

CITY OF MUNCIE, IN

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

PREPARED BY ANCHOR GROUP SOLUTIONS, OCTOBER 2021



The Honorable Daniel J. Ridenour, Mayor
Gretchen Bookout Cheesman, Community Development Director

TABLE OF CONTENTS

I.	Executive Summary_____	3
II.	Introduction_____	6
III.	AI Development Methodology_____	13
IV.	Fair Housing Analysis_____	16
	A. Demographic Summary	
	B. Housing and Market Data Analysis	
	C. Mortgage Lending Analysis	
V.	General Issues Analysis_____	23
	A. Segregation/Integration	
	B. Disparities in Access to Opportunity	
	C. Disproportionate Housing Needs	
VI.	Publicly Supported Housing Analysis_____	34
	A. Muncie Housing Authority	
	B. Subsidized Housing in Muncie	
VII.	Disability and Access Analysis_____	38
	A. Demographics on the Disabled	
	B. ADA Compliance	
	C. Disabled Housing and Other Services	
VIII.	Status of Muncie Fair Housing_____	45
	A. HUD Enforcement	
	B. Muncie Human Rights Commission Enforcement	
	C. Fair Housing Concerns: Patterns and Impediments	
	D. Local Policies Impacting Fair Housing	
	E. Community Survey Results on Fair Housing	
	F. Outreach Capacity	
	G. Resources	
IX.	Recommended Fair Housing Goals and Actions to Address Impediments____	54
	A. Goal: Address declining housing quality and lack of maintenance	
	B. Goal: Expand housing opportunities outside of low and moderate (R/ECAP) neighborhoods	
	C. Goal: Improve services for Limited English Proficiency populations	
	D. Goal: Expand access to affordable, accessible units	
	E. Goal: Ensure realtors, banks and mortgage companies and others are providing opportunities for protected classes	
	F. Goal: Support services for the homeless population	
X.	Appendix_____	57
	A. Muncie Fair Housing Ordinance	
	B. Muncie Human Rights Commission Complaints	
	C. Consultation Focus Groups	
	D. Community Survey for Analysis of Impediments	
	E. Community Survey Results	
	F. Community Focus Groups Results	
	G. Key Community Stakeholder Interviews	
	H. Glossary	

I. Executive Summary

Communities receiving United States Department of Housing and Urban Development (HUD) grants, normally at least once every five years, analyze impediments to fair housing choice within their jurisdictions and create a set of action plans to mitigate identified impediments. As recipients of Community Development Block Grant (CDBG) funds, the city of Muncie, IN completed an Analysis of Impediments to Fair Housing Choice (AI). The city of Muncie completed the last an Analysis of Impediments in 2011.

HUD grantees are required, per the Community Development Act of 1974, and as amended, to “affirmatively further fair housing,” which necessitates that grantee communities conduct an analysis of impediments to fair housing choice and take meaningful action to fight discrimination and restricted access to housing and opportunity for persons with protected class characteristics. Those protected class characteristics are race, color, religion, sex, national origin, familial status, and disability.

The entitlement communities fulfill their requirement to affirmatively further fair housing by:

- Conducting an Analysis of Impediments to Fair Housing Choice
- Developing actions to overcome the effects of Impediments to Fair Housing
- Maintaining records to support each jurisdiction’s initiatives to affirmatively further Fair housing

Summary Findings

The preparation of the AI involved extensive data collection and analysis and significant outreach with community stakeholders, including organizations and agencies that provide housing and housing related services. Detailed research and engagement methodology are presented in Section III. Here, key highlights of socio-economic and demographic changes within Muncie and the grantee communities; identified impediments to fair housing choice; and key action plans to mitigate the identified impediments are discussed.

Socio-Economic and Demographic Changes

A significant focus is placed on data from 2010 to 2018, which represents a view of current trends. Highlights of this analysis are:

- **Population.** From 2010 to 2018, the city of Muncie experienced population changes and according to the U.S. Census Bureau 2018 American Communities Survey (ACS), population decreased slightly.

- **Segregation.** Segregation has remained consistent in most of the city over the past 10 years; uneven distribution of populations by race and ethnicity has been consistent since 2010.
- **Concentrated Areas of Poverty.** Linkages exist between areas of concentrated race and ethnicity and concentrated poverty. Instances of racially or ethnically concentrated areas of poverty occur in Muncie.
- **Housing Units.** There was a modest decrease in countywide population from 2011 to 2018 and the number of housing units in Muncie also decreased slightly. The age and condition of the housing stock and the increase in vacant units limits the availability of quality housing.
- **Rent.** Rent has increased faster than income; however, median rent remains below or near HUD fair market rent across bedrooms for the most part.
- **Poverty.** Delaware County continues to struggle with poverty, especially concentrated poverty in several Muncie neighborhoods.
- **Jobs.** Job creation is largely happening in the suburban community outside of the Muncie city limits, creating a disconnect between jobs and affordable housing.

Impediments to Fair Housing Choice

Impediments to fair housing choice are policies and practices in both the public and private sectors that restrict access to appropriate housing for members of protected classes. These impediments can include direct discrimination, such as a landlord refusing to rent to a member of a protected class, or indirect, such as zoning ordinances that restrict the development of multi-family and other affordable housing options. A multi-pronged strategy was utilized to identify possible impediments to fair housing Muncie, in the public sector and the private market.

Comprehensive plans and land use ordinance were reviewed to identify how Muncie engaged with fair housing and how the current policies might serve as barriers. Common issues identified in the public sector include a lack of land zoned for multi-family housing; large minimum lot sizes and parking standards that increase development costs; and additional requirements like special use permits that can lead to delays and denials of multi-family projects. Other issues include codes that do not address group homes, emergency shelters, and related services that are needed in Muncie.

A large percentage of zoning for multi-family housing is in more of the predominately minority areas of Muncie. Mortgage lending, real estate advertising, realtor practices, and other private activities were reviewed to determine if private practices were limiting fair access to housing for protected classes. Review of real estate advertising and fair

housing complaints filed with HUD, City of Muncie and the State of Indiana showed no discriminatory practices resulted in complaints. Analysis of home mortgage lending patterns showed much higher rates of loan denial for African American applicants than White applicants across income levels. Other minority groups tended to have higher denial rates, although the disparity was not as extreme as for African American applicants. This is an indication that mortgage lending may remain an impediment to fair housing for minority residents in Muncie.

Actions Plans

Identifying impediments to fair housing choice is a worthwhile endeavor. More importantly, overcoming impediments is crucial to affirmatively furthering fair housing. To that end, goals and action plans were developed based on the analysis of data, private and public sector policies and practices, and extensive public engagement. Fair Housing Action Plans were developed for Muncie in this AI. These action plans identify opportunities to address impediments to Fair Housing.

II. Introduction

Communities receiving United States Department of Housing and Urban Development (HUD) grants, are required, per the Community Development Act of 1974, and as amended, to “affirmatively further fair housing,” which necessitates that each entitlement grantee conduct an analysis of impediments to fair housing choice and take meaningful action to fight discrimination and restricted access to housing and opportunity for persons with protected class characteristics. Those protected class characteristics are race, color, religion, sex, national origin, familial status, and disability. As recipients of Community Development Block Grant (CDBG) funds, the city of Muncie, IN completed an Analysis of Impediments to Fair Housing Choice.¹

Nationally, fair housing and impediments to fair housing are monitored by the U.S. Department of Housing and Urban Development (HUD). HUD’s fundamental fair housing goal is to make fair housing a reality through proactive planning and intervention. HUD mandates fair housing planning through the Community Development Block Grant (CDBG) and Home Investment Partnership Program (HOME) requirements.

The entitlement communities fulfill their requirement to affirmatively further fair housing by:

- Conducting an Analysis of Impediments to Fair Housing Choice
- Developing actions to overcome the effects of identified impediments to fair housing
- Maintaining records to support Muncie’s initiatives to affirmatively further fair housing

This report presents the City of Muncie’s assessment of the nature and extent of fair housing concerns, and the impediments to fair housing choice that the residents of the city encounter. The city’s last Analysis of Impediments was conducted in 2011 in conjunction with the preparation of the Five-Year Consolidated Plan for the Period 2011 to 2016.

A. Laws on Fair Housing

Federal Law

The Civil Rights Act of 1968, Title VIII (Fair Housing Act, 42 U.S.S., 3601). The federal law is the foundation upon which HUD’s AFFH principles are built.² It protects against discrimination for protected class persons when they seek to rent or buy a home; apply for a mortgage; seek housing assistance; or otherwise engage in housing-specific activities. This protects individuals from discrimination based on race, color, national origin, religion, sex, familial, or disability. The Fair Housing Act covers most housing related situations. Exemptions to the Act include owner-occupied buildings with no more than four units, single-family housing sold or rented without

¹US Department of Housing & Urban Development’s HUD Fair Housing Planning Guide Volume 1, p. 2-17.

²Title VIII of the Civil Rights Act of 1968 (Fair Housing Act, 42 U.S.S., 3601).

the use of a real estate broker, and housing operated by organizations and private clubs that are limited to members.

The following list provides specific prohibitions and additional regulations.³

1. Sale and Rental of Housing

The Fair Housing Act forbids the following actions based on race, color, religion, sex, disability, familial status, or national origin:

- Refusal to rent or sell housing
- Refusal to negotiate for housing
- Selectively stating that housing is unavailable
- Otherwise withholding housing
- Setting different terms, conditions or privileges for sale or rental of housing
- Providing different housing services or facilities
- Falsely claiming that housing is unavailable for inspection, sale, or rental
- Attempting to persuade or persuading homeowners to sell or rent by suggesting that people of a particular race have moved, or are about to move into the neighborhood
- Refusing a person access to, membership or participation in, any organization, facility, or service (such as a rental broker), or discriminatory terms or conditions related to the sale or rental of housing

2. Mortgage Lending

The Fair Housing Act forbids the following actions based on race, color, religion, sex, disability, familial status, or national origin:

- Refusal to make a mortgage loan
- Refusal to provide information regarding loans
- Imposing different terms or conditions on a loan, such as different interest rates, points, or fees
- Discrimination in appraising property
- Refusal to purchase a loan
- Setting different terms or conditions for purchasing a loan.

3. Other prohibitions

It is illegal to:

- Threaten, coerce, intimidate, harass, or interfere with anyone that is exercising a fairhousing right or assisting someone in exercising a fair housing right
- Make, print, or publish any statement, related to the sale or rental of housing, which shows a preference, limitation, or discrimination
- Refusal to provide homeowners insurance coverage for housing

³US Department of Housing & Urban Development's HUD Fair Housing Planning Guide Volume 1, p. 2-17.

- Discriminatory terms or conditions of homeowner's insurance coverage
- Refusal to provide all available information on the full range of homeowner's insurance coverage options available
- Make, print, or publish any statement, related to homeowner's insurance coverage, which shows a preference, limitation, or discrimination

Additional Protections for Disabled Persons

The protected class of people with disabilities applies to any person with a physical or mental disability (hearing, mobility and visual impairments, cancer, chronic mental illness, HIV/ AIDS, or mental retardation) that limits life activities. For these people, it is illegal to:

- Refuse to let a tenant with disabilities make reasonable modifications to housing or common use areas, at their expense, if it is necessary to fully use the housing. A landlord may permit changes only if it is agreed to restore the property to its original condition when the tenant moves.
- Refuse to make reasonable accommodations in rules, policies, practices, or services if it is necessary to use the housing as equally as a nondisabled person.

Accessibility Requirements for New Multifamily Buildings

In buildings with four or more units that were first occupied after March 13, 1991, and that have an elevator:

- Public and common use areas must be accessible to people with disabilities.
- All doors and hallways must be wide enough for wheelchairs.
- All units must have:
 1. An accessible path into and through the unit
 2. Accessible light switches, electrical outlets, thermostats, and other environmental controls
 3. Reinforced bathroom walls to allow possible installation of grab bars.
 4. Kitchens and bathrooms that can be used by people in wheelchairs.

If a building with four or more units has no elevator and was first occupied after March 13, 1991, these standards apply to ground floor units only. These accessibility requirements for new multifamily buildings do not replace stricter accessibility standards required under State or local law.

Familial Status

Under the Fair Housing Act, it is illegal to discriminate against a person whose household includes one or more children who are under 18 years of age. Familial status is one of the protected classes and it extends to pregnant women and any person in the process of securing legal custody of a minor child (including adoptive or foster parents).

Familial status protection covers households in which one or more minor children live with a parent; a person who has legal custody or guardianship of a minor child or children; or a person designated by a parent or legal custodian through written permission.

Housing for Older Persons

A Housing for Older Persons Exemption is a part of the Fair Housing Act that directly covers some senior housing facilities and communities from liability for familial status discrimination. Exempt senior housing facilities or communities can legally refuse to sell or rent dwellings to families with minor children.

To qualify for the Housing for Older Persons Exemption, a facility must prove that its housing meets at least one of the following criteria:

- Provided by a State or Federal program that HUD has recognized as specifically designed and operated to assist elderly persons (as defined in the State or Federal program)
- Intended for and exclusively occupied by persons 62 years of age or older
- Intended and operated for occupancy by persons 55 years of age or older

To qualify for the “55 or older” housing exemption, a facility or community must satisfy each of the following requirements:

- At least 80 percent of the units must have at least one occupant who is 55 years of age or older
- The facility must publish and follow policies and procedures that demonstrate the operation of “55 or older” housing
- The facility must follow HUD’s regulatory requirements for age verification of residents

The “housing for older persons” exemption does not exempt senior housing facilities or communities from liability for housing discrimination based on race, color, religion, sex, disability, or national origin.

B. State of Indiana Fair Housing Laws

The primary enforcement agency for the State of Indiana is the Indiana Civil Rights Commission. The agency was established in 1961 as the Indiana Fair Employment Practices Commission. The agency lacked ability to enforce decisions or laws and had a limited scope. In 1963, the scope expanded to include civil rights and renamed the Indiana Civil Rights Commission (ICRC). The agency’s ability to enforce laws, prosecute and make administrative decisions expanded at that time. The ICRC further expanded its jurisdiction in 1965 to include Housing.⁴

In 1991, the State of Indiana General Assembly passed the Indiana Fair Housing Act. Enacting the Indiana Fair Housing Act and promulgating rules and regulations were part of a process that allowed the agency to be certified as a substantially equivalent fair housing enforcement agency with the HUD. The Indiana Fair Housing law prohibits activities like blockbusting and discriminatory advertising, which have the effect of making it harder for a person to live in a

⁴Indiana Code section 22-9.

neighborhood or individual housing unit of their choice. The Indiana Fair Housing Act is considered substantially equivalent to the federal Fair Housing Act.

The Indiana Civil Rights Commission (ICRC) is a four to seven-member board, all appointed by the Governor, responsible for enforcing the anti-discrimination laws of the Indiana Civil Rights Law (“ICRL”) (IC 22-9) and the Indiana Fair Housing Act (IFHA) (IC 22-9.5). Its jurisdiction covers individuals, private or public entities, housing providers and business establishments within the State of Indiana whenever there is a belief that discrimination against a protected class has occurred.

The Indiana Civil Rights Commission Strategic Plan published to address fair housing, covered the period between 2015 to 2018. The Strategic Plan had not been updated at the time of publication of this document (August 2021).

C. *City of Muncie Ordinance*

The Code of Ordinances of the City of Muncie, IN Chapter 34, Division 5 creates the governing document which prohibits discrimination in housing throughout city of Muncie. This ordinance was revised and adopted by the Muncie Common Council on April 5, 2015.⁵ The Muncie ordinance addresses both fair housing discrimination by individuals, companies, and financial institutions. The revised Muncie Ordinance in 2015 also expands the protected classes of individuals from discrimination from race, religion, color, sex, handicap, ancestry or national origin to include race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status.

The following is the overall purpose of the Ordinance:

“Title III, Chapter 34, Division 5, Section 34.80. Public policy and purpose.

(A) It is the public policy of the city to provide all of its citizens equal opportunity for education, employment access to public conveniences and accommodations, and acquisition through purchase or rental of real property including but not limited to housing, and to eliminate discrimination based on race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status since such discrimination is an impediment to equal opportunity. Equal education, employment opportunities, access to and use of public accommodations, and equal opportunity for acquisition of real property are hereby declared to be civil rights.

(B) The practice of denying these rights to properly qualified persons by reason of the race, color, age, religion, sex, sexual orientation, gender identity, disability ancestry, national origin, or United States military service veteran status of such person

⁵City of Muncie, IN, Ordinance 9-15, Title III, Chapter 34, Division 5 (Human Rights Commission).

(C) is contrary to the principles of freedom and equality of opportunity and is a burden to the objective of the public policy of this city and shall be considered as discriminatory practices. The promotion of equal opportunity without regard to

(D) race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry,

(E) national origin, or United States military service veteran status is the purpose of this section.

The section of the Muncie City Ordinance that specifically addresses unlawful housing discrimination is in Section 34.87.⁵ The entire Muncie Ordinance for Title III, Chapter 34, Division 5 - the Human Rights Commission can be found in the Appendix of this document and online at: https://library.municode.com/in/muncie/codes/code_of_ordinances?nodeId=CD_ORD_TITIIIAD_CH34BOCO_DIV5HURICO

D. Fair Housing Defined

In the light of various pieces of fair housing legislation at the federal, state, and local level, throughout this report fair housing is defined as follows:

Fair housing is a condition in which individuals of similar income levels in the same housing market having a like range of housing choices available to them regardless of age, color, creed, disability, gender identity, marital status, familial status, national origin, race, religion, sex, sexual orientation, presence or absence of dependents, or public assistance source of income.⁶

Impediments Defined

Within the legal framework of federal and state laws and based on the guidance provided by the HUD Fair Housing Planning guide, impediments to fair housing are defined as:

1. Actions, omissions, or decisions that have the effect of restricting housing choices or the availability of housing choices for protected classes.
2. Policies, practices, or procedures that appear neutral on their face, but which operate to deny or adversely affect the availability of housing to persons in protected classes.
3. Impediments to fair housing choice include actions or omissions that:
 - a. Are counterproductive to fair housing choice, such as:
 - i. Community resistance when minorities, persons with disabilities and/or low-income

⁵City of Muncie, IN, Ordinance 9-15, Title III, Chapter 34, Division 5 (Human Rights Commission).

⁶US Department of Housing & Urban Development's HUD Fair Housing Planning Guide Volume 1, p. 2-17.

persons first move into white and/or moderate- to high-income areas.

- ii. Community resistance to the siting of housing facilities for persons with disabilities because of the persons who will occupy the housing.

Fair Housing vs. Affordable Housing

Fair Housing and Affordable Housing: The notion of “fair housing” is sometimes conflated with that of “affordable housing.” “Affordable housing” refers to the ability of persons/households/families to buy or rent housing, based on income; the term is also used to describe housing for low-income households. Thus, the two concepts of “fair housing” and “affordable housing” while intertwined are distinctly different. An Analysis of Impediments (AI) study is not a study of affordable housing.

III. AI Development Methodology

To fulfill the HUD requirement the city of Muncie, undertook this Analysis of Impediments to Fair Housing Choice to evaluate impediments to fair housing within the city of Muncie.

Data and Resources

A critical component in the development of the Analysis of Impediments is extensive collection, review, and analysis of laws and regulations; community plans and ordinances; and social, economic, and demographic data from secondary sources. The AI reflects and is guided by, directly and indirectly, data and information obtained from the following sources:

- Current social, economic, and housing data from the US Census Bureau
- Local land use ordinances that dictate the form, manner, and location of housing development
- Local plans, including the *Muncie Action Plan*, and its subsequent reports.
- Mortgage lending data from the Home Mortgage Disclosure Act (HMDA)
- The Consolidated Plan 2020-2024, Annual Action Plans, and CAPERs
- Fair Housing complaints file with HUD and the City of Muncie.

Stakeholder Engagement

The staff of the MCD worked to identify the universe of community stakeholders that could offer important and meaningful insight into their efforts supporting protected class members directly with housing and housing-related issues. Invitations to attend a consultation session were sent to 54 identified organizations. About 40 citizens participated in the in-person consultations and interviews held December 2019 through January 2020. In addition, 339 Muncie residents participated in a survey that provided information about their Fair Housing knowledge, experiences, and concerns. Information from participants was compiled, reviewed, and analyzed to assist in the development of the Analysis of Impediments. This survey information can be found in the Appendix of this Analysis.

Participants in the in-person consultation process were invited from organizations throughout the city of Muncie. The invited stakeholders, by agency type, and sign-in sheets from each meeting conducted for the AI. These representatives included:

- Muncie Housing Authority
- Muncie Schools
- Homeless Providers
- Community Housing Development Organizations
- Financial Institutions
- Organizations serving
- Real Estate Professional Organizations
- Health Organizations

- Educational Institutions
- Neighborhood Community Organizations
- Nonprofit Service Organizations
- Senior Citizen Organizations
- Business Leaders and Organizations
- Religious Leaders and organizations
- Service Organizations for the Disabled

Participants in the Community Focus Groups, Interviews and Public Meetings

Organization Name	Name
Bridges Community Services Inc.	Samantha Buckles, Dir
Christian Ministries & Muncie Mission	Andrea Smith, Dir
Collective Coalition of Concerned Clergy	Pastor Kevin D. Woodgett, Pres
Muncie Human Rights Commission	Yvonne Thompson
Muncie Street Outreach	Laura Janney
Meridian Health Services	Kellie Pearson-Carroll
Muncie Victim Advocate	Police Department Associate
BY5 Child Development	Missy Modesitt, Exec. Dir.
Muncie Community Schools	Lee Ann Kwiatkowski, EdD
Muncie Housing Authority	Joseph Anderson
Chamber of Commerce	Jay Julian
Carol Johnson	United Day Care Center
Betty Brewer	Muncie Action Plan
Lindsey Horan	Motivate Our Minds
Ashley Mann	Minnetrista
Amy Gibson	Boys & Girls Clubs of Muncie
Stacy Wheeler	Back to School Teachers Store
Richard Ivy	Friend of Conley
Holly Juip	Cornerstone
Susie Kemp	Alpha Center
Judy Elton	Muncie Delaware Senior Center
Carol Bradshaw	Cornerstone
Debbie Bennett	Hillcroft Services
Chris Allen	Pathstone Corp
Major Mark L. Litherland	Salvation Army
Heather Williams	Ball State Office of Community Engagement/Muncie Action Plan/Muncie Land Bank/ EcoRehab
Betty Brewer	Minnetrista/Muncie Action Plan
Tom Miller	Star Financial Bank
Linda Gregory	Muncie resident
Connie Gregory	Home Savers
Anitra Davis	City Council 6 – Elect

Aaron Clark	Indiana Michigan Power – City Council – Elect
Susie Kemp	Alpha Center
Margaux Dever	PathStone
Jacob Ih-ie	PathStone
Joy Rediger	Urban Light Community Development
Jill Vaught	The Arc
Erin Moore	Ball State (Office of Comm. Engagement)
Delania Boyd	Ball State (Office of Comm. Engagement)
James Mitchell	Minnetrista
Annette Phillips	PathStone, Inc.
Lindsey Arthur	Habitat For Humanity

IV. Fair Housing Analysis

A. Demographic Summary

Population Data: The City of Muncie, which is in east central Indiana, serves as the county seat of Delaware County. The land area of Muncie is 27.4 square miles and a population density of 2,484 per square mile. Muncie is the 11th largest city in Indiana with a resident population of 68,530 as estimated by the 2018 ACS 5-Year Survey. This is a minus 2.3% decline from the 2010 Base Year Census estimate of 70,210 Muncie residents. Majority of the Black population resides in the Industry and Whitely neighborhoods. A significant proportion of the population falls within the 18 to 24-year-old range due to the presence of Ball State University located in the city. The median age in Muncie is 28.7 years, 29.1 years for females and 28.4 for males. The sex ratio population for Muncie is 52% female vs 48% male.

Table 1.1: Muncie Population by Race

Population by Race	Number	Percentage
White	55,886	81%
Black or African American	8,020	11%
Two or More Race Group	1,904	.03%
Asian	1,221	.02%
Hispanic or Latino	1,383	.02%
American Indian or Alaska	67	.005%
Native Hawaiian	49	.005%

Source: 2018 5-year ACS

Employment Statistics: Major employers in Muncie would include Ball State University, IU Health/Ball Memorial Hospital, Muncie Community Schools, Navient Corp. and First Merchants Corp. Muncie like other Midwestern cities in the United States has seen losses in manufacturing jobs over the past forty years. Muncie's 2018 unemployment rate of 8.2% was 3% points higher than the Indiana state rate of 5.4%. 2018 unemployment rates by Ethnicity/Race in Muncie: Asian 4.3%, Black 11.9%, Hispanic 7.4%, Other 8.3%, and White 7.5%. In June 2020, due to the Corona Virus pandemic, the unemployment rates were as follows: Muncie proper 16.3%, Delaware County 11.4%, State of Indiana 11.2%, and the United States 11.2%.

Table 1.2: Muncie Population by Age

Population by Age	Number	Percentage
65 and over	9,594	14%
55 to 64	7,333	11%
35 to 54	13,021	19%
25 to 34	7,881	11%
18 to 24	19,119	28%
5 to 17	8,155	12%
Under 5	3,495	5%

Source: 2018 5-year ACS

Households and Families: According to the 2018 5-year ACS, there are 27,481 households in the city of Muncie with an average size of 2.27 per household. The average family size is 2.87 individuals. The median household income is \$33,616, while the average household income is \$45,516. There are 51.3% owner households and 48.7% renter households in Muncie.

Table 1.3: Muncie Household Types

Household Type	Owner Count	Owner %	Renter Count	Renter %
Married	6,684	76.5	2,053	23.5
Female	1,540	38.9	2,418	61.1
Male	593	45.9	700	54.1
Non-Family	5,276	39.1	8,217	60.9
All	14,098	51.3	13,383	48.7

Source 2018 5-year ACS

Income and Poverty: Muncie's household income amounts, median \$33,616 and average \$45,516 are well below the State average amounts \$55,746 and \$69,197, respectively. Median Income of \$33, 616 is also broken out by Race and Ethnicity of Muncie's resident population. While the numbers reflect an affordable city as far as livelihood, it shows a city with a struggling with employment opportunities.

Table 1.4: Muncie Household Income by Family Type

Income by Household Type	Median Income Amount	Average Income Amount
Single Person	\$47,813	\$57,268
Married Families	\$60,625	\$68,462
Single Person	\$22,694	\$31,457
All Total	\$33,616	\$45,516

Source 2018 5-year ACS

Table 1.5: Muncie Household Income by Race/Ethnicity

Median Household Income by Race/Ethnicity Estimate:						
Race	White	Hispanic	Black	Mixed	Asian	Other
Income	\$32,800	\$28,200	\$22,300	\$20,400	\$9,200	\$48,500
% of AMI	97.6%	83.9%	66.3%	60.7%	27.4%	144.2%

Source 2018 5-year ACS

According to the 2018 5-year ACS, the poverty rate of 30.5 percent of all Muncie residents is much higher than the State of Indiana poverty rate of 13.1 percent. The female poverty rate in Muncie of 32.97 percent is higher than the male rate of 27.84 percent. In the labor force 48.6% of part-time workers are in poverty compared to 5.35% of full-time workers. Childhood poverty rate in Muncie is 26.7% of the Race/Ethnicity group most likely to be in poverty is as follows:

Table 1.6: Muncie Poverty by Race and Ethnicity and Percentage

Race and Ethnicity	Population in Poverty	
Total Population	18,518	30.5%
Multiracial (Mixed)	1,551	50.41%
Asian	539	50.36%
Hispanic	521	41.53%
Black	1,991	40.18%
Other	27	20.09%
White	13,890	28.04%
Native American	99	16.33%

B. Housing and Market Data Analysis

According to the 2018 5-year ACS, there are an estimated 32,728 housing units in the city of Muncie Indiana. Of that number, 27,481 units or 83.9% are owner or renter occupied. 5,247 units are vacant for various reasons such as on the market to be sold, rented, revitalized or uninhabitable. Most of the housing unit stock in Muncie was built prior to the 1978 Lead Base Paint housing requirements and the average age being 57 years old.

Table 1.7: All Residential Properties Bedroom Size

Property Type	Number	Percent
1-unit detached structure	21,058	64.3%
1-unit attached structure	625	1.9%
2-4 units	3,925	12.2%
5-19 units	4,096	12.5%
20 or more units	1,675	5.1%
Mobile Home, Boat, RV, Van	1,289	3.9%
Total	32,728	100.0%

Source: 2018 5-year ACS

Table 1.8: All Residential Properties by Occupants & Bedroom Size

Bedroom Size	Owners		Renters	
	Number	Percentage	Number	Percentage
0-bedroom	12	0.4	407	3.0
1-bedroom	370	2.6	2,891	22.0
2-bedroom	4,437	31.0	5,233	39.0
3-or more	9,279	66.0	4,852	36.0
Total	14,098	100.0	13,383	100.0

Source: 2018 5-year ACS

Table 1.9: All Residential Properties by Year Built

Age of Housing Units		
Years Built	Number of Units	Percentage
2000 or Later	2,472	7.5
1980 to 1999	5,122	15.7

Age of Housing Units		
1960 to 1979	8,723	26.6
1939 to 1959	16,411	50.2

Source: 2018 5-year ACS

There is a diverse mix of housing options at different price points for owner-occupied and rental housing units in most Muncie neighborhoods. Unfortunately, the city has suffered in recent past yearstough economic periods which has adversely affected the development of both market rate and affordable housing markets in Muncie. Low-income residents are affected the most and find themselves having to account for the lack of decent housing in safe and stable neighborhoods. The median home value, according to Realtor groups and ACS statistics, did increase 3.0 percent over an eight-year period from 2010 to 2018. Contract rent has increased 20.0 percent over the same period. With few exceptions apartment rents, market and subsidized, are comparable in pricing. This suggest the rents and homes are still affordable to Muncie median income groups. however, income groups below 50% of median income may have difficulty in finding affordable quality housing. See tables below.

Table 1.10: Median Home Value and Rental Contract Rent

Housing Markets	Base Year 2010	Year 2018	Percent Change
Median Home Value	\$73,900	\$76,100	3.0%
Medan Contract Rent	\$518	\$621	20.0%

Source: 2010 and 2018 ACS

Table 1.11: Muncie Households Housing Status by Median Family Income (HAMFI)

Median Income Level	Owner Households	Renter Households
< 30% HAMFI	1,015	4,470
30% HAMFI	1,660	2,455
50% HAMFI	2,575	2,540
80% HAMFI	1,680	1,375
100% HAMFI	7,160	2,550
Total	14,080	13,395

Source: 2014 -2018-ACS

Table 1.12: Muncie's FMR, Home and Market Rents

Type of MonthlyRent	0 - bedroom unit	1- bedroom unit	2- bedroom unit	3- bedroom unit	4- bedroom unit
Fair Market Rent	\$557	\$559	\$733	\$943	\$1,150
High HOME Rent	\$557	\$559	\$733	\$943	\$1,150
Low HOME Rent	\$557	\$559	\$726	\$838	\$936
Area Median Rent	\$537	\$603	\$729	\$836	\$1,586

Source: U.S. Dept of HUD

C. Mortgage Lending Analysis

The Fair Housing Law also governs discrimination in lending for residential mortgages. Over the past several years, the lending industry has changed a great deal, many potential mortgage applicants no longer go to their local bank for loans but apply for loans all over the country. However, no matter where borrowers apply for mortgage loans, the fair housing practices can be examined.

The Home Mortgage Disclosure Act (HMDA) requires that demographic and other information for mortgage applications is reported and maintained by the Federal Financial Institutions Examinations Council (FFIEC). This information is used in several ways to determine compliance with federal, state, and local laws and regulations. The information below examines this information as it relates to fair housing.

Table 1.13: Muncie Non-Conforming Mortgages Data Race

Race	FHA/VA/FSA Applications	Applications Withdrawn	Denials FHA/VA /FSA	Loan Originated	% of Apps Approved
White	558	74	42	431	77.2%
Black	23	8	1	13	56.5%
Hispanic	8	2	8	4	50.0%
Mixed	12	2	2	7	58.3%
Other Minorities	2	0	1	1	50.0%

Total	603	86	54	456	75.6%
--------------	-----	----	----	-----	-------

Source: HDMA 2016

Table 1.14 Muncie Conventional Mortgage Data by Race

Race	Conventional Applications	Applications Withdrawn	Denials Conventional	Loan Originated	% of Apps Approved
White	673	58	79	516	76.7%
Black	15	1	3	9	60.0%
Hispanic	6	2	1	5	83.3%
Mixed	0	2	0	0	0.0%
Other Minorities	5	0	1	4	80.0%
Total	699	63	84	534	76.4%

Source: HDMA 2016

Based on the data from the HMDA in the Muncie SMSA, there were 1,302 mortgage applications filed in financial institutions in 2016 (the most recent data available). There were 990 mortgage applications that resulted in a mortgage loan origination. Of the applications submitted to lenders, 92% of the government-insured mortgage applications (FHA, VA, or FSA) were submitted by non-white applicants. Of the minority borrowers who applied for government-insured mortgages, 25% were approved. 96% of the conventional mortgage applications were. Of the loans approved and originated by the government - insured mortgages approved, 25% were from minority borrowers and of conventional mortgages approved 4% were from minority borrowers. This data shows that there is a great discrepancy between the conventional and government-backed mortgage market in serving minority borrowers. Although there are many reasons for the wide variance in these statistics, there are solutions that are recommended Housing Goals and Actions in Section IX of this Analysis that can assist in narrowing this gap that must be remedied by both the lender and the borrower.

V. General Issues Analysis

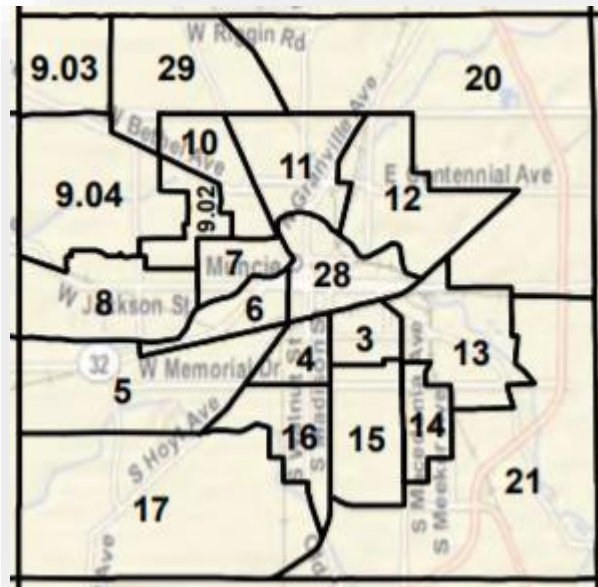
The city of Muncie is leading the efforts to create housing development, attract new amenities, upgrade outdated infrastructure and transportation systems to make Muncie a greater place to live and visit. With an overarching goal of improving the quality of life for all residents, neglected neighborhoods have been identified and in the process of being transformed to establish a “quality of place” mindset for each of them. An urban housing initiative is being discussed in the surrounding Downtown area to give Muncie a unique opportunity to offer a growing inventory of well-designed and diverse housing stock. City leaders believe this will increase social interactions, support diverse living, ability to age in place and still consider Muncie one of the most affordable cities in the United States.

A. Segregation/Integration

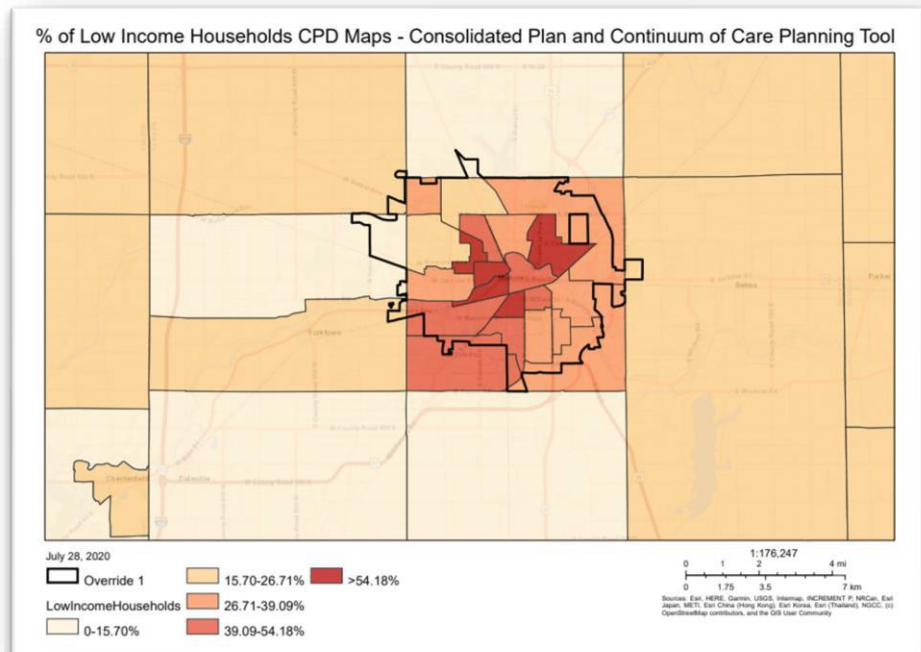
A key factor to analyzing the existing impediments to fair housing within a given area is the examination of distribution of racial and ethnic minorities across the region. In some cases, minority concentrations reflect preferences,

meaning that minorities may choose to live in certain areas because of access to the types of grocery stores, restaurants, etc. that cater to them. However, in other cases, minority populations are intentionally discouraged from living in certain areas. Housing prices can also affect the decision of some minorities when choosing where to live. This section will only examine data and not make assumptions as to why households of different races live in areas of the community.

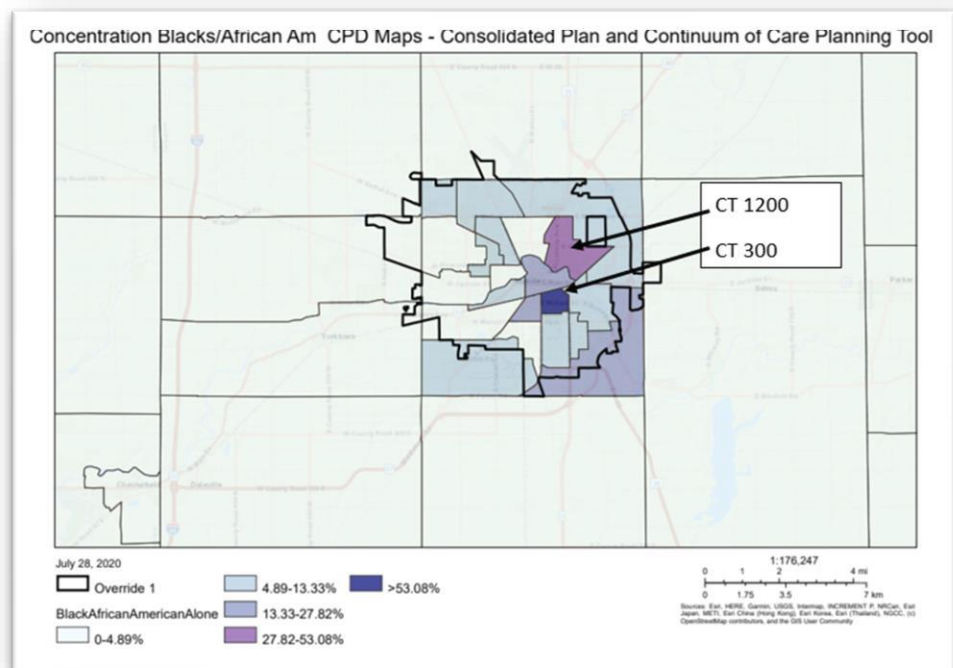
Census Tracts are small, relatively permanent statistical subdivisions of a county or equivalent entity that are updated by local participants prior to each decennial census as part of the Census Bureau's Participant Statistical Areas Program. The primary purpose of census tracts is provide a stable set of geographic units for the presentation of statistical data, sometimes where no local government, state, or tribal location declined to participate. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people.



Map of Muncie, Indiana Census Tracts, Statistics Indiana, Census 2020



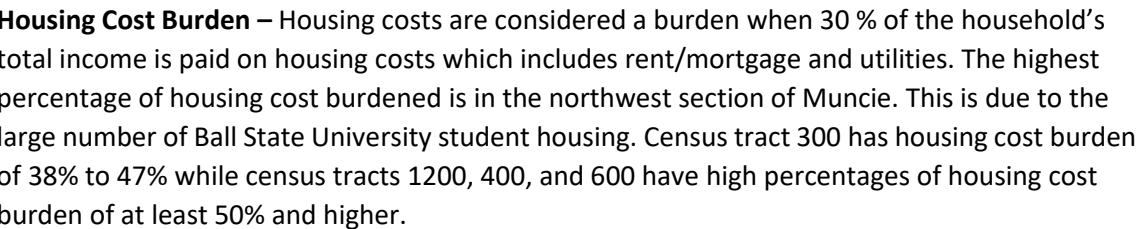
Low Income households – The majority of Muncie’s census tracts has high concentrations of low-income households ranging from 26% to greater than 54%. The highest concentration of low-income households is located in census tracts 1200, 400, 600, 700, and 900.02.



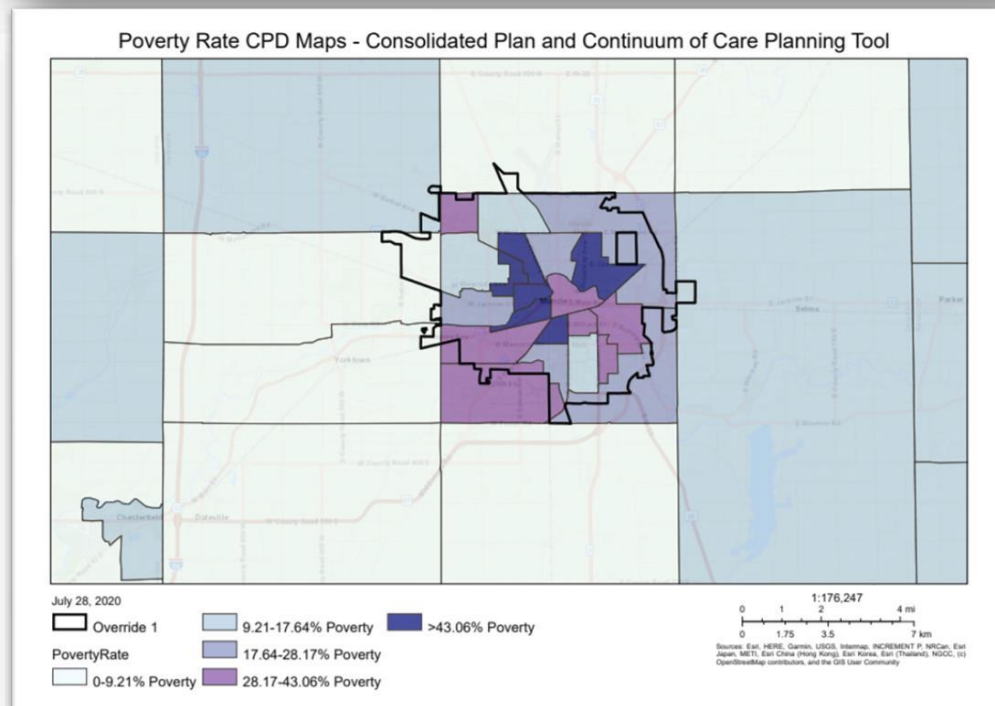
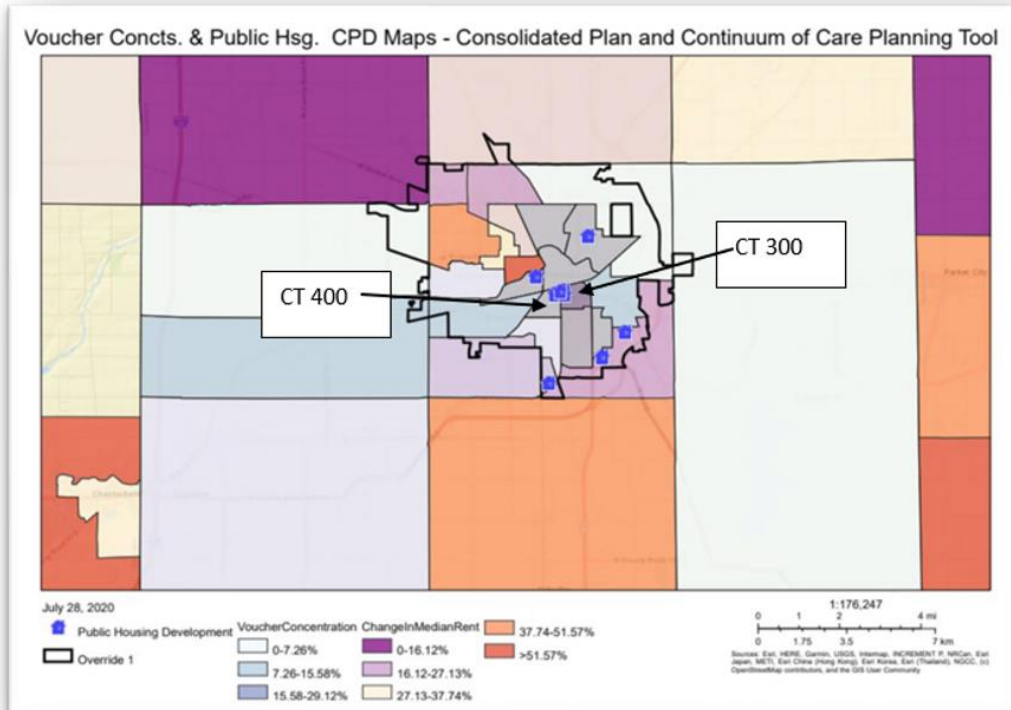
Census tract 1200, Whitely Neighborhood, is 49% Black. Census tract 300, Industry Neighborhood, has a higher Black population of 71%. These census tracts have the highest concentration of Blacks in Muncie.

Segregation/Integration

Census tract 1200, Whitely Neighborhood, is 49% Black. Census tract 300, Industry Neighborhood, has a higher Black population of 71%. These census tracts have the highest concentration of Blacks in Muncie.



Voucher Concentration and Public Housing – Section 8 vouchers are primarily located on the northeast, central, and south side of Muncie. The highest concentration of vouchers is located in census tract 300. While five public housing communities are identified throughout Muncie, census tracts 300 and 400 have a higher concentration representing three developments, Centennial Place, Millennium Place, and Gillespie Towers. Two other public housing communities Southern Pines and Earthstone Terrace are located outside of these areas of high minority concentration.



Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

Concentrated poverty is the confinement of the poor to a subset of neighborhood locations rather than their dispersions across all sectors of the urban area. It is assumed that the most harmful outcome of this spatial concentration is the isolation of the poor from the social and economic mainstream. The map below shows the areas of Muncie where there are concentrated areas of poverty of greater than 30%. Census tract 1200, displayed in dark blue, where there is more than 50% Blacks, experiences a poverty rate of 40% and higher. These areas of concentrated poverty also portray low-income households, cost burden and severe cost burden, and household area family median income of 0% to 30% and 30% to 50%.

B. Disparities in Access to Opportunity

There is both a geographic pattern of disparities in access to opportunity and a human pattern of disparities. These two dimensions are, of course, closely linked and overlap extensively. In terms of geographic disparities there are a number of elements that demonstrate a strong concentration of both poverty and people of color in Muncie.

As stated previously, the dimensions of geography, race/ethnicity and poverty overlap and reinforce each other. Where there are areas of high concentrations of African Americans, there are also low-income households, low-income housing, housing burdens, housing problems, public assisted housing, and housing cost burden.

One of the disparities is access to affordable housing. The City has no obvious policies that serve as barriers to affordable housing. Delaware County (which includes Muncie) land use controls and zoning ordinance are fairly inclusive and flexible. City building code provisions are standard, and permit fees and charges are not excessive and do not present a barrier at this point.

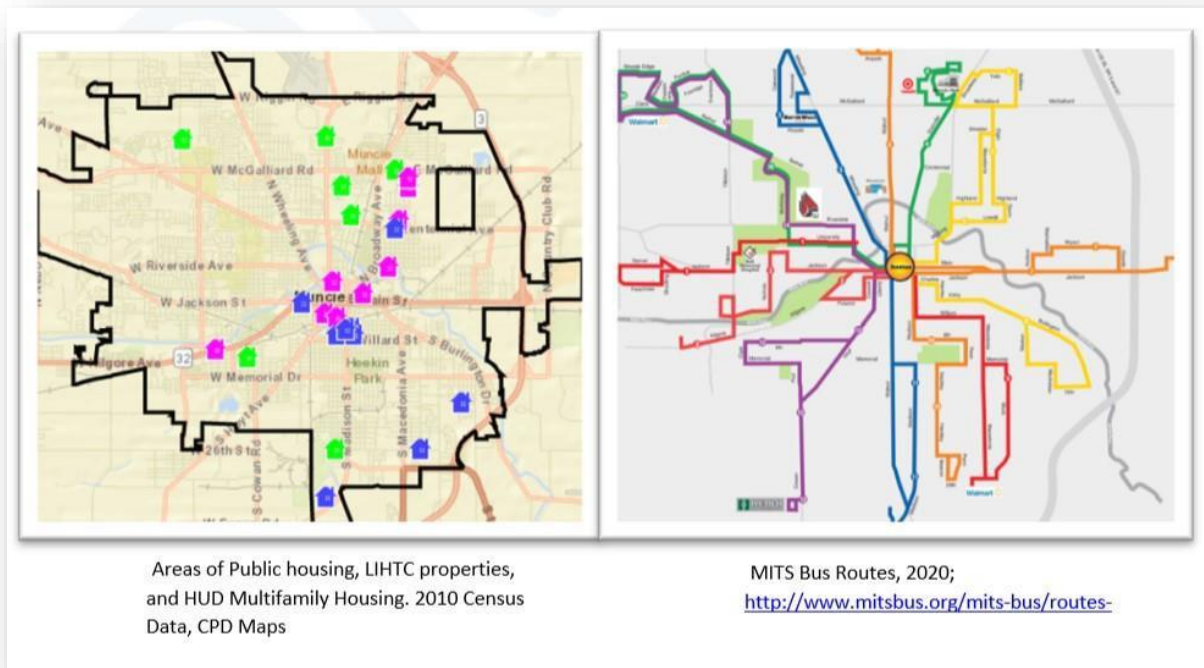
Furthermore, there are policies and programs in place that help to prevent barriers to affordable housing, such as a three-year tax abatement available for new construction of single-family homes in the city, and energy assistance. The Interlocal Community Action Program (ICAP) provides energy assistance to income-eligible households, thus making their housing more affordable. Funds are provided by the Indiana Housing and Community Development Authority (IHCA) through their Low-Income Energy Assistance Program (LIEAP). Additionally, the Muncie Land Bank was established by City Ordinance in 2017 and can be used as a tool for the development of affordable housing.

The City will continue to use CDBG and HOME funds to partner with non-profit and for-profit housing developers to construct and rehabilitate affordable housing units, make home repairs, and construct ramps and make other accessibility improvements for the homes of disabled persons. HOME funds for housing development are only provided for units in the inner city where there is ready access to public transportation and other amenities.

The City partners with HUD-approved Housing Counseling agency, PathStone to provide down payment assistance, with the requirement that homebuyers receive at least 8 hours of counseling prior to purchasing a home. CDBG funds also provide funds to PathStone for homebuyer orientation classes. Both the counseling sessions and classes include information about avoiding

predatory lending, repairing credit, financial literacy, and home maintenance.

Community Development will continue to partner with the Muncie Human Rights Commission in support of fair housing education and outreach to local lenders, realtors, apartment owners, property managers, housing providers, and citizens.



The Muncie Indiana Transit System (MITS) provides public transportation in Muncie. There appears to be adequate bus transportation in close proximity to LIHTC and Section 8 housing, and to public and multifamily housing. Maps above show the affordable housing locations and the bus routes. These bus routes have a regular weekday schedule between 6:15 am to 9:30 pm. The schedules are less frequent on Saturdays and nonexistent on Sundays. MITS is free for school children and students, and \$1.00 day passes for unlimited rides for adults. MITS provides special door-to-door services for the disabled and veterans.

C. Disproportionate Housing Needs

Housing Affordability

Affordable housing is not necessarily low-income housing or public housing. Affordable housing is housing that costs less than 30 percent of a household's gross monthly income. Households who spend more than 30 percent of their gross month income towards housing costs are considered to have a cost burden. By evaluating the number of households with cost burden, the City of Muncie may determine if there is a shortage in affordable housing for its population.

Many households spend more than 30 percent of their gross monthly income towards housing costs. By spending more than 30 percent of the gross monthly income, the household is

considered to have a housing problem or a cost burden by the U.S. Department of Housing and Urban Development (HUD). There is a higher level of cost burden, called Severe Cost Burden, where a household spends more than 50 percent of their gross monthly income towards housing costs. This is particularly difficult for these households to prepare or save for any emergency when most of their income goes towards housing.

Housing Problems

This section provides data on households with disproportionate housing needs. Data are presented by race and ethnicity and income category. Racial categories and ethnicity (Hispanic) are consistent with the definitions used by the U.S. Census. Income ranges correspond to HUD income categories and are based on the area median income for a family of four, which can be found at <http://www.huduser.org/portal/datasets/il.html>.

According to HUD, disproportionate need occurs when a household category has a level of need that is at least 10 percentage points higher than the level of need of all households in a particular income category. For example, if 60 percent of households earning between 50 and 80 percent of the area median income (AMI) have a housing problem, and 75 percent of Hispanics in the same income category have a housing problem, Hispanics would have a disproportionate need.

Per HUD's Consolidated Plan regulations at 91.205(b)(2), 91.305(b)(2), and 91.405, a grantee must provide an assessment for each disproportionately greater need identified. Although the purpose of these tables is to analyze the relative level of need for each race and ethnic category, the data also provide information for the jurisdiction that can be useful in describing overall need. Income classifications are as follows: 0%-30% AMI (Area Median Income) is considered extremely low-income, 30%-50% AMI is low-income, 50%-80% AMI is moderate-income, and 80 %-100% is middle-income. Data is pulled from the 2011-2015 HUD Comprehensive Housing Affordability Strategy (CHAS). The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%. *

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,460	665	700
White	3,325	1,135	485
Black / African American	220	85	114
Asian	540	85	114
American Indian, Alaska Native	160	29	55
Pacific Islander	4	0	0
Hispanic	145	20	20

*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,210	1,275	0
White	2,750	1,135	0
Black / African American	220	95	0
Asian	40	0	0
American Indian, Alaska Native	15	0	0
Pacific Islander	0	0	0
Hispanic	25	4	0

*The four housing problems listed above

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but the or the other housing problems
Jurisdiction as a whole	1,985	3,115	0
White	1,670	2,680	0
Black / African American	180	205	0
Asian	20	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	30	55	0

*The four housing problems are listed above

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but the or the other housing problems
Jurisdiction as a whole	400	2,520	0
White	365	2,325	0
Black / African American	10	155	0
Asian	0	0	0

American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	15	10	0

*The four housing problems listed above

The disproportionate need of racial and ethnic groups in Muncie are summarized by income level below:

0%-30% & of AMI: Of the 5828 total households at this level, 76.5% have one or more housing problems. No racial group is ten percentage points above that.

30%-50% & of AMI: Of the 4485 total households at this level, 71.5% have one or more housing problems. Those with disproportionately greater need: 100% of Asian households have housing problems, 100% of American Indian/Alaska Native households have housing problems, 86% of Hispanic households have housing problems.

50%-80% & of AMI: Of the 5100 total households at this level, 38.9% have one or more housing problems. Those with disproportionately greater need: 100% of Asian households have housing problems.

80%-100% & of AMI: Of the 2920 total households at this level, 13.6% have one or more housing problems. Those with disproportionately greater need: 60% of Hispanic households have housing problems.

Severe Housing Problems

In this section are severe housing needs as defined by HUD, using HUD-prepared housing needs data. The tables show the number of households that have severe housing needs by income, race, and ethnicity.

As stated above, a disproportionately greater need exists when the members of a racial or ethnic group at a particular income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. For example, assume that 60 percent of all low-income households within a jurisdiction has a housing problem, and 72 percent of low-income Hispanic households have a housing problem. In this case, low-income Hispanic households have a disproportionately greater need.

Per HUD's Consolidated Plan regulations at 91.205(b)(2), 91.305(b)(2), and 91.405, a grantee must provide an assessment for each disproportionately greater need identified. Although the purpose of these tables is to analyze the relative level of need for each race and ethnic category, the data also provide information for the jurisdiction as a whole that can be useful in describing overall need.

Income classifications are as follows: 0%-30% AMI is considered extremely low-income, 31%-50% AMI is low-income, 51%-80% AMI is moderate-income, and 81%-100% is middle-income.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four severe housing problems	Has none of the four severe housing problems	Household has no/negative income, but none of the other severe housing problems
Jurisdiction as a whole	3,825	1,305	700
White	2,865	960	485
Black / African American	485	140	114
Asian	105	85	55
American Indian, Alaska Native	4	0	15
Pacific Islander	0	0	0
Hispanic	115	50	20

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four severe housing problems	Has none of the four severe housing problems	Household has no/negative income, but none of the other severe housing problems
Jurisdiction as a whole	1,475	3,005	0
White	1,195	2,690	0
Black / African American	140	180	0
Asian	40	0	0
American Indian, Alaska Native	0	15	0
Pacific Islander	0	0	0
Hispanic	4	25	0

*The four severe housing problems are listed above.

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	425	4,680	0
White	375	3,975	0
Black / African American	24	360	0
Asian	0	20	0
American Indian, Alaska Native	0	0	0
White	40	2,650	0
Black / African American	10	160	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	25	0

*The four severe housing problems are listed above.

The disproportionate need based on severe housing problems of racial and ethnic group in Muncie are summarized by income level below:

0%-30% & of AMI: Of the 5830 total households at this level 65% have one or more severe housing problems. No racial group is ten percentage points above 65%.

30%-50% & of AMI: Of the 4485 total households at this level 32.9% have one or more housing problems. Those with disproportionately greater need: 43.7% of Black/African American households have severe housing problems, 100% of Asian households have severe housing problems. Both of these racial groups is above the ten percentage points of 32.9%, indicating disproportionate need on severe housing problems.

50%-80% & of AMI: Of the 5105 total households at this level, 8.3% have one or more severe housing problems. No racial group is ten percentage points above 8.3%.

80%-100% & of AMI: Of the 2920 total households at this level, 1.5% have one or more severe housing problems. No racial group is ten percentage points above 1.5%.

VI. Publicly Supported Housing Analysis

According to the 2018 5-year American Community Survey (ACS) there are 32,728 housing units in the city of Muncie. Of the housing units, 27,481 units (84%) are occupied units and 5,237 are vacant. Occupied units have 13,383 units (48.7%) are renters while 14,098 (51.3%) are occupied by owners. The approximate number of affordable rental units in Muncie is 1,516 of which only 1,075 units have some form of rental subsidy. Tenants of income-based apartments typically pay no more than 30% of their income toward rent and utilities according to federal standards.

Publicly Supported Housing (PSH) consists of the following housing program categories involving rental and owner-occupied housing units: Low Rent Public Housing, Housing Choice Vouchers (HCV), Veterans Administration Supportive Housing (VASH), HUD Multifamily Project Based Section 8, HUD Multifamily 202 (Elderly) and 811 (Disabilities), HUD Single Family Homeownership Programs, HUD CDBG or HOME funds and Low- Income Housing Tax Credit (LIHTC). All Programs participate in and promote HUD's Affirmatively Further Fair Housing initiatives administered by HUD FHEO Division. The Affirmative Fair Housing Marketing Plan is required to be certified by owner/sponsors, management agents, mortgage lenders, and realtors that they will comply with Fair Housing Laws.

A. Muncie Housing Authority

(MHA) has 438 units in its public housing inventory located in the named properties below. These properties help serve the Muncie residents whose incomes fall below the 30% limit of Area Median Income (AMI). The properties are in various Census tracts in the City. Several communities are in Census tracts 300 and 1200 which have the highest concentration of Minority (Black) resident population in Muncie. See CPD Maps in Section V (B) General Issues. The Delaware County Housing Authority (DCHA) which is a separate entity with a Muncie address operates a 162-unit public housing community called Middletown Gardens. DCHA also has in addition 164 Section 8 Housing Choice Vouchers (HCV) to serve eligible households in Delaware County.

Table 2.1: Muncie Public Housing Communities

Name of Apartments	Number of Units	Year Open	Serve
Earth Stone Terrace	99	1982	Families
Southern Pines	100	1984	Families
Gillespie Towers	98	1983	Elderly
Millennium Place	106	2002	Families
Centennial Place	35	2010	Elderly

MHA also administers the Section 8 Housing Choice Voucher (HCV) Program, which provides

rental assistance to tenants who are qualified to lease housing from private landlords. MHA has 842 standard Vouchers, 15 VASH Vouchers and six (6) Homeownership Vouchers. The highest concentration of HCVs is in the central, south, and northeast neighborhoods of Muncie. MHA inspects each unit at least once annually to determine if the unit is in a decent, safe, and sanitary condition. MHA in partnership with private developers and the City of Muncie, has also demolished obsolete public housing developments and replaced these units with new development under the Hope VI Program utilizing HOME funds and Low- Income Housing Tax Credits (LIHTC).

The MHA is interested in two approaches to increase quality available housing: 1) acquire vacant buildings or sites to rehabilitate or build new affordable developments in the area it serves, 2) demolish three of the older properties to rebuild new or rehabilitate existing buildings by converting to HUD's Rental Application Development (RAD) program. These efforts could be accomplished by partnering with the City of Muncie and a private developer. MHA would supply the HCVs and the developing partner financing LIHTC from Indiana Housing Community Development Authority (IHCD) while supplementing the permanent financing with a HUD 221d-4 Insured Mortgage Loan.

MHA has established a Resident Relations Advisory Sub-Committee (RRASC) that is activated when needed to discuss upcoming MHA plans or resident concerns. All site managers have quarterly meetings with the residents to provide information, hear complaints and to deal with environmental and health and safety issues. MHA RRASC acts as a resident liaison for community resources and self-sufficiency programs. In addition to training courses for resident adults and children outside community partners meetings are held for residents at the Neighborhood Network Center

MHA has established a local Section 8 preference for Public Housing residents that meet all HUD homeownership requirements and are ready to purchase a home. Presently, there are six residents in the program receiving vouchers toward owning a home. MHA has collaborated with Muncie Homeownership and Revitalization, a nonprofit community-based organization to provide counseling, financial literacy, and educational services to prospective home buyers. Major activities of Muncie Homeownership and Revitalization include pre and post purchase homebuyer counseling, fair housing assistance, mortgage delinquency counseling and predatory lending advocacy.

B. Subsidized Housing in Muncie

HUD's Office of Multifamily Housing has funded subsidized in Muncie that would include the following: Section 236 BelowMarket Interest Rate (BMIR) properties, Section 202 elderly housing and Section 811 supportive housing. Whereas the rental subsidies are Project Based Section 8 certificates or Project Rental Assistance Contracts, that remain with the property and not the resident should they move. The Section 236 Program (BMIR) for new development ended over 40 years ago, but those existing properties with the Section 8 certificates still in place play a role in providing affordable housing to the underserved community in Muncie. The HUD 202 and 811 grant programs (competitive scoring) are still active for non-profit sponsors to develop and

manage new rental housing communities throughout the United States and its territories. Submitted applications must address Affirmative Furthering Fair Housing (AFFH) to score points and not have the application rejected.

Table 2.2: Muncie Multifamily Properties

Property Name	MF Housing Program	Population Served	No. of Units
Cambridge Square Apts.	Sec. 236	Elderly	144
Carriage House Apts.	Sec. 236	Families	100
Gillbecke Apts.	Sec. 811	Disabled	20
Hillcroft Apts.	Sec. 811	Disabled	8
Calvary Place Apts.	Sec. 811	Disabled	24
Ashgrove Crossing	Sec. 202	Elderly	60
Goodall Apts.	Sec. 202	Elderly	50

A location map of the above HUD Multifamily developments (green dots) is shown in the General Issues Section V - B. of this report. Five of the Multifamily properties are in the northern areas of Muncie, while two are in the southern area of the city.

Helping to supply the need of affordable PSH in Muncie are Low Income Housing Tax Credit (LIHTC) properties developed by private and/or nonprofit organizations. The LIHTC program is administered by the Indiana Housing Community Development Authority (IHCDA). Since its inception back in 1986, LIHTC has funded affordable housing projects throughout the various communities in the United States.

Because most of the housing stock in Muncie was built before 1970, the City using CDBG and HOME funds is partnering with developers to rebuild affordable housing units, both owner and rental, in neighborhoods within the city limits. While cost and allowable land use are critical factors in siting proposed developments, making housing opportunities available to all residents should be a high goal. Most of the LIHTC development in Muncie neighborhoods are in the southwest to northeast portion of the city, Census tracts 3,4,5,6 12 and 28. See the 2010 CPD Map Areas of PSH (pink dots) for LIHTC properties; the General Issues Section V - B.

Table 2.3: Muncie Low Income Tax Credit Housing Communities

Property Name	Population Served	Number of Units
Creekside Apts. I & II	Families	120
Daley Apts.	Families	34
Elgin Manor Apts.	Families	120
Historic Muncie Apts.	Families	35
Howard Square Apts.	Families	30
Jackson & Vine Apts.	Elderly	35
Lofts at Roberts Apts.	Families	83
Silver Birch Apts.	Elderly	119
Walnut Commons Apts.	Disabled/Vets	44
Walnut Manor Apts.	Families	128
Wilson School Apts.	Elderly	50
Woods Edge Apts.	Families	112
KTS Place Apts.	Disabled	7

LIHTC properties have a 15-year Affordability Use Agreement, on all or some of the unit rents, at 60,50,40 and 30 percent of AMI. Near the expiration of the Agreement the owner can decide to opt-out or renew for another 15-year period. Two of the listed properties Historic Muncie Apartments and Howard Square Apartments can terminate their Use Agreement within the next five years.

Although Muncie is named one of the most affordable cities in America to live, low- and moderate-income families still have limited quality affordable housing. The median home value in Muncie, according to the 2018 -year ACS was \$76,100. With 30-year mortgage interest rates at a record low of 3.0 to 4.0 percent, there are affordable homeownership opportunities available to low- income residents within the 50 percent AMI household range than in recent years. The City of Muncie with use of CDBG dollars will demolish abandoned dwellings, land bank the vacant sites and then provide HOME funds to organizations such as Habitat for Humanity and ECO Rehab to build new single-family dwellings or rehabilitated units. Downpayment assistance will also be a key to these homeownership efforts.

VII. Disability and Access Analysis

People with a disability, mental or physical, face a lifestyle crisis as much if not more than individuals without a disability. The importance of providing shelter and daily living services to the disabled population can be challenging as the disabled seeks to become independent and self-sufficient. There is more recognition that people with disabilities will do better in community settings than institutions. However, people with disabilities are more subject to poverty conditions due to the lack of income in their household. Their main source of income is Social Security and/or Disability Supplemental Income benefits.

Affordable housing programs for the disabled population is in high demand with waiting list as there is a short supply of resources. Medicaid, which is the principal source of funding services and support for the disabled, typically does not allow funds to be used to pay rent or other housing related costs. Such factors pose barriers to community living, making it difficult to move from segregated facilities into the local community, and putting many people with a disability and limited income at risk of staying in an institution or worse, becoming a homeless person. The disabled have the right to be free from housing discrimination and there must be robust education, outreach, and enforcement of that right. They should have the same rights as those without a disability to rent or buy a home.

According to the 2018 5-year ACS, 16.8 percent of the population in Muncie Indiana suffers from a disability. While in the State of Indiana and the United States population percentages are 13.8 and 12.6 respectively. Muncie's disabled population percentage rate is among the highest of the major cities in Indiana. It can be further broken down in more demographic population categories by age, poverty, race, and sex.

Table 3.1: Muncie Disabled Population

Jurisdiction	Population	Percent of Disabled	# of Disabled Pop.
Muncie	68,530	16.8%	11,513
Indiana	5,146,360	13.8%	710,198
United States	322,249,485	12.6%	40,603,435

Table 3.1: Muncie Disabled Population by Sex

Population by Sex	No. in Population	Number of Disabled	Percentage
Female	35,636	5,951	16.7%
Male	32,894	5,562	16.8%

A. Demographics on the Disabled

The estimated labor force, age 18 to 64, in Muncie, per the 2018 5-year ACS, is 31,458 workers. An estimated 29,328 are employed in some full or part time capacity. The estimated number of labor force workers employed that have a disability are 2,742. The unemployed estimate number of labor force workers in Muncie is 2,130. Of that number, there are 283 unemployed workers with a disability.

Table 3.2: Muncie Disabled Population by Age

Pop. Age Group	Pop. Not Disabled	Pop. Disabled	Percentage Disabled
Under 5 years	3,506	27	0.8%
5 to 17 Years	8,066	743	9.2%
18 to 34 Years	27,198	1,938	7.1%
35 to 64 Years	20,385	4,968	24.4%
65 to 74 Years	5,194	1,768	33.0%
75 Years and Over	3,698	2,069	54.5%

Table 3.3: Muncie Disabled Population by Race

Pop. Group By Race	Number in Population	Number Disabled	Percentage Disabled
White	55,886	9,602	17.2
Black/African American	8,020	1,346	16.8
Two or More Race	1,904	318	16.7
Asian	1,221	86	7.0
Hispanic or Latino	1,383	184	13.3
American Indian/Alaska	67	25	37.3
Native Hawaiian	49	0	0

Muncie's disabled population has public transportation access to workplaces and services. Muncie Indiana Transit System (MITS) buses are equipped with wheelchair lifts ramps and a kneeling feature at the front steps. MITS drivers are trained in the proper operation of the equipment. MITS provides a total of 14 bus routes that travel approximately five miles in all directions to and from downtown Muncie. See MITS Bus Route Map General Issues Section B.

B. ADA Compliance

The American With Disabilities Act (ADA) is the federal law that governs the

The Muncie Housing Authority has approved and is implementing a 504/ADA Voluntary Compliance Agreement (VCA) to address accessibility and ADA provisions as required by Section 504 of the Rehabilitation Act of 1973. As part of the 5-Year Plan for MHA, they set forth a strategic goal to undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities.

The Executive Director of the Human Rights Commission is the ADA Coordinator for the city of Muncie and consults with all city departments regarding the requirements. In addition, the Human Rights Commission takes complaints regarding violations of the ADA, including fair housing and employment complaints. The city of Muncie developed an American with Disabilities Act Transition and Implementation Plan published on December 2, 2011. The Muncie Community Development (MCD) provides funding to city departments and nonprofits to assist in them in meeting needs regarding accessibility.

C. Disabled Housing and Other Services

MITS offers a door-to-door transportation option called Plus for those who have a disability that prevents them from riding one of the fixed bus routes. A MITS van will come to a residence and take disabled riders roundtrip within the city of Muncie for any reason. MITS offers free training assistance to the disabled on how to read the bus maps and schedules, including in braille, recognize bus stops, landmarks and route names, street safety and other pedestrian skills. This training opportunity gives Muncie's disabled population confidence in using the transit system.

A citizens advisory committee consisting of local riders was established to represent and voice a broad spectrum of transportation and community concerns. These concerns could include but are not limited to discrimination, policies, or services with respect to a disabled passenger. MITS and the Federal Transit Administration (FTA) sponsor a voucher program for those who qualify for the subsidy based on their income and disabled status.

Some private healthcare facilities provide transportation services for their residents. It will include shopping trips, entertainment field trips and medical visits. This transportation service is generally included in the resident's monthly rent. Community based organizations also provide transportation services to the disabled community in Muncie to ensure the access to other public resources. There are segments of the disabled community who drive and use their own vehicle to serve daily living needs.

Affordable housing options should be available to people with disabilities, including those with limited income and those that have families. The ideal situation will fully give the individual or family the opportunity to interact with people without disabilities. To ensure that the disabled can make informed decisions about where and with whom they live, they and their families should be

given information about the benefits of living in the community of their choice. Information about innovative housing models that promote independence should be disseminated to the disabled for their decision making and choice selection.

The health and safety of the disabled must be highly considered wherever they reside but should always be balanced with the right to exercise choice and control even taking on some risk to make decisions. All children and youth need a home with a family that provides an atmosphere of love, security, and safety. Young adults with a disability should be given the support needed to move out of the family home into a place that will promote their independence.

Public policies need to ensure people with a disability receive their share of all local, state, and national housing resources. There needs to be for an adequate supply of housing to eliminate long waiting lists for the disabled. Universal design and Visitability standards should be adopted for all new housing. New construction and substantial rehabilitation of multifamily housing needs to include fully accessible units in numbers that reflect the proportion of people with disabilities in the general population.

Full time and temporary housing opportunity for the disabled population, including the homeless, are being created in Muncie through the Publicly Supported Housing (PSH) groups. MHA, HUD, and VA, IHCD, Muncie's Office of Community Development are some of the government agencies providing housing and service resources to the disabled and homeless community. Nonprofit community organizations involved in disabled housing and providing supportive resources are the following groups and several belong to the Muncie area Homeless Provider Network (HPN): Bridges, Habitat for Humanity, YMCA, Pathstone, Arc/Hillcroft, Meridian Services, Christian Ministries and Muncie Mission.

MHA has 75 units, in their public housing inventory, that are set aside to be occupied by disabled families. MHA has another 225 disabled families with tenant-based vouchers residing in other apartment communities. The MHA has 15 VASH HCV's for Veterans many of whom suffer from disability. The MHA is implementing a 504/ADA Voluntary Compliance Agreement (VCA) to address accessibility and ADA provisions as required by Sec. 504 of the Rehabilitation Act of 1973 and Americans with Disabilities Act of 1990. The MHA has set forth a strategic goal to undertake affirmative measures to ensure accessibility housing to persons with all varieties of disabilities.

According to the PIH Information Center (PIC), approximately 280 resident families requested accessibility features to their units, including, but not limited to, widened doorways, modified kitchen cabinets, lowered sink counters, bathroom grab bars, raised or lowered toilet seats. In addition, the MHA also offers reasonable accommodations in policies, procedures, and practices that will make non-dwelling facilities, services, and programs accessible to persons with disabilities. MHA has collaborated with Muncie Homeownership and Revitalization to provide counseling, financial literacy and educational services to Public Housing residents including the disabled residents residing in the Public Housing communities.

Sixty percent of the dwelling units in Muncie were built prior to Section 504 (1973). Therefore, the Uniform Federal Accessibility Standards 1984 (UFAS) and Americans Disabilities Act 1990 (ADA) requirements and standards do not apply to single-family construction. Private owners of single-family housing, who rent to tenants who have Housing Choice Vouchers (HCVs), are exempt from accessibility and design standards. However, they are encouraged under the Fair Housing Act (FHA) to make units adaptable and accessible to serve the needs of disabled tenant daily living.

Existing HUD multifamily projects in Muncie providing housing for the disabled and elderly under Housing Section Acts 202 and 811 Capital Advance funding grants were all constructed to meet Section 504, ADA and Fair Housing Act regulations and statues. This table depicts these multifamily housing projects.

Table 3.1: Muncie Disabled & Supportive Housing

Property Name	Housing Program	Population Served	Number of Units
Gillbecke Apts	Sec. 811	Supportive/Disabled	20
Hillcroft Apts.	Sec. 811	Supportive/Disabled	8
Calvary Place Apts.	Sec. 811	Supportive/Disabled	24
Ashgrove Crossing	Sec. 202	Elderly/Supportive	60
Goodall Apts.	Sec.202	Elderly/Supportive	50

The 202 and 811 programs are competitive grant awards for not-for-profit owners/sponsors to develop and provide housing and supportive resources for very low-income elderly and persons with disabilities. 2020 NOFAs have been delayed due to COVID-19 outbreak, but additional funding is expected from the CARES Act.

HUD's Office of Residential Care Facilities administers the Section 232 Lean program. Section 232 is a (HUD) Federal Housing Administration (FHA) mortgage loan process that provides mortgage insurance to the owners and operators of residential care facilities. Such facilities, provide full and part time housing and services for the disabled and independent elderly population.

The map below shows the location of Muncie area assisted living and nursing homes that are in the HUD Section 232 insured mortgage loan program to meet the needs of the disabled population. Low Income Housing Tax Credits (LIHTC) funding from the Indiana Housing Community Development Authority (IHCD) were used with private permanent financing to develop and construct the Muncie Silver Birch community. This is an affordable assisted living and elderly housing facility serving the needs of the senior and disabled population in Muncie. Not only is IHCD using 9% and 4% LIHTC's to support building shelter for the disabled, but they also

provide a rental subsidy resource in the form of Housing Choice Vouchers (HCV) to eligible low-income disabled households.



The Muncie area Homeless Providers Network (HPN) serves as the community's Continuum of Care group and it is a sub-group of the Indiana Region 6 Regional Planning Council. Homeless Provider Network (HPN) includes the following Muncie community organizations: A Better Way, Bridges Community Services, Christian Ministries, Meridian Services, the Muncie Mission, and the Muncie YWCA. HPN meets on a quarterly basis along with Muncie Community Development, Social Security Administration, Muncie Center Township Trustee, United Way, and the Muncie Housing Authority. These agencies address housing, health, social services, victim services, employment, and education needs of the extremely low to moderate income individuals and families with special needs.

If an individual is "chronically disabled or homeless", they are initially referred to Meridian Services, which provides three types of permanent housing, including Shelter Plus Care, or temporary housing. The Meridian Case Manager will provide case management services and refers the client to mainstream services available in the Muncie community by HPN members. In collaboration with IHEDA,

City of Muncie and HUD, Meridian Services was awarded LIHTCs and HOME funds to build Walnut Commons Apartments. Opened in 2015, Walnut Commons is a 44-unit housing development for the disabled and homeless, many residents are Veterans, in need of housing and supporting resources to help with daily living.

The level of supportive housing and resources appear to be adequate for the disabled population living in Muncie. However, the current adverse economic conditions, due to the COVID-19 outbreak, will increase the need for additional funding resources. The CARES Act money, the city of Muncie receives, should be used primarily to provide COVID-19 relief to those out of work and unable to meet their housing obligations. Because much of the disabled population are employed in service sector jobs, they are most likely to be furloughed at higher a rate.

Proposed funding in PY2020 should have a positive impact of providing self-sufficiency to the disabled Muncie population. This can be done by making accessibility convenient to the disabled by updating infrastructure to meet their needs, offering new building design techniques, re-adapting existing structures, providing access to transportation, and providing services to enhance daily living. A collective effort between the local community, public and private agencies geared toward giving the disabled population comparable opportunities in housing to others living in Muncie.

VIII. Status of Muncie Fair Housing

On February 12, 1964, the Muncie City Council passed Ordinance 1627 that created the Muncie Human Rights Commission (MHRC). Since the Human Rights Commission was created, has been working to ensure equal opportunity and equal rights for all individuals living within the Muncie city limits. The Commission operates to enforce the local, state, and federal laws that protect the rights of protected classes of individuals against discrimination. The City of Muncie, the protected classes of individuals were previously stated was revised by City Ordinance 9-15 and have been defined in Chapter 34, Division 5, Section 34.85 Ord. No. 9-15 as:

- | | |
|-------------|---|
| 1. Race | 6. Sexual Orientation |
| 2. Religion | 7. Gender Identity |
| 3. Color | 8. Disability |
| 4. Sex | 9. Ancestry or National Origin |
| 5. Age | 10. United States Military/Veteran Status |

The federal Fair Housing Law has eight protected classes race, color, religion, sex (including sexual orientation, gender identity), disability, familial status, and national origin. The Age Discrimination Act of 1975 is the federal law that governs discrimination based on age and prohibits such actions in local programs and services receiving funds from the federal government.

In addition, the city of Muncie has further defined requirements for rental housing which sets forth guidelines for housing quality standards in Division 1, Section 155 which further protects the rights of citizens who are renting property in Muncie. These two local ordinances sometimes complement each other by requiring landlords to properly maintain property. This ordinance is enforced by the Muncie Building Commissioner through its Code Enforcement activities.

A. HUD Enforcement

The Muncie Human Rights Commission has the enforcement authority regarding Fair Housing for the protected classes of individuals under the federal, state, and local laws and can take complaints for all these concerns. Fair Housing complaints made to MHRC receive a preliminary review. Complaints that are determined to be covered by federal Fair Housing laws are then sent for investigation and adjudication to the U.S. Department of Housing and Urban Development (HUD), the federal Fair Housing enforcement agency.

Individuals in the protected classes who feel that they have experienced Fair Housing discrimination can file complaints with either MHRC or directly with HUD. The MHRC adjudicates Fair Housing complaints filed by individuals that meet only the local

protected class not covered under federal and state law which is U.S. Military/Veteran Status.

The following areas were reviewed to evaluate the status of enforcement in the city of Muncie:

A. Fair housing complaints or compliance reviews where the Secretary has issued a charge of or made a finding of discrimination on a fair housing discrimination suit filed by the Department of Justice or private plaintiffs.

Period – 2011 to 2014 – Two cases charged with discrimination or caused Fair Housing Assistance Program (FHAP)

Period – 2015 to 2019 – Two cases charged with discrimination or caused Fair Housing Assistance Program (FHAP)

Period – 2015 to 2019 - Three cases resulted in Conciliation/Settlement

B. Fair Housing Complaints to the Department of Housing & Urban Development

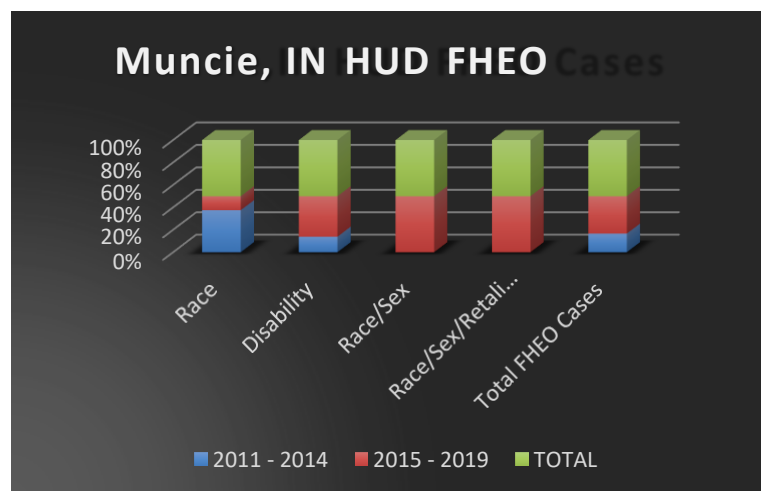


Table 4.1: HUD Fair Housing Cases

Basis for Discrimination	2011 to 2014	2015 to 2019	TOTAL
Race	3	1	4
Disability	5	13	18
Race/Sex	0	1	1
Race/Sex/Retaliation	0	1	1
Total FHEO Cases	8	16	24

The U.S. Department of Housing and Urban Development, FHEO Division, received 24 cases of discrimination from 2011 to 2019 from Muncie. Of the Fair Housing complaints, 8 cases were received between 2011 and 2014. The outcome in 2 of the 8 cases was a charge of discrimination or FHAP caused, in 5 cases there was a determination of No Cause, and in 1 case, the complainant failed to cooperate. There were 16 Fair Housing

cases received from 2015 to 2019. Of the 16 Fair Housing complaints, 2 of the cases were charged with discrimination or FHAP caused, 3 cases were resolved through Conciliation/Settlement, in 9 cases there was a determination of No Cause, in 1 case the complainant failed to cooperate, and 1 case was withdrawn by Complainant without resolution.

As these Fair Housing cases are examined, 25% from 2011 through 2014 and 87.5% from 2015 through 2019 were resolved by HUD taking some action to enforce the Fair Housing laws. Of the 2 cases during 2011 to 2014, where discrimination was found or FHAP Caused, both were based on Race. Of the 5 cases where discrimination was found or FHAP caused or Conciliation/Settlement was made during 2015 through 2019, 100% of these cases were based on Disability.

B. Muncie Human Rights Commission Enforcement

Based on the information from the Muncie Human Rights Commission between 2015 through 2019 there were 66 Fair Housing discrimination complaints received. The basis of the complaints are as follows:

- | | |
|--------------------------|--------------------|
| 1. Race – 46 | 4. Harassment – 2 |
| 2. Sexual Harassment – 2 | 5. Disability – 14 |
| 3. Familial Status – 1 | 6. Retaliation – 1 |

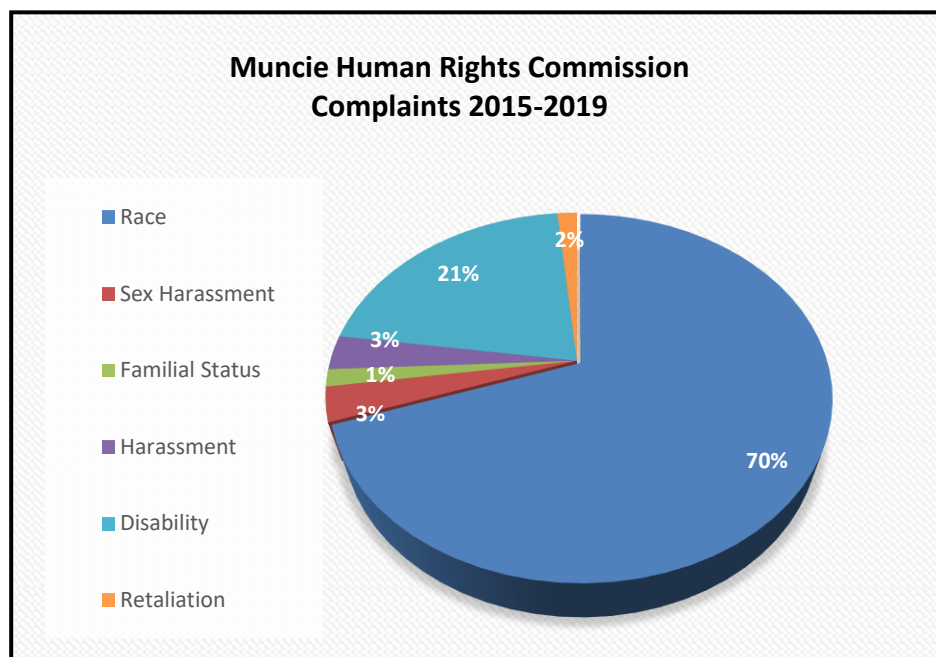


Table 4.2: MHRC Fair Housing Cases

Basis	2015	2016	2017	2018	2019	Total Complaints
Race	11	4	6	11	14	46
Sexual Harassment	0	0	0	1	1	2
Familial Status	1	0	0	0	0	1
Harassment	1	0	1	0	0	2
Disability	2	0	0	6	6	14
Retaliation	1	0	0	0	0	1
TOTALS	16	4	7	18	21	66

The number of Fair Housing complaints in Muncie began increasing in 2018 and surpassed 2015 levels by 31%. All fair housing complaints submitted to MHRC were reviewed and forwarded to HUD for investigation and adjudication.

C. Fair Housing Concerns: Patterns and Problems

1. Residential location of minorities in Muncie - The 2018 American Community 5Year Survey data in Section V, General Issues, shows that 81 percent of the total population 68,530 living in Muncie are White, 11 percent are Black/African American, 3 percent are Hispanic/Latino and less than 1 percent or other racial/ethnic minorities. Based on this data, the residential locations of minorities living in Muncie are highly concentrated in only two census tracts that have the highest concentration of Black/African Americans, Census Tract 300 and 1200 (the Industry and Whitely neighborhoods).

2. Measure of racial segregation in Muncie - The two neighborhoods of Industry and Whitely have a white population of 27.0% and 25.8% respectively. The Muncie Zoning map shows the zoning categories in Muncie by census tracts. As stated previously in this report, the neighborhoods with the greatest percentage of minorities also have most of the subsidized housing.

3. Other concerns – Achieving Fair Housing in Muncie is impacted based on the income disparity for racial minority groups and the median cost of housing. As discussed in Section IV of this Analysis, the median household income in Muncie is \$33,616; however, for whites the median income is \$32,800 and for Hispanics \$28,800, for Blacks \$22,800 and lower other minorities. Lower income families sometimes receive rental assistance payment through the Housing Voucher Program; however, the Muncie Housing Authority has indicated that many landlords will not accept this source of income to supplement rent. Additionally, the Housing Voucher program has a long waiting list and to receive assistance to participate can takes over a year.

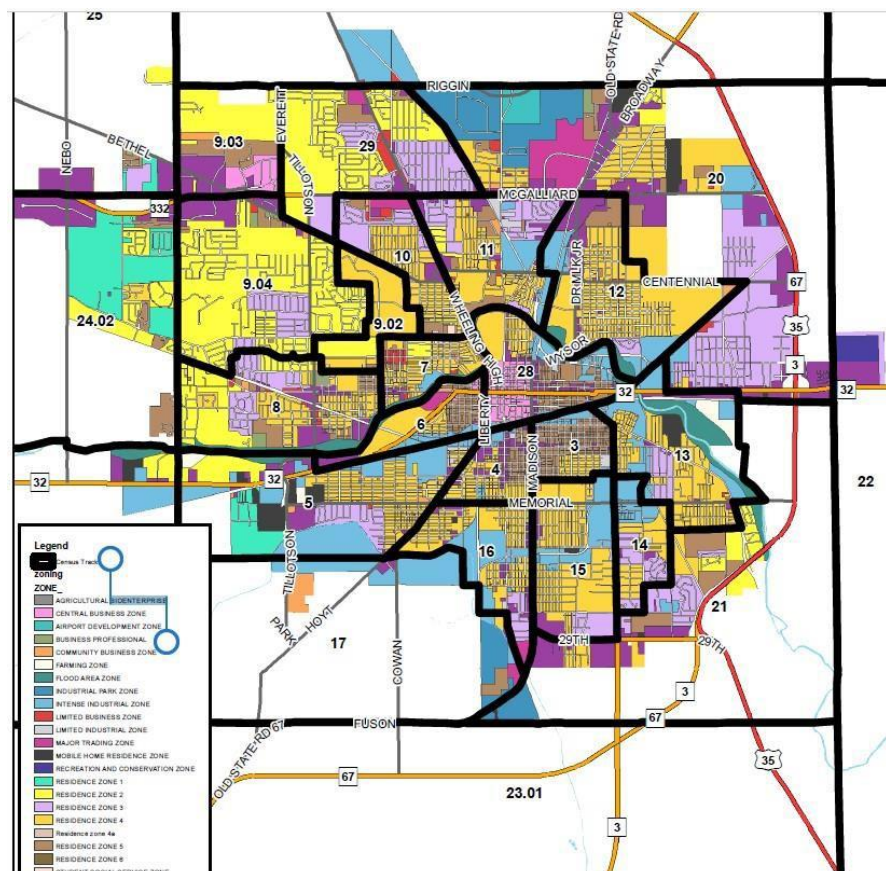
The Muncie area MLS reports that currently, the median home sale price at \$104,500 and the 2018 ACS data shows that the area median rent for a 2-Bedroom unit is \$729. At 30% of average median income for Black and Hispanic households, an affordable median 2-Bedroom rent is \$645, which this affordable rent is well below the area median rent. The average home sale price is too high for most minority families and limits opportunities for homeownership. In addition to the cost of housing, the mortgage information in this Analysis indicates that a large percentage of Muncie minority loan applicants are denied a mortgage loan, especially for a conforming loan product at a higher percentage than White applicants.

One other issue that has a great impact on the housing market is the fact that Muncie is the home to Ball State University with 16,160 undergraduate students and more than 5,000 graduate students. BSU estimates that approximately 10% of its students live off campus. In a city of 68,750, this could have a significant impact on the housing market.

D. Local Policies Impacting Fair Housing

The Ordinance passed in 2015 made the city of Muncie's Fair Housing ordinance equivalent to the federal and state statutes. Although the Muncie ordinance adds a protected class of U.S. Military or Veteran status, this addition does not impact the efficacy of other laws. It is important that the zoning ordinance be reviewed considering the 2020 Census to ensure that changes are not significant enough to warrant changes in the zoning.

Muncie Neighborhoods by Census Tract

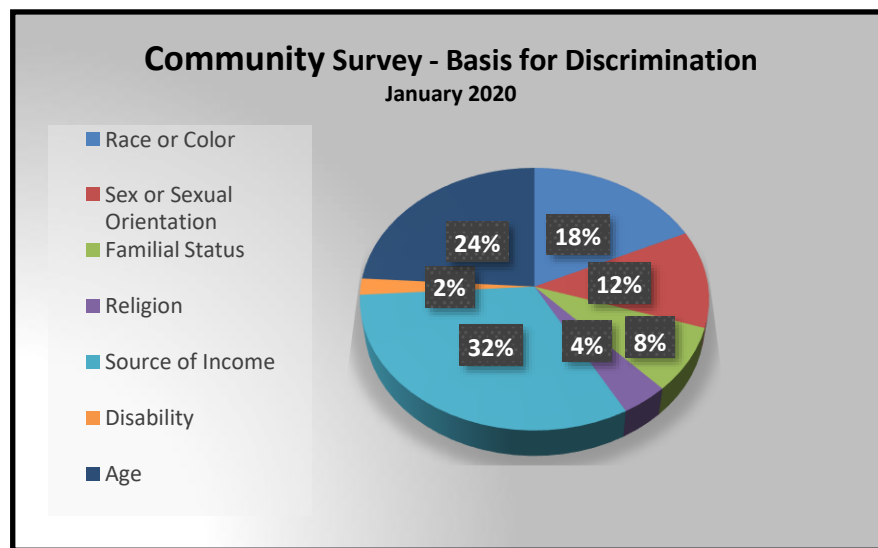


E. Community Survey Results on Fair Housing

The Muncie Community Development Department conducted a survey of Muncie residents both distributed and online from December 2019 to February 2020. The survey compiled information from the community consultation to prepare the Consolidated Plan and Analysis of Fair Housing Impediments of which, 339 people respondents participated. Additionally, over 50 individuals participated in listening groups and interviews.

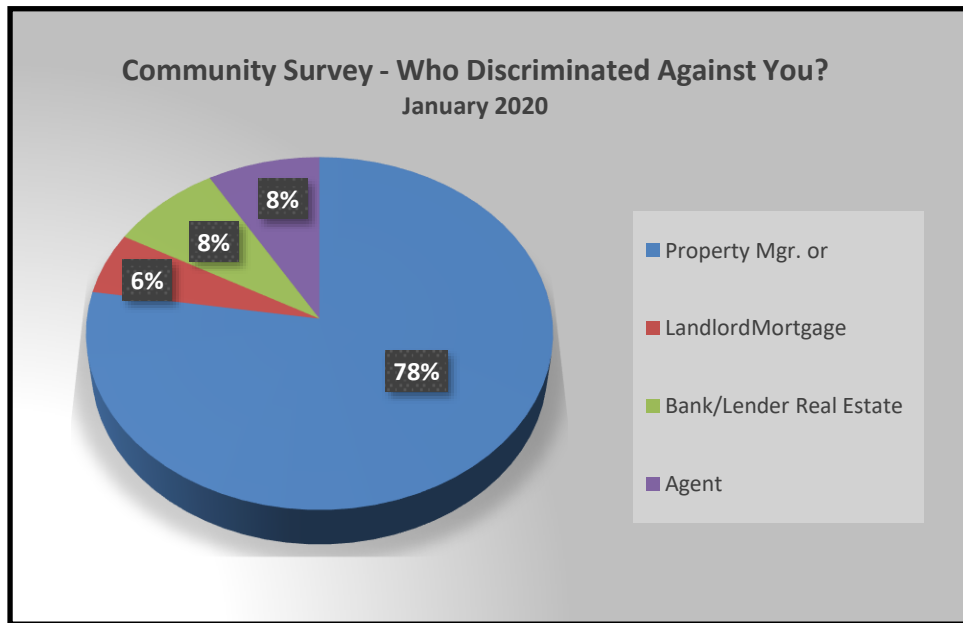
A review of the survey and consultation results indicated that of the participants surveyed, 21% identified themselves as members of one or more of several protected class, racial minority, ethnic minority or disabled. Of the 337 participants surveyed, 9.5% said that they had experienced discrimination when looking for a place to live in Muncie.

Of those survey respondents who indicated that they had experienced discrimination, the following chart shows the basis of the discrimination. The majority of the discrimination took place based on an area that is not a protected class such as the - source of income, age was the second highest basis, the next highest basis Race or Color followed by Sex or Sexual Orientation.

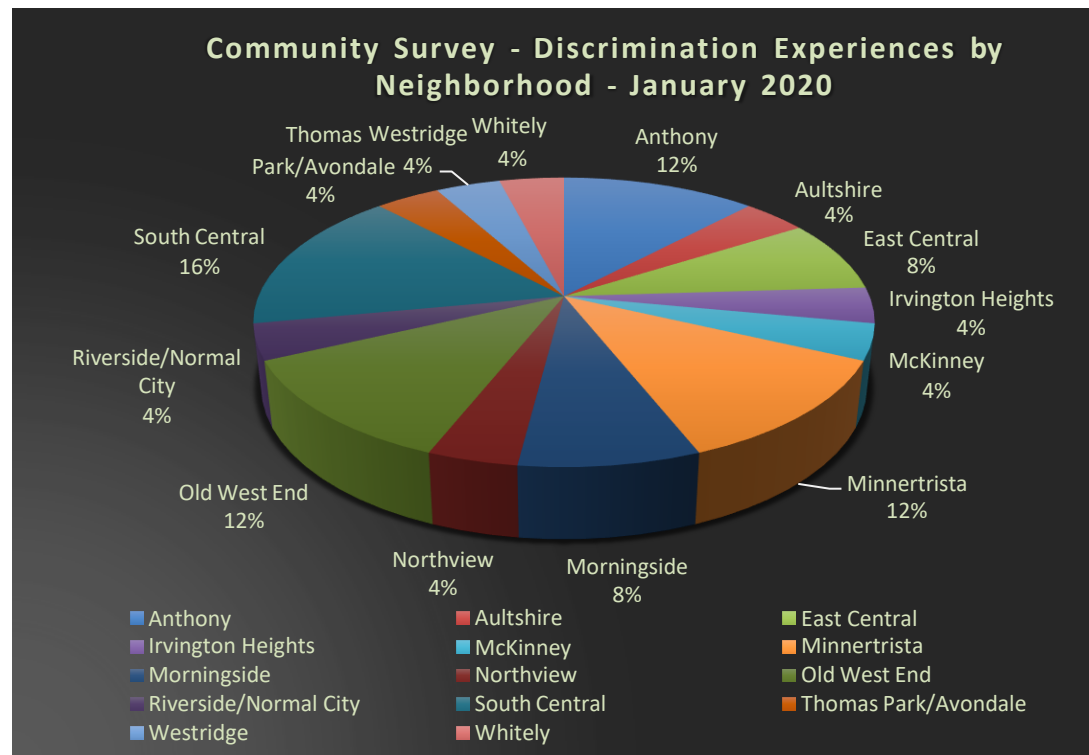


Respondents were asked where they experienced discrimination when seeking housing? Most of the respondents 36% felt that they were discriminated against while seeking housing from a property manager or landlord/owner.

The Community Survey next questioned who discriminated against the participant, the respondents indicated that 78% of the time the discrimination came from a property manager or landlord. Local, state, and federal law protect citizens from discrimination; however, for many of these allegations, complaints are never filed with the appropriate agencies.



Another Community Survey question asked; “In what Muncie neighborhood did you experience what you believe to be discrimination?”. The following chart indicates the results from the respondents who identified the neighborhoods where they believed they had experienced discrimination.



Although there were many respondents who believed that they had experienced discrimination while pursuing housing in Muncie, 87% that answered the question “Did you

report the discrimination?” responded No. In determining why these individuals did not report discrimination the survey indicated the following reasons why these individuals did not report the discrimination.

F. Outreach Capacity

Based on the Community Survey, 87% of those who experienced what they believed to be discrimination did not report it to the appropriate agencies. The Muncie Human Rights Commission has worked to be a catalyst for educating the public in Muncie regarding the laws that protect individuals from housing. The Commission works with the Muncie Community Development Department and continues to work with organizations throughout the community to educate individuals and organizations regarding Fair Housing.

The MHRC staff speaks at organizational meetings throughout the year to educate and inform the public regarding the local, state, and federal discrimination laws and how a complaint can be filed. During the Spring and Summer of 2019, the MHRC worked with Ball State University and the 8Twelve Coalition to develop “The Renter’s Book”. The MHRC Office is in City Hall and staff can schedule appointments with any member of the public that needs assistance in filing a discrimination complaint.

In May of 2020, the MHRC worked with Ball State University students and several community organizations and institutions to conduct a Human Rights Symposium. The purpose of the Symposium was to increase awareness for residents’ human rights and the City of Muncie Human Rights Commission’s mission, services, and the process for filing and investigating complaints.

G. Resources

The Muncie Human Rights Commission works with other departments and decision makers for Muncie, institutions, and state government to receive funding to carry out its Fair Housing responsibilities. MHRC receives Fair Housing complaints and reviews the complaints before they are forwarded to the U.S. Department of Housing and Urban Development for investigation and adjudication.

The city of Muncie provides most of the funds to MHRC through the city budget. MHRC also receives some funds from fee for services for carrying out specific Fair Housing responsibilities and from competitive grants to carry out specific outreach projects. Some other competitive funding sometimes includes organizations such as The Indiana Governor's Council for People with Disabilities that provides support for the local community ADA grants program and annual training.

Affordable housing continues to be a priority in implementing the HOME and CDBG programs administered through the City of Muncie Community Development Department (MCD). (2019 CAPER). The city’s Affirmative Action Marketing Plan requires that fair housing guidelines are a requirement in implementing all these projects. Subrecipients are required to effectively

market housing available to both minority and non-minority populations. In addition, accessibility and accommodations for the disabled are also required for these programs.

During program year (PY) 2019, ten (10) homeowners were physically assisted through the Holistic Program by subrecipient Pathstone. One (1) homeowner was assisted using FY2017 funds. Nine (9) homeowners were assisted using FY2018 funds. The COVID-19 pandemic prevented PY2019 Holistic from being completed in the program year. More progress on utilizing the PY2019 funds will be made once all COVID 19 restrictions are lifted.

For the 2020-2021 program year, the City received the following funding:

Community Development Block Grant (CDBG) \$1,274,641
Home Investment Partnerships Program (HOME) \$ 513,565
Community Development Block Grant (CDBG-COVID) \$749,824
Total Funding Awarded: \$ 2,538,030

Affordable housing will continue to be a priority for the MCD as it implements HUD grants over the next five years of the Consolidated Plan 2020-2024. The need for housing to improve access and opportunity for low- and moderate-income households has been well documented. In addition, including demolitions of abandoned properties to allow for redevelopment and control blight, the development of new housing units for low income residents, public infrastructure improvements, and a variety of housing assistance programs through partner organizations.

IX. Recommended Fair Housing Goals and Actions to Address Impediments

A. Goal: Address declining housing quality and lack of maintenance

Action: Work with local community organizations and professional real estate groups to provide a fair housing training for rental housing landlords and property managers.

Action: Provide aggressive code enforcement to address housing decline and unsafe conditions

Action: Provide education to tenants about their rights to safe and adequate housing

- Continue partnerships with housing advocates and organizations providing outreach and education
- Continue practice of Muncie Human Rights staff participating in seminars, conferences, and education programs.
- Develop a public service announcement and publicity campaign to ensure that the residents of Muncie are aware of “The Renters Book”.

Action: Develop public/private partnerships to increase the supply of affordable rental housing development.

Action: Eliminate blight in low- and moderate-income neighborhoods to stabilize these communities.

Action: Provide funds for housing rehabilitation programs for rental and homeowner repair projects.

Action: Increase Code Enforcement efforts and consider registration of rental units to assist Code Enforcement efforts.

B. Goal: Expand housing opportunities outside of low and moderate income (R/ECAP) neighborhoods.

Action: Partner with developers to encourage inclusion of affordable units into new developments

Action: Leverage HOME and CDBG funding to provide additional affordable units throughout the city of Muncie

Action: Assist developers with Low Income Housing Tax Credit process to provide affordable units in new developments.

Action: Provide community-wide education efforts and support to reduce NIMBY opposition to housing (especially affordable unit) development

Action: Review zoning maps to determine impediments are being addressed through zoning classifications.

Action: Support efforts to reduce barriers to affordable housing development in neighboring jurisdictions and throughout the city of Muncie.

Action: Partner with local nonprofit and community organizations and lenders to provide and expand financial literacy programs and homebuying counseling opportunities.

Action: Continue and expand fair housing education to nonprofit housing and service providers to ensure that they recognize fair housing concerns from clients when they are communicated and are aware of how they can be remedied.

C. Goal: [Improve services for Limited English Proficiency populations](#)

Action: Partner with service organizations and others to ensure access to non-English speaking residents these communities in Muncie when requested for participation in public meetings or other public forums.

Action: Partner with to ensure that information is available to non-English speaking populations regarding programs to provide housing services and their rights pertaining to Fair Housing.

D. Goal: [Expand access to affordable, accessible units](#)

Action: Consider implementing residency preferences for persons with disabilities.

Action: Consider expanding percentage of accessible and “visitable” units required in new multi-family development.

Action: Provide education to developers about need for accessible housing and design standards that can be incorporated into development.

E. Goal: [Ensure realtors, banks, mortgage companies, and are providing opportunities for to protected classes of individuals](#)

Action: Continue to provide fair housing education and training to real estate professionals

Action: Work with local lenders to expand access to funding for protected classes

Action: Continue / expand use of HOME and CDBG funding to provide down payment assistance for first-time and low-income homebuyers

F. Goal: [Support services for the homeless population](#)

Action: Review and expand funding support for homeless service providers

Action: Support the development of additional transitional and supportive housing where appropriate

Action: Work with regional partners to support expanded services in communities around Delaware County to reduce concentration of poverty and homelessness in Muncie

APPENDICIES

APPENDIX A
Muncie Fair Housing Ordinance

DIVISION 5. HUMAN RIGHTS COMMISSION¹

Sec. 34.80. Public policy and purpose.

- (A) It is the public policy of the city to provide all of its citizens equal opportunity for education, employment access to public conveniences and accommodations, and acquisition through purchase or rental of real property including but not limited to housing, and to eliminate discrimination based on race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status since such discrimination is an impediment to equal opportunity. Equal education, employment opportunities, access to and use of public accommodations, and equal opportunity for acquisition of real property are hereby declared to be civil rights.
- (B) The practice of denying these rights to properly qualified persons by reason of the race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status of such person is contrary to the principles of freedom and equality of opportunity and is a burden to the objective of the public policy of this city and shall be considered as discriminatory practices. The promotion of equal opportunity without regard to race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status is the purpose of this section.
- (C) It is also the public policy of the city to protect employers, labor organizations, employment agencies, property owners, real estate brokers, builders, and lending institutions from unfounded charges of discrimination.
- (D) In filling such broad purposes, the Muncie Human Rights Commission is to:
 - (1) Study, investigate and take action in regard to any condition having an adverse effect upon relations between persons of various race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status groups;
 - (2) Institute and conduct educational and other programs intended to promote the equal rights and opportunities of all persons;
 - (3) Solicit the cooperation the race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status groups within the community in order to improve the quality of communications and understanding within the community;
 - (4) Stimulate private and governmental departments and agencies to develop and foster meaningful programs in support of the objectives and purposes of the Muncie Human Rights Commission; and
 - (5) Ensure the equal protection of all persons and the full availability of all rights and privileges of citizenship to all persons.

(Ord. No. 9-15, § 1(Exh. A), 4-6-15)

Sec. 34.81 Definitions and exemptions.

- (A) *Definitions:* For the purpose of this subchapter, the following definitions shall apply unless the context clearly indicates or requires a different meaning.

¹Editor's note(s)—Ord. No. 9-15, § 1(Exh. A), adopted April 6, 2015, amended former Div. 5, §§ 34.80—34.87, in its entirety to read as herein set out. Former Div. 5 pertained to similar subject matter and derived from Ord. No. 41-89, adopted Oct. 2, 1989.

Disability. A person who has a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such an impairment, or a person who is perceived by others as having such an impairment.

Discrimination. Any difference in treatment based on race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status. The term "discrimination" shall also mean the exclusion of a person from or failure or refusal to extend to a person equal opportunities because of race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status. The term "discrimination" shall also mean the promotion of segregation or separation, in any manner on the basis of race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status.

Employer. Any person employing six or more individuals within the territorial limits of the city. Employer does not include any not-for-profit corporation or association organized exclusively for fraternal or religious purposes, or any school, educational, or charitable religious institution, or any exclusively social club, corporation, or association that is not organized for profit.

Executive committee. The Chair, Vice Chair, and Secretary of the Muncie Human Rights Commission. The Executive Director will serve as an ex-officio member to this group. The Chair may, if necessary, invite the input of other individuals in the deliberations of the Executive Committee.

Labor organization. Any organization which exists for the purpose, in whole or part, of collective bargaining or of dealing with employers concerning grievances, terms or conditions of employment, or for other mutual aid or protection in relation to employment.

Owner. Includes the lessor, sub-lessor, assignor or managing agent, or other persons having the right of ownership or possession or the right to sell, rent, or lease any housing accommodation.

Person. One or more individuals, partnerships, associations, organizations, corporations, labor organizations, cooperatives, legal representatives, mutual companies, joint stock companies, unincorporated organizations, trustees, trustees in bankruptcy, receivers, fiduciaries, and other groups or persons. The foregoing includes members, representatives, officers, directors, and agents.

Real estate operator. Any person, partnership, association, or corporation who for a fee or other valuable consideration, sells, purchases, exchanges or rents, negotiates, or offers, or attempts to negotiate the sale, purchase, exchange, or rental of the real property of another, or collects rental of the use of real property of another.

(B) *Exemptions.*

- (1) With respect to employment discrimination, employers of six or less employees are exempt from the provision of this division.
- (2) It shall not be deemed discrimination for any not-for-profit corporation or association organized exclusively for religious purposes or for any school, educational or charitable institution owned or conducted by or affiliated with a church or religious institution to devote its resources to its owner religion or denomination, or to give preference to members of such institution or educationally to promote exclusively the religious principles for which it is established or maintained.
- (3) It shall not be deemed discrimination on account of disability for any governmental agency or not-for-profit corporation established for the purpose of offering or providing education, training or other social services and benefits to disabled persons or to give a preference to disabled persons with respect to such education, training or social services and benefits.

(Ord. No. 9-15, § 1(Exh. A), 4-6-15)

Sec. 34.82. Human rights commission created.

To assist in the elimination of discrimination in the city, there is hereby created a commission to be known as the Muncie Human Rights Commission.

- (A) The Commission shall be composed of nine members serving without compensation, except members may be reimbursed for authorized expense incurred in the performance of their duties, providing there are sufficient monies in the Human Rights Commission budget to cover such expenses.
 - (B) The members shall be broadly representative of the economic, racial, ethnic, age, religious, sex, sexual orientation, gender identity, disabled, ancestry, national origin, or United States military service veteran status populations in the city.
 - (C) Each member shall be a registered voter in, and resident of the city.
- (Ord. No. 9-15, § 1(Exh. A), 4-6-15)

Sec. 34.83. Term of office.

- (A) The term of each member shall be three years commencing June 1. No member may serve more than two full consecutive terms.
- (B) Future appointments. The Mayor shall appoint six members and the Common Council shall appoint three members. Terms of office of the present Commission are staggered. On June 1 of each year, there shall be three expirations and three appointments. Of these three appointments, two shall be made by the Mayor and one shall be made by the Common Council.
- (C) In the event of death, removal, or resignation of any member, the member's successor shall be appointed by the Mayor or the Common Council, whichever originally appointed the vacating member, to serve for the unexpired period of the vacated term.
- (D) A member who is absent from three consecutive regular meetings of the Commission or four in a calendar year without good and sufficient cause, will be removed from the Commission. In this case the vacancy caused by the removal shall be filled as in other vacancies.
- (E) Either the Mayor or the Common Council shall, at any time, have the right to remove any member of the Commission appointed by him or it with cause.

(Ord. No. 9-15, § 1(Exh. A), 4-6-15)

Sec. 34.84. Officers.

- (A) The Commission shall elect a Chair at the annual meetings and shall also elect such other officers as the Commission shall desire from among their members. They shall serve until noon of the succeeding January 1.
- (B) The Commission shall appoint an Executive Director who shall serve and be responsible to the Human Rights Commission for daily operations of the Commission and other related duties as assigned by the Commission.
- (C) The Chair or the Executive Director act as the official representative and spokesperson for the Commission. No Commissioner shall speak for the Commission unless designated by the Chair or the Executive Director.

(Ord. No. 9-15, § 1(Exh. A), 4-6-15)

Sec. 34.85. Meetings.

- (A) The Commission shall meet once each month at a regularly published time and place and shall hold special meetings as the Chair deems necessary or at the request of a majority of its members. All regularly scheduled meetings shall be open to the public.
 - (B) A quorum consisting of five (5) Commissioners must be present in order to conduct any business at the regular monthly meetings or special meetings.
- (Ord. No. 9-15, § 1(Exh. A), 4-6-15)

Sec. 34.86. Powers and duties.

The Commission shall have the following powers and duties:

- (A) All powers that may lawfully be conferred upon the Commission pursuant to the applicable provisions of Indiana law including the power to:
 - (1) Investigate, conciliate and hear complaints;
 - (2) Subpoena and compel the attendance of witnesses or production of pertinent documents and records, and make use of such other discovery techniques as shall be necessary to complete investigations or conduct full hearings as provided for in IC 4-22-1 et. seq. and Rule 28(F) of the Indiana Rules of Trial Procedure. Subpoena shall only be used in the investigative and hearing processes.
 - (3) Administer oaths;
 - (4) Examine witnesses;
 - (5) Appoint hearing examiners or panels;
 - (6) Make findings and recommendations;
 - (7) Issue cease and desist orders requiring remedial action;
 - (8) Order payment of actual damages, except that damages to be paid as a result discriminatory practices relating to employment shall be limited to lost wages, salaries, commissions, or fringe benefits;
 - (9) Institute actions for appropriate legal or equitable relief in an appropriate court;
 - (10) Employ an Executive Director and other staff personnel;
 - (11) Adopt rules and regulations;
 - (12) Initiate complaints, except that no person who initiates complaints may participate as a member of the agency in the hearing or disposition of the complaint; and
 - (13) Conduct programs and activities via standing committees to carry out the purposes of the Muncie Human Rights Commission provided for in this subchapter within the territorial boundaries of the city.
- (B) The Executive Director of the Human Rights Commission, will present, in writing, documentation for a subpoena to the City Attorney for the purpose of further conducting an investigation. The City Attorney shall review the documentation provided by the Human Rights Commission and then, in writing, inform the person or party to be subpoenaed. Upon receipt of notification, five (5) working days are allotted to show cause why the subpoena should not be issued. Appropriate weight shall be given to the

information submitted by the person or party in question. The City Attorney will approve or deny the subpoena request based on documentation provided by the Human Rights Commission and the person or party involved. If approved, then the subpoena may be issued as requested by the Executive Director. If denied, then no subpoena shall be issued.

- (C) The Commission shall endeavor to keep itself fully informed concerning the studies and findings of private organizations in respect to the practices falling within the Commission's jurisdiction.
- (D) Commissioners must attend a minimum of two (2) training sessions per year. Failure to meet this minimum will result in the offending commissioner's removal from the Commission at year's end. Training for members of the Commission will be arranged by the Executive Director.

(Ord. No. 9-15, § 1(Exh. A), 4-6-15)

Sec. 34.87. Unlawful discriminatory practices.

- (A) It shall be unlawful for any person to commit any act of discriminatory practice as herein defined.
- (B) Unlawful housing discrimination in the sale or rental of housing (including mobile homes) by any owner, or any real estate operator or any person employed by or acting on behalf of any real estate operator, is prohibited. It shall be an unlawful discriminatory housing practice for any owner, or any real estate operator or any person employed by or acting on behalf of any real estate operator:
 - (1) To refuse to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or to indicate such dwelling is not available for inspection, sale, or rental when such dwelling is in fact so available, or otherwise make unavailable or deny, a dwelling to any person because of race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status;
 - (2) To discriminate against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities in connection therewith, because race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status;
 - (3) To make, print, or publish, or cause to be made, printed, or published any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination based on race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status, or an intention to make any such performance, limitation, or discrimination; and
 - (4) For profit, to induce or attempt to induce any person to sell or rent any dwelling by representations regarding the entry or prospective entry into the neighborhood of a person or persons of a particular race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status.
- (C) Unlawful financial discrimination.
 - (1) It shall be unlawful for any person, herein defined, whose business consists in whole or in part in the appraising of property or the making of real estate loans, to deny a loan or other financial assistance to an applicant therefor, or to discriminate against such applicant in the fixing of amount, interest rate, duration, or other terms or conditions of such loan or other financial assistance, or to make a lower appraisal valuation because of the race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status of such applicant, or of any person connected with such applicant in connection with such loan or other financial assistance or the purposes of such loan or other financial assistance, or of the present or prospective owners, lessees, tenants, or occupants of the dwelling or dwellings in relation to which such loan or other financial assistance is to be made or given; or because of the presence or absence or the prospective presence or absence within a neighborhood of concentrations of persons of a particular race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status.
 - (2) It shall be unlawful for any creditor to discriminate against any person in any credit transaction because of race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status.
- (D) Unlawful employment discrimination.
 - (1) It shall be unlawful for any person or employer to discriminate against any person by treating any such person differently or by excluding from or failing or refusing to extend to any person equal opportunities with respect to hiring, termination, compensation, tenure, or other terms, conditions, or privileges of employment, because of race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status.

- (2) It shall be unlawful for any person or employer to limit, segregate, or classify his/her employees or applicants for employment in any way which would deprive or tend to deprive, any individual of employment opportunities or otherwise adversely affect his or her status as an employer, because of such individual's race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status.
- (3) It shall be unlawful for any employer to fail to make reasonable accommodation to the known physical or mental limitations of an otherwise qualified employee or prospective employee or fail to make reasonable accommodations to the religious observance or practice of any employee or prospective employee unless such employer can demonstrate that the accommodation would impose an undue hardship on the conduct of the employer's business.
- (4) It shall be unlawful for any person to make, print, or publish, or cause to be made, printed or published any notice, statement, or advertisement with respect to employment that indicates a preference, limitation, specification or discrimination based on race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status.
- (5) It shall be unlawful for any employment or agency to fail or refuse to refer for otherwise to discriminate his or her race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status.
- (E) Unlawful labor organization discrimination. It shall be unlawful for a labor organization:
 - (1) To exclude or expel from its membership, or otherwise to discriminate against, any individual because of race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status;
 - (2) To limit, segregate, or classify its member- ship, or applicants for membership, or to classify or fail or refuse to refer for employment any individual in any way which would deprive or tend to deprive any individual of employment opportunities, or otherwise adversely affect his or her status as an employee or as an applicant for employment because of race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status;
 - (3) To cause or attempt to cause an employer to discriminate against an individual in violation of this action.
- (F) Unlawful public place of accommodation or amusement discrimination. It shall be unlawful for any person or establishment which caters or offers its services or facilities or goods to the general public to discriminate against anyone because of race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status.
 - (1) It shall be unlawful for any person to deny another or charge another a higher price than the regular rate for the full and equal enjoyment of any public place of accommodation or amusement because of his or her race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status.
 - (2) It shall be unlawful for any person to directly or indirectly publish, circulate, display, or mail any written communication which he or she knows is to the effect that any of the facilities of any public place of accommodation or amusement will be denied to any person by reason of his or her race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status or that employment or against any individual on the basis of his or her race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status or that the patronage of a person is unwelcome, objectionable, or unacceptable for any of these reasons.
 - (3) It shall be unlawful for any person of any place of public accommodation or amusement to refuse to permit a person with a disability to enter or use any such accommodations as are available for the reason that the person is being assisted by a service animal, unless admission of the service animal

would fundamentally alter the nature of a service or program being provided at the place of public accommodation.

- (a) For purposes of this section, a service animal is defined as a dog that has been individually trained to do work or perform tasks for an individual with a disability.
 - (b) In situations where it is not obvious that the dog is a service animal, staff of any place of public accommodation may ask only two specific questions: (1) is the dog a service animal required because of a disability? and (2) what work or task has the dog been trained to perform?
 - (c) The service animal must always remain under the control of the handler, and must be harnessed, leashed or tethered while in a place of public accommodation unless these devices interfere with the service animal's work or the person's disability prevents use of these devices.
 - (d) A person with a disability accompanied by a service animal shall not be required to provide documentation or credentials as proof that a service animal has been certified, trained or licensed as a service animal.
 - (e) A service animal trainer, while engaged in the training process of a service animal, is entitled to access to any public accommodation.
- (G) Unlawful discrimination in education institutions. It shall be unlawful for any person, establishment, or governmental agency regularly engaged in the offering of education services to discriminate against anyone because of race, color, age, religion, sex, sexual orientation, gender identity, disability, ancestry, national origin, or United States military service veteran status.
- (H) Other unlawful practices:
- (1) It shall be unlawful for any person to aid, abet, incite, compel, or coerce the doing of any act declared by this subchapter to be unlawful.
 - (2) It shall be unlawful for any person knowingly to obstruct the fair and lawful enforcement of this subchapter by coercing or intimidating any complainant or prospective complainant, or any witness to any act made unlawful herein, or by destroying any records, documents or other evidence relevant to any alleged unlawful discriminatory practice as defined herein, after such person has received actual notice of a discrimination charge or has been served notice of a complaint filed.
 - (3) It shall be unlawful for any person to discriminate against any other person with regard to, or to deny any other person access to or opportunities in employment, real estate transactions, education, or public accommodations because any other person has opposed any practice made unlawful by this subchapter, or because other person has made a charge, testified, assisted or participated in any manner in an investigation, proceeding, or hearing under this subchapter.

(Ord. No. 9-15, § 1(Exh. A), 4-6-15; Ord. No. 4-21 , § 1, 4-5-21)

Secs. 34.88—34.94. Reserved.

APPENDIX B
Muncie Human Rights Commission
Complaints

MUNCIE HUMAN RIGHTS COMMISSION COMPLAINTS		
DATE	Reason	Number of Complaints
<u>2015</u>		
August	Race - Black/African American	1
August	Race - White	3
Sept	Race – White	2
Sept	Race - Black/African American	1
Nov	Disability	2
Nov	Familial Status	1
Nov	Retaliation	1
Nov	Harassment	1
Nov	Race - Black/African American	1
Nov	Race - White	3
Total Complaints Received		16
<u>2016</u>		
Dec	Race - Black/African American	3
Dec	Race - White	1
Total Complaints Received		4
<u>2017</u>		
Feb	Race - White	1
Feb	Harassment	1
March	Race - White	1
Oct	Race - White	1
Oct	Race - Black/African American	3
Total Complaints Received		7
<u>2018</u>		
Mar	Race - White	1
June	Sexual Harassment	1
July	Disability	2
Aug	Race - White	3
Aug	Disability	3
Sept	Race – Black/African American	2
Oct	Race - White	2
Oct	Race - Black/African American	1
Nov	Race - Black/African American	1
Nov	Disability	1
Dec	Race - White	1
Total Complaints Received		18
<u>2019</u>		
Jan	Race - White	1
Feb	Race - Black/African American	1
Mar	Race - Black/African American	2
Mar	Race - White	1
Apr	Race - Black/African American	2
May	Race - White	2
June	Race - Black/African American	1
July	Disability	1
Aug	Disability	1
Sept	Disability	2
Oct	Disability	1
Oct	Race - Black/African American	1
Oct	Race - White	1
Nov	Disability	1
Dec	Race - Black/African American	2
Dec	Sexual Harassment	1
Total Complaints Received		21
TOTAL Complaints – 2015 - 2019		66

APPENDIX C
Consultation Community Focus Groups

Groups invited to participate in Community Focus Groups

Organization	Category
A Better Way Services	Continuum of Care Agencies
Bridges Community Services Inc	Continuum of Care Agencies
Christian Ministries	Continuum of Care Agencies
Muncie Mission	Continuum of Care Agencies
Region 6 Continuum of Care Homeless Prevent Network	Continuum of Care Agencies
YWCA	Continuum of Care Agencies
Delaware County Home Savers	Housing and Community Development Organizations
ecoREHAB	Housing and Community Development Organizations
Greater Muncie, IN Habitat for Humanity	Housing and Community Development Organizations
IHCDA	Housing and Community Development Organizations
Muncie Bicycle-Pedestrian Committee	Housing and Community Development Organizations
Muncie Building Commissioner's Office	Housing and Community Development Organizations
Muncie Historic Preservation & Rehabilitation Commison	Housing and Community Development Organizations
Muncie Homeownership & Revitalization	Housing and Community Development Organizations
Muncie Housing Authority	Housing and Community Development Organizations
Muncie Urban Forestry	Housing and Community Development Organizations
Muncie-Delaware Clean & Beautiful	Housing and Community Development Organizations
PathStone	Housing and Community Development Organizations
Urban Light CDC	Housing and Community Development Organizations
World Changers	Housing and Community Development Organizations
Alpha Center	Human Services
Center Township Trustee's Office	Human Services
Collective Coalition of Concerned Clergy	Human Services
Cornerstone	Human Services
Hillcroft Services	Human Services
Inside Out CDC	Human Services
Meridian Health Services	Human Services
Muncie Delaware County Senior Center	Human Services
Muncie Human Rights Commission	Human Services
Muncie Street Outreach	Human Services
Muncie Victim Advocate	Human Services
Second Harvest Food Bank	Human Services
The Arc of Indiana Foundation	Human Services
The Salvation Army	Human Services
BSU - Office of Community Engagement	Neighborhood Organizations
Muncie Action Plan	Neighborhood Organizations
Muncie Action Plan – Neighborhood Leadership Council	Neighborhood Organizations
Whitely Community Council	Neighborhood Organizations
Back to School Teacher's Store	Workforce Development and Economic Development Organizations
Muncie Funders Forum	Workforce Development and Economic Development Organizations
Muncie Redevelopment Commission	Workforce Development and Economic Development Organizations
Muncie-Delaware County Chamber of Commerce	Workforce Development and Economic Development Organizations
Sustainable Muncie	Workforce Development and Economic Development Organizations
United Way of East Central Indiana	Workforce Development and Economic Development Organizations
Boys & Girls Clubs of Muncie	Youth and Educational Service Organizations
BYS	Youth and Educational Service Organizations
Huffer Memorial Children's Center, INC	Youth and Educational Service Organizations
Inspire Academy	Youth and Educational Service Organizations
Motivate Our Minds	Youth and Educational Service Organizations
Muncie Community Schools	Youth and Educational Service Organizations
Ross Center	Youth and Educational Service Organizations
TeenWorks	Youth and Educational Service Organizations
United Day Care Center	Youth and Educational Service Organizations
Unity Center	Youth and Educational Service Organizations

APPENDIX D
Community Survey for Consolidated Plan &
Analysis of Impediments to Fair Housing

Appendix D – Community Survey

City of Muncie Office of Community Development



The city of Muncie – 2020-2024 Consolidated Plan and Analysis of Impediments to Fair Housing Choice

How would you spend \$1,500,000? Each year, the City of Muncie receives approximately \$1,500,000 of federal housing and community development grants to spend on projects in your community.

As a community member your input is critical, and your voice should be heard. Take this short survey and help us create Muncie's Consolidated Plan. Raise your hand!

1) What zip code do you live in the City of Muncie? (Please select one)

- ☐ 47302 – Muncie, IN
- ☐ 47303 – Muncie, IN
- ☐ 47304 – Muncie, IN
- ☐ 47305 – Muncie, IN
- ☐ 47306 – Muncie, IN

2) Which of the following best describes you? (Please select one)

- ☐ Homeowner
- ☐ Renter
- ☐ Homeless

3) Do you identify as any of the following? Please select any that may apply.

- ☐ A member of a minority race such as African American, Asian, American Indian, Pacific Islander, Multiple Races, or Other Race Not Mentioned that is not White
 - ☐ A member of a minority ethnicity such as Hispanic
 - ☐ Person living with a disability
 - ☐ Person experiencing homelessness or who has experienced homelessness
 - ☐ Person who has experienced an eviction or forced to move
 - ☐ Person who has experienced domestic violence
 - ☐ Single Parent, male or female
 - ☐ Person 62 or older
 - ☐ Individual or household living in poverty
 - ☐ I do not identify with any of the above
-

4) When looking for a place to live in Muncie, have you experienced any discrimination? (If no, please skip to question #12)

- ☐ Yes
 - ☐ No
-

5) Please tell where you would report housing discrimination.

6) On what basis do you believe you were discriminated against, select all that apply.

- ☐ Race
- ☐ Color
- ☐ Religion
- ☐ National Origin
- ☐ Ancestry
- ☐ Sex
- ☐ Marital Status
- ☐ Sexual Orientation
- ☐ Age
- ☐ Family Status
- ☐ Source of Income
- ☐ Disability
- ☐ Other

7) Where did the discrimination take place? Select all that may apply.

- ☐ Apartment complex
- ☐ Condo development
- ☐ Public or subsidized housing project
- ☐ Trailer or mobile home park
- ☐ Bank/lending institution
- ☐ Non-profit agency
- ☐ Other

8) Who do you believe discriminated against you? Select all that may apply.

- ☐ Landlord/property manager
- ☐ Real estate agent
- ☐ Mortgage lender
- ☐ Non-profit agency employee
- ☐ Other

9) Please identify the neighborhood where you experienced discrimination? Please select all that may apply.

<input type="checkbox"/> Anthony	<input type="checkbox"/> Norwood
<input type="checkbox"/> Aultshire	<input type="checkbox"/> Old West End
<input type="checkbox"/> Blaine	<input type="checkbox"/> Orchard Lawn
<input type="checkbox"/> East Central	<input type="checkbox"/> Pettigrews Acres
<input type="checkbox"/> Eastside	<input type="checkbox"/> Riverside/Normal City
<input type="checkbox"/> Forest Park	<input type="checkbox"/> South Central
<input type="checkbox"/> Gilbert	<input type="checkbox"/> Southeast
<input type="checkbox"/> Industry	<input type="checkbox"/> Thomas Park/Avondale
<input type="checkbox"/> McKinley	<input type="checkbox"/> Westridge
<input type="checkbox"/> Minnetrista	<input type="checkbox"/> Westside
<input type="checkbox"/> Morningside	<input type="checkbox"/> Whitely
<input type="checkbox"/> Northview	<input type="checkbox"/> Other

10) If you believe you have been discriminated against, have you reported the incident?

- ☐ Yes
☐ No
-

11) If no, what is the primary reason you haven't reported the incident?

- ☐ Don't know where to report
☐ Afraid of retaliation
☐ Don't believe it makes any difference
☐ Other

12) Rank the following according to what you consider to be the urgent housing needs in the City of Muncie. Please check one for each housing need.

	1 (Not Urgent)	2 (Somewhat Urgent)	3 (Urgent)
Repair assistance to homeowners	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Creation of new, affordable housing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rehabilitation of foreclosed or vacant housing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Creation of safe, decent and affordable rental housing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Creation of housing with services - assistance for homeless neighbors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Creation of housing with services - assistance for senior citizens or disabled neighbors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rent assistance to low income tenants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Creation of emergency shelter beds (short term stays)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Creation of transitional housing (for stays less than 2 years)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Create affordable housing for veterans.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please specify)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

13) Rank the following according to what you consider to be the urgent community development needs in the City of Muncie. Please check one for each community need.

	1 (Not Urgent)	2 (Somewhat Urgent)	3 (Urgent)
Repair/replace curbs/sidewalks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Repair/upgrade street or sewers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Park upgrades	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Crime prevention	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Business attraction	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Job creation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Upgrade/renovate community centers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please specify)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Rank the following according to what you consider to be the urgent social services needs in the City of Muncie. Please check one for each social services need.

	1 (Not Urgent)	2 (Somewhat Urgent)	3 (Urgent)
Youth programs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Senior citizen programs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Programs for disabled neighbors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Programs for people with HIV/AIDS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Green programs/environmental awareness	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public transportation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Legal services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Child care	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please specify)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Your answers will help to ensure representation from all income levels and age groups.

14) Please select the annual income of your household. (Please select one)

- ☐ Under \$15,000
 - ☐ Between \$15,000 and \$29,999
 - ☐ Between \$30,000 and \$44,999
 - ☐ Between \$45,000 and \$59,999
 - ☐ Between \$60,000 and \$74,999
 - ☐ Over \$75,000
-

15) What is the size of your household?

- ☐ One Person
 - ☐ Two Person
 - ☐ Three Person
 - ☐ Four Person
 - ☐ Five or More Persons
-

16) What is your age?

- ☐ Under 18 years old
- ☐ 18-24 years old
- ☐ 25-34 years old
- ☐ 35-44 years old
- ☐ 45-54 years old
- ☐ 55-64 years old
- ☐ 65 years old or older

Appendix F – Community Survey Results Data

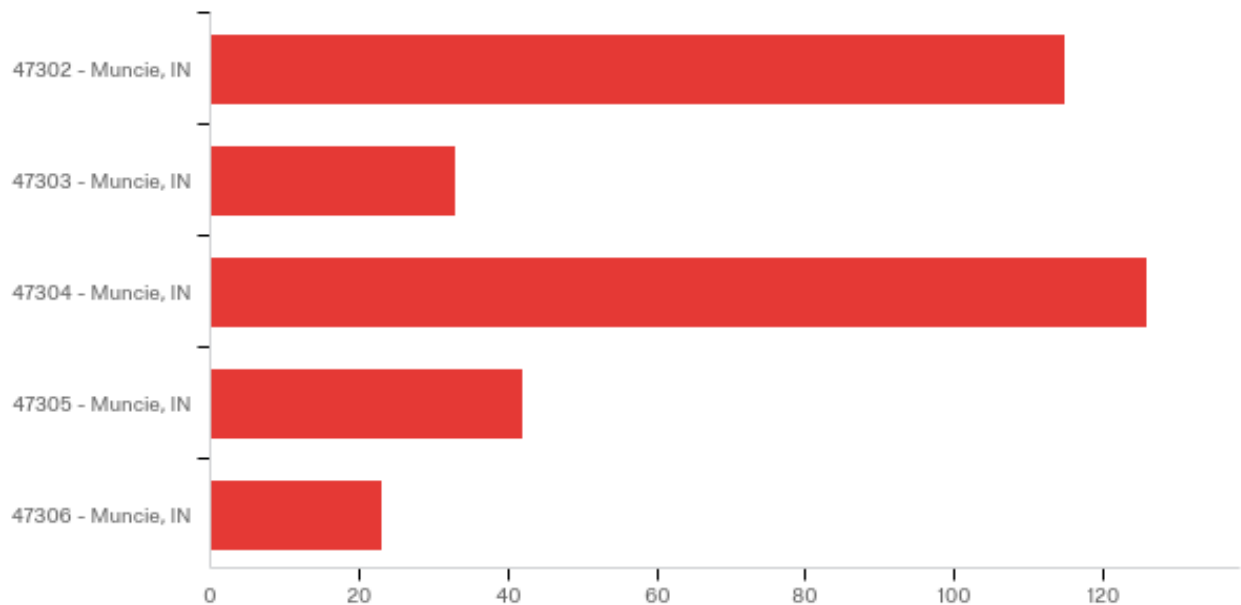
City of Muncie – 2020-2024 Consolidated Plan
January 28th, 2020, 5:34 pm EST

Number of Respondents - 339

APPENDIX E

Community Survey Results

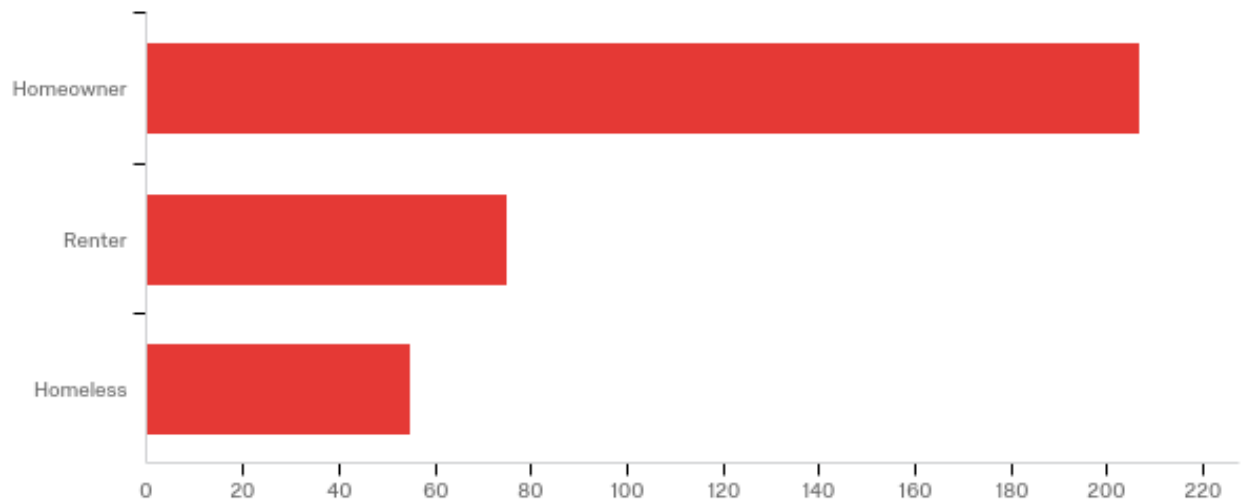
Q2 - What zip code do you live in the City of Muncie?



#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
1	What zip code do you live in the City of Muncie?	1.00	5.00	2.48	1.26	1.58	339

#	Answer	%	Count
1	47302 - Muncie, IN	33.92%	115
2	47303 - Muncie, IN	9.73%	33
3	47304 - Muncie, IN	37.17%	126
4	47305 - Muncie, IN	12.39%	42
5	47306 - Muncie, IN	6.78%	23
	Total	100%	339

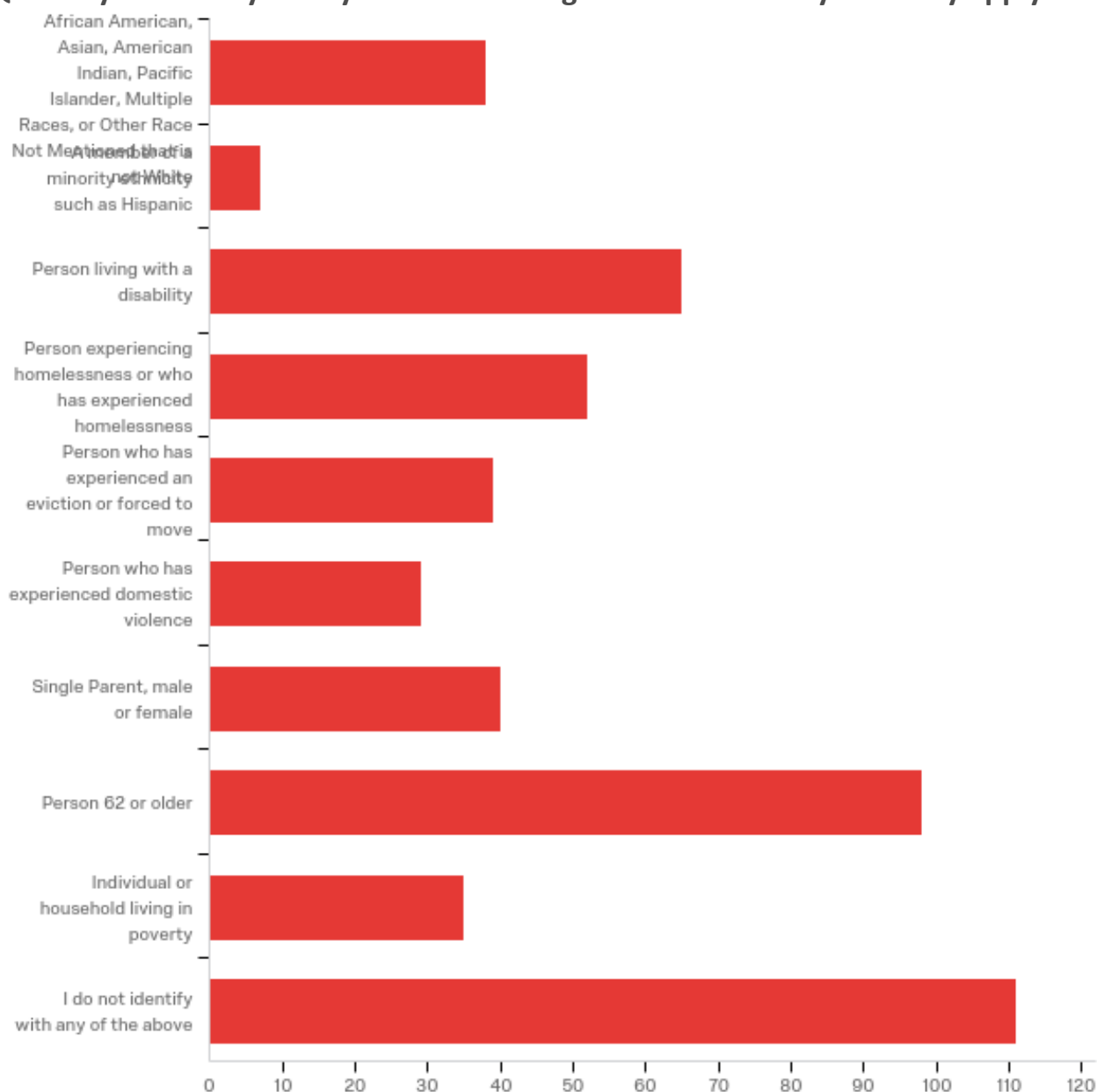
Q4 - Which of the following best describes you?



#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
1	Which of the following best describes you?	1.00	3.00	1.55	0.76	0.57	337

#	Answer	%	Count
1	Homeowner	61.42%	207
2	Renter	22.26%	75
3	Homeless	16.32%	55
	Total	100%	337

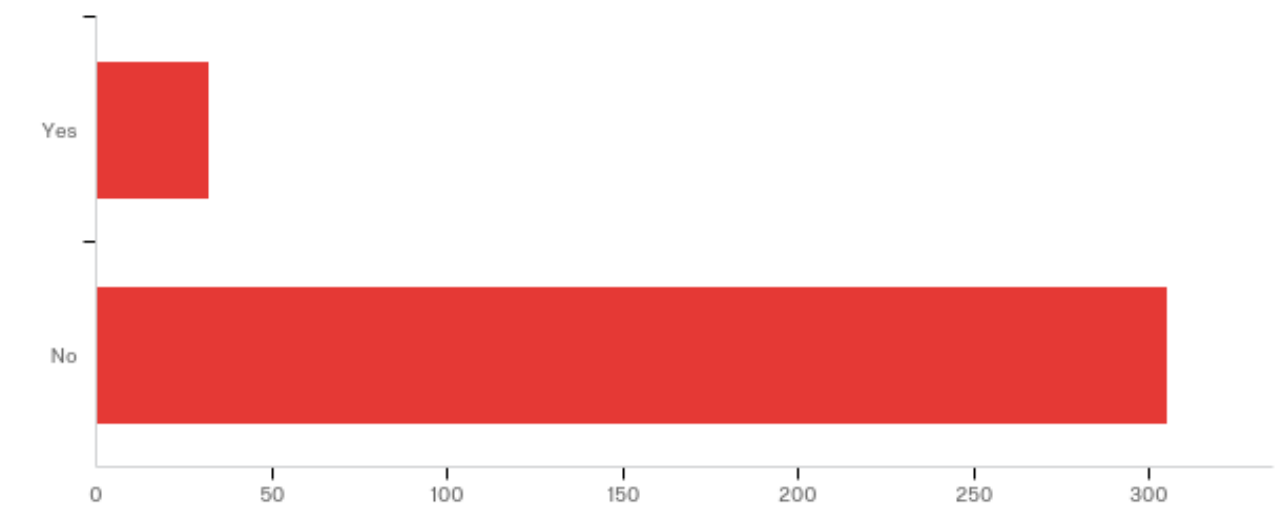
Q3 - Do you identify as any of the following? Please select any that may apply.



#	Answer	%	Count
1	A member of a minority race such as African American, Asian, American Indian, Pacific Islander, Multiple Races, or Other Race Not Mentioned that is not White	7.39%	38
2	A member of a minority ethnicity such as Hispanic	1.36%	7
3	Person living with a disability	12.65%	65
4	Person experiencing homelessness or who has experienced homelessness	10.12%	52
5	Person who has experienced an eviction or forced to move	7.59%	39

6	Person who has experienced domestic violence	5.64%	29
7	Single Parent, male or female	7.78%	40
8	Person 62 or older	19.07%	98
9	Individual or household living in poverty	6.81%	35
10	I do not identify with any of the above	21.60%	111
	Total	100%	514

Q5 - When looking for a place to live in Muncie, have you experienced any discrimination?



#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
1	When looking for a place to live in Muncie, have you experienced any discrimination?	1.00	2.00	1.91	0.29	0.09	337

#	Answer	%	Count
1	Yes	9.50%	32
2	No	90.50%	305
	Total	100%	337

Q6 - Please tell where you would report housing discrimination.

Please tell where you would report housing discrimination.

Human Rights Commission

Human rights comm. - city hall

Bridges/City

Attorney General

I have no clue

Middletown gardend

Not allowing 9 year old pit bull because of breed

Unsure.

City Hill

Bridges Center

not a clue

HUD

City hall

Not sure

Human Rights off with Yvonne.

No idea

Steve Slavin from Caldwell Banker Real Estate

Unknown at the time - know now to report to victim's advocate office

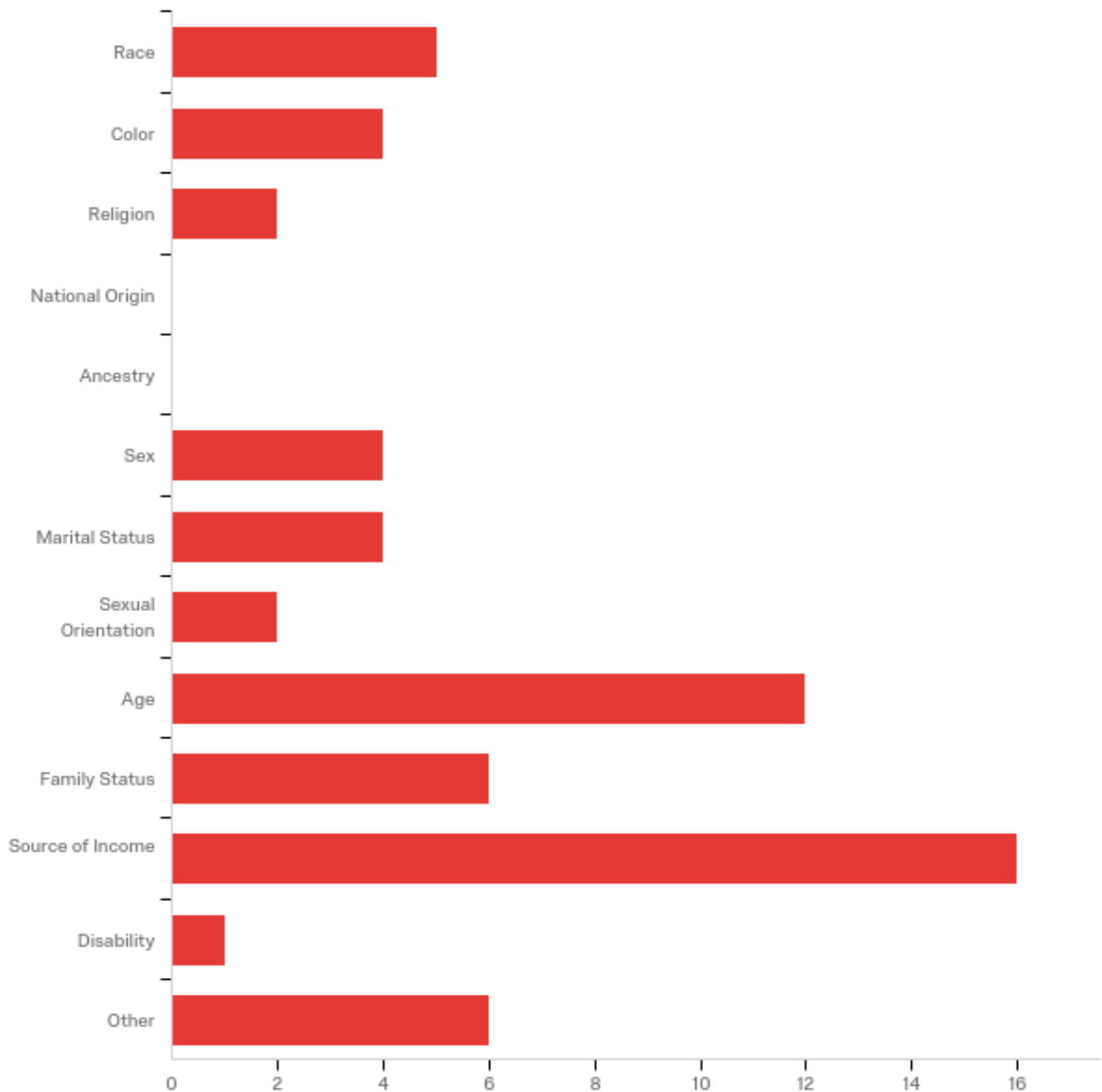
I don't know.

I don't know

I don't know

Habitat for humanity amd all other housing programs in muncie

Q7 - On what basis do you believe you were discriminated against, select all that apply.



#	Answer	%	Count
1	Race	8.06%	5
2	Color	6.45%	4
3	Religion	3.23%	2
4	National Origin	0.00%	0
5	Ancestry	0.00%	0

6	Sex	6.45%	4
7	Marital Status	6.45%	4
8	Sexual Orientation	3.23%	2
9	Age	19.35%	12
10	Family Status	9.68%	6
11	Source of Income	25.81%	16
12	Disability	1.61%	1
13	Other	9.68%	6
	Total	100%	62

Q7_13_TEXT - Other

Other - Text

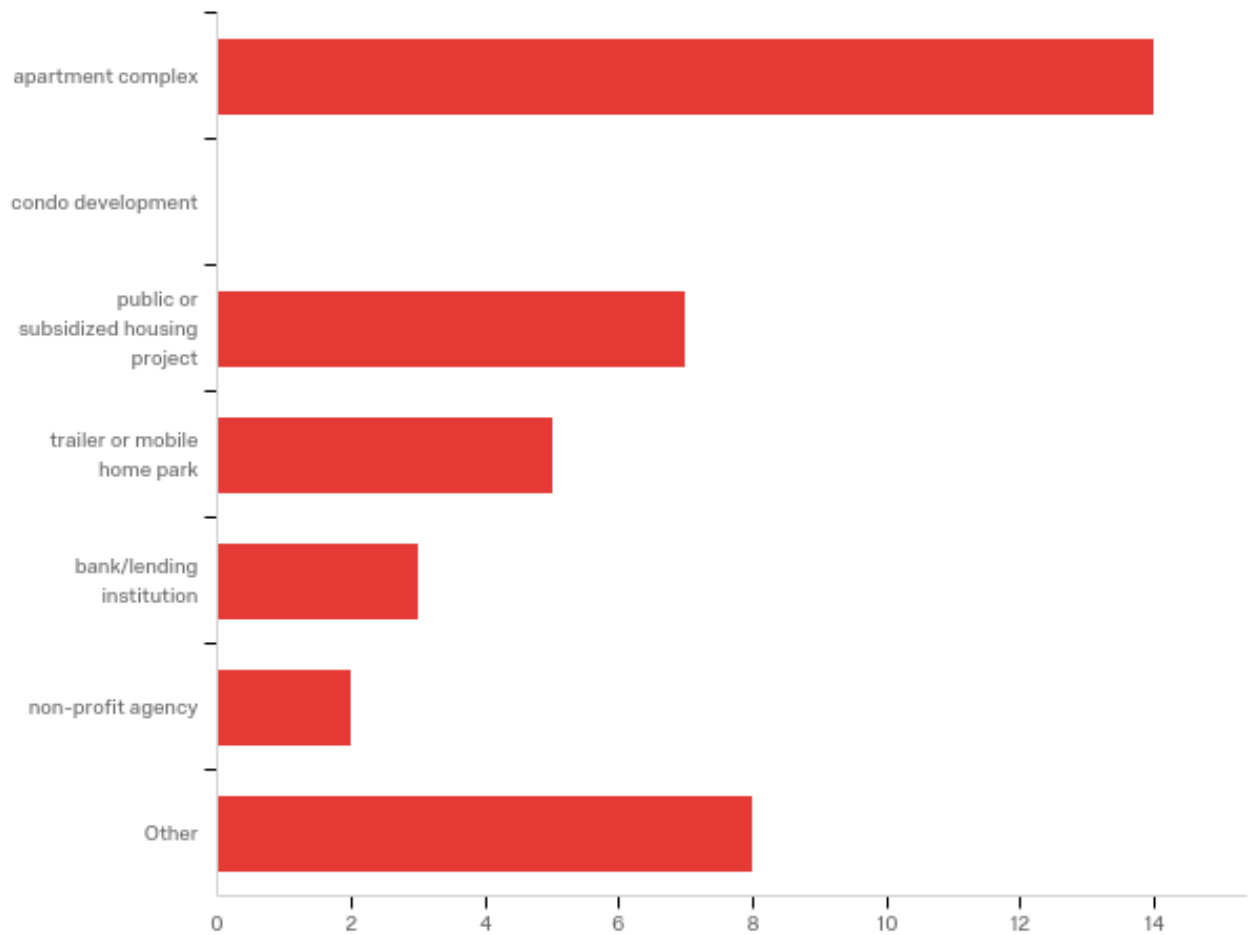
Credit

Responsible pet owner. Couldn't afford 1 million in insurance

Income

History of Addiction

Q8 - Where did the discrimination take place? Select all that may apply.



#	Answer	%	Count
1	apartment complex	35.90%	14
2	condo development	0.00%	0
3	public or subsidized housing project	17.95%	7
4	trailer or mobile home park	12.82%	5
5	bank/lending institution	7.69%	3
6	non-profit agency	5.13%	2
7	Other	20.51%	8
	Total	100%	39

Q8_7_TEXT - Other

Other - Text

No Ramp

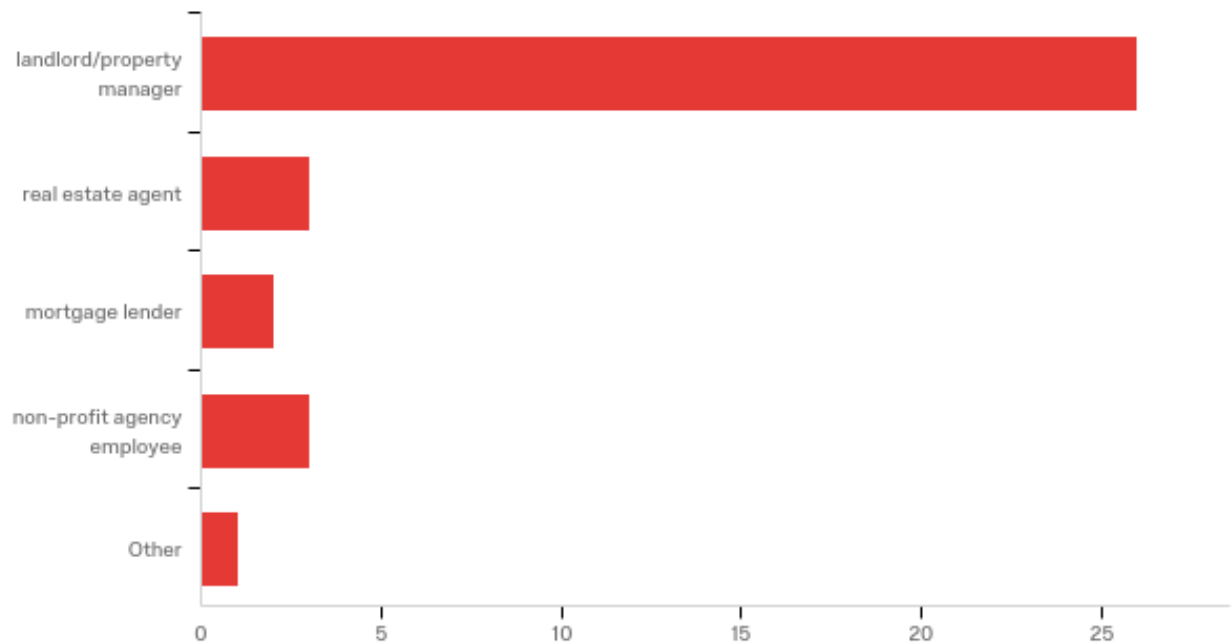
Private Landlord

House Rental

different sides of the town

Private landlords

Q9 - Who do you believe discriminated against you? Select all that may apply.



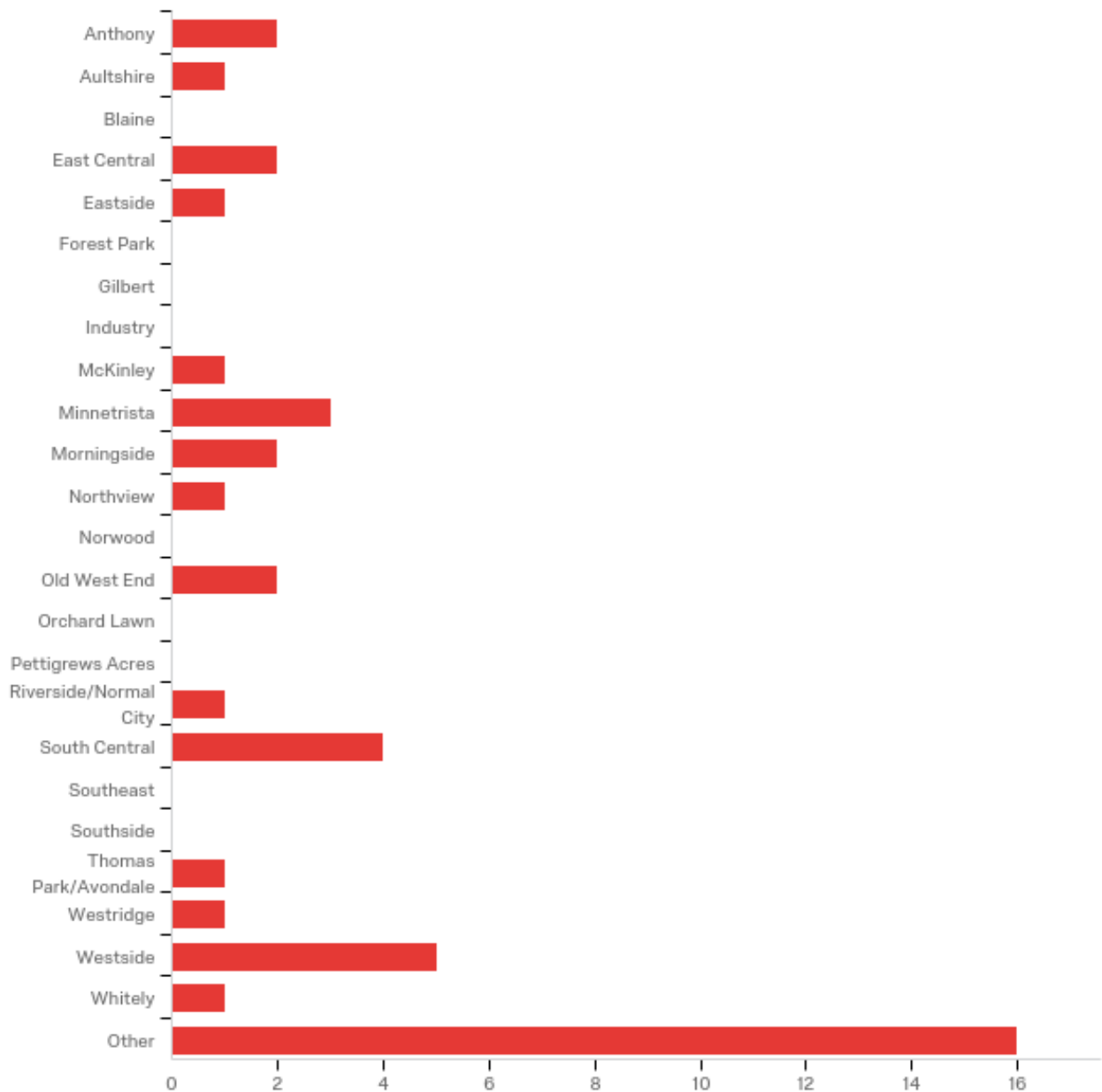
#	Answer	%	Count
1	landlord/property manager	74.29%	26
2	real estate agent	8.57%	3
3	mortgage lender	5.71%	2
4	non-profit agency employee	8.57%	3
5	Other	2.86%	1
	Total	100%	35

Q9_5_TEXT - Other

Other - Text

Owner

Q10 - Please identify the neighborhood where you experienced discrimination? Please select all that may apply.



#	Answer	%	Count
1	Anthony	4.55%	2
2	Aultshire	2.27%	1
3	Blaine	0.00%	0
4	East Central	4.55%	2
5	Eastside	2.27%	1

6	Forest Park	0.00%	0
7	Gilbert	0.00%	0
8	Industry	0.00%	0
9	McKinley	2.27%	1
10	Minnetrista	6.82%	3
11	Morningside	4.55%	2
12	Northview	2.27%	1
13	Norwood	0.00%	0
14	Old West End	4.55%	2
15	Orchard Lawn	0.00%	0
16	Pettigrews Acres	0.00%	0
17	Riverside/Normal City	2.27%	1
18	South Central	9.09%	4
19	Southeast	0.00%	0
20	Southside	0.00%	0
21	Thomas Park/Avondale	2.27%	1
22	Westridge	2.27%	1
23	Westside	11.36%	5
24	Whitely	2.27%	1
25	Other	36.36%	16
	Total	100%	44

Q10_25_TEXT - Other

Other - Text

hartford city

behind northwest plaza

on kilgore

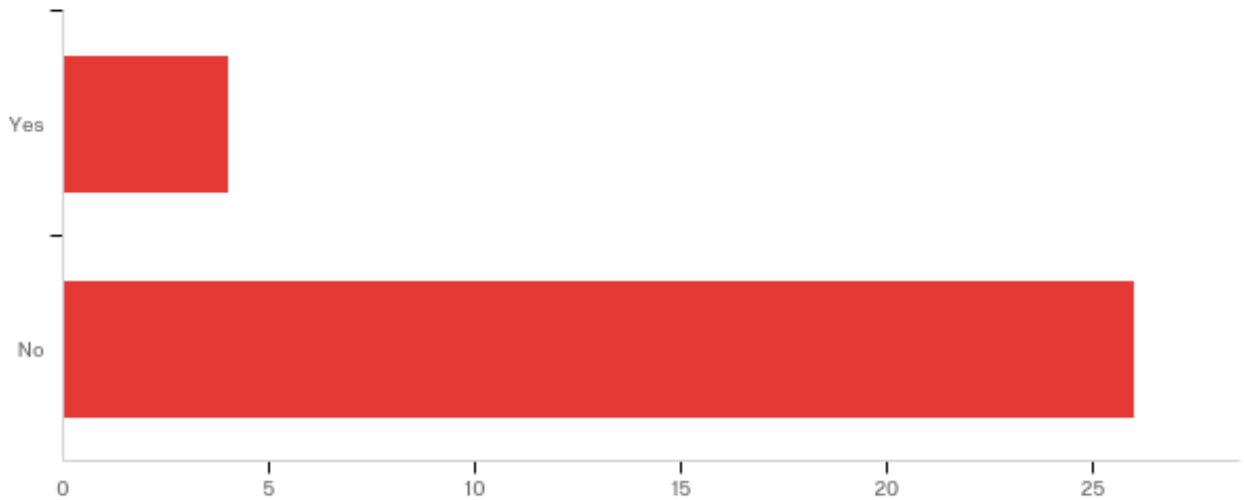
Middletown gardens

neighborhoods surrounding bsu campus

Everywhere

Downtown Bridges Community services building on liberty and Charles street

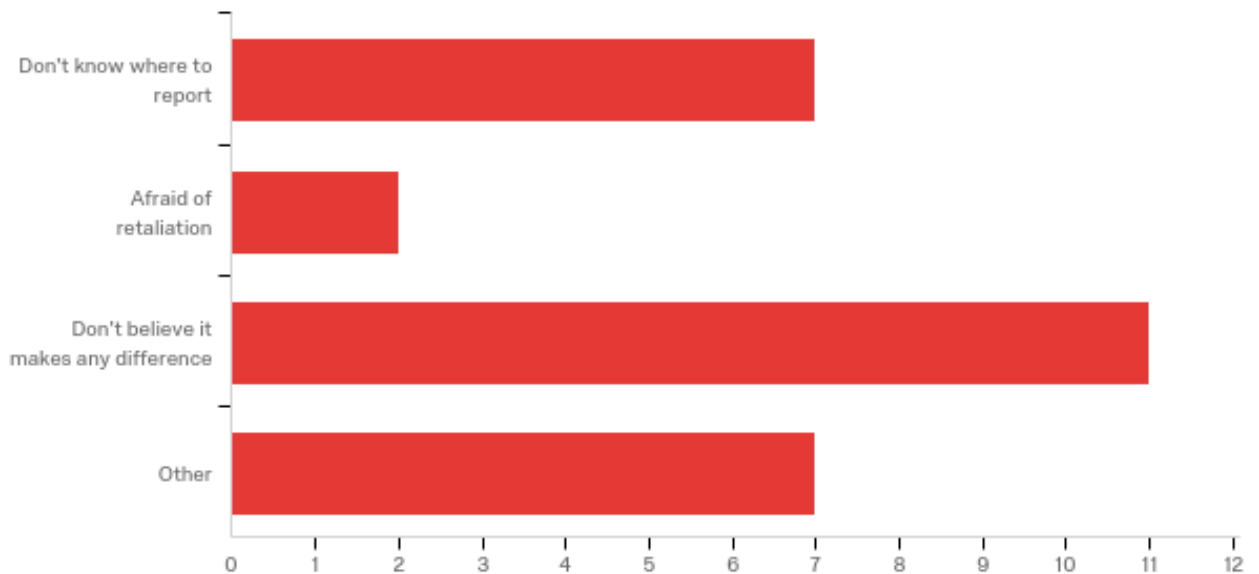
Q11 - If you believe you have been discriminated against, have you reported the incident?



#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
1	If you believe you have been discriminated against, have you reported the incident?	1.00	2.00	1.87	0.34	0.12	30

#	Answer	%	Count
1	Yes	13.33%	4
2	No	86.67%	26
	Total	100%	30

Q12 - If no, what is the primary reason you haven't reported the incident?



#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
1	If no, what is the primary reason you haven't reported the incident? - Selected Choice	1.00	4.00	2.67	1.12	1.26	27

#	Answer	%	Count
1	Don't know where to report	25.93%	7
2	Afraid of retaliation	7.41%	2
3	Don't believe it makes any difference	40.74%	11
4	Other	25.93%	7
	Total	100%	27

Q12_4_TEXT - Other

Other - Text

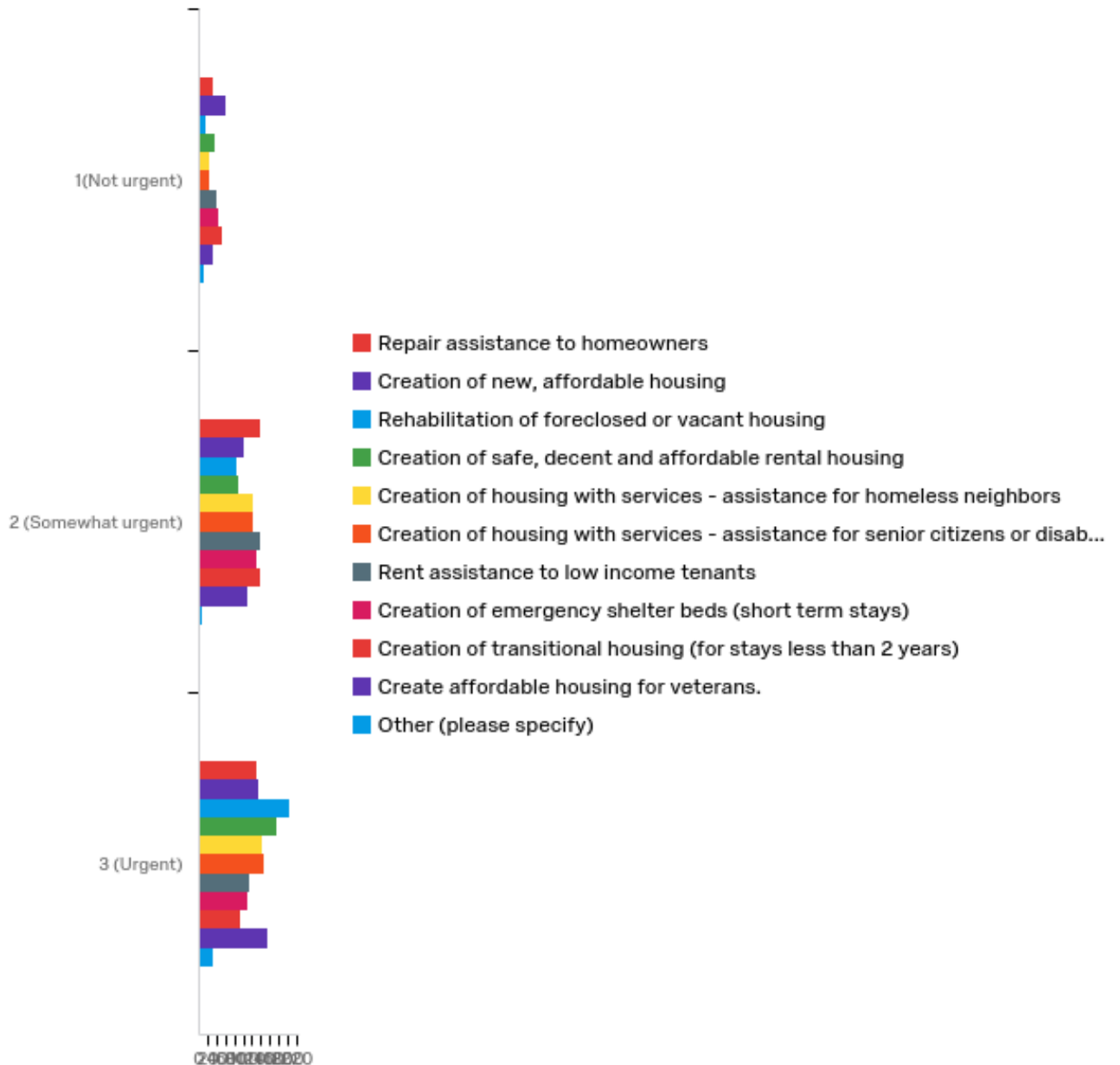
Resolved

Made Arrangements for Deposit

it was when i first arrived into muncie and i was alot younger and did not realize it was happening

All of the above it would not let me pick more than one answer

Q13 - Rank the following according to what you consider to be the urgent housing needs in the City of Muncie.

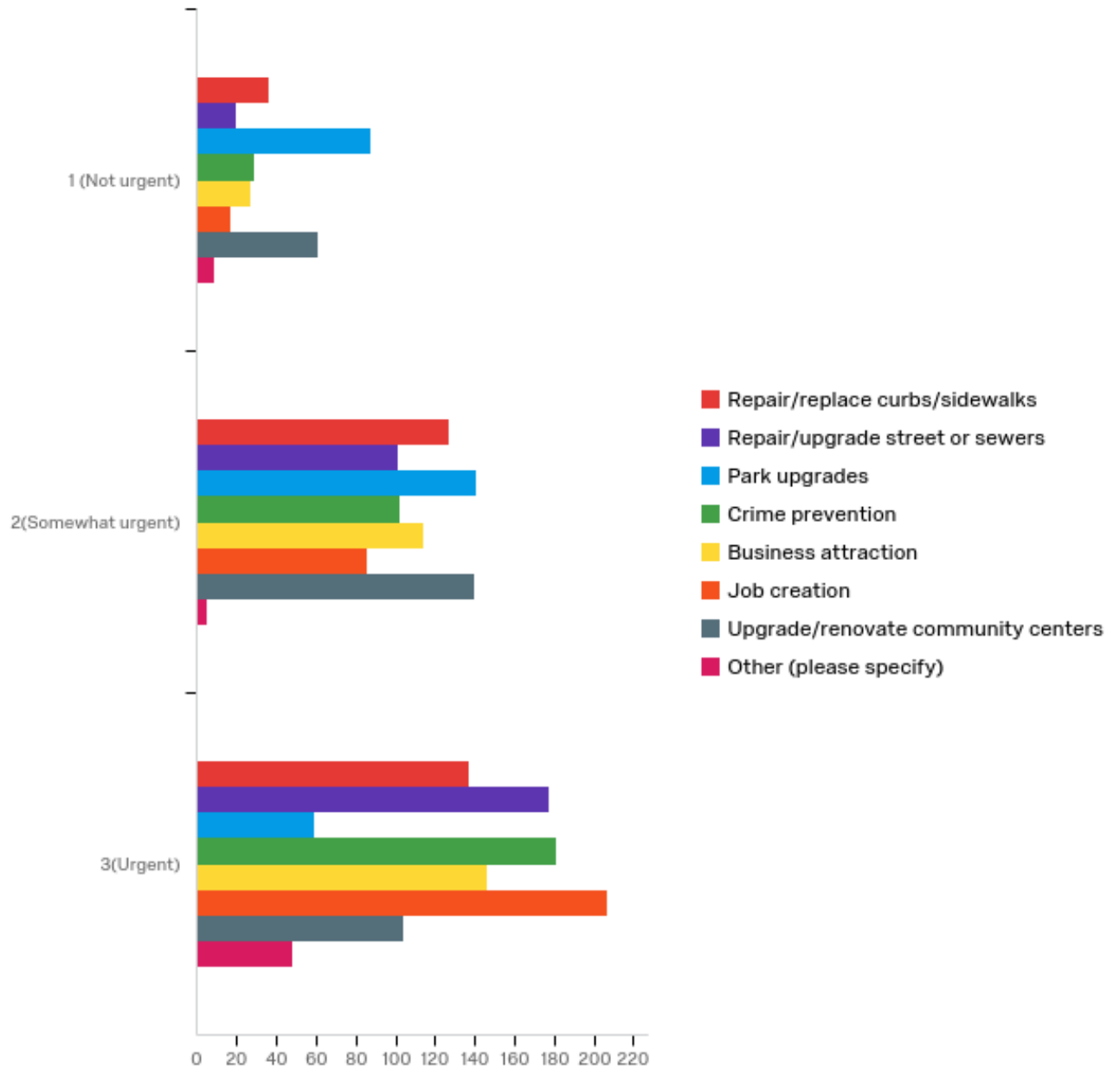


#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
1	Repair assistance to homeowners	1.00	3.00	2.33	0.66	0.43	302
2	Creation of new, affordable housing	1.00	3.00	2.25	0.77	0.59	296
3	Rehabilitation of foreclosed or vacant housing	1.00	3.00	2.63	0.57	0.32	304
4	Creation of safe, decent and affordable rental housing	1.00	3.00	2.48	0.69	0.48	299

5	Creation of housing with services - assistance for homeless neighbors	1.00	3.00	2.41	0.63	0.40	287
6	Creation of housing with services - assistance for senior citizens or disabled neighbors	1.00	3.00	2.42	0.64	0.41	293
7	Rent assistance to low income tenants	1.00	3.00	2.25	0.68	0.46	291
8	Creation of emergency shelter beds (short term stays)	1.00	3.00	2.24	0.69	0.48	282
9	Creation of transitional housing (for stays less than 2 years)	1.00	3.00	2.15	0.70	0.49	283
10	Create affordable housing for veterans.	1.00	3.00	2.41	0.68	0.46	298
11	Other (please specify)	1.00	3.00	2.47	0.81	0.65	45

#	Question	1 (Not urgent)		2 (Somewhat urgent)		3 (Urgent)		Total
1	Repair assistance to homeowners	10.60%	32	46.03%	139	43.38%	131	302
2	Creation of new, affordable housing	20.27%	60	34.46%	102	45.27%	134	296
3	Rehabilitation of foreclosed or vacant housing	4.61%	14	27.30%	83	68.09%	207	304
	Creation of safe, decent and affordable rental housing	11.37%	34	29.43%	88	59.20%	177	299
	Creation of housing with services - assistance for homeless neighbors	8.01%	23	42.51%	122	49.48%	142	287
	Creation of housing with services - assistance for senior citizens or disabled neighbors	8.19%	24	41.30%	121	50.51%	148	293
	Rent assistance to low income tenants	13.40%	39	47.77%	139	38.83%	113	291
	Creation of emergency shelter beds (short term stays)	14.89%	42	46.45%	131	38.65%	109	282
	Creation of transitional housing (for stays less than 2 years)	18.02%	51	49.12%	139	32.86%	93	283
	Create affordable housing for veterans.	11.07%	33	36.91%	110	52.01%	155	298
	Other (please specify)	20.00%	9	13.33%	6	66.67%	30	45

Q14 - Rank the following according to what you consider to be the urgent community development needs in the City of Muncie.

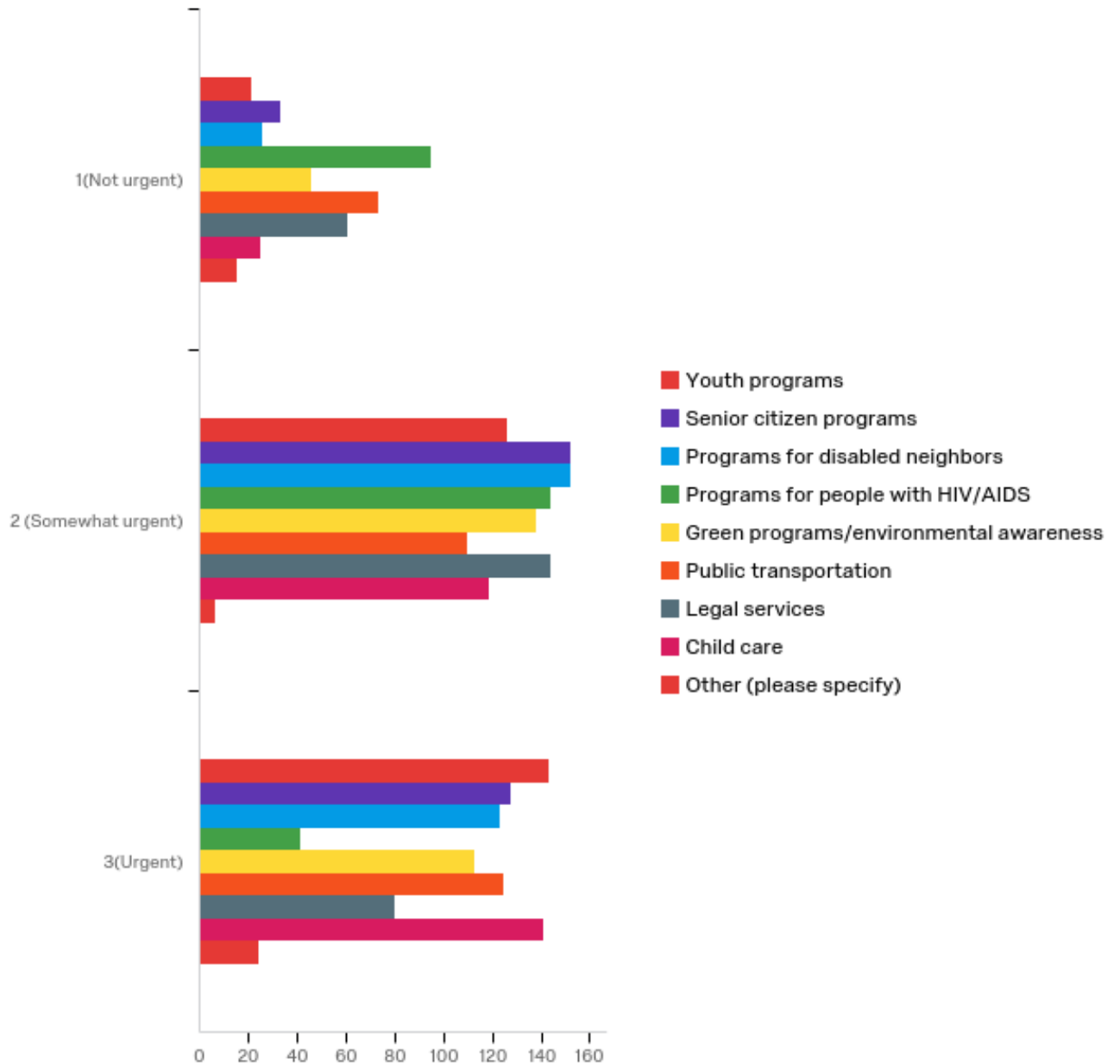


#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
1	Repair/replace curbs/sidewalks	1.00	3.00	2.34	0.68	0.46	300
2	Repair/upgrade street or sewers	1.00	3.00	2.53	0.62	0.38	298
3	Park upgrades	1.00	3.00	1.90	0.71	0.50	288
4	Crime prevention	1.00	3.00	2.49	0.66	0.44	312

5	Business attraction	1.00	3.00	2.41	0.66	0.43	287
6	Job creation	1.00	3.00	2.61	0.59	0.35	310
7	Upgrade/renovate community centers	1.00	3.00	2.14	0.72	0.52	305
8	Other (please specify)	1.00	3.00	2.63	0.72	0.52	62

#	Question	1 (Not urgent)		2 (Somewhat urgent)		3 (Urgent)		Total
1	Repair/replace curbs/sidewalks	12.00%	36	42.33%	127	45.67%	137	300
2	Repair/upgrade street or sewers	6.71%	20	33.89%	101	59.40%	177	298
3	Park upgrades	30.56%	88	48.96%	141	20.49%	59	288
	Crime prevention	9.29%	29	32.69%	102	58.01%	181	312
	Business attraction	9.41%	27	39.72%	114	50.87%	146	287
	Job creation	5.48%	17	27.74%	86	66.77%	207	310
	Upgrade/renovate community centers	20.00%	61	45.90%	140	34.10%	104	305
	Other (please specify)	14.52%	9	8.06%	5	77.42%	48	62

Q15 - Rank the following according to what you consider to be the urgent public service needs in the City of Muncie.

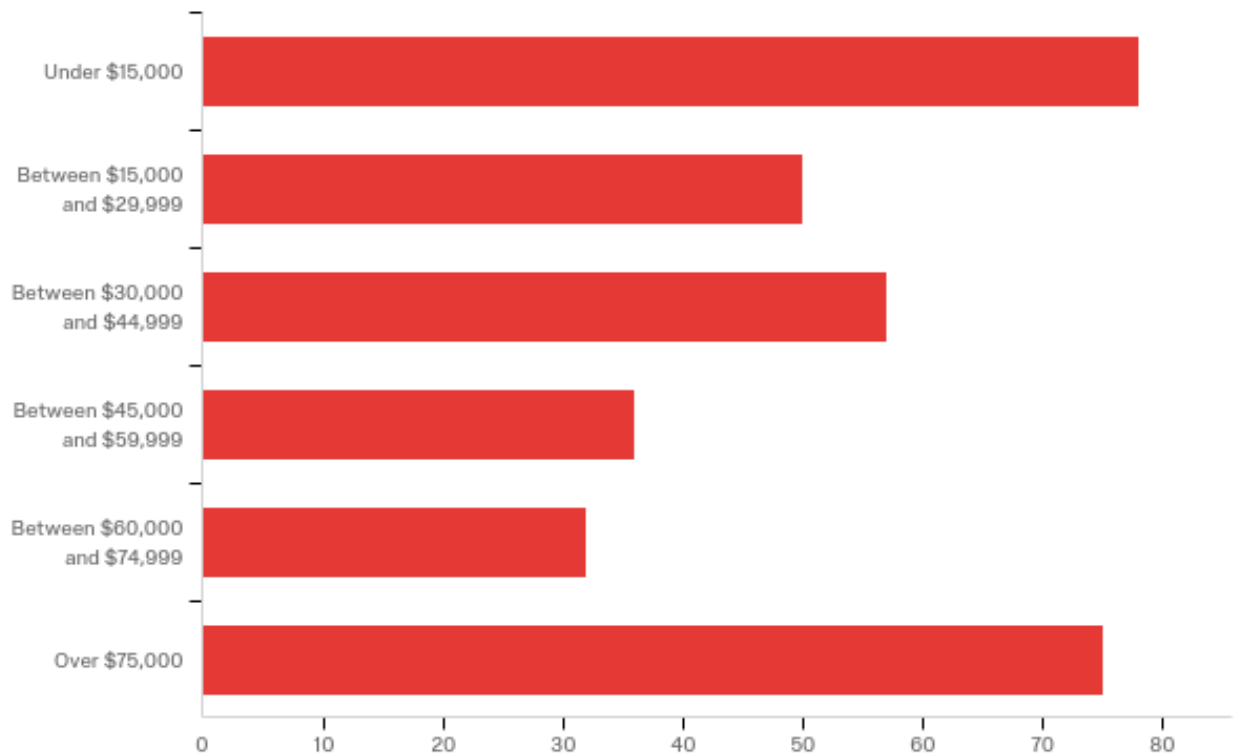


#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
1	Youth programs	1.00	3.00	2.42	0.62	0.39	290
2	Senior citizen programs	1.00	3.00	2.30	0.65	0.42	313
3	Programs for disabled neighbors	1.00	3.00	2.32	0.63	0.39	301
4	Programs for people with HIV/AIDS	1.00	3.00	1.81	0.67	0.45	280

5	Green programs/environmental awareness	1.00	3.00	2.23	0.70	0.48	297
6	Public transportation	1.00	3.00	2.17	0.78	0.61	308
7	Legal services	1.00	3.00	2.07	0.70	0.49	285
8	Child care	1.00	3.00	2.41	0.65	0.42	285
9	Other (please specify)	1.00	3.00	2.20	0.91	0.83	45

#	Question	1 (Not urgent)		2 (Somewhat urgent)		3 (Urgent)		Total
1	Youth programs	7.24%	21	43.45%	126	49.31%	143	290
2	Senior citizen programs	10.54%	33	48.56%	152	40.89%	128	313
3	Programs for disabled neighbors	8.64%	26	50.50%	152	40.86%	123	301
	Programs for people with HIV/AIDS	33.93%	95	51.43%	144	14.64%	41	280
	Green programs/environmental awareness	15.49%	46	46.46%	138	38.05%	113	297
	Public transportation	23.70%	73	35.71%	110	40.58%	125	308
	Legal services	21.40%	61	50.53%	144	28.07%	80	285
	Child care	8.77%	25	41.75%	119	49.47%	141	285
	Other (please specify)	33.33%	15	13.33%	6	53.33%	24	45

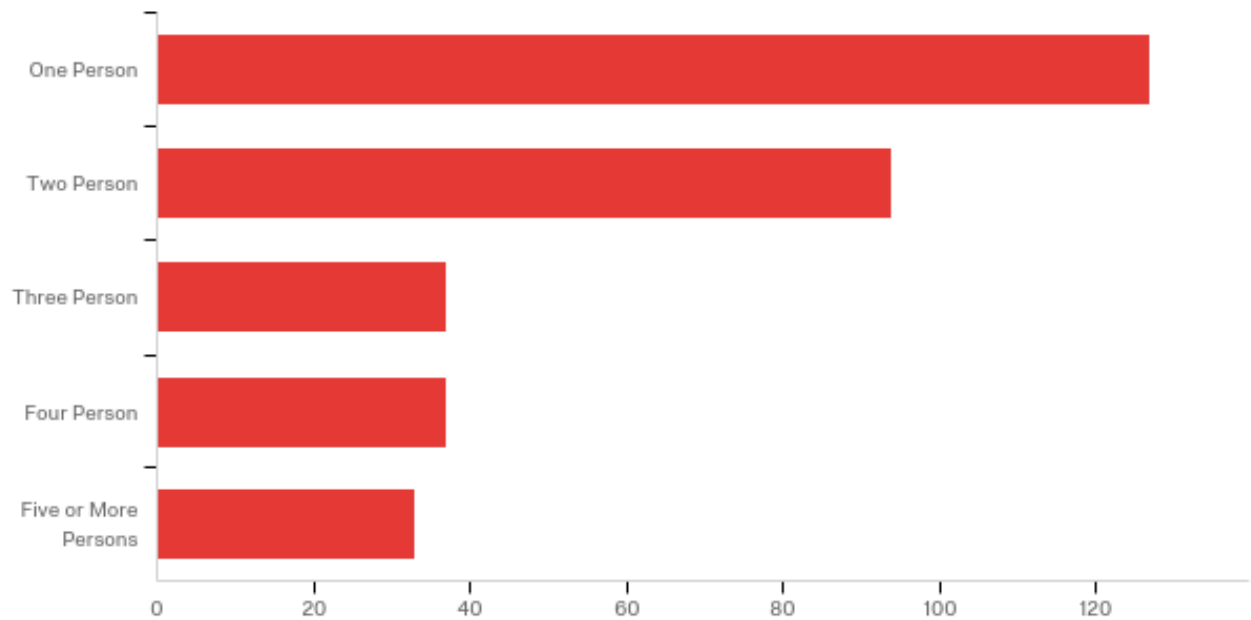
Q17 - Please select the annual income of your household.



#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
1	Please select the annual income of your household.	1.00	6.00	3.36	1.88	3.53	328

#	Answer	%	Count
1	Under \$15,000	23.78%	78
2	Between \$15,000 and \$29,999	15.24%	50
3	Between \$30,000 and \$44,999	17.38%	57
4	Between \$45,000 and \$59,999	10.98%	36
5	Between \$60,000 and \$74,999	9.76%	32
6	Over \$75,000	22.87%	75
	Total	100%	328

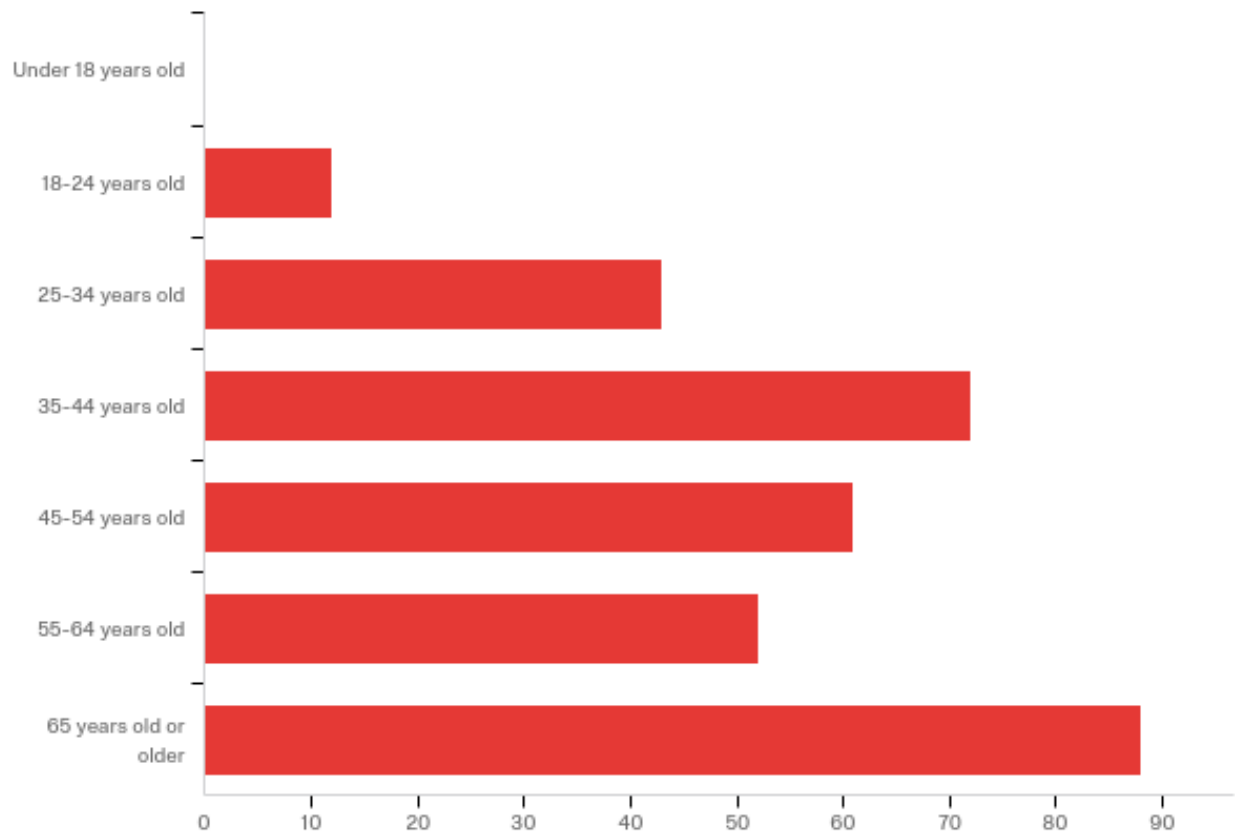
Q18 - What is the size of your household?



#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
1	What is the size of your household?	1.00	5.00	2.25	1.34	1.79	328

#	Answer	%	Count
1	One Person	38.72%	127
2	Two Person	28.66%	94
3	Three Person	11.28%	37
4	Four Person	11.28%	37
5	Five or More Persons	10.06%	33
	Total	100%	328

Q19 - What is your age?



#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
1	What is your age?	2.00	7.00	5.10	1.51	2.29	328

#	Answer	%	Count
1	Under 18 years old	0.00%	0
2	18-24 years old	3.66%	12
3	25-34 years old	13.11%	43
4	35-44 years old	21.95%	72
5	45-54 years old	18.60%	61
6	55-64 years old	15.85%	52
7	65 years old or older	26.83%	88
	Total	100%	328

APPENDIX F
Community Focus Group Results

APPENDIX F – Listening Session #1

City of Muncie - Consolidated Plan - Listening Sessions

Focus Group: Youth & Education

Location: Boys & Girls

Club

Date: December 12, 2019

Two Discussion Groups

Question#1

- a. What are the most important needs you have identified that CDBG Funds and HOME Funds can help the Muncie Community address housing?

Group#1

Rank
#1 Addressing transience
#2
#3

1. Addressing transience #1
a. Schools

Group#2

Rank
#1 Emergency shelters (families stay together)
#2 Rental Ed/resources
#3 Connecting folks to housing resources

1. Emergency shelters (families stay together) #1
2. Rental Ed/resources #2
a. Unsafe housing
b. Getting out of a lease
3. Connecting folks to housing resources #3
4. Home repairs

- b. Rank the Top 3

Question #2

A. What are the most important needs you have identified that CDBG Funds and HOME Funds can help your organization and clients address community development?

Group#1

Rank
#1 Addressing trauma
#2 Post-secondary planning
#3 Improved livability (food security, transportation)

1. Addressing trauma #1
2. Post-secondary planning #2
3. Improved livability (food security, transportation) #3
4. Building resilient cities
5. ACE

Group#2

Rank
#1 Childcare funding for those in transitional situations
#2 Childcare subsidy/supports for workers on nights/weekends
#3 Upgrade/renovate community centers

1. Childcare funding for those in transitional situations #1
2. Childcare subsidy/supports for workers on nights/weekends #2
 - i. Need facilities – family daycare homes (need)
3. Upgrade/renovate community centers #3

B. Rank the Top 3

Question #3

- a. What are the most important needs you have identified that CDBG Funds and HOME Funds can help your organization and clients address public services?
- b. Rank the Top 3

Group#1

Rank
#1 Financial skills & literacy
#2 Affordable childcare
1. #3 Life skills & household mgt.

1. Financial skills & literacy #1
2. Affordable childcare #2
3. Life skills & household mgt. #3

Group#2

Rank
#1 Programs that address trauma (ACE) appropriately/fully
#2 Social services that address transient for families (pk-12) and their educational needs
#3 Neighborhood improvements towards greater livability/bike-ability

1. Programs that address trauma (ACE) appropriately/fully #1
2. K-12 & teacher self-care
3. Food security
 - A. Affordability & access
4. Transportation
 - A. Affordable/connected
5. Neighborhood improvements towards greater livability/bike-ability #3
6. Post-secondary planning support
7. Social services that address transient for families (pk-12) and their educational needs #2
8. Financial skills & literacy
9. Life skills & household management
10. Affordable childcare quality

Group#2

Rank
#1 Emotional support ACES (Adverse Childhood Experiences)
#2 Financial literacy youth/families
#3

1. Emotional support ACES (Adverse Childhood Experiences) #1
2. Financial literacy youth/families #2
3. Childcare funding for those in transitional situations
4. Social services
 - a. Emotional support ACES
 - b. Counseling
5. Emergency shelters for men/families
6. Youth/family financial literacy
7. Rental ed/resources

Question #3

- a. What are the most important needs you have identified that CDBG Funds and HOME Funds can help your organization and clients address public services?
- b. Rank the Top 3

Group#1

Rank
#1 Financial skills & literacy
#2 Affordable childcare
#3 Life skills & household mgt.

1. Financial skills & literacy #1
2. Affordable childcare #2
3. Life skills & household mgt. #3

Rank
#1 Programs that address trauma (ACE) appropriately/fully
#2 Social services that address transient for families (pk-12) and their educational needs
#3 Neighborhood improvements towards greater livability/bike-ability

1. Programs that address trauma (ACE) appropriately/fully #1
2. K-12 & teacher self-care
3. Food security
4. Affordability & access
5. Transportation - Affordable/connected
6. Neighborhood improvements towards greater livability/bike-ability
- #3
7. Post-secondary planning support
8. Social services that address transient for families (pk-12) and their educational needs #2
9. Financial skills & literacy
10. Life skills & household management
11. Affordable childcare quality

Group#2

Rank the Top 3
#1 Emotional support ACES (Adverse Childhood Experiences)
#2 Financial literacy youth/families
#3

1. Emotional support ACES (Adverse Childhood Experiences) #1
2. Financial literacy youth/families #2
3. Childcare funding for those in transitional situations
4. Social services
 - a. Emotional support ACES
 - b. Counseling
5. Emergency shelters for men/families
6. Youth/family financial literacy
7. Rental ed/resources

Question #4

- a. What do you identify as the most important fair housing issue that affects you or your organization's participants or clients?
- b. Rank the Top 3

Group#1

1. Source of income

Group #2

1. Do not want to report income
2. Non-citizens
3. Language barriers
4. Child translation
5. Poor landlords/unsafe housing
6. Custody issues (non-parents)

- c. Where would you or your clients or participants report a fair housing complaint?

Group #1

1. Muncie Housing Authorities or Muncie Office of Community Development

Group #2

1. Housing authority
2. CD
3. Muncie Human Rights Commission

Participating Organizations

Facilitator – Anchor Group Solutions, LLC

Alpha Center
Muncie Delaware Senior Center
Cornerstone
Hillcroft Services
Cornerstone
PathStone, Corp
Salvation Army

APPENDIX G – Listening Session #2

City of Muncie - Consolidated Plan

Focus Group: Housing & Community Development

Location: Library

Date: 12-18-2019

3 Discussion Groups

Question#1

A. What are the most important needs you have identified that CDBG Funds and HOME Funds can help your organization and clients address housing?

B. Rank the Top 3

Group#1

Rank
#1: Keeping homeowners in their homes
#2: Affordable/quality rental properties
#3: Vacant Housing

a. Keeping homeowners in their homes #1

1. Improvements (Roofs/Systems)
2. Aging in place (Ramps)
3. Affordability (Energy Efficiency)
4. Supporting homeownership

A. Down-payment assistance

b. Affordable/quality rental properties #2

5. Improvements (not enough equity/poor market)
6. Money for deposits/first month's rent

c. Supporting transitional housing

d. Vacant Housing #3

7. Rehabilitation
8. Demolition
9. Re-use (New build/gardens/parks/etc.)

APPENDIX G
Community Stakeholder
Interviews

Appendix G – Key Stakeholders Interviews

1. Muncie Street Outreach- Laura Janncy

What is street outreach?

Street outreach involves moving outside the walls of an agency to engage with people experiencing homelessness or hunger insecurity that may be disconnected or alienated from mainstream services and support. This important work helps establish supportive relationships, gives people advice and information, and hopefully shows them the possibility that they can access necessary services and support that will help them overcome their current hardships.

What concerns do you have that will help your agency's client needs in the following areas?

A) Housing

1. Fair housing is an issue for clients and they don't know what services are available to them.
2. Clients need stable rent and good wages. The rent continues to go up. She mentions that minimum wages are \$7.25 and waitresses make \$2.25 an hour with tips. Wages are too low to cover housing costs.
3. Clients have difficulty finding affordable housing.

B) Public Services

1. Muncie needs more advocates. A great deal of staff time is spent advocating for the homeless clients.
2. Our staff is beginning to see more children living on the streets.

C) Fair Housing

1. To report fair housing our clients need to go online and to the library to use a computer.

2. Muncie Victim Advocate-Shelby Looper(Associated with the Muncie Police Dept.)

Advocates offer victims information about the different options available to them and support victim's decision-making. Advocates do not tell victims what to do. They are committed to maintaining the highest level of confidentiality in their communication with victims.

What concerns do you have that will help your agency's client needs in the following areas?

A) Housing

1. Landlords control everything. The leaderships begin with the landlord from rent to controlling the leases. Unhealthy living conditions.
2. The women are also the victims. They sometimes need a safe place to stay.

B) Public Services

1. Muncie does have numerous social services organizations.
2. The issues that the people of Muncie face are as follows: homelessness issues, lack of jobs, and poverty, crimes, drugs and mental illness.

C) Fair housing

1. Not sure if this applies to their victims and we do not address their living situation.
2. In order to report an issue they would go to the Muncie Police Department.

3. Bridges Community Services Inc. - Samantha Buckles, Director

Bridges goals and objectives are to develop, provide and coordinate housing, supportive services, education and employment programs for low income individuals and families in the Muncie, Delaware County area. The programs that Bridges brings to the Muncie area should not change.

What concerns do you have that will help your agency's client needs in the following areas?

A) Housing

1. Affordable permanent housing
Bridges develops and operates low income rentals at below fair market rate. They also have a First Time Buyers Program for eligible individuals and, when available Rent-to own homes.
2. Emergency solutions grant rapid re-housing
This program assists homeless individuals or families to move as quickly as possible into permanent housing and achieve stability.
3. Supportive services for veterans families
Assist veterans that are homeless or a risk of becoming homeless.
4. HUB(Housing utilization building)
HUB offers a hygiene center which includes laundry and showers for individuals in the area. This is made possible because of thirty organizations working together for to solve homeless. During the winter and summer months it becomes a cooling and heating center when the weather gets above 100 degrees or below zero.
5. Street hub vending machine
Located in a Fire Station this machine only takes tokens that have been awarded to the needed. In the machines are blankets, socks and hygiene items and other necessities. They can be purchased after normal store hours. All items inside the vending machine come from community donations.
6. Tiny Home Village
This is a small six home community built for individuals who slip through the cracks.
7. Emergency shelter(The INN)

Bridges offers temporary short term emergency shelter for person displaced because of circumstance affecting their housing rendering them homeless.(i.e. furnace failure. frozen pipes, fire ,etc.)

B) Public Services

One of the most important issues facing clients is evictions and because of evictions people cannot find decent and affordable housing.

C) Fair Housing

Fair Housing complaints should be reported to HUD.

4. Muncie Community Schools –Lee Ann Kwiatkowski, ED

The mission of the Muncie Community Schools is to provide a quality educational environment that allows every student to maximize his or her potential and upon graduation, possess the skills necessary to be a positive, productive, and contributing member of society.

What concerns do you have that will help your agency's client needs in the following areas?

A) Housing

Clean and reliable environment for children to live in with families. Strick inspection of landlords.

B) Community Development

Continue the efforts that have begun to bring positive attention to Muncie, Indiana.

D) Public Services

Offer more free or subsidized drug counseling and rehabilitation services. Possibly use the Muncie Mall as a Wellness and Health facility.

E) Fair Housing

To make a complaint online or U.S. Department of Housing and Urban Development (HUD) at 800-669-9777

5. Muncie Mission Ministries –Frank Baldwin, Pres/CEO

Muncie Mission Ministries is a faith based agency that has brought hope and healing to the homeless and needy of Delaware County for more than ninety years.

Muncie Mission is a part of the 8 Twelve Coalition in Muncie. The 8 Twelve Coalition is comprised of residents ,non-profits and business working to revitalize the 8 Twelve target area bordered by 8th street, Memorial Street ,Perkins Avenue, and Madison Street. The 8 Twelve revitalization plan was developed as a result several community meetings spearheaded by Greater Muncie e Habitat for Humanity and the Vectren Foundation. The plan focuses on improving housing, beautifying the neighborhood, and supporting local business.

What concerns do you have that will help your agency's client needs in the following areas?

A) Housing

The Mission is a Transitional Housing and recovery program. They have over 109 beds for shelter. Must be 30 days clean from drug and alcohol. The women who experienced domestic violence must be out of a domestic violence for 6 months.

B) Public Services

Family Services include donations of clothing, furniture and food and they provide at no cost. Household items and hygiene products are also provided. Limited emergency funds for utility bills or rent once every twelve months.

- Number of persons served in 2019
 - a.) 4,040 People served
 - b.) 9,465 Hygiene items given out.
 - c.) 54,140 Food items given out.
 - d.) 14,418 Clothing items given out.

The most important issues are lack of funding, housing shortage and connecting families with other agencies.

C) Fair Housing

To report Fair Housing complaints, they would send their people to the website and the City of Muncie.

Ball State University and Muncie Landbank collaborated to publish a handbook called "Renter Rights". He also stated that City Council is looking into an ordinance concerning landlords and renters.

5. Christian Ministries –Andrea Smith, Director

Christian Ministries of Delaware County is a non-profit, social services agency that serves the poor and need of our community with emergency assistance through its programs and commissions.

A) Housing

- a. CBDG funds the Men's Shelter. Men's shelter only operates from 6:00 PM to 8:00 PM. from October to April. The men receive dinner and breakfast, and clean clothing and can take a hot shower.
- b. The Family Shelter consists of one efficiency apartment and four rooms they share a kitchen and a bathroom, in which a family can only stay up to 45 days. Staff assists them with finding housing and connecting to other social services agencies. Women's Shelter does have a waiting list.

B) Emergency Assistance assist with utility bills and rent before eviction occur.

- a. Human Services

- b. The blanket Cupboard distributes blankets, bedding and lines to individuals and families in need from September through May.
- C) The Baby care program offers food diapers, formula and other items for mothers once a month.
- D) Christian Ministries partners with Heart and Hands United to be a drop-point for schools supply donations that are distributed to families with school-age children.
- E) The Treasure Shop (our thrift store) is stocked with gently used items donated by members of our community.
- F) Christian Ministries has the largest food pantry in Delaware County. The food pantry services 212 families each month.
- G) Numbers of families served.
 - a. 1230 Beds provided for men (overnight sleeping rooms)
 - b. 123 Families Sheltered(short term housing and assistance)
 - c. 8121 Families Assisted(food pantry)

What concerns do you have that will help your agency's client needs?

- A) Housing

The biggest problem in Muncie is finding affordable housing and permanent housing. After about three months clients get evicted because of not being able to budget properly. They cannot determine wants from needs.(Example paying the cable over the electric bill.) Once evicted it is hard finding them a new place and it is a vicious cycle.
- B) Fair Housing

Fair Housing contact person will be called when client has an issue.

6. Muncie Delaware County Chamber of Commerce/Economic Development Alliance – Jay Julian – Executive Director

Chamber of Commerce is working on the following:

- A) Housing
 - Near Downtown Improvement Areas – Priority Area for Chamber
 - Opportunity Zones – Riverfront Improvement & surrounding neighborhood – Goal - Mixed Income & Mixed Use - (Our research -37% Cost Burden – 41% Poverty)
 - Overall Goal - Improve the Quality of Life - Goal -Increase Housing & Lowering Poverty Actions
 - Objective for Early Childhood Education for Economic Development – Supported By5 Project & Assisted day care program in re-opening
 - Want to see development of 250-300 - homes Available downtown – Some have properties have need rehab or remediation – Land banking properties
- B) Community Development Funds Needed For:
 - Infrastructure
 - Poverty Abatement

- Open Door- Infant Mortality - Gaps in Health Care identified by former CEO who put clinic next to Walmart. Meridian Health Services – provides health & mental health services.
- Job Retention Activities – Soft skills training would help managers with job retention.

Economic Development Alliance - Vision 2021 – 5 -Year Economic Plan – Goals

- Enrich quality of life
- Enhance quality of place
- Expand and retain existing business
- Create a culture of education
- Prepare the community for the future
- Encourage job growth in targeted sectors

7. Muncie Human Rights Office – Yvonne Thompson – Director

The office is tasked with ensuring that your rights as a citizen and resident of Muncie Indiana are protected. The focus is to promote equal opportunity and equal rights for everyone regardless of race, religion, color, sex, or disability.

1. Continued Education is a key part of the Human Office role in Housing Issues – staff is available to speak to any group regarding Fair Housing.
2. Renter's Handbook – online version available – Published in 2019 in partnership with Ball State University and PathStone of Indiana
3. Plans to work with the Housing Authority and Building Commissioner on inspector training – Many Human Rights complaints are really related to housing conditions.
4. Changes were made to the governing ordinances in 2011.
5. ADA Plan (2011) - Muncie is still working on compliance with Dept. of Justice.

8. Muncie Housing Authority (MHA) – Joseph Anderson – CEO

Mission: "The mission of the Muncie Housing Authority is to provide quality choices of affordable housing and to foster self-sufficiency and homeownership."

1. Housing

- Considering transition of tax credit project at Millennium Place
- Currently planning applications for RAD projects with several projects including Earthstone, South Pines and Gillespie communities.
- Need for additional rental housing development – considering rehabilitation
- Resident Advisory Board – currently ad hoc
- Homeownership Program is not active; however, working with the Homeownership and Revitalization, Inc. on homeownership
- ADA units are available at the MHA
- TBRA funds needed for rental housing development projects.
- Need to change the perception of Housing Voucher Program (Section 8) participants – experience problems getting landlords to rent to them.
- Tenants need training on their rights when dealing with landlords and Fair Housing concerns.

2. Public Services

- Currently no active Resident Council and no Community Center – Unity Center closed in 2018
- Resident Services Coordinator position would be helpful
- Coordinate with Ball State University, Ivy Tech, Excel Center/Goodwill to assist residents with training for the employment.

Additional Interviews conducted with the following organizations:*

9. Meridian Health Services, Corp. –Kellie Pearson-Carroll Ed. M

10. Collective Coalition of Concerned Clergy - Pastor Kevin D. Woodgett

*Interview Summaries not available

APPENDIX H

Glossary

AFFH Glossary

Affirmatively Furthering Fair Housing means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a program participant's activities and programs relating to housing and urban development. (24 C.F.R. § 5.152)

Assessment of Fair Housing (assessment or AFH) means the analysis undertaken pursuant to § 5.154 that includes an analysis of fair housing data, an assessment of fair housing issues and contributing factors, and an identification of fair housing priorities and goals, and is conducted and submitted to HUD using the Assessment Tool. The AFH may be conducted and submitted by an individual program participant (individual AFH), or may be a single AFH conducted and submitted by two or more program participants (joint AFH) or two or more program participants, where at least two of which are consolidated plan program participants (regional AFH). (24 C.F.R. § 5.152)

Assessment Tool refers collectively to any forms or templates and the accompanying instructions provided by HUD that program participants must use to conduct and submit an AFH pursuant to § 5.154. HUD may provide different Assessment Tools for different types of program participants. In accordance with the Paperwork Reduction Act (44 U.S.C. Chapter 35) (PRA), the Assessment Tool will be subject to periodic notice and opportunity to comment in order to maintain the approval of the Assessment Tool as granted by the Office of Management and Budget (OMB) under the PRA. (24 C.F.R. § 5.152)

Community Participation as required in § 5.158, means a solicitation of views and recommendations from members of the community and other interested parties, a consideration of the views and recommendations received, and a process for incorporating such views and recommendations into decisions and outcomes. For HUD regulations implementing the Housing and Community Development Act of 1974, the statutory term for "community participation" is "citizen participation," and, therefore, the regulations in 24 CFR parts 91, 92, 570, 574, and 576 use this term. (24 C.F.R. § 5.152)

Consolidated Plan The document that is submitted to HUD that serves as the comprehensive housing affordability strategy, community development plan, and submissions for funding under any of the Community Planning and Development formula grant programs (e.g., CDBG, ESG, HOME, and HOPWA), that is prepared in accordance with the process described in this part. (24 C.F.R. § 91.5)

Consolidated Plan Program Participant means any entity specified in § 5.154(b)(1). (24 C.F.R. § 5.152). Those entities are Jurisdictions and Insular Areas that are required to submit consolidated plans for the following programs:

- The Community Development Block Grant (CDBG) program (see 24 C.F.R. part 570, parts D and I);
- The Emergency Solutions Grants (ESG) program (see 24 C.F.R. part 576);

- The HOME Investment Partnerships (HOME) program (see 24 C.F.R. part 92);
- The Housing Opportunities for Persons with AIDS (HOPWA) program (see 24 C.F.R. part 574).

Consortium An organization of geographically contiguous units of general local government that are acting as a single unit of general local government for purposes of the HOME program (see 24 CFR part 92). (24 C.F.R. § 91.5)

Contributing Factor or Fair Housing Contributing Factor means a factor that creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues. Goals in an AFH are designed to overcome one or more contributing factors and related fair housing issues, as provided in § 5.154. (24 C.F.R. § 5.152)

Data refers collectively to the sources of data provided in paragraphs (1) and (2) of this definition. When identification of the specific source of data in paragraph (1) or (2) is necessary, the specific source (HUD-provided data or local data) will be stated.

1. **HUD-Provided Data.** As more fully addressed in the Assessment Tool, the term “HUD-provided data” refers to HUD-provided metrics, statistics, and other quantified information required to be used with the Assessment Tool. HUD-provided data will not only be provided to program participants but will be posted on HUD’s Web site for availability to all of the public;
2. **Local Data.** As more fully addressed in the Assessment Tool, the term “local data” refers to metrics, statistics, and other quantified information, subject to a determination of statistical validity by HUD, relevant to the program participant’s geographic areas of analysis, that can be found through a reasonable amount of search, are readily available at little or no cost, and are necessary for the completion of the AFH using the Assessment Tool. (24 C.F.R. § 5.152)

Disability (1) The term “disability” means, with respect to an individual:

1. A physical or mental impairment that substantially limits one or more major life activities of such individual;
2. A record of such an impairment; or
3. Being regarded as having such an impairment.

(2) The term “disability” as used herein shall be interpreted consistent with the definition of such term under section 504 of the Rehabilitation Act of 1973, as amended by the ADA Amendments Act of 2008. This definition does not change the definition of “disability” or “disabled person” adopted pursuant to a HUD program statute for purposes of determining an individual’s eligibility to participate in a housing program that serves a specified population. (24 C.F.R. § 5.152)

Disproportionate Housing Needs refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups or the total population experiencing that category of housing need in the applicable geographic area. For purposes of this definition, categories of housing need are based on such factors as cost burden, severe cost burden, overcrowding, and substandard housing conditions, as those terms are applied in the Assessment Tool. (24 C.F.R. § 5.152)

Fair Housing Choice means that individuals and families have the information, opportunity, and options to live where they choose without unlawful discrimination and other barriers related to race, color, religion, sex, familial status, national origin, or disability. Fair housing choice encompasses:

1. Actual choice, which means the existence of realistic housing options;
2. Protected choice, which means housing that can be accessed without discrimination; and
3. Enabled choice, which means realistic access to sufficient information regarding options so that any choice is informed. For persons with disabilities, fair housing choice and access to opportunity include access to accessible housing and housing in the most integrated setting appropriate to an individual's needs as required under Federal civil rights law, including disability-related services that an individual needs to live in such housing.

(24 C.F.R. § 5.152)

Fair Housing Contributing Factor (see Contributing Factor)

Fair Housing Issue means a condition in a program participant's geographic area of analysis that restricts fair housing choice or access to opportunity, and includes such conditions as ongoing local or regional segregation or lack of integration, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, disproportionate housing needs, and evidence of discrimination or violations of civil rights law or regulations related to housing. Participation in "housing programs serving specified populations," as defined in this section, does not present a fair housing issue of segregation, provided that such programs are administered by program participants so that the programs comply with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d–2000d–4) (Nondiscrimination in Federally Assisted Programs); the Fair Housing Act (42 U.S.C. 3601–19), including the duty to affirmatively further fair housing; section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794); the Americans with Disabilities Act (42 U.S.C. 12101, et seq.); and other Federal civil rights statutes and regulations. (24 C.F.R. § 5.152)

Fair Housing Enforcement and Fair Housing Outreach Capacity means the ability of a jurisdiction, and organizations located in the jurisdiction, to accept complaints of violations of fair housing laws, investigate such complaints, obtain remedies, engage in fair housing testing, and educate community members about fair housing laws and rights. This definition covers any State or local agency that enforces a law substantially equivalent to the Fair Housing Act (see 24 CFR part 115) and any organization participating in the Fair Housing Initiative Programs (see 24 CFR part 125). (24 C.F.R. § 5.152)

Familial Status means one or more individuals (who have not attained the age of 18 years) being domiciled with--

- (1) a parent or another person having legal custody of such individual or individuals; or
- (2) the designee of such parent or other person having such custody, with the written permission of such parent or other person.

The protections afforded against discrimination on the basis of familial status shall apply to any person who is pregnant or is in the process of securing legal custody of any individual who has not attained the age of 18 years. (42 U.S.C. 3602(k))

Geographic Area means a jurisdiction, region, State, Core-Based Statistical Area (CBSA), or another applicable area (e.g., census tract, neighborhood, Zip code, block group, housing development, or

portion thereof) relevant to the analysis required to complete the assessment of fair housing, as specified in the Assessment Tool. (24 C.F.R. § 5.152)

HUD-provided data refer to the definition of “data”.

Housing Programs Serving Specified Populations Housing programs serving specified populations are HUD and Federal housing programs, including designations in the programs, as applicable, such as HUD’s Supportive Housing for the Elderly, Supportive Housing for Persons with Disabilities, homeless assistance programs under the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11301 et seq.), and housing designated under section 7 of the United States Housing Act of 1937 (42 U.S.C. 1437e), that:

1. Serve specific identified populations; and
2. Comply with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d– 2000d–4) (Nondiscrimination in Federally Assisted Programs); the Fair Housing Act (42 U.S.C. 3601–19), including the duty to affirmatively further fair housing; section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794); the Americans with Disabilities Act (42 U.S.C. 12101, et seq.); and other Federal civil rights statutes and regulations.(24 C.F.R. § 5.152)

Housing Type is a term clarified in the Assessment Tool’s publicly supported housing section. HUD requires analysis for the following housing program types:

1. Housing that primarily serves families with children;
2. Housing for the elderly; and
3. Housing for persons with disabilities.

Insular Area has the same meaning as provided in § 570.405. (24 C.F.R. § 5.152) Eligible applicants are Guam, the Virgin Islands, American Samoa, the Trust Territory of the Pacific Islands, and the Commonwealth of the Northern Mariana Islands. (24 C.F.R. § 570.405)

Integration means a condition, within the program participant’s geographic area of analysis, as guided by the Assessment Tool, in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area. For individuals with disabilities, integration also means that such individuals are able to access housing and services in the most integrated setting appropriate to the individual’s needs. The most integrated setting is one that enables individuals with disabilities to interact with persons without disabilities to the fullest extent possible, consistent with the requirements of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.) and section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794). See 28 CFR part 35, appendix B (addressing 28 CFR 35.130 and providing guidance on the American with Disabilities Act regulation on nondiscrimination on the basis of disability in State and local government services). (24 C.F.R. § 5.152)

Joint Participants refers to two or more program participants conducting and submitting a single AFH (a joint AFH), in accordance with § 5.156 and 24 CFR 903.15(a)(1) and (2), as applicable. (24 C.F.R. § 5.152)

Jurisdiction A State or unit of general local government. (24 C.F.R. § 91.5)

Local Data refer to the definition of “data”.

Local Knowledge as more fully addressed in the Assessment Tool, local knowledge means information to be provided by the program participant that relates to the participant’s geographic areas of analysis and that is relevant to the program participant’s AFH, is known or becomes known to the program participant, and is necessary for the completion of the AFH using the Assessment Tool. (24 C.F.R. § 5.152)

Meaningful Actions means significant actions that are designed and can be reasonably expected to achieve a material positive change that affirmatively furthers fair housing by, for example, increasing fair housing choice or decreasing disparities in access to opportunity. (24 C.F.R. § 5.15.2)

Program Category is a term clarified in the Assessment Tool’s publicly supported housing section. HUD is providing data and requires analysis for the following five housing program categories. The program categories are:

1. Public Housing
2. Project-Based Section 8
3. Other HUD multifamily housing (includes both Section 202—Supportive Housing for the Elderly and Section 811—Supportive Housing for Persons with Disabilities)
4. Low Income Housing Tax Credit (LIHTC) housing
5. Housing Choice Vouchers (HCV)
6. Other publicly supported housing program categories may be relevant to the analysis, but are not included in the program categories for which HUD-provides data and requires analysis.

Program Participants means any entities specified in § 5.154(b). (24 C.F.R. § 5.152). Jurisdictions and Insular Areas that are required to submit consolidated plans for the following programs:

- The Community Development Block Grant (CDBG) program (see 24 C.F.R. part 570, parts D and I);
- The Emergency Solutions Grants (ESG) program (see 24 C.F.R. part 576);
- The HOME Investment Partnerships (HOME) program (see 24 C.F.R. part 92);
- The Housing Opportunities for Persons with AIDS (HOPWA) program (see 24 C.F.R. part 574).
- Public housing agencies (PHAs) receiving assistance under sections 8 or 9 of the United States Housing Act of 1937 (42 U.S.C. 1437f or 42 U.S.C. 1437g). (24 C.F.R. § 5.154(b))

Protected Characteristics are race, color, religion, sex, familial status, national origin, having a disability, and having a type of disability. (24 C.F.R. § 5.152)

Protected Class means a group of persons who have the same protected characteristic, e.g., a group of persons who are of the same race are a protected class. Similarly, a person who has a mobility disability is a member of the protected class of persons with disabilities and a member of the

protected class of persons with mobility disabilities. (24 C.F.R. § 5.152)

Qualified Public Housing Agency (Qualified PHA) Refers to a PHA:

(1) For which the sum of:

The number of public housing dwelling units administered by the PHA; and

The number of vouchers under section 8(o) of the United States Housing Act of 1937 (42 U.S.C. 1437f(o)) administered by the PHA is 550 or fewer; and

(2) That is not designated under section 6(j)(2) of the United States Housing Act of 1937 as a troubled PHA, and does not have a failing score under the Section 8 Management Assessment Program (SEMAP) during the prior 12 months. (24 C.F.R. § 5.152)

Racially or Ethnically Concentrated Area of Poverty means a geographic area with significant concentrations of poverty and minority populations. (24 C.F.R. § 5.152)

Regionally Collaborating Program Participants refers to joint participants, at least two of which are consolidated plan program participants. A PHA may participate in a regional assessment in accordance with PHA Plan participation requirements under 24 CFR 903.15(a)(1). Regionally collaborating participants conduct and submit a single AFH (regional AFH) in accordance with § 5.156. (24 C.F.R. § 5.152)

Segregation means a condition, within the program participant's geographic area of analysis, as guided by the Assessment Tool, in which there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a type of disability in a particular geographic area when compared to a broader geographic area. For persons with disabilities, segregation includes a condition in which the housing or services are not in the most integrated setting appropriate to an individual's needs in accordance with the requirements of the Americans with Disabilities Act (42 U.S.C. 12101, et seq.), and section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794). (See 28 CFR part 35, appendix B, addressing 25 CFR 35.130.) Participation in "housing programs serving specified populations" as defined in this section does not present a fair housing issue of segregation, provided that such programs are administered to comply with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d 2000d-4) (Nondiscrimination in Federally Assisted Programs): The Fair Housing Act (42 U.S.C. 3601-19), including the duty to affirmatively further fair housing; section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794); the Americans with Disabilities Act (42 U.S.C. 12101, et seq.); and other Federal civil rights statutes and regulations. (24 C.F.R. § 5.152)

Significant Disparities in access to opportunity means substantial and measurable differences in access to educational, transportation, economic, and other important opportunities in a community, based on protected class related to housing. (24 C.F.R. § 5.152)

State Any State of the United States and the Commonwealth of Puerto Rico. (24 C.F.R. § 91.5)

Unit of General Local Government A city, town, township, county, parish, village, or other general purpose political subdivision of a State; an urban county; and a consortium of such political subdivisions recognized by HUD in accordance with the HOME program (24 CFR part 92) or the CDBG program (24 CFR part 570). (24 C.F.R. § 91.5)