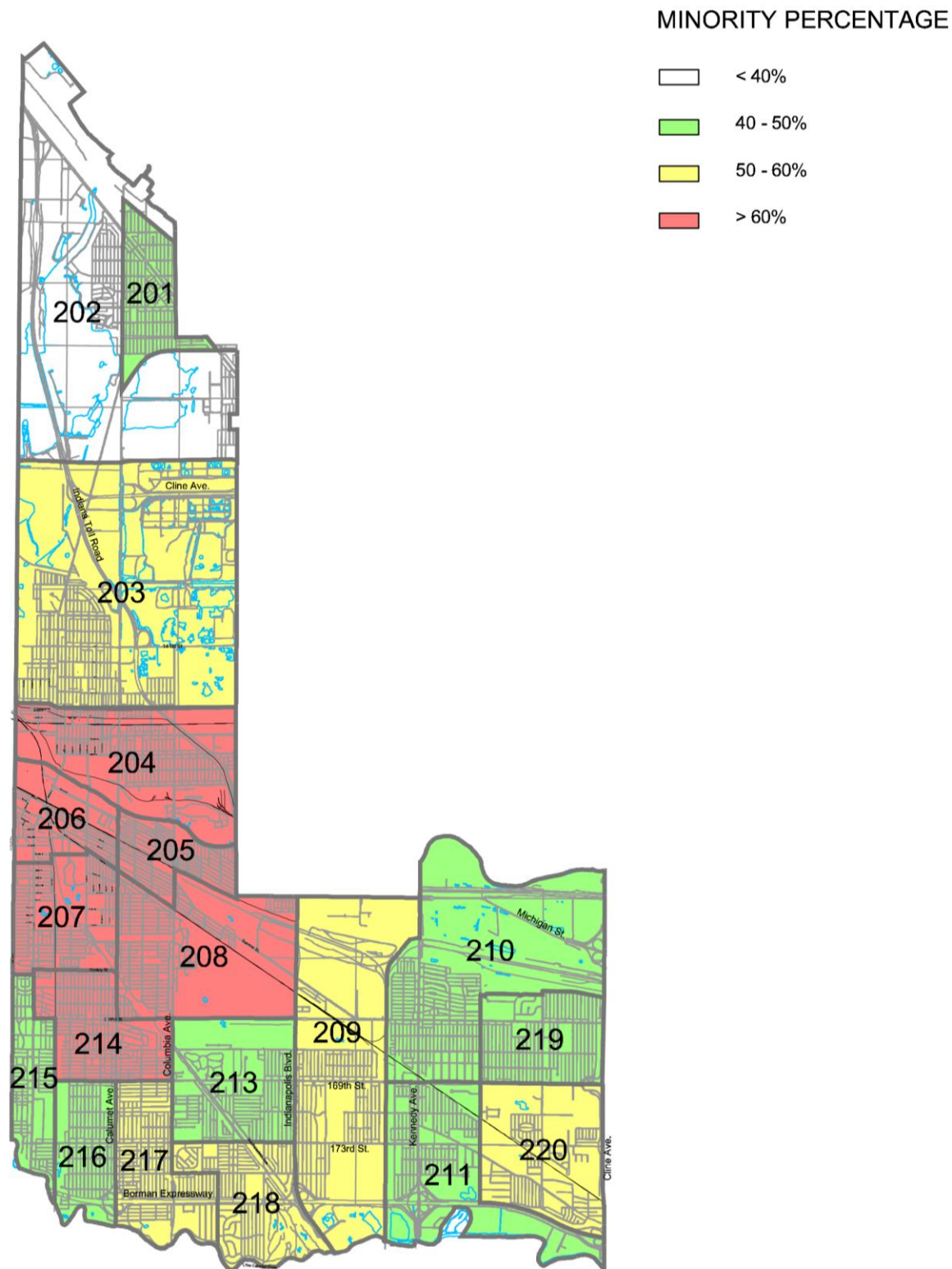


Table II- 3
Age Distribution

Age	2000		2010		% Change
	Number	%	Number	%	
0-14	19,293	23.23%	18,641	23.06%	-3.38%
15-24	11,563	13.92%	11,943	14.78%	3.29%
25-44	25,028	30.14%	22,061	27.29%	-11.85%
45- 64	16,405	19.75%	19,559	24.20%	19.23%
65 - over	10,759	12.96%	8,626	10.67%	-19.83%
Total	83,048	100%	80,830	100.00%	-2.67%

Source: U.S. Census

2.1.5 Education

Enrollment in the Hammond School Corporation system has fluctuated between 2007 and 2011. Student enrollment reached a high of 14,679 in 2009. The 2011 school year recorded the lowest enrollment over the past five years, with 14,332 students.

Table II-4
School City of Hammond

Category	2011		2010		2009		2008		2007	
	#	%	#	%	#	%	#	%	#	%
Special Ed. Students	n/a	n/a	1,956	13.3%	2,066	14.1%	2,095	14.5%	1,998	13.8%
Free Meal Students	10,153	70.8%	10,052	68.5%	9,050	61.7%	8,783	60.9%	8,783	60.5%
Reduced Price Meal Students	941	6.6%	1,441	9.8%	1,526	10.4%	1,510	10.5%	1,576	10.9%
Limited English Students	n/a	n/a	2,301	15.7%	2,245	15.3%	2,384	16.5%	2,120	14.6%
Student Enrollment	14,332		14,673		14,679		14,414		14,511	

Source: Indiana Department of Education

Special education student enrollment experienced moderate fluctuations. Table II-4 identifies two years when the percentage of special education students was above 14%, in 2008 and 2009. In 2010, special education students represented 13.3%, of the student population. This was the lowest percentage of special education students in the last four years.

Students who participate in the free meals program have continued to increase for the past several years. In 2007, the percentage of students receiving free meals was 60.5%. Within five years, free meal student participation increased to 70.8% in 2011.

The increase in free meal participation may be linked to the economic downturn which started in 2007. Prior to 2007, the City of Hammond started to experience a rise in unemployment. The City's unemployment rate rose from 4.2% in 2000, to 7.1% in 2005. By 2010, Hammond's unemployment rate was in double-digits and had increased to 12.6%. There is also reported evidence of a rise in homeless student enrollment, as reported by the Hammond School District McKinney Vento Program, that serves this population.

Minority enrollment has increased at a steady rate since 2007, ranging between 1.3% to 2.1% annually. The largest increase in minority enrollment occurred between 2007 and 2008, when minority enrollment increased from 71.6% to 73.7%. During the same period, school enrollment experienced a slight decline of 97 students.

**Table II-5
Minority Enrollment**

Year	Enrollment	Minority	% Minority
2011	14,332	11,274	78.7%
2010	14,673	11,351	77.4%
2009	14,679	11,087	75.5%
2008	14,414	10,625	73.7%
2007	14,511	10,388	71.6%

Source: Indiana Department of Education

According to the 2010 Census, the City of Hammond's non-minority population is 59.4%. In contrast, the non-minority population is not reflected proportionately in school enrollment. Minorities account for 77.4% of the school population in 2010, while representing less than 50% of the City's overall population.

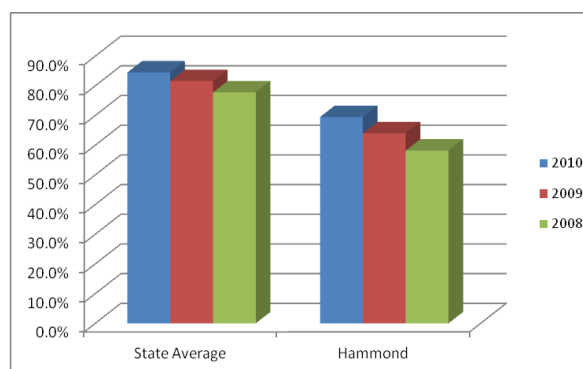
Graduation rates have continued to rise for the last three years. Table A-6 provides a comparison of graduation rates over a three year period for the Hammond School Corporation and the State.

**Table II-6
Graduation Rates**

Year	State Average	Hammond
2010	84.5%	69.5%
2009	81.6%	64.0%
2008	77.8%	58.2%

Source: Indiana Department of Education

The strength of the educational system is an element that impacts the stability of a community. Neighborhoods with lower performing schools have lost population as many families have moved to communities with better performing schools. The State continues an aggressive campaign to provide education options for lower performing school districts. An alternative introduced to address underperforming



Source: Indiana Department of Education

schools are "Public Charter Schools". Demand for charter schools Source: Indiana Department of Education has been relatively high. The City of Hammond recently built a new charter school, Hammond Academy for Science and Technology (HAST) for grades six through nine. The Academy opened in September 2010, with 310 students. HAST recently announced the opening of the lottery used to select student for enrollment. This lottery will be held to select sixth grade students for the fall 2012 school year.

2.1.5 Income

The Department of Housing and Urban Development (HUD) developed terms to describe housing affordability. The methodology used to define and calculate data associated with these terms are derived from the Community Housing and Affordability Strategy (CHAS) report. This report is typically completed in conjunction with the Decennial Census data. At the time of this writing, the 2010 CHAS report had not been released by HUD. Nonetheless, the terminology used for the report has been recognized since the inception of the CHAS report. The terms used provide a sliding scale to measure income, and are categorized as follows:

- Extremely Low Income (0%-30%) of Median Family Income (MFI)
- Very Low Income (31%-50%) of MFI
- Low Income (51%-80%) of MFI
- Moderate Income (81%-95%) of MFI

HUD further defines the cost burden associated with housing based on available resources needed to pay (out of gross income), gross housing related costs, including utilities. HUD defines affordable housing, as housing where the occupant pays no more than 30 percent of their gross income for housing costs.

1. Income Comparison

Table II-7 shows, the Median Family Income (MFI) in Hammond increased by 9.2% over the last decade. During the same period, Lake County experienced an increase in median family income of 11.1%. According to the Census report, the median household income rose by 4.99% during the same period for Hammond.

Table II-7
Median Family and Household Income

Area	Family			Household		
	2000	2010	% Change	2000	2010	% Change
Hammond	\$ 42,221	\$ 46,104	9.20%	\$ 35,528	\$ 37,300	4.99%
Lake County	\$ 50,131	\$ 55,696	11.10%	\$ 41,829	\$ 45,153	7.95%

Source: U.S. Census

2. Income by Census Tract

Median Family Income as estimated by HUD in 2011 for the Metropolitan Statistical Area (MSA) which includes Hammond is \$65,200. Based on estimated MFI in the City, only one Census Tract, (206) is considered a low income Tract.

Nine of the City's census tracts are moderate income, and the remaining eight tracts are middle income. The highest incomes families are located in census tract 215.

Table II-8
Income Concentration

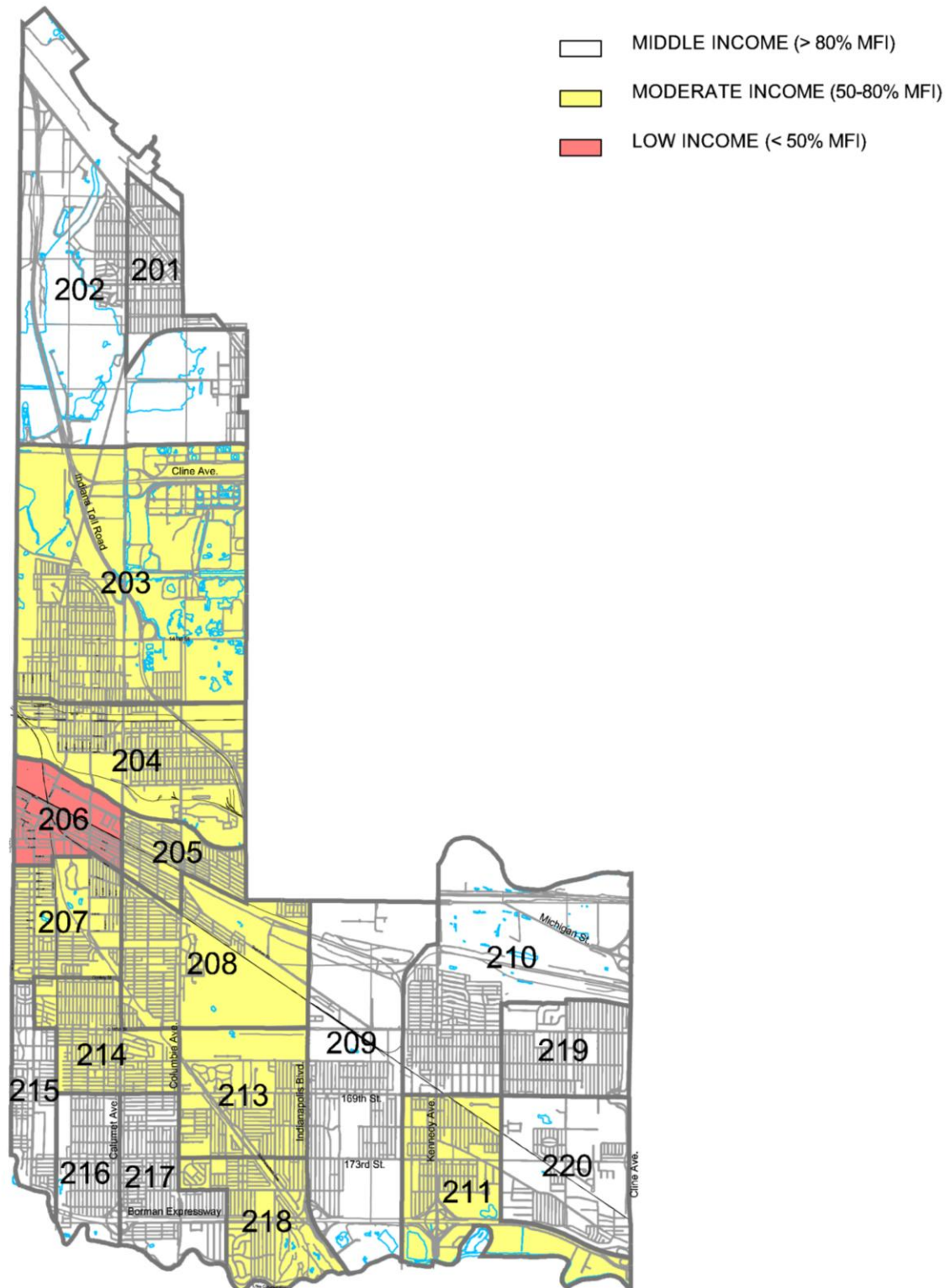
Tract	Population	Income Level	Median Family Income %	Median Family Income	2000 Median Family Income
201	4922	Middle	100.26	\$65,370	\$52,656
202	2669	Middle	89.02	\$58,041	\$46,750
203	6663	Moderate	69.73	\$45,464	\$36,619
204	5412	Moderate	60.86	\$39,681	\$31,964
205	4148	Moderate	69.02	\$45,001	\$36,250
206	2290	Low	31.66	\$20,642	\$16,625
207	5503	Moderate	73.94	\$48,209	\$38,833
208	4912	Moderate	69.44	\$45,275	\$36,469
209	3868	Middle	96.99	\$63,237	\$50,938
210	5323	Middle	91.52	\$59,671	\$48,067
211	4302	Moderate	77.73	\$50,680	\$40,820
213	3528	Moderate	70.98	\$46,279	\$37,279
214	5158	Moderate	70.11	\$45,712	\$36,818
215	2382	Middle	108.57	\$70,788	\$57,019
216	2878	Middle	90.99	\$59,325	\$47,784
217	4817	Middle	87.14	\$56,815	\$45,765
218	4054	Moderate	60.25	\$39,283	\$31,641
219	5238	Middle	86.73	\$56,548	\$45,547
220	4981	Middle	88.38	\$57,624	\$46,415
2011 HUD Est. - Median Family Income				\$65,200	

Source: Home Mortgage Disclosure Act (HMDA)

2.1.6 Employment

A review of employment levels for the past ten years shows the highest rate of employment in the City of Hammond was in 2000, when over 35,500 people were employed. At that time, the unemployment rate was 4.2%. Hammond's unemployment rate reached a high of 12.6% in 2010.

LOW-MODERATE INCOME RATE



**Table II-9
Historical Employment Comparison**

Year	Hammond				Rate	
	Labor Force	Employed	Unemployed	Rate	Indiana	US
2010	32,508	28,398	4,110	12.6	10.2	9.1
2005	34,329	31,888	2,441	7.1	5.4	5.1
2000	37,142	35,565	1,578	4.2	2.9	4.0
% Change 2000 -2010	-12.5%	-20.2%	160.5%	200.0%	251.7%	127.5%

Source: Indiana Department of Workforce Development

The economic downturn which began in 2007 continues to influence in the job market. Table II-9 compares the City's rate with the State and Country. Traditionally, Hammond's unemployment rate has been higher than both the State and the U.S. average. According to the Department of Workforce Development's latest figures, the City of Hammond has experienced a decrease in the unemployment rate from 12.6% in 2010 to 10.5% in November of 2011.

2.2 Housing Market Profile

2.2.1 Housing and Household Characteristics

The provision of housing in Hammond has decreased over the last decade. The 2010 Census reports a decline of 3.5%. The loss of units is spread between both rental and owner-occupied. Owner-occupied units declined by about 1,870 units between 2000 and 2010.

**Table II-10
Housing Tenure**

Tenure	2000	%	2010	%	Change	%
Owner Occupied	20,236	59.3%	18,366	55.7%	-1,870	-9.2%
Renter Occupied	11,790	34.5%	11,583	35.2%	-207	-1.8%
Vacant	2,113	6.2%	2,996	9.1%	883	41.8%
Total	34,139	100.0%	32,945	100%	-1,194	-3.5%

Source: U.S. Census

The loss of population over the last decade has contributed to the decline in the number of housing units. Table II-10 shows an increase of vacant structures of over 40%. In the last decade vacant structures in Hammond increased by 883 units. A comparison of housing inventory in the last ten years show 34,139 units of housing in 2000, and a reduction to 32,945 in 2010. Sheriff sale and other foreclosure data suggests that housing market conditions may have contributed to the increases in vacant structures.

Table II- 11
Tenure By Year of Structure

Year Built	Owner Occupied		Renter Occupied		Total	
2008 or later	77	0.43%	0	0.00%	77	0.26%
2000 to 2007	366	2.10%	55	0.40%	421	1.40%
1990 - 1999	602	3.40%	148	1.20%	750	2.49%
1980 to 1989	393	2.20%	1,238	10.00%	1,631	5.41%
1970 to 1979	440	2.50%	1,335	10.80%	1,775	5.89%
1960 to 1969	1,387	7.80%	1,798	14.60%	3,185	10.57%
1950 to 1959	5,645	31.70%	1,488	12.10%	7,133	23.67%
1940 to 1949	3,028	17.00%	1,952	15.80%	4,980	16.53%
1939 <	5,850	32.90%	4,328	35.10%	10,178	33.78%
Totals	17,788	100.00%	12,342	100.00%	30,130	100%

Source: U.S. Census

Hammond's housing stock, 73.9% was built before 1960. Building activity began to increase in 1990 in both owner and renter occupied housing at 3.4% and 2.49% respectively. Table II- 11 illustrates the type of owner-occupied construction over time. Property build before 1978, may require updating and renovations due to the potential of lead-paint.

As population fell, the number of households also decreased. In 1990, the City had 32,146 households. According to the 2010 Census the City's number of households has dropped to 29,949. In contrast, household size has fluctuated over the past thirty years. Between 1990 and 2000, household size decreased from 2.61 to 2.58 persons per unit. During the last decade the households have increased from 2.58 to 2.67 persons per unit.

Table II-12
Housing Tenure

Households	1990	2000	2010
Households	32,146	32,026	29,949
Household Size	2.61	2.58	2.67

Source: U.S. Census

Similar trends are occurring in both owner-occupied units and rental units. In the last thirty years the size of owner-occupied average household size has fluctuated, decreasing between 1990 and 2000, from 2.76 to 2.70. In the following decade the household size for owner-occupied units increased from 2.70 to 2.79.

Table II- 13
Household Change by Tenure

Tenure	1990	2000	2010
Average household size of owner-occupied	2.76	2.70	2.79
Average household size of renter-occupied	2.33	2.37	2.48

Source: U.S. Census

According to the 2010 Census, the City's total owner-occupied units are 29,949, with 2,996 vacant. The City's elderly own a total of 6,079 units. The elderly represent a notable number of homeowners in a community, at over 20%. Table II-14 illustrates owner and rental rates for three groups of elderly. Elderly homeownership rate is the highest for the 65 to 74 age group at 45%. The same age group represent 58% of the renters.

Table II- 14
Elderly Homeowners (2010)

Age Group	Owner		Renter		Total
	Total	%	Total	%	
65 to 74 years	2,096	45%	833	58%	2,929
75 to 84 years	1,721	37%	423	30%	2,144
85 years and over	836	18%	170	12%	1,006
Total	4,653	100%	1,426	100%	6,079

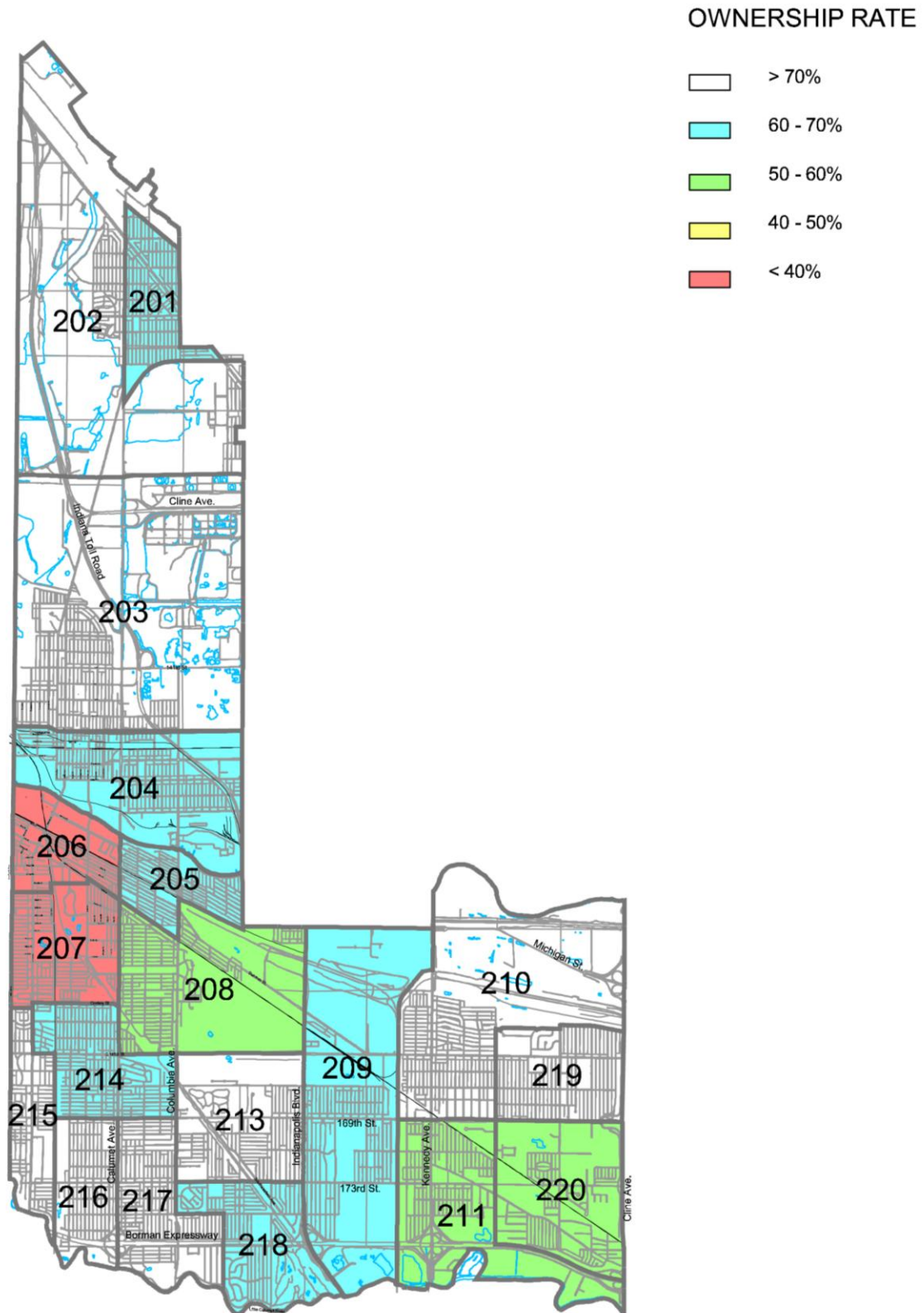
Source: U.S. Census 2010

In the last decade this same group has declined in population by nearly 20%. In contrast to the decline in elderly population in the City, requests for affordable housing remains high. The Hammond Housing Authority's current waiting list show, 155 elderly families are seeking public housing and 170 requested for Housing Choice Vouchers (HCV). The requests for housing assistance may indicate a gap in the provision of housing options in the City.

Table II- 15
Median Rents

Area	Year	
	2010	2000
Hammond	\$ 745.00	\$ 518.00
Gary	\$ 677.00	\$ 469.00
Lake County, Indiana	\$ 747.00	\$ 544.00
Cook County, Illinois	\$ 917.00	\$ 648.00

Source: U.S. Census 2010



Median rents during the last decade have increased in the Metropolitan Statistical Area (MSA). Table II-15 compares rents in Hammond, Gary, Lake County, Indiana, and Cook County, Illinois. The average increase amounts to a little over \$225. The area experiencing the largest increase was Cook County, Illinois. Median gross rent in Cook County was \$648 in 2000, and jumped to \$917 in 2010. Locally, the City of Hammond's median rent increased the most by \$227, up from \$518 in 2000, to \$745 in 2010.

2.2.2 Residential Development Activities

The City's Building Department records shows home improvement and demolition permits that were issued between 2009 and 2011. Home improvements continue to comprise the majority of housing related permit activity, averaging over 2,200 annually for the past 3 years. This number may be attributed to the high volume of older homes and foreclosures which have saturated the market.

Table II- 16
City of Hammond Building Permits

Year	Home Improvements	Demolition
2011	2,434	101
2010	2,494	112
2009	2,398	114

Source: Hammond Building Department

The award of the Neighborhood Stabilization Program (NSP1) grant has also contributed to an increase in residential construction activity. The City of Hammond has accumulated a little over \$5 million for purchase, rehabilitation, and sale of foreclosed homes. As a result of the success of the program, HUD awarded the City of Hammond additional funding through NSP3. The amount of the award is \$1,243,931. Other residential developments in the City include:

1. **Parrish View**

Parrish View subdivision offers 28 high end single family homes sites that are available for purchase and construction by approved contractors. The subdivision also features pedestrian sidewalks, ornamental lighting, and landscaping.

2. **Columbia Center Revitalization Area**

The Columbia Center Revitalization Plan consists of several residential housing developments located in the footprint of the existing public housing site owned by the Hammond Housing Authority. The project development is a phased construction which consists of five Phases. Phase I consisted of a four story senior complex for the 55 and older age group. Golden Manor Senior housing building was completed and fully occupied in 2007, and has 80 one bedroom units.

The Saxony Townhomes was constructed along the perimeter of the Columbia Center footprint. Saxony Townhomes is comprised of sixty-eight two story units. This phase of the development was completed in May of 2009.

Phases III and IV consist of 143 single-family homes, all ground level, ranch style. The American Heartland Homes I and II, Buildings A, B and C are comprised of one, two and three bedroom homes that range between 510 and 1,135 square feet.

3. Lincoln-Lake Homes - Robertsdale

The Lincoln-Lake development is a 5 lot subdivision for five single-family detached homes which are located in the Robertsdale neighborhood. This is the first new subdivision development in the Robertsdale community in the last forty years. Homes in this development start at \$190,000 and are between 1,800 and 2,400 square feet.

2.2.3 Affordable Housing Needs

At the time of this report, HUD ACS CHAS data for 2010 had not been released. In an effort to provide relative housing needs information for the assessment, the 2008 HUD ACS/CHAS Data is used. These estimates reflect sizable variation in the margin of errors, thereby impacting accuracy. Any discrepancies in different tables is a result of the these variations.

Table II- 17
Housing Needs By Household Income

Median Family Income	Total HH	% With Housing Problems	Owner				Renter			
			Total HH	Housing problem		% Total HH	Total HH	Housing problem		% Total HH
				Total	%			Total	%	
Household Income <=30% MFI	5,160	87.4%	1,685	1,610	95.5%	9.1%	3,475	2,900	83.5%	28.9%
Household Income >30 to <=50% MFI	3,705	68.6%	2,355	1,535	65.2%	8.7%	1,350	1,005	74.4%	10.0%
Household Income >50 to <=80% MFI	6,570	49.3%	4,055	2,055	50.7%	11.7%	2,515	1,185	47.1%	11.8%
Household Income >80% MFI	12,240	9.6%	9,535	975	10.2%	5.5%	2,705	195	7.2%	1.9%
Total	27,675	41.4%	17,630	6,175	35.0%		10,045	5,285	52.6%	

Source: 2008 HUD ACS/CHAS

The 2008 HUD ACS/CHAS data compares categories of household income by tenure in relationship to ability to meet housing costs. The total number of households in the City is 27,675. The majority of these households, 12,240 are categorized as moderate or higher income. Other households according to income are:

- (5,160) Extremely Low Income (0-30% MFI);
- (3,705) Very Low Income (30-50% MFI); and
- (6,570) Low Income (50-80% MFI).

Extremely Low Income and Very Low Income households are often the most impacted by housing related problems. These households have difficulty meeting obligations associated with housing related costs, either as a homeowner or renter. Combined, this group of

households comprise 8,865 of the City's total. Homeowners in this category lack the necessary resources required for housing upkeep and general repairs. Renters may lack sufficient resources to pay for necessities that include food, utilities, and transportation costs. According to the 2010 Census, median rent in the City is \$745. A minimum wage earner working full-time earns \$1,160 per month. In this example, the cost of rent per month would account for 64.2% of monthly wages. This amount far exceeds HUD's recommended 30% maximum wages for use to cover housing costs, without including other expenses, and would constitute a housing burden.

Another category of households are Low Income, earning 50-80% MFI. This group represents 6,570 households. The homeowners and renters in this category are nearly evenly split. Homeowners comprise 11.7% of the households and renters 11.8%. Both owners and renters in this category have what is viewed as sufficient resources to meet routine housing needs. The 2010 Census data, listed in Table II-7, records the median household income in the City at \$37,300. Income for this category of earners range between \$18,650 - \$29,840.

The largest households represented in the City are moderate income earners, representing 12,240 households. This income group represents more than 44% of the total households in the City. Considered as the middle class, this group of homeowners, in many cases receive the least housing related assistance in most communities. This group of residents have continued to decline in the City, while the number of low and moderate income residents increase.

To reduce this trend of outmigration by moderate income households, the City has introduced several incentives to persuade this group to remain or move to the City. New market rate single family homes, retail development, and the College Bound Program are examples of these efforts. Elderly households in this category may have been overlooked as it relates to housing options. Focus group and other reports indicate seniors may be relocating due to lack of housing options in the City.

The Department of Planning and Development has several residential rehab programs to assist Low and Moderate Income households. Among those programs are; Emergency Rehabilitation, Facade/Deferred Match FHLB Roofs, Disability Ramps, and Project Pride Paint. Rental assistance program is also available through the Hammond Housing Authority. Despite the availability of the listed assistance, some gap continues to persist, as is evidenced in the long waiting lists for housing collected annually by the Hammond Housing Authority.

2.2.4 Housing Costs

Home sales for the past four years in the City of Hammond have averaged a little over 510 per year. The highest home sales occurred in 2009, when 562 homes were sold. The lowest number of homes sold 464 was in 2011. Home sales for 2011 include all homes sold up to December 6, 2011.

**Table II - 18
Hammond Home Sales**

Year	Median S.F.	Median Selling Price	Median Days on the Market	# Homes Sold
2011 (to 12/6)	1,326	\$55,078	82/109	464
2010	1,209	\$61,643	81/114	491
2009	1,215	\$59,411	91/125	562
2008	1,220	\$73,846	80/111	537

Source: Greater Northwest Indiana Realtors Association (GNIAR)

The housing market downturn has impacted home values in the Hammond. A significant number of foreclosures in the market have caused home sales pricing to be reduced. Housing sales prices over the past year between 2010 and 2011 dropped nearly 12%.

A review of existing housing and new residential development suggests that the availability of housing in Hammond can be considered adequate. A number of the housing units may not be considered updated, or some units may not be ready for occupancy. Nonetheless, of the 32,945 units of housing in the City, less than 10% are vacant, and home prices are affordable. According to the 2010 Census, the overall rental vacancy rate is 6.9%, while the homeowner vacancy rate is 2.6%.

Although housing costs are affordable in the City, other factors and conditions may prevent homeownership. The most notable factor preventing homeownership is downpayment, and loan qualifications due to new mortgage restrictions by lending institutions.

**Table II - 19
Vacancy Rates**

Category	#	%
For rent	868	2.6
Rented, not occupied	46	0.1
For sale only	499	1.5
Sold, not occupied	66	0.2
Seasonal, recreational, or occasional use	36	0.1
All other vacants	1,481	4.5
Homeowner vacancy rate	(x)	2.6
Rental vacancy rate	(x)	6.9
Vacant housing units	2,996	9.1
Total housing units	32,945	100.0

Source: U.S. Census 2010

Homeowner and rental vacancy rates in the City are 2.6% and 6.9% respectively. According to the 2010 Census, there are 868 units for rent. Some units have been sold and rented, but not yet occupied. Nearly 500 of the total vacant housing units are for sale. The number of vacant

and available housing units offer opportunity for purchase, rehabilitation, and resale for low/moderate income families and individuals. Incentive for not-for-profits and private investors may help to return some of these vacant units into housing for the underserved in the community.

2.2.5 Public and Assisted Housing

The City of Hammond continues to make inroads in the quality and supply of assisted housing options in the community. These housing options units are available through the public and the private sector. Combined subsidized housing providers offer 1,915 units of housing.

**Table II - 20
Public Housing**

Facility	Total Units	Elderly	Family
Columbia Center	83		83
**Humphrey Building	119	119	
Turner Park	80		80
Total Facilities	282	119	163
Section 8 (HCV) & (PBV)		751	
Public and Assisted Housing		1,033	

Source: Hammond Housing Authority - ** near elderly 50+

The Hammond Housing Authority (HHA) currently has 425 Public Housing Units and 751 Project and Tenant Based Voucher (Housing Choice Vouchers) in inventory to meet the needs of the community. These units are located in developments throughout the City.

**Table II - 21
LIHTC Housing**

Facility	Total Units	Type
*Golden Manor	80	Elderly
Saxony Town Homes	68	Multi-Family
American Heartland Homes One	94	Multi-Family
American Heartland Homes Two	49	Multi-Family
Douglas Point III	64	Multi-Family
Total Facilities	355	

Source: Hammond Housing Authority - * 55 and older

ASSISTED HOUSING SITES

PUBLIC HOUSING

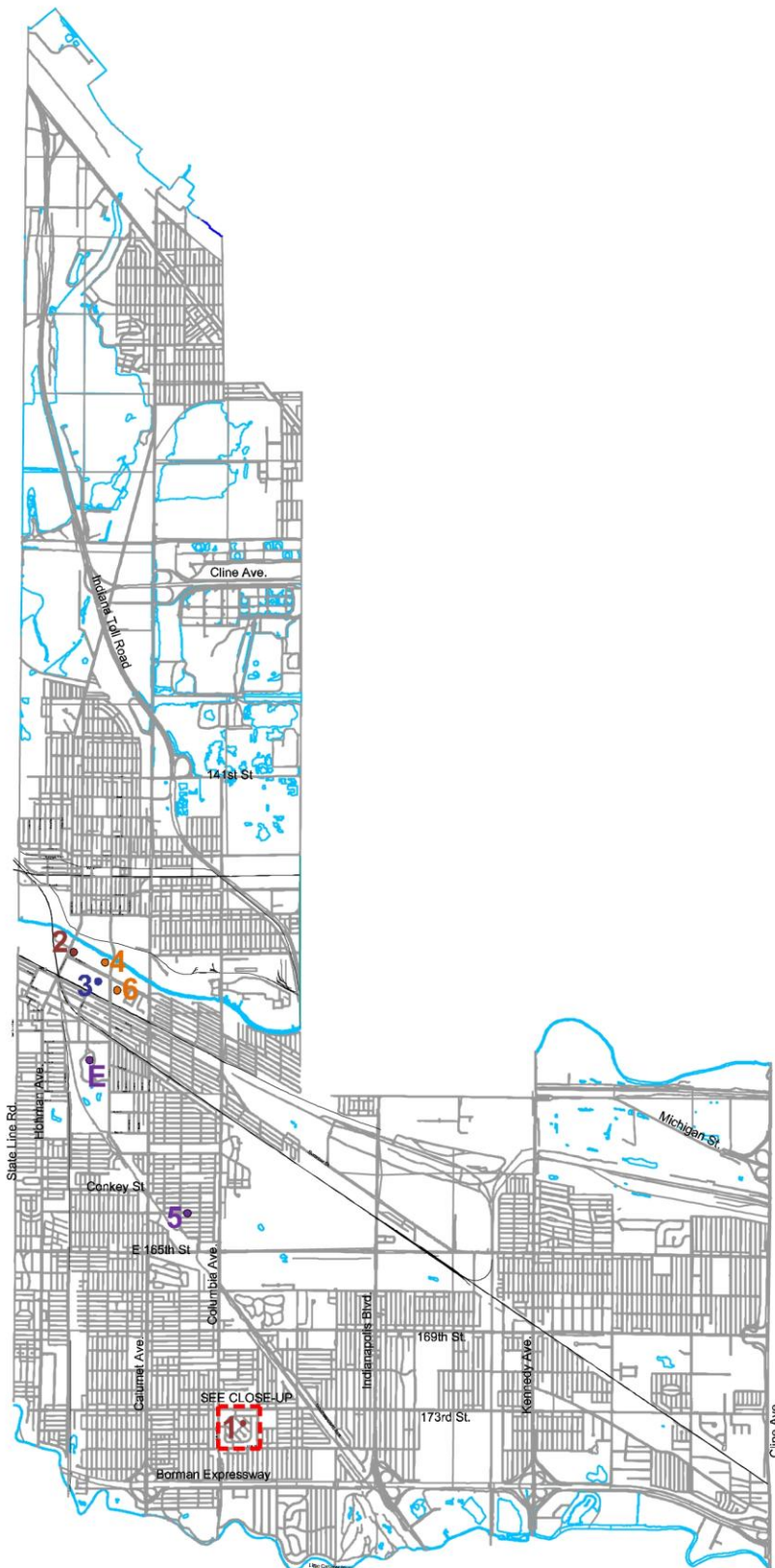
- 1) COLUMBIA CENTER
- 2) HUMPHREY BUILDING
- 3) TURNER PARK

LIHTC

- A) GOLDEN MANOR
- B) SAXONY TOWNHOMES
- C) AMERICAN HEARTLAND I
- D) AMERICAN HEARTLAND II
- E) DOUGLAS POINT

OTHER

- 4) RENNAISSANCE CENTER
- 5) MOUNT ZION
- 6) HAMMOND ELDERLY



COLUMBIA CENTER CLOSE-UP (N.T.S.)



Table's II-20, II-21, and II-22 show assisted housing facilities and the types of units that are available for the elderly, families and persons with disabilities. Family units in the inventory is 306, and housing for the elderly is 119. Private assisted housing facilities that are available in the City is 732. Of these units that are available, 80 located in Golden Manor for seniors 55 years and older.

The HHA seeks applicants during an annually open solicitation process, according to Admissions and Continued Occupancy Policy (ACOP) procedures. On an annual basis demand for limited subsidized housing exceeds available openings. For this reason, the HHA, maintains a waiting list on a first come, first served basis. The current 2011 waiting list has 960 families for public housing and 260 families for Housing Choice Vouchers. The number of applicants on the waiting list suggests a need for additional subsidized housing. Renovations and upgrades may account for the interest in these units in addition to current economic conditions.

**Table II - 22
Other Housing**

Facility	Number of Units	Accessible Units	Availability
Renaissance Center	250	15	Section 8
Mount Zion	127	13	Low Income
Hammond Elderly	150	36	
Total Facilities	527		

Source: Hammond Housing Authority

The majority of HHA's housing stock has been rehabilitated or newly constructed within the last seven years. American Heartland I and II are currently under construction. Golden Manor Senior Building and the Saxony Townhomes were completed in 2007 and 2009, respectively.

2.2.6 Accessible Housing Provision

Section 504 of the Rehabilitation Act of 1973, outlines the accessibility provision of the Act. Under this Section, federal program administrators and recipients of federal funds must operate their programs in a manner which ensures that persons with physical limitations are provided reasonable access and/or accommodations to existing and new facilities that include housing, public buildings, and public spaces. In addition, any significant construction modifications or alterations of dwelling units must provide, at a minimum five percent of those units as accessible units for persons with disabilities. For physical access, a recipient may make structural changes, reassign services to accessible buildings, assign aids to assist beneficiaries, or any other means that make its program or activities accessible to persons with physical limitations.

This provision also extends to individuals with other limitations. Federal fund recipients must ensure that persons with hearing and vision impairments can find out about the existence and locations of programs, services, activities, and facilities.

Table II - 23
Individuals with Disabilities

Character	5-17 w/ disability	%	18-64 w/ disability	%	65+ w/ disability	%	Total*
With a hearing difficulty	0	0.0%	1,743	23.4%	1,741	49.7%	3,484
With a vision difficulty	50	4.4%	2,094	28.1%	511	14.6%	2,655
With a cognitive difficulty	824	72.4%	2,865	38.5%	801	22.9%	4,490
With an ambulatory difficulty	70	6.2%	4,451	59.8%	2,096	59.8%	6,617
With a self-care difficulty	499	43.8%	1,562	21.0%	896	25.6%	2,957
With an independent living difficulty	0	0.0%	3,126	42.0%	1,330	37.9%	4,456
Total	1,138		7,447		3,505		12,090

Source: U.S Census 2010

Table II-23 provides a breakdown of the disabled in the City of Hammond based on several descriptive categories. According to the 2010 Census, over half, (6,617) of the City's disabled population suffers from an ambulatory impairment. Census data also shows that a number of Hammond's disabled population suffers from more than one disability.

The Hammond Housing Authority has been aggressive in its efforts to update and modernize its housing portfolio. Therefore, the majority of HHA housing exceeds the legal requirements of a minimum of 5% of the housing units as accessible. Private Low Income Tax Credit (LIHTC) units are new construction units. These units meet accessibility code, and a number of units are designated handicap accessible. Other assisted housing units in the City also have designated accessible units that exceed the minimum 5% allotment required by HUD.

Private sector accessible units are difficult to ascertain. Review of Census disability data may not provide the level of information necessary to determine gaps in private sector accessible housing.

2.2.7 Employment and Transportation Worker Profile

Access to housing and housing choice can also be attributed to other factors that include employment opportunities and proximity of jobs. The City of Hammond's largest employer is St. Margaret's Hospital, which employs 2,930 workers. The second highest employer is Horseshoe Casino, which employs almost 2,700 workers. Additional businesses in the City include a food additive company, steel fabricators, aluminum and soap manufacturers, retail outfitting, government, and many other small and medium sized storefront businesses.

**Table II-24
Worker Profile**

Worker Category	Car, Truck, Van drove alone	Car, Truck, Van carpooled	Public Transit (exclud. taxicab)
16 years and over	26,801	2,759	702
Median age (years)	40.7	39.1	35.5
Native	88.4%	61.7%	91.5%
Foreign born	11.6%	38.3%	8.5%
Naturalized U.S. citizen	4.5%	17.0%	8.5%
Not a U.S. citizen	7.1%	21.3%	0.0%
Speak language other than English	23.6%	46.3%	25.8%
Speak English "very well"	15.1%	14.3%	17.2%
Speak English less than "very well"	8.5%	32.0%	8.5%
Median earnings (dollars)	30,605	20,141	36,413
Below 100 percent of poverty	7.7%	7.0%	10.1%
100 to 149 percent of poverty	12.5%	34.6%	0.0%
At or above 150 percent of poverty	79.7%	58.4%	89.9%
Worked in state of residence	69.1%	45.2%	10.1%
Worked in county of residence	66.4%	40.7%	10.1%
Worked outside county of residence	2.7%	4.5%	0.0%
Worked outside state of residence	30.9%	54.8%	89.9%
No vehicle available	4.1%	19.2%	11.4%
1 vehicle available	24.6%	19.5%	45.6%
2 vehicles available	45.5%	28.7%	20.1%
3 or more vehicles available	25.8%	32.6%	22.9%
Total Workers	31,873		

Source: U.S. 2010 Census (ACS) 1- year estimate

Table II-24 provides a profile of workers 16 years of age and older in the City of Hammond covering a twelve month period in 2010. The majority of the workers used their own transportation, 26,801 to arrive at work. Further review of the transportation patterns of residents show public transportation is used by two distinctive groups. These groups include higher wage earners, and those who own one or two automobiles. Lower wage earners also used their own transportation to work. Worker profile data show that public transportation was most used by workers (at or above 150% of poverty), and (worked outside the state) at 89.9% respectively during the twelve month study period.

Access to jobs and transportation may not represent a significant barrier to housing choice in the City of Hammond. Workers who have access to one personal transportation and those at or above 150 % of the poverty level, use public transportation. According to the Census 2010 Worker Profile, these two groups use public transportation at a rate of 45.6%, and 89.9% respectively. Access to public transportation in the City includes routes provided by the Regional Bus Authority's (RBA) Easygo buses with access to hospitals and medical offices, shopping, government offices, and is linked with Hammond and East Chicago South Shore stations, Amtrak Hammond/Whiting stations, PACE Routes 350 and 364, Coach USA in Highland.

3.1 Information Gathering

3.1.1 The Process of Information Collection and Fair Housing

A number of agencies and resources were used to gather legal information related to housing and cases which may pertain to protected class issues as defined by the Fair Housing Act. The agency providing the most assistance with the collection of information was the Hammond Human Relations Commission (HHRC). This agency serves as the jurisdictional agency responsible for housing discrimination complaints. A list of other stakeholders and participants are listed in Table III-25.

Table III-25
List of Participants

	Agency	Person Contacted	Position
1	Planning and Development	Mr. Phil Taillon	Executive Director
2	Community Development	Ms. Owana J. Miller	Community Development Director
3	Inspections Department/Building Division	Mr. Kurt Koch	Building Commissioner
4	Engineering Department	Mr. Stanley J. Dostatni	City Engineer
5	Hammond Human Relations Commission	Ms. Lolita Weems	Director
6	Hammond Human Relations Commission	Ms. Sandi Harkin Bleau	Commissioner, Vice Chairperson
7	United Neighborhoods Incorporated	Ms. Alexius Barber	Executive Director
8	Hammond Housing Authority	Ms. Michelle Seljan	Housing Coordinator
9	Hammond Housing Authority	Ms. Jennifer Dilldine	Director of Finance
10	Planning and Development	Mr. Dennis Radowski	Home/NSP Manager
11	Mayor's Housing Task Force	Ms. Becky McKinley	Chairperson
12	Northwest Indiana Continuum of Care	Ms. Sharron Liggins	Executive Director
13	Centier Bank	Mr. Art R. Russell	Vice-President/Director of Lake County Community Development
14	Hammond Legal Aid Clinic	Ms. Kris Costa Sakelaris	Director
15	Hammond Development Corporation	Mr. Mark McLaughlin	Executive Director
16	Hammond School Corporation	Dr. Watkins	Superintendent

HHRC is also charged with community outreach and education to communicate Fair Housing Laws in addition to resolving complaints. In support of other Fair Housing related duties and responsibilities, the Commission's staff is involved in on-going training and outreach activities. Some of these activities include, but are not limited to, the following:

- Annual Fair Housing Month Program;
- Mayor's Commission on Disabilities Annual Awards Breakfast;
- Brochure distribution;
- Mayor's Prayer Breakfast;
- Realtor's Breakfast; and
- Outreach and Training.

3.1.2 Discriminatory Behaviors in Jurisdiction

The Code of Ordinance of the City of Hammond, Indiana, adopted on September 12, 2005, under the heading of "Title IX - General Regulations" Chapter 104.01-General Provisions, outlines the City's Fair Housing policy. Under this section all Fair Housing related policies and procedures are detailed for both the public and private sector.

This section identifies the City's Human Relations Commission as the agency responsible to process all cases related to Fair Housing. This provision includes processes for addressing the protected classes identified in Section Fair Housing Act and Title VIII of the Civil Rights Act of 1968, as it relates to sale and rental housing. HHRC serves as the agency to process cases for the City of Hammond.

Compliance Reviews

HHRC uses established guidelines for processing Fair Housing Assistance Program (FHAP) cases, as prescribed through a Cooperative Agreement between HUD the local agency, and other required jurisdictions. This agreement outlines the minimum actions which must be taken and identifies the type of documentation that must be submitted to HUD.

Table III-26
Investigative Process

Category	Process
1	Investigation
a.	Complaint intake
b.	Dual-filed complaints
c.	Amendment of complaints
d.	Notification to respondents
e.	Investigate case process
2	Probable Cause or No Probable Cause Determination
a.	Requirements for acceptance
b.	Required documentation
c.	Making the determination
d.	Documenting the final determination
3	Conciliation
a.	Requirements for acceptance
b.	Required documentation
c.	Unsuccessful conciliation
d.	Cases set for administrative proceedings, civil action or judicial review
4	Settlement Closures
a.	Negotiated settlements
b.	Withdrawals with settlements
c.	Unable to locate complainant
d.	Failure of complainant to cooperate with investigation
e.	Lack of Jurisdiction

Source: Hammond Human Relations Commission

Table III-26 identifies the process used to investigate and bring to a conclusion, cases filed. A review of documented cases from the HHRC's Fair Housing Assistance Program (FHAP) presented include a period between July 1, 2009 to June 30, 2010, and July 1, 2010 to June 30, 2011.

Caseloads reported for the identified period by the HHRC is 16 total. The disposition of the FHAP Caseload 7/1/2009 to 6/30/2011 cases are:

<u>Status</u>	<u>Number of Cases</u>
Closed	9
Open	7
Pending	0

Privacy policy prevented access to certain information related to the City's sixteen cases. With the assistance of staff, sufficient information was provided to analyze impediments that affect Fair Housing opportunities in the community.

A review of the information provided for the period between July 1, 2009 to June 30, 2010 describes the average processing time for closure of complaints was a little over 204 days.

Table III-27
FHAP Case Disposition

Description	2009/10	2010/11	Total
	#	#	
No Cause	2	1	3
Conciliated	2	1	3
Settled w/Relief	1	2	3
Withdrawn w/Resolution	1	0	1
Failure to Cooperate	1	1	2
Open	4	3	7
Total Cases	11	8	19

Source: Hammond Human Relations Commission

The disposition of cases for both years reviewed were categorized into five groups: *No Cause*, *Conciliated*, *Settled w/ Relief*, *Withdrawn w/ Resolution*, and *Failure to Cooperate*. Both year totals for all categories accounted for were less than five cases each. Three categories represented the majority cases for the last two years. Table III-28 lists the disposition of all the cases, and the three majority cases received the following disposition: No Cause, Conciliated, and Settled w/Relief, (3 each).

Fair Housing Complaints

Examination of the cases for Fair Housing related issues showed a few incidents that may have infringed on protected classes. Table III-28 lists a breakdown and detail of these protected classes. The cases reviewed involved private housing providers, a lending institution, and a Real Estate rental leasing company. The complaints involved race, disability, and familial status. Two of the cases were resolved with monetary settlement, one case was withdrawn, and three cases were conciliated. Of the other cases reviewed, two cases were withdrawn by the complainant, and the HHRC could not locate one of the respondents. Cases that were closed, no cause, or failure to cooperate are not listed in Table III-28.

Tab III-28
FHAP Case by Protected Class

Case Characteristics		
Category	#	%
Race*	5	63%
Sex	0	0%
National Origin	0	0%
Disability	1	13%
Familial Status	2	25%
Total	8	100%

Source: Hammond Human Relations Commission

Note: Period (July 1 to June 30, 2009-2011) * Race of 1 person, white

A majority of the complainants, 63%, were based on racial discrimination. The racial distribution in the City represents somewhat of a balance. The 2010 Census reports the White population, is 59.4%, African-Americans is 22.5%, and Hispanics represent 34.1%. Review of the cases indicate a lack of understanding of Fair Housing related practices among landlords, tenants, and housing professionals as the primary cause for these cases.

HUD Compliance Reviews

According to records provided by the HHRC all complaints filed are forwarded to HUD who furnishes a copy to the person or organization against whom the complaint is filed. A total of 19 cases between 2009 and 2011 submitted.

There were no Fair Housing complaints or compliance reviews by the Secretary of Housing and Urban Development, where a finding of discrimination was made either involving the public or private sector in Hammond.

3.2 Assessment of Public/Private Housing Programs

3.2.1 Public Housing Programs

The HHA has an inventory of 1,033 housing units which includes 751 Housing Choice Vouchers (HCV), Project Based Vouchers (PBV) and 425 units. Investment and capital improvements have been underway to transform the City's public housing for several years. At the completion of the capital improvements the majority of HHA's facilities will either be modernized, or newly constructed and transferred to private management as part of the LIHTC portfolio. These efforts are expected to eliminate substandard public housing in the City.

Transitioning residents to homeownership has been a goal of the HHA for a number of years. The homeownership program is in the planning stage at this time. Most of the efforts of the Authority has been directed towards renovations and the Columbia Center revitalization project. The homeownership program aims to prepare resident through homeownership and financial literacy, housing counseling, and foreclosure prevention training.

The HHA also operates a Family Self-Sufficiency Program. The program provides employment training for participates in the Section 8 HCV Program. Rental assistance programs include a career, personal counseling, job training and placement, child care, transportation, adult basic education, and literacy training. These training programs may provide a pool of residents that may be interested in homeownership.

3.2.2 Private Housing Programs

Several programs are available in the City to promote housing. These programs are administered through different city agencies. One such program is the College Bound Scholarship Program. This program started in August of 2004 as a means to retain and attract new homeowners to the City. Finances are made available using gaming funds. The maximum award amount is \$9,100 per year.

Hammond's Neighborhood Stabilization Program (NSP), also a national program, provides funds to rehabilitate homes. These funds are used to purchase, rehabilitate foreclosed homes, and sell them to new homebuyers. Under the NSP program, the primary goal is to reduce the number of foreclosed properties. Other housing related programs are:

1. Emergency Housing Rehabilitation
Provides low interest loans to income eligible homeowners to make emergency related repairs to their homes. These repairs typically relate to major home components or structural issues which would prevent a homeowner for remaining in their home. Examples of repairs may include roof replacement, furnace, electrical upgrades, and HVAC repair or replacement.
2. Façade/ Roofs with Deferred Match Federal Home Loan Bank (FHLB) financing
Partnership between the City and Citizens Financial Services FSB provides loans to very low income households for exterior rehabilitation and improvements.

3. Disability Access Ramp
Provides for the installation of a ramp to remove physical barriers and make home accessible for disabled residents.
4. Project Pride Paint Program
Neighborhood improvement initiative to pay for paint for low-income homeowners to paint the exterior of their homes.
5. Curb Appeal Program
Funds will be used to provide minor housing repair services for low-income residents.

Explanation of Trends

3.3.1 Housing Characteristics

A review of housing information and patterns in the City support several observations that have been documented over the years. Shifts in population and economic conditions have had an impact in the overall housing characteristics. Over the last decade, the City has experienced a decline in the number of renter and owner-occupied units. These units combined declined by 2,077. The number of vacant structures increased by 883 units.

Economic conditions have contributed to the significant number of foreclosures. These foreclosures continue to impact home values. Foreclosures in the City have averaged 530 per year between 2008 and 2010. The number of vacant structures has influenced the fabric of the community, creating an image of neighborhood obsolescence. Vacant units have also placed a strain on limited government resources needed to address them.

Existing home sales between 2008 and 2010 averaged 530 units. Foreclosed homes in the market between 2009 and 2011, exceed existing homes sales, at 597 units. The number of foreclosed homes exceeded existing home sales by 67 units. The disparity in the quantity of foreclosed homes on existing homes sales and potential new constructions is having a significant impact on the home values. An aggressive strategy is needed to address declining home values associated with these foreclosures. New residential construction added 421 units in the last decade. New construction home ranged from affordable to high end.

3.3.2 Lending Characteristics

Hammond's homeownership rate is 61.3%. This rate falls behind both Lake County's rate of 69.3% and the State of Indiana's rate of 69.9%. The composition of owners and renters in the City by racial groups as a whole experienced moderate change between 2000 and 2010. Homeownership for Whites increased from 71% in 2000 to 73% in 2010. Whites also experienced a decrease in the number of renters by 2%, from 29% in 2000 to 27%. Both African-American and Hispanics experienced similar reductions, moving from rental to homeownership.

Hispanics in the City have made gains in homeownership. The number of Hispanic renters fell from 37.3% in 2000 to 34% in 2010. During the same period, homeownership increased

from 62.7% to 66%. African-Americans have the lowest homeownership rate, at 29.7% , and the highest rental rate, above 70%.

Tab III-29
Housing Tenure by Race

Housing Tenure by Race	Category		2000			2010		
			#	Total	%	#	Total	%
	OWNER	White	15,803	22,273	71.00%	11,323	15,509	73.00%
		Black	1,221	4,511	27.10%	1,921	6,466	29.70%
		Hispanic	2,946	4,700	62.70%	4,894	7,417	66.00%
		All Other	277	542	51.10%	228	557	40.90%
		Total	20,247	32,026	63.20%	18,366	29,949	61.30%
	RENTER	White	6,470	22,273	29.00%	4,186	15,509	27.00%
		Black	3,290	4,511	72.90%	4,545	6,466	70.30%
		Hispanic	1,754	4,700	37.30%	2,523	7,417	34.00%
		All Other	265	542	48.90%	329	557	59.10%
		Total	11,779	32,026	36.80%	11,583	29,949	38.70%

Source: U.S. Census

The disparity in homeownership for African-Americans may be explained by lack of access to mortgage loans. According to the Home Mortgage Disclosure Act (HMDA) report, African-Americans received the lowest home purchase loans, at 20.4%.

Tab III-30
Purchase Loans by Race

Home Purchase Loans by Race	2007
Pct. of owner-occupied home purchase loans to Whites	37.10%
Pct. of owner-occupied home purchase loans to Blacks	20.40%
Pct. of owner-occupied home purchase loans to Hispanics	40.40%

Source: HMDA

HMDA information related to mortgage lending practices continue to have mixed reviews in underserved communities. Minority borrowers are disproportionately denied loans at higher rates, and receive higher percentages of high cost loans.

Tab III-31
Loans Denials

Loan Denials by Race-Income Combinations	2007
Denial rate of conventional purchase loans to high-income Whites	29.20%
Denial rate of conventional purchase loans to high-income Blacks	36.40%
Denial rate of conv. purchase loans to high-income Hispanics	36.20%

Source: HMDA

Table III-31 shows that high income African-Americans in the City are denied a mortgage at nearly the same rate as Hispanics, yet homeownership rates for Hispanics is substantially higher. The rate of African-Americans ownership is only 29% as compared with White and Hispanic rates of more than 65% combined.

A comparison of high cost mortgages show private lenders loan 43% of high cost mortgages. Government insured high cost loans represent only 2% of these loans. Traditionally, minorities receive a higher percentage of these loan products. High costs mortgages, in most cases are offered to individuals with some credit blemishes. Low and Moderate income households may also be subject to these loan products due to lack of knowledge. High income minorities have also received these loans.

Tab III-32
Mortgage Loans

Mortgage Lending Comparison	2007
Pct. of conv. home purchase loans with high interest rates	43.40%
Pct. of govt.-insured home purch. loans with high interest rates	2.20%
Pct. of conv. refinancing loans with high interest rates	35.40%
Pct. of govt.-insured refinancing loans with high interest rates	12.40%

Source: HMDA

Table III-32 also compares refinanced loans from private lenders and government insured entities Fannie Mae and Freddie Mac. High interest refinance loans from private lenders are nearly three times the cost of similar government insured loans.

As a whole, the City's homeownership opportunity is available to the majority of residents. The data does suggest that African-Americans own homes at a disproportionately rate in comparison to other groups. Additional effort by local lenders in partnership with the City and community organizations must be developed to reach these residents. Increasing homeownership opportunity has been a goal of the City for several years. Existing programs may require some modifications in order to reach those experiencing the most difficulty with homeownership opportunities.

3.3 Fair Housing and Protected Classes by Industry

A review of HHRC cases was completed for the July 1, 2009 to June 30, 2011 Performance Period. These cases were accessed according to HUD procedures, and are listed with disposition of each case identified as follows:

1. Real Estate Industry

A review of Fair Housing practices in the Real Estate industry in the City did not show any issues related to the sale of homes. Discrimination complaint file related to access to rental housing noted the following:

A case was filed with HHRC in the July 1, 2009 to June 30, 2010 Performance Period. The case was mediated by an Attorney and pertained to familial status. The case was conciliated with compensation.

2. Lending Institutions

A review of Fair Housing practices relating to access to mortgage loans in the City identified a case related to access to a mortgage loan, noted as follows:

A case was filed with the HHRC and noted in the July 1, 2009 to June 30, 2010 Performance Period. The case was prepared by an outside Attorney and pertained to disability, fair lending practices and reverse discrimination by a Caucasian person. The case was closed due to no findings by the complainant's Attorney.

3. Public

The public housing provider did not receive any Fair Housing complaints during the review period covered in this report.

4. Private

No incidents of discriminatory complaints were filed relating to sales of real estate at the time of this report and covering the review period.

A number of discriminatory complaints were filed related to rental property. A description of the circumstances of the filings is as follows:

- A case was filed with the HHRC and noted in the July 1, 2010 to June 30, 2011 Performance Period. The case pertained to familial status by an African-American. The case was conciliated with compensation.
- A case was filed with the HHRC and noted in the July 1, 2010 to June 30, 2011 Performance Period. The case pertained to discrimination based on race by an African-American. The case was conciliated. (*total of three cases of this nature was filed with the same results*)

No complaints were filed under the categories of appraisal, and insurance, either for sale or rental property.

3.3.4 Other Fair Housing concerns

No other Fair Housing complaints were filed. General comments received during the evaluation process were favorable. The provision of housing choice was considered adequate. Existing affordable housing is viewed as sufficient for low to moderate income families both for rental and homeownership. Migration out of the City suggests that there may be

deficiency in the housing style and sizes which reduces homeownership opportunities for middle income families. Housing style choices, included townhomes, duplexes, and paired villas. Recreational activities, regional mobility, and high performing public schools, were also mentioned as considerations that relate to housing.

4.1 Impediments in the Public Sector

Previous reviews and examinations discussed in this Analysis of Impediments document focused in the area of access to housing based on housing quality, access to financing, and accessibility. Similar review and examination is also required as it relates to access to housing that is governed by public policy, the delivery of municipal services, and public/private industry standards and regulations. This section of the report discusses three major categories, *Public Sector*, *Private Sector*, and *Public and Private*. The analysis discusses what, if any impact these categories may have in "Affirmatively Furthering Fair Housing".

4.1.1 Public Sector Impediments

1) Description and Analysis of Zoning

The City of Hammond adopted Zoning Ordinance #8514 on October 21, 2003. Administration and enforcement of the Ordinance is the responsibility of the Director of City Planning and the Zoning Administrator. The Ordinance addresses federal, state and local regulations governing accessibility and visitability in housing, both for public and private buildings. Specifically the review shows the following:

- Permitted residential lot sizes are varied with opportunities for small lots accommodating a variety of household types.
- A variety of residential types are permitted including single-family detached, duplexes, townhouses, and apartments, supporting housing opportunities for varied income groups and household types.
- Permitted densities generally vary from moderate to high supporting the production of varied housing, including lower cost housing.
- No restrictions placed on household living arrangements that prevent non-related individuals from living together supporting sharing of housing by households for economic reasons. The lack of restrictions also supports the siting of group homes for occupancy by the disabled outside of institutional settings.
- No minimum building size requirements in excess of local housing or health codes that support healthy living standards.

2) Site Selection

Hammond's Zoning Ordinance has a number of provisions that allow for flexibility in site configurations and residential zoning districts. The lack of availability of developable land allows the City to be less restrictive for the purpose of fostering opportunities for private investment. For this reason, site selection is not restricted in a manner which would impede furthering fair housing choice in the City of Hammond.

3) Property Tax Policies and Practices

Property tax burden was identified as an impediment in the (2007-2011). This impediment has been eliminated as a result of House Bill 1001. This Bill was introduced by State legislation in 2008. The legislation placed a cap on all property taxes. Owner-occupied residential property tax is now capped at 1% of assessed valuation, rental and farm property is capped at 2% of assessed valuation, and business and industrial property is capped at 3% of assessed valuation. The City has a tax abatement Program where new developments can receive substantial reduction in tax liability for up to ten years.

4) Building Codes

Section 504 of the Rehabilitation Act of 1973 forbids organizations and employers from excluding or denying individuals with disabilities an equal opportunity to receive program benefits and services. It defines the rights of individuals with disabilities to participate in, and have access to, program benefits and services. Under this law, individuals with disabilities are defined as persons with a physical or mental impairment which substantially limits one or more major life activities.

Examination of information provided by the City shows that no complaints has been filed relating to Section 504 of the Rehabilitation Act of 1973. The Hammond Code of Ordinances Section 104.22, Handicap (E) (3) and (4) provides for protection of the physically handicapped for access to public and private dwellings, buildings and structures. These provisions include reasonable access for the disabled, that includes modifications of existing premises at the occupant's expense, including multi-family dwellings.

5) Municipal Services

Municipal services are fully available and are not restricted in any neighborhood. The City of Hammond has been undergoing substantial Capital Improvement projects throughout all neighborhoods. These improvements include; new sewer, curb and sidewalks, lighting and other improvements. Other public services, neighborhood improvements, and recreational facilities receiving any grants assistance through Community Development Block Grants (CDBG) are not limited to any one neighborhood. Access to programs and activities is available to all, and most facilities are located in low/moderate income areas.

6) Neighborhood Revitalization Strategies/Delivery of Services

Restoring confidence to neighborhoods is an important element to neighborhood revitalization strategies. In recent years, practitioners have learned that focusing on the central goal of building confidence are powerful tools for revitalizing neighborhoods, enabling them to compete effectively for the investment choices of homebuyers and responsible investors. Confidence-building strategies can also further social equity and build a better quality of life for all residents.

To this end, the City of Hammond's has concentrated on developing a comprehensive approach to neighborhood revitalization. The vision for these revitalization plans include several strategies and approaches in the following areas:

- Neighborhood infrastructure improvements which includes installation of curbs and sidewalks, providing accessibility to individuals with disabilities;
- Expanding housing opportunity for diverse economic groups;
- New retail development in downtown Hammond and other locations throughout the neighborhoods; and
- Facade improvements for existing businesses.

7) Tenant Selection Process- Public Housing Authority

As part of the Hammond Housing Authority's commitment to adhere to all federal rules and regulations, the Authority has instituted the following Fair Housing Equal Opportunity requirements, located in *SUBPART A – Equal opportunity requirement & fair housing* (24 C.F.R. 960-103) as part of policy:

- Applicable requirements. The HHA will administer its public housing program with all applicable equal opportunity requirements imposed by contract or federal law, including the authorities cited in 5.105 (a) of Title 24 of the Code of Federal Regulations.
- It is the duty of the HHA to affirmatively further fair housing. The HHA will affirmatively further fair housing in the administration of its public housing program.
- Equal Opportunity certification. The HHA will submit signed equal opportunity certifications to HUD in accordance with 903.7 (o) of ref. title, including certification that the HHA will affirmatively further fair housing.
- The HHA shall comply with all Federal and State nondiscrimination laws; the Americans with Disabilities Act; and the federal regulations governing Fair Housing and Equal Opportunity. No person shall, on the grounds of race, color, sex, religion, national or ethnic origin, familial status, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under HHA's programs. (The cited Federal Regulations apply as cited in 24 C.F.R. (a) Nondiscrimination and equal opportunity. The Fair Housing Act (42 U.S.C. 3601-19) and implementing regulations at 24 C.F.R. part 100).
- To further its commitment to full compliance with applicable Civil Rights laws, HHA will publicly post at each business offices, information to applicants/residents of the Public Housing Program regarding discrimination and any recourse available to them if they believe they may be victims of discrimination. In addition, written information and advertisements will contain the appropriate Equal Opportunity language and/or logo.

LIHTC and other housing providers receiving housing subsidy from the federal government are governed by the same regulations as public housing agencies. An open tenant selection process is required.

8) Sale of Subsidized Housing/Displacement

The HHA has been involved in the revitalization of Columbia Center as a mixed finance development. As a result of this development, the Authority transferred subsidized units to segments of the development in the form of Section 8 Project Based Vouchers. Several of the developments are privately held for 15 years as tax credits. Other developments are operated by HHA. The total number of subsidized public housing operated by HHA is 425 unit, and privately operated housing is 355 units. No residents have been displaced during this process.

9) Unlawful Segregation

A review of case from HRC and HUD show no reported cases of unlawful segregation or other housing discrimination other than what has been identified.

No impediments were identified that relate specifically to City Ordinances, municipality policy and procedures or taxes. A number of the impediments identified through this examination process may have significant impact in areas that may influence or render necessary, modifications in City Ordinances or policy. These impediments include vacant and abandoned property, foreclosed property, and quality housing.

Impediment 1 Vacant and Abandoned Property

Hammond's declining population for the past forty years has had a measurable impact on the number of vacant and abandoned property. Within the last decade, the City has experienced a decrease in population of 2.67%, or (2,218) individuals. Since 1980, the City has lost 12,884 population. The lack of balance between outmigration and new residents, and an increase in the number of foreclosures has created a large number of vacant properties. According to the 2010 Census the City has a total of 2,996 vacant units.

Vacant land and buildings impact housing values, insurance rates, and may create safety concerns. Neighborhood stabilization and revitalization through removal of vacant units, aesthetic treatment for vacant land and buildings, and infill construction are alternative treatments that may minimize the impact of these conditions in the community. Private investment and neighborhood partnerships that focus on cleanup and reinvestment activities should be pursued by city agencies and incorporated into short-term strategies.

Well-thought out temporary use of vacant lots can significantly change how these places impact the neighborhoods. Whether the intervention encourages an active relationship or a passive one, or whether it's intended to last one year (or longer), cities around the country have been experimenting with interim uses that change how people interact with the space. The City of Hammond must explore different models and institute alternative uses for vacant properties. Land banking, lot split, or use of the vacant land for other environmental or green purposes all have merits and can be applied in different locations. A systematic approach and evaluation will be required for a successful adaptive use of these properties.

To address Impediment 1 - "Vacant and Abandoned Property" in the city, we have identified four areas of concentration for development of recommendations, plan of action, and an implementation timeline.

1. Code Enforcement
2. Vacant Property Registration
3. Overgrown vacant land and abandoned property
4. Expand Adopt-a-Lot Program

Impediment 2 Foreclosed Properties

There are many causes for property foreclosure. Long-term job loss, underemployment economic decline, and predatory lending are among the major factors. It is widely known in the industry that predatory lenders offer high cost and adjustable rate loan product. These products were widespread over the past several years. As a result of these and other practices, the City has experienced higher than average rates of foreclosure.

Foreclosures in Hammond has consistently been above 500 for the last three years, ranging between 511 to 717. The impact of foreclosures can result in significant costs and hardships for those most directly affected. This impact is realized in loss of accumulated home equity, costs associated with acquiring other housing, and access to stable, decent housing. Moreover, foreclosures can damage credit ratings, hurting the owners' prospects not only in the credit markets but also in labor and insurance markets and in the market for rental housing. Forecloses also have a significant neighborhood impact, with the decline in home values, aesthetic appearance, and neighborhood obsolescence.

With the significant rise in foreclosures impacting City of Hammond, and across the nation, it's important for the City to understand the whole life cycle of real estate owned (REO) property and how servicer changes and recent federal actions are likely to change the life cycle. This will help to devise strategies by which the impact of distressed properties can be reduced on the community. The City must explore the financial, legal, structural, and social issues that determine the disposition of mortgage-foreclosed properties. It is equally important that the City to better understand what happens when the cost of foreclosure exceeds the property value, how the foreclosure process is being revisited by many lenders, how servicers are influenced by the investor-owners of these assets, and how local housing providers can proactively help effectuate the best outcomes.

To address Impediment 2 - "Foreclosed Properties" in the city, we have identified two areas of concentration for development of recommendations, plan of action, and an implementation timeline.

1. Declining property values
2. Neighborhood obsolescence

Census data records the number of homes built in Hammond before 1980 at over 31,000. In addition to older housing stock not meeting today's market standards, other potential hazards may exist. Homes that were built before 1978 may contain lead-based paint material. Lead-based paint hazards have been linked to developmental issues in children, and may add risk to women of childbearing years. The combination of the age of the housing stock, size of older homes and amenities impacts the ability to attract homebuyers that are interested in updated homes.

A significant number of vacant property, over 2,900 units is available in the City. Demolition and Land Banking of some of these properties could be used to attract developers to build new home construction. Acquiring contiguous land parcels for larger development sites may attract developers interested in multiple home options or high end housing. These types of developments offer a number of housing options, which may include attached/detached single-family, town homes, paired villas, and condominiums. Other parcels may offer opportunity for purchase and expansion of existing homes.

To address Impediment 3 - "Quality Housing" in the city, we have identified one area of concentration for development of recommendations, plan of action, and an implementation timeline.

1. Lack of modern and suitable housing

4.2 Impediments in Private Sector

The review of practices in the real estate, insurance, appraisals, and lending institutions identified a few issues involving mortgage lending in relationship to homeownership opportunity and African-Americans.

Several issues of concern were identified in the review of HMDA disclosure information related to lending and African-Americans in the City. This group received the lowest percentage of home purchase loans, at 20% in comparison to other borrowers, rate of between 37% - 40%. The disparity of approval for conventional home loan purchases extended to high income African-Americans at a higher rate than other groups. High income African-American were denied loans by over 36%.

The disproportionate rate of loan denial and high cost loans for African-Americans may have a direct relationship to homeownership opportunity. The African-American homeownership rate has been the lowest among all racial groups for the last decade, at less than 30%.

No other impediments were identified in the private sector that impact home appraisals or the availability of homeowner insurance policies. One issue of concern is access to mortgage loans for African-Americans and high cost loans. Homeownership and financial literacy was identified as Impediment 4.

The relationship between homeownership was reviewed based on number of mortgages, income and home prices. Hammond's housing market has experienced some decline over the past several years. In 2005, the Home Mortgage Disclosure Act (HMDA) report shows 49 home purchases per 1,000 housing units in the City. By 2007, the home purchase rate per 1,000 units dropped to 33.

Median borrower's income was unchanged during the same time period, remaining at \$41,000. The City's home values are affordable in comparison to surrounding communities. According to GNIAR, the median value ranged from \$73,846 in 2008, to \$55,078 in 2011. Home values have declined significantly due to the high foreclosure rate.

Despite the affordability of homes, the City has experienced a decline in the homeownership rate over the last decade. Homeownership in the City is down from 63.2 % in 2000 to 61.3% in 2010, a decrease of almost 2%. Among the minority groups, African American have the lowest homeownership rate in the City at 29.7%, despite their income as reported in the 2010 Census. The high-income minorities experienced loan denial rates of over 36%.

Traditionally, high cost mortgages are offered in underserved communities. Qualifications for these loans may support a lower credit score or lack of credit history. In many cases, the gap that impedes homeownership may be attributed to credit scores, income, lack of understanding of the process, and distrust of the banking industry.

To address Impediment 4 - "Homeownership and Financial Literacy" in the city, we have identified one area of concentration for development of recommendations, plan of action, and an implementation timeline.

- i. Establish a robust program to provide foreclosure and financial literacy training to at-risk homeowners.
- ii. Institute partnerships with local lenders to convert high cost and subprime loans to conventional mortgages.
- iii. Partner with community colleges, universities, and other institutions to provide financial literacy training by including a curriculum that supports homeownership preparedness.
- iv. Develop an aggressive marketing strategy through a public/private partnership to promote ease of homeownership in the City of Hammond.

4.3 Impediments in Public and Private Sector

1) Visitability

Promoting visitability allows mobility impaired residents to have the option of visiting families, friends, or places of interest without assistance of others. Visitability for a person is defined as:

1. At least one entrance is at grade level without any stride;
2. Approached by an accessible route, such as a sidewalk;
3. The entrance door and interior doors on the first floor of such property must provide at least 32 inches of clear passage space.
4. Allows the mobility impaired residents to visit families and friends without any impediments.

The most widely known explanation of accessibility is prescribed under the rules and regulations that determine ADA compliance. The term visitability of a unit is not characterized as accessible based on all the architectural features of accessible units.

In examination of the City of Hammond visitability guidelines, we have identified the following:

1. The City has completed a number of Capital Improvement projects, and continue to make improvements that include; curb and sidewalks, lighting and other improvements. Access to public transportation is available with routes provided by the Regional Bus Authority's (RBA) Easygo buses with access to hospitals and medical offices, shopping, government offices, and is linked with Hammond and East Chicago South Shore stations, Amtrak Hammond/Whiting stations, PACE Routes 350 and 364, Coach USA in Highland.
2. The City is in the process of developing a audit, by 2013 for all of its public facilities and right of ways. The aim of this assessment will be to maintain a reasonable process of improving its public facilities' and right-of-ways for full compliance with accessible codes.
3. The City and the Housing Authority continue to incorporate visitability standards in the homeownership or rental developments.
4. The City and the Housing Authority typically incorporate visitability standards into rehabilitation projects where applicable.
5. The City of Hammond or the Housing Authority do not have a written visitability policy and/or a visitability transition plan in place to make all or a significant percentage of its units visitable.

In other areas related to visitability, services and access to services are evenly distributed throughout the community. Access to bus and train transportation available through Easygo, Amtrak, and PACE. The City continues to invest in infrastructure improvements, which are evenly distributed throughout the neighborhoods. In addition, the City intends to complete a new accessibility audit by 2013 for all of its public facilities and right of ways. The aim of this assessment will be to maintain a reasonable process of improving its public facilities' and right-of-ways for full compliance with accessible codes.

Recommendation:

City of Hammond as a part of the 504 Audit effort should attempt to develop a written Visitability Policy and a transition plan to make all or a significant percentage of its units visitable.

5.1 Conclusions and Recommendations

Earlier chapters of this Analysis of Impediments to Fair Housing (AI) has provided information on the population and housing needs of the City of Hammond, with a special emphasis on the needs of racial and ethnic minorities, families with children, persons with disabilities, and other members of protected classes. Hammond is a city of great racial and ethnic diversity, in which groups that are members of the racial and ethnic minorities groups have lived in harmony with other residents for many generations. The City also has significant number of seniors and people with disabilities, for whom there may be a need for housing with supportive services. There are also a considerable number of large families who find it difficult to secure adequate and affordable housing.

Analysis of the data available to the City indicates that the availability of housing for some minorities is significant-particularly for High-Income Blacks. In addition, because minorities are far more likely to be low income, rates of housing problems for minorities are generally higher. Because of the nexus between race, income and housing choice, promotion of fair housing requires specific actions to expand the availability of decent affordable housing for persons of low and moderate income.

Available reports 2007 compiled under the Home Mortgage Disclosure Act also point to a continuing pattern of disparate treatment of racial minorities in mortgage lending practices. Efforts to enforce requirements under Fair Housing laws and the Community Reinvestment Act need to be pursued to ensure that housing opportunities are not denied to minority households because of possible discriminatory treatment in mortgage lending. It is strongly believed that such practices are the main cause of highest foreclosure rates that the City has ever seen in its housing market.

One aspect of fair housing choice is neighborhood conditions and the provision of good services to areas in which low and moderate income families reside. Blacks, Hispanics, other racial minorities and persons with disabilities who are often concentrated in low income neighborhoods will benefit from better conditions and stable environments. Efforts to reduce vacancy, continuance of code enforcement and other concerted efforts are strongly recommended to maintain the neighborhoods, stem the effects of blight, and improve the sense of community.

Analysis of policies and practices in the administration of public housing, Section 8, and publicly assisted housing and community development programs indicate that most programs are successfully expanding fair housing choices, although specific improvements can be made in some areas. In addition, the City's Consolidated Plan includes as one of its priority goals the promotion of fair housing. Toward that end, the following actions are recommended to address impediments and affirmatively further fair housing in the City of Hammond:

Impediment 1 Vacant and abandoned property

Recommendations

1. Develop vacant property strategies that will:
 - Identify vacant property
 - Identify the owner
 - Develop a treatment for the property on a case by case basis,
 - Place on police watch list (as determined per case)
 - Make repairs in case of vandalism, and board up as necessary
2. Assess the merits of a Vacant Property Registration Ordinance.
3. Institute an aesthetic improvement and maintenance installation regiment for all vacant land and building sites as a part of City's Curb Appeal Program. These treatments can include:
 - Community garden;
 - Native plant and rain garden; and;
 - Window board up art.
4. Expand Adopt a Lot Program

Impediment 2 Foreclosed properties

Recommendations

1. Implement vacant property strategy to maintain neighborhood integrity.
2. Collaborate with neighborhood and block club organizations to maintain foreclosed properties.
3. Acquire dilapidated foreclosed structures, demolish them, and institute a land bank for these properties, for redevelopment or infill opportunity.
4. Purchase, rehabilitate, and sell foreclosed homes.
5. Provide down payment and rehabilitation assistance to purchase foreclosed homes.

Impediment 3 Quality housing

Recommendations

1. Expand acquisition of available land for land banking. Solicit investors to purchase land to build infill housing or subdivision development.
2. Rehabilitate and modernize existing substandard homes.
3. Demolish substandard housing and build infill housing.

Impediment 4 Homeownership and financial literacy

Recommendations

- i. Establish a robust program to provide foreclosure and financial literacy training to at-risk homeowners.

- ii. Institute partnerships with local lenders to convert high cost and subprime loans to conventional mortgages.
- iii. Partner with community colleges, universities, and other institutions to provide financial literacy training by including a curriculum that supports homeownership preparedness.
- iv. Develop an aggressive marketing strategy through a public/private partnership to promote ease of homeownership in the City of Hammond.

As part of the Analysis report we have summarized the Impediments as identified and are providing a plan of action, monitoring tool, and implementation timeline. The implementation schedule serves as a guideline to meet recommended actions over the five year period that the report is in effect.

Identified with each impediment and plan of action is an associated timeline with numeric goals. During the course of the implementation process, circumstances may arise that make it necessary to adjust or modify these timelines. Responsible agencies have been identified to carry out the Plan of Action. These agencies are listed in the Implementation Schedule, as abbreviated letter (s) according to the following key:

<u>Agency</u>	<u>Abbreviation</u>
• City	C
• City Council	CC
• Banks/Lending Institutions	B/LI
• Economic Development	ED
• Educational Institutions	EI
• Hammond Housing Authority	HHA
• Investors	I
• Inspections Department/Building Division	ID/BD
• Law Department	LD
• Neighborhood Organizations	NO
• Planning and Development	PD
• Zoning	Z

Impediment - 1 Vacant and abandoned property

ITEM	PLAN OF ACTION	RESPONSIBLE AGENCY		IMPLEMENTATION TIMELINE (Yr)					MONITORING TOOL
		LEAD	SUPPORT	1	2	3	4	5	
1 Code Enforcement		PD	ID/BD,LD	25	25	25	25	25	
	<p>a) Develop vacant property strategy that will: 1) identify vacant property, 2) identify the owner, 3) develop a treatment for the property on a case by case basis, 4) place on police watch (as determined per case), 5) make repairs in case of vandalism, and 6</p>			Establish a working group from the following departments: Inspections Department/Code Enforcement, Planning and Development, and the Law Department. This group will determine processes and procedures, and streamline implementation of the vacant property					Vacant Property Strategy completed.
2 Vacant Property Registration		ID/BD	LD	n/a	n/a	n/a	n/a	n/a	
	<p>a) Access the merits of a Vacant Property Registration Ordinance.</p>			Review, and if determined useful, institute a Vacant Property Registration Program					Vacant Property Registry completed or determined not useful.
3 Overgrown vacant land and abandoned property		PD	C, LD, CC, ID/BD	3	16	16	16	16	
	<p>a) Institute an aesthetic environmental treatment, and maintenance installation regiment for all vacant land and building sites as a part of City's curb appeal Program. These treatments can include the following:</p> <ul style="list-style-type: none"> Community garden Native plant and rain garden Window board up art 			Develop a plan, process, and implementation strategy for treatment of vacant land and abandoned property. Include a timeline and resources for maintenance of vacant land and lots, at a rate/per year listed above.					Vacant property plan completed. Treatment plans have been developed and adopted by the City.
4 Expand Adopt-a-Lot Program		PD	ID/BD	3	6	9	12	15	
	<p>a) Expand the program and incorporate with vacant property strategy, and environmental treatments.</p>			Expand the program through marketing. Encourage use of aesthetic treatments developed for vacant property.					Department IDIS or monitoring report.

Impediment - 2 Foreclosed Property

ITEM	PLAN OF ACTION	RESPONSIBLE AGENCY		IMPLEMENTATION TIMELINE (Yr)					MONITORING TOOL
		LEAD	SUPPORT	1	2	3	4	5	
1	Declining property values	PD	ID/CE	20	20	20	20	20	
	a) Implement vacant property strategy to maintain neighborhood integrity.			Identify and track all foreclosed property systematically. Implement vacant property strategy on a case by case basis, for foreclosed property at a rate per year, listed above.					Vacant log. Property
2	Neighborhood blight	PD	NO	10	50	50	50	50	
	a) Collaborate with neighborhood and block club organizations to maintain foreclosed properties.			Incorporate vacant property strategy with a plan that involves neighborhood organizations. Develop the process and implementation strategy for treatment of foreclosed property, according to the vacant property strategy program. Include a timeline and identify resources as well as a compensation package for neighborhood organizations to maintain the properties. Quantify success by the number of foreclosed properties maintained by neighborhood organizations at a rate per year, listed above.					Vacant log. Property
	b) Acquire dilapidated foreclosed structures, demolish them, and institute a land bank for these properties for redevelopment or infill opportunity.	C	ID/CE, RD	3	17	15	15	15	City demolition records. Redevelopment acquisition records.
				Identify foreclosed structures in target areas, then acquire and demolish structures for redevelopment at a rate per year, listed above. Properties should be in prime locations for redevelopment/sale to investors.					

Impediment - 2 Foreclosed Property continued

ITEM	PLAN OF ACTION	RESPONSIBLE AGENCY		IMPLEMENTATION TIMELINE (Yr)					MONITORING TOOL
		LEAD	SUPPORT	1	2	3	4	5	
c)	Purchase, rehabilitate, and sell foreclosed homes.	PD	I/HHA	12	22	22	22	22	Departments NSP report.
				Continue NSP Program and invest resources in locations that will have the greatest impact to increase home values. Engage in outreach efforts to develop relationships with investors for rental opportunity, Hammond Housing Authority for HCV potential for investors, and Realtors to market and sell homes. Purchase and rehab at a rate per year, listed above.					
d)	Provide down payment and rehabilitation assistance to purchase foreclosed homes.	PD	B/LI, NO	n/a	n/a	n/a	n/a	n/a	Based on determination of Purchase Rehabilitation Program need.
				Assess the feasibility of a Purchase Rehabilitation Program for foreclosed properties in collaboration with lending institutions.					

Impediment - 3 Quality Housing

ITEM	PLAN OF ACTION	RESPONSIBLE AGENCY		IMPLEMENTATION TIMELINE (Yr)					MONITORING TOOL
		LEAD	SUPPORT	1	2	3	4	5	
1	Lack of modern and suitable housing	PD		2	5	8	12	15	
	<p>a) Expand acquisition of available land for land banking. Solicit investors to purchase land to build infill housing or subdivision development.</p>								<p>Planning Department must identify sites, including those on tax sale for acquisition and redevelopment. The agency will coordinate efforts to market homes to private investors to build or infill housing. Quantify success with number of infill homes built at a rate/ per year, listed above.</p> <p>Records of acquisitions and sales.</p>
	<p>b) Rehabilitate and modernize existing substandard homes.</p>	PD	LD	14	14	14	14	14	<p>Department IDIS or monitoring reports to HUD.</p>
	<p>c) Demolish substandard housing and build infill housing.</p>	PD	I/HHA	12	22	22	22	22	<p>City demolition and new construction records and permits.</p>

Impediment - 4 Homeownership and financial literacy

ITEM	PLAN OF ACTION	RESPONSIBLE AGENCY		IMPLEMENTATION TIMELINE (Yr)					MONITORING TOOL
		LEAD	SUPPORT	1	2	3	4	5	
1	Foreclosure prevention	PD	B/LI, NO	100	100	100	100	100	
	a) Establish a robust program to provide foreclosure and financial literacy training to at risk homeowners.			Work with counseling agencies to plan and conduct training in the community, in a manner that reaches the largest number of at risk homeowners. Quantify success by the number of foreclosure prevention counseling attendees present at a rate per year, listed above.					Documented training attendees by sign in sheet.
2	Subprime loans	PD	B/LI, NO	2	6	8	8	8	
	a) Institute partnerships with local lenders to convert high cost and subprime loans to conventional mortgages.			Work with lender established programs to assist homeowners with loan modifications for high cost and subprime loans. Quantify success by the number of high costs and subprime loans that have been converted to conventional mortgages at a rate per year, listed above.					Documented mortgage modifications.

Impediment - 4 Homeownership and financial literacy continued

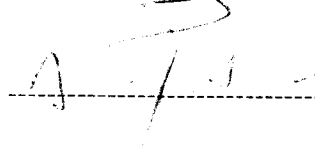
ITEM	PLAN OF ACTION	RESPONSIBLE		IMPLEMENTATION TIMELINE (Yr)					MONITORING TOOL
		LEAD	SUPPORT	1	2	3	4	5	
3	Inadequate housing education and training	PD	C, EI	5	8	13	13	13	
	a) Partner with community colleges, universities, and other institutions to provide financial literacy training by including a curriculum that supports homeownership preparedness.				Work with Ivy Tech, Calumet College, and Purdue University to develop a program, provide facilities and staff to educate residents on homeownership. Quantify success by the number of persons completing training at a rate per year, listed above.				Documented training attendees by sign in sheet.
4	Lack of awareness of home ownership opportunity	PD	C, ED	100	100	100	100	100	
	a) Develop aggressive marketing strategy through a public/private partnership to promote ease of homeownership in the City of Hammond.				engage private marketing campaign in partnership with a not-for-profit organization, churches, community groups, and realtors to increase awareness of homeownership opportunities. The marketing campaign should include all Programs: neighborhood stabilization, investor/foreclosure, down payment assistance, housing rehabilitation, new construction, new subdivisions, and college bound Programs. Quantify success by the increase in the number of persons responding to the marketing campaign at a rate per year, listed above.				Results of marketing report.

VI. SIGNATURE PAGE

The City of Hammond has completed this Analysis of Impediments to Fair Housing as part of its overall dedication to fair housing planning, as affirmed in the 2012-2016 City of Hammond Consolidated Plan.

Adopted by the City of Hammond on February 17, 2011.

Phil Taillon, Executive Director
Department of Planning and Development



2 / 16 / 2013
Date: -----