



National Association of Realtors

TRUMBULL COUNTY ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Submitted to the Ohio Department of Development | June 2024

Abstract

This report was completed to identify and develop strategies to mitigate impediments to fair housing choice in Trumbull County, and the cities of Warren and Niles, Ohio and contains a demographic analysis, an assessment of current impediments to fair housing choice, and an action plan designed to reduce the impacts of barriers to fair housing choice and affirmatively further fair housing in Trumbull County.

Prepared for: Trumbull County and the cities of Warren and Niles, Ohio

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INTRODUCTION

FEDERAL HOUSING LAW

Title VIII of the Civil Rights Act of 1968, also known as the Fair Housing Act, prohibits discrimination based on race; color; ethnic origin; disability; religion; gender; and familial status, including families with children under the age of 18 who live with parents or legal guardians, pregnant women, and persons securing custody of children under the age of 18. This includes the sale, rental, and financing of dwellings, and other housing-related transactions.

In addition, the United States Department of Housing and Urban Development (HUD) has strongly encouraged the adoption and enforcement of state and local fair housing laws and a reduction in segregation by race, ethnicity, and disability status through its community development programs. HUD is also committed to eliminating discriminating practices and racial, ethnic, social, and other barriers to fair housing through the Fair Housing Act's requirement to Affirmatively Further Fair Housing (AFFH). AFFH is accomplished through the planning and implementation of a set of actions to eliminate barriers or impediments to fair housing choice. HUD strives to promote this fair housing choice through Fair Housing Planning (FHP). Provisions to AFFH are long-standing components of HUD's Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs. HUD is the federal agency which is charged with enforcing the Fair Housing Act.

According to HUD, AFFH obligations are not statutorily, although HUD requires grantees to do the following, according to its *Fair Housing Planning Guide*:

- Conduct an Analysis of Impediments to Fair Housing Choice.
- Take actions to correct and remediate any impediments found during the analysis.
- Maintain records detailing actions taken to correct impediments and the outcome of each action.

HUD required funding recipients to certify AFFH through the development of an Analysis of Impediments to Fair Housing Choice (AI) from 1996 through a 2015 AFFH rule which required an assessment of fair housing. Until the full implementation of the 2015 AFFH rule, communities were directed to continue developing AIs until the institution of the 2020 proposed rule, *Preserving Community and Neighborhood Choice* (PCNC), which if implemented, would have eliminated the regulatory framework for the AI.

However, HUD's efforts to implement AFFH through fair housing planning was restored through the publication *Restoring Affirmatively Furthering Fair Housing Definitions and Certifications Interim Final Rule*, published in the *Federal Register* on June 10, 2021, and which took effect on July 31, 2021. This interim rule repeals PCNC and establishes that HUD funding recipients must certify compliance with AFFH, although it does not reinstate the requirement to conduct and Analysis of Fair Housing or an Analysis of Impediments to Fair Housing Choice (AI). However, the Ohio Department of Development (ODOD) requires grantees to update their AI every five years. To satisfy the ODOD requirement that

HUD funding recipients certify compliance with AFFH and complete or update their AI, Trumbull County has chosen to develop and implement an update to the Analysis of Impediments to Fair Housing Choice that was completed in 2019.

OHIO FAIR HOUSING LAW

In addition to federal fair housing laws, the State of Ohio Attorney General's *Fair Housing Guide for Landlords* mandates the following:

Fair housing is a person's right to choose, without unlawful discrimination, where to live. Ohio's fair housing laws protect people who are denied housing based on myths, stereotypes, or prejudices about groups of people. Ohio's discrimination laws protect everyone. The law states that it is illegal to discriminate in the sale, rental, or financing of housing, or otherwise interfere with someone's housing rights based on his or her membership in the following protected classes: race, color, religion, sex, familial status (having at least one child who is younger than 18), ancestry, disability, national origin, and military status.

All housing providers, including owners, property managers, sales managers, and condominium associations, are covered under Ohio's fair housing laws.

In the state of Ohio, it is unlawful to do any of the following based on race, color, religion, sex, national origin, ancestry, military status, disability, or familial status:

- Refuse to rent, sell, finance, or insure housing accommodations or residential property.
- Represent to any person that housing accommodations are not available for inspection, sale, rental, or lease.
- Refuse to lend money for the purchase, construction, repair, rehabilitation, or maintenance of housing accommodations or rental property.
- Discriminate against any person in the purchase, renewal, terms and conditions of fire, extended coverage, of homeowners or renters' insurance.
- Refuse to consider without prejudice the combined income of both spouses.
- Print, publish, or circulate any statement or advertisement which would indicate a preference or limitation.
- Deny any person membership in any multiple listing services or real estate broker's organization.

No one may take any of the following actions based on race, color, religion, sex, national origin, ancestry, military status, disability, or familial status:

- Refuse to make a mortgage loan.
- Fail to provide information regarding loans.
- Deny or make different terms for home loans, such as different interest rates, points, or fees.
- Refuse to purchase the loan or set different terms or conditions for purchasing a loan.

In addition, it is illegal to:

- Coerce, intimidate, threaten, or interfere with anyone exercising their rights granted under the Fair Housing Act or assisting others who are exercising that right.
- Make, print, publish, or post statements or advertisements that a house or an apartment is available only to persons of a certain race, color, religion, sex, familial status, or disability.

Ohio is a substantially equivalent state, in which HUD has delegated ability to enforce fair housing laws. In Ohio, the Ohio Civil Rights Commission (OCRC) enforces state laws against discrimination. The Commission receives and investigates discrimination charges based on protected class, and the Ohio Prosecutor's Office is the civil prosecutor for OCRC.

The Ohio Development Services Agency, Office of Community Development requires all communities who receive federal financial assistance to administer their programs and activities related to housing and community development in a manner affirmatively to further the purposes of the Fair Housing Act, and consistent with other applicable provisions ensuring equal opportunity and freedom from discrimination.

Beginning in 1993, the State of Ohio required all CDBG and HOME grantees to conduct a fair housing program with standard features. Historically, a comprehensive AI should be completed every five years to reflect the current fair housing situation in the jurisdiction. Grantees should update the AI annually to reflect current market conditions or other factors related to fair housing choice. An AI is a review of impediments or barriers that affect the rights of fair housing choice. It covers public and private policies, practices, and procedures affecting fair housing choice. The Interim Final Rule published in June 2021 and that went into effect in July 2021 requires funding recipients to affirmatively further fair housing implementation. Trumbull County last completed an Analysis of Impediments to Fair Housing Choice in 2019. The following 2024 AI update covers the city of Warren, an entitlement city which receives funding directly from HUD, and the city of Niles and the balance of Trumbull County, which receives its HUD funding through the Ohio Development Services Association.

WHO CONDUCTED THE ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

The 2024 Analysis of Impediments to Fair Housing Choice was conducted by the Youngstown State University Center for Applied GIS (YSU), with assistance from the Trumbull County Planning Commission, Trumbull County Board of Commissioners, the cities of Warren and Niles, and agency partners.

YSU provided GIS mapping and data services to the project, assisted in the planning and facilitation of meetings with key stakeholders and a public community meeting, and developed the Analysis of Impediments (AI) to Fair Housing Plan for Trumbull County and the cities of Warren and Niles. YSU coordinated with the Trumbull County Planning Commission to facilitate stakeholder meetings and collected and analyzed data and input obtained from key stakeholders.

This comprehensive AI for Trumbull County and the cities of Warren and Niles was developed using guidance from HUD's *Restoring Affirmatively Furthering Fair Housing Definitions and Certifications Interim Final Rule*, published on July 31, 2021; HUD's *Fair Housing Planning Guide Volume 1*; and ODOD's *How to Analyze Impediments to Fair Housing and Develop a Plan*, published in November 2023.

The following steps were taken to complete the project and final AI document:

GIS mapping and data analysis.

- Demographic, social, economic, and housing characteristics of the population (2022 US Census Bureau American Community Survey Estimates and 2020 US Census Bureau Summary File 1 and Redistricting Data).
- List of maps and tables:
 - o Trumbull County and cities of Warren and Niles.
 - o Population Density.
 - Race and Ethnicity.
 - Protected Race and Ethnicity.
 - o White Alone Population.
 - o Black or African American Alone Population.
 - o American Indian or Alaskan Native Alone Population.
 - o Asian Alone Population.
 - o Population of Two or More Races.
 - o Other Race Alone Population.
 - o Hispanic or Latino Population.
 - o Foreign-Born Population.
 - o Families and Related Children Under 18.
 - Median Household Income.
 - Poverty Rate by Block Group.
 - o Low-Income Population.
 - Vacancy Rate (Housing Units).
 - o Tenure: Owner- and Renter-Occupied Housing Units.
 - Median Contract Rent.
 - Cash Rent Less than \$500/Mo.
 - o Median Value of Owner-Occupied Housing Units.
 - o Location of Multi-Family Housing.
 - o Location of Registered Rentals and Likely Rental Properties.
 - o Foreclosures.
 - Major Employers and Public Transit Lines.
 - o Low-Income Population and Public Transit Lines.
 - o Central Business Districts.
 - o Community Reinvestment Areas.
 - o Home Mortgage Disclosure Act reporting.
 - Other GIS mapping and data, as necessary.

Engagement of key stakeholders.

- Coordinate, schedule, advertise, and send invitations for three stakeholder meetings.
- Facilitate stakeholder meetings.
- Collect and analyze all data and input collected at stakeholder meetings, to include in the final AI document.

Development of the final AI document.

- Develop the final AI document.
- Review the Ohio Development Services Agency's guide to How to Analyze Impediments to Fair Housing and Develop a Plan and HUD's Affirmatively Furthering Fair Housing guidelines to ensure compliance, and that all maps and data are current and included in the report.
- The final AI document includes the following components:
 - o Introduction
 - Fair Housing Law
 - Ohio Fair Housing Law
 - Who Conducted the Analysis of Impediments to Fair Housing Choice
 - Methodology
 - Funding
 - o Community Participation Process
 - o Current Fair Housing Legal Status and Assessment of Past Goals
 - Evaluation of Trumbull County's Current Fair Housing Legal Status
 - Fair Housing and Housing-Related Complaints and Concerns
 - Assessment of Past Goals and Public and Private Fair Housing Programs and Activities
 - o Demographic and Trends Analysis
 - Overview of Fair Housing Laws and Demographic Trends
 - Total Population
 - Race and Ethnicity, Origin, and Ancestry
 - Family Characteristics
 - Economic Characteristics
 - Housing Characteristics
 - Affordable Housing Providers
 - Major Employers and Mass Transit Lines
 - Community Reinvestment Areas
 - Community Reinvestment and Home Mortgage Disclosure Acts
 - o Identification of Impediments to Fair Housing Choice
 - Impediments to Fair Housing Choice
 - Persons who are Least Likely to Apply
 - Conclusions and Action Steps
 - Conclusions

Action Steps to Address Impediments to Fair Housing Choice

FUNDING

This Analysis of Impediments to Fair Housing was funded through Trumbull County's Community Development Block Grant Administration budget and local contributions from the City of Niles and the City of Warren.

COMMUNITY PARTICIPATION PROCESS

STAKEHOLDER INPUT

Stakeholder input is a key component to the development of an Analysis of Impediments to Fair Housing Choice. Trumbull County last developed an AI in 2019. During the process of developing the 2024 AI, the public outreach process consisted of a public meeting on May 28, 2024, and stakeholder interviews. Stakeholders included various government offices, affordable housing providers, fair housing and minority advocacy, mental health and addiction advocacy, homeless assistance and advocacy providers, and realtors and realtor organizations.

Stakeholder feedback was obtained from the following persons, groups, or organizations throughout the process of developing the 2024 AI for Trumbull County:

- Trumbull County Planning Commission.
- City of Niles.
- City of Warren.
- Coleman.
- Emmanuel Community Care Center.
- Family & Community Services/Axcess Point.
- Salvation Army.
- St. Vincent DePaul.
- Trumbull County Combined Health District.
- Trumbull County Mental Health and Recovery Board.
- Trumbull Metropolitan Housing Authority.
- Trumbull Neighborhood Partnership/Trumbull County Land Bank.
- Youngstown State University.

The stakeholder interviews consisted of several basic questions and followed this format:

- Are there housing-related discriminatory problems in your community?
- How do you feel about fair housing testing in your community?
- To your knowledge has fair housing testing been implemented at all in your community?
- Are any of the following fair housing issues prevalent in your community?
 - Lack of affordable and accessible housing options in Trumbull County and the cities of Warren and Niles.
 - o Landlord/tenant disputes (related to fair housing/discriminatory practices).
 - NIMBY (Not-In-My-Back-Yard) syndrome.
- What are the action steps (of which you are aware) that have been taken since the completion of the last AI in 2019?
- What are the potential actions to target persons "least likely to apply" (meaning housing, and those who are not likely to apply for housing without outreach efforts)?

A summary of responses from community outreach efforts is as follows:

- Many of the impediments facing Trumbull County residents in 2019 are still in place in 2024.
- TNP offers accessibility modifications for LMI owner-occupants, and although there is a wait list, resources to support this endeavor exist. Modifications include ramps, and bathroom modifications, among other accessibility modifications. This begins to address an issue identified in 2019; the challenge of modifying or retrofitting aging housing stock for those with disabilities.
- There are a limited number of resources for landlords or tenants to make modifications to rental units.
- Funding through the Federal Home Loan Bank of Pittsburgh restricts projects to distressed
 census tracts, which limits the locations available to projects. This prevents county agencies
 from submitting competitive grant applications. Potential projects would include renovation or
 resale of vacant units and there are not enough suitable homes located in eligible areas.
- TNP is discussing balancing resource deployment (particularly for new construction or vacant rehabilitation) in low-to-moderate income (LMI) neighborhoods, which would increase the concentration of LMI households, but would be an investment in an LMI neighborhood) vs. resource deployment in middle- or moderate-income neighborhoods.
- TNP would like to see a template library of leases and land contracts made available for renters and landlords to use, that are fair and equitable. This could include a website where information can be housed and would serve as a central repository of this information for housing partners to share with clients. If this does already exist, then we should formulate a plan to share this information with and educate housing partners about its availability.
- There is an increasing need for accessible housing. A frequent challenge is residents who age in place but have a second-floor bathroom. With an aging population in Trumbull County, this is an important point.
- There exists in Niles a general desire to not add any additional low-income housing units. The
 preference is for moderate-income or well-managed low-income units, but there is no desire for
 new low-income housing.
- In Niles, there is a need to educate the community that multi-family units can be market-rate and owner-occupied, as a strong connection exists among residents that all multi-family units are rentals. However, many single-family homes are renter-occupied. Increasing knowledge about the different housing and financing types in the community would go a long way towards eliminating impediments to fair housing choice.
- We should encourage cities and villages to pass fair housing ordinances that prohibit source of income discrimination by landlords. Is this something that the county can adopt, like what Akron has passed?
- Multiple communities in Trumbull County have issued moratoriums on construction permits for new multi-family units, which is an impediment to fair housing choice, as many multi-family units are rentals.

The following impediments to fair housing choice were discussed during the public meeting held on May 28, 2024:

- Landlords often discriminate based on familial status, ethnicity, and other protected classes.
- The landlord community tight knit in Trumbull County and they often use this to leverage the rents that they charge.
- There is a general lack of affordable and accessible housing. Although there is ample housing stock, much of it is unsafe and in poor condition for habitation.
- Monthly renter costs have skyrocketed over last couple of years.
- The COVID-19 pandemic skewed eviction and foreclosure rates (downward) due to long moratoriums on each. There is a hesitation to use these numbers to plan going forward.
- Rental ownership monopolies exist throughout the county, especially by out of state and out of country entities. Anecdotally, a large percentage of housing choice voucher properties are by companies or individuals in New Zealand.
- There has been demolition of apartment buildings, and replacing these structures with greenspace, not rebuilding. These include the Buckeye Apartments, Reeves Apartments, and others. This results in a loss of safe and affordable units.
- Many private developers in Trumbull County are not interested in building mixed use or infill housing.
- Housing Choice Vouchers are essentially worthless and often time out because the voucher is not worth enough to cover the rent that landlords expect.
- Many landlords avoid leases by executing "forever" land contracts instead.
- Transportation-WRTA routes and service have significantly decreased.
- Grant funds for rehabbing are highly competitive and very limited.
- There is a general lack of support from local elected officials and the community in general.
- There is profit in not renting properties and flipping clients. The way this works is by landlords charging non-refundable application fees that are hundreds of dollars and not renting the structure, or by securing a security deposit and first month's rent, knowing the renter cannot afford a second month. The renter is then evicted, and the process begins anew with a new renter.
- Eviction sealing is not allowed in Niles.

CURRENT FAIR HOUSING LEGAL STATUS AND ASSESSMENT OF PAST GOALS

EVALUATION OF TRUMBULL COUNTY'S CURRENT FAIR HOUSING LEGAL STATUS

Trumbull County and the cities of Warren and Niles receive CBDG and HOME program funds through the US Department of Housing and Urban Development (HUD). Warren, as a central city in the Youngstown-Warren-Boardman Metropolitan Statistical Area (MSA), is an entitlement city and receives its funding directly from HUD's Columbus office. Trumbull County and the city of Niles receive their funding through the Ohio Department of Development.

There are seven class of people who are protected under Title VIII of the Civil Rights Act of 1968, which is also known as the Fair Housing Act. The protected classes include the following:

- Color
- Race
- Religion
- Sex
- Familial Status (families with children)
- Disability
- National Origin

In addition, Ohio law includes two additional protected classes:

- Ancestry
- Military Status

The Fair Housing Act prohibits discrimination in housing-related activities and requires grantees to "affirmatively further" fair housing (AFFH) in all housing-related activities. These requirements extend to all federal executive departments and agencies, as well as state and local recipients of federal funds. Since Trumbull County and its municipalities receive federal financial assistance to administer housing programs, and activities related to housing and community development, including CDBG and HOME funds, it is required to "affirmatively further" the purposes of the Fair Housing Act. The spirit of AFFH is to reduce and eliminate housing discrimination and segregation and increase the supply of open and affordable housing.

Trumbull County has a fair housing training schedule, which is contained in Table 1 and Appendix B.

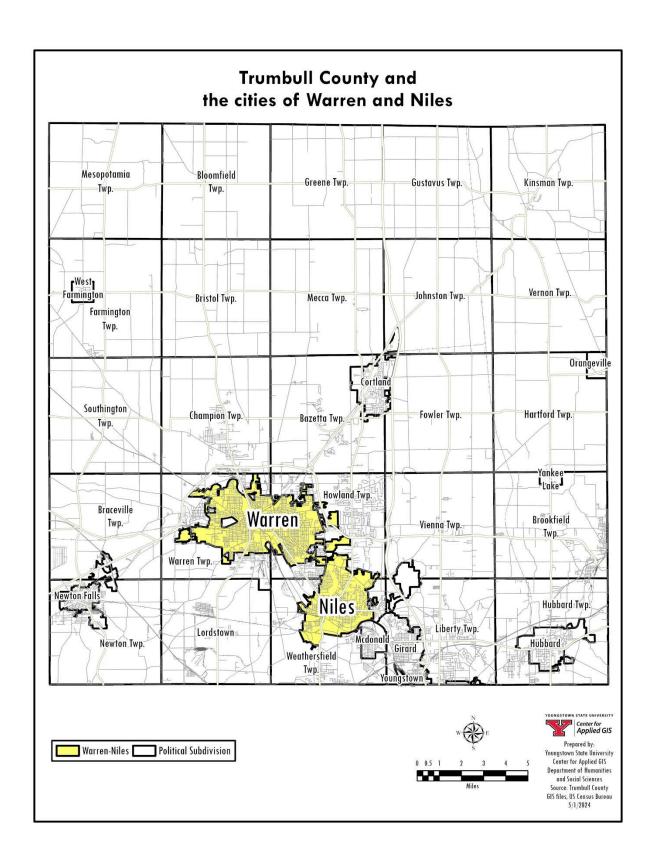
Table 1: Fair Housing Training Schedule for Trumbull County, 2024-2026

Target Population or Target Area	Training Location	Training Location	Description of Training	Year	Date & Time
City of Girard – Target	Girard Multi-	Girard Multi-Generational	Fair Housing Right and	2024	Q1 –
Population/Area	Generational	Center	Complaint Process		March 5,
	Center	443 Trumbull Avenue			2024 @
		Girard, OH 44420			9:00am

Target Population or	Training	Training Location	Description of Training	Year	Date &
Target Area	Location	Towards III County Materials	Overview of Federal	2024	Time
Veterans Services-	Trumbull	Trumbull County Veterans	Overview of Federal,	2024	Q2- May
Organization	County	Services Commission	State, and Local Fair		22, 2024
Requirement	Veterans	253 E Market Street	Housing Laws		@10:00am
	Services	Warren, Ohio 44481			
	Commission			222	
Limited Clientele	Warren	Warren SCOPE	Fair Housing Rights and	2024	Q2-June
(Elderly and Disabled)	SCOPE	YWCA	Complaint Process for		21, 2024
		375 N Park Avenue	Elderly and Disabled		@ 2:00pm
		Warren, Ohio 44481	Populations		
Limited Clientele	Trumbull	Trumbull County Housing	Overview of Federal,	2024	Q3- July 9,
(Homeless)	County	Collaborative Meeting	State & Local Fair		2022 @
	Housing	YWCA	Housing Laws		2:00pm
	Collaborative	375 N Park Ave			
		Warren, OH 44481			
General Population	Trumbull	Trumbull County Fairgrounds	Fair Housing Rights and	2024	Q3 – July
	County	899 Everett Hull Road	Complaint Process		11, 2024
	Fairgrounds	Cortland, Ohio 44410			@
					10:00am
Trumbull Metropolitan	TMHA	TMHA	Overview of Federal,	2024	Q3 –July
Housing Authority-		4076 Youngstown Rd SE	State & Local Fair		24, 2024
Organization		Warren, Ohio 44484	Housing Laws		@
Requirement					10:00am
Howland Township-	Howland	Howland SCOPE	Fair Housing Rights and	2024	Q3 –
Target	SCOPE	8273 High Street	Complaint Process		September
Population/Area		Warren, Ohio 44484			10, 2024
					@
					10:00am
Warren City Schools-	Warren City	Warren City Schools	Overview of Federal,	2024	Q4- TBD
Organization/School	Schools	105 High Street	State & Local Fair		(sometime
Requirement		Warren, Ohio 44481	Housing Laws		in
					October)
Limited Clientele	Girard Multi-	Girard Multi-Generational	Fair Housing Rights and	2024	Q4-
(Elderly and Disabled)	Generational	Center	Complaint Process for		October
in Target Population	Center	443 Trumbull Avenue	Elderly and Disabled		15, 2024
Area		Girard, Ohio 44420	Populations		@ 9:00am
Stark Trumbull Area	Stark	Stark Trumbull Area Board of	CEU Seminar for Realtors	2025	Q1- TBD
Board of Realtors-	Trumbull Area	Realtors			
Organization	Board of	TBD			
Requirement	Realtors				
Trumbull County	Trumbull	Trumbull County Zoning	Overview of Federal,	2025	Q2-TBD
Zoning Inspectors	County Zoning	Inspectors Association	State & Local Fair		
Association-	Inspectors	TBD	Housing Laws		
Organization	Association				
Requirement					
Girard Multi-	Girard Multi-	Girard Multi-Generational	Fair Housing Rights and	2025	Q2-TBD
Generational Center -	Generational	Center	Complaint Process for		
Organization	Center	443 Trumbull Avenue	Elderly and Disabled		
Requirement		Girard, Ohio 44420	Populations		
Elderly and	Lordstown	Lordstown SCOPE	Fair Housing Rights and	2025	O2-TBD
Disabled/CHIP	SCOPE	1776 Salt Springs Rd	Complaints Process		
		Warren, Ohio 44481			
General	Trumbull	Trumbull County Fairgrounds	Fair Housing Rights and	2025	Q3-TBD
Population/CHIP	County	889 Everett Hull Road	Complaint Process		
' '	Fairgrounds	Cortland, Ohio 44410	·		
Limited Clientele	Trumbull	Trumbull County Housing	Fair Housing Rights and	2025	Q3-TBD
(Homeless)	County	Collaborative Meeting	Complaint Process		
•					

Target Population or Target Area	Training Location	Training Location	Description of Training	Year	Date & Time
	Housing Collaborative	YWCA 375 N Park Ave Warren, Ohio 44481			
Limited Clientele (Elderly and Disabled) in Target Population Area	Howland SCOPE	Howland SCOPE 8273 High Street Warren, Ohio 44484	Fair Housing Rights and Complaint Process	2025	Q4-TBD
Trumbull County Continuum of Care/CHIP	YWCA	YWCA of Warren 375 North Park Ave Warren, Ohio 44481	Fair Housing Rights and Complaint Process	2026	Q1-TBD
General Population/CHIP	Warren- Trumbull Public Library	Warren-Trumbull County Library Liberty Location 415 Churchill Hubbard Rd Youngstown, Ohio 44505	Fair Housing Rights and Complaint Process	2026	Q3-TBD

The following map shows Trumbull County and the cities of Warren and Niles.



FAIR HOUSING AND HOUSING-RELATED COMPLAINTS AND CONCERNS

All housing-related complaints in Trumbull County and the city of Warren are administered by Community Legal Aid. Community Legal Aid is a nonprofit law firm that serves low-income persons and families throughout northeast Ohio. Community Legal Aid maintains an office in the city of Warren. The city of Niles administers housing-related complaints through its Housing and Zoning Department.

The following is a summary of fair housing and housing-related complaints received in Trumbull County and the cities of Warren and Niles:

ASSESSMENT OF PAST GOALS AND PUBLIC AND PRIVATE FAIR HOUSING PROGRAMS AND ACTIVITIES

An Analysis of Impediments to Fair Housing Choice was completed for Trumbull County and the cities of Warren and Niles in 2019. During this analysis, the following impediments to fair housing choice were identified. Those impediments are as follows:

- Lack of education about fair housing issues available not only to landlords but to tenants.
- Plethora of affordable housing, but a lack of accessible housing to those persons with disabilities.
- Historic segregation issues that continue to plague Trumbull County.
- Pervasive "Not in My Backyard" (NIMBY) syndrome that runs generations deep in the county.

Trumbull County regularly updates a Limited English Proficiency Plan, which it posts on the county's website. This plan contains contact information for translation services, if needed. Trumbull County also distributes Department of Housing and Urban Development-generated "I Speak" cards to every public meeting and has them on file at the county office to distribute to any non-English speaking person, or if a person with a physical disability is not able to interpret the meeting subject matter or content. Trumbull County also travels to the homes of non-English speaking or disabled individuals to assist them with applications for funding if the individual is not able to travel to the county office in downtown Warren.

Trumbull County provides education and outreach, and equity training, and distributes fair housing flyers at community events such as the Trumbull County Fair. Trumbull County also distributes fair housing flyers at every meeting attended by County representatives.

The Stark Trumbull Area Realtors has affirmed its commitment to fair housing laws and regularly offers free fair housing and civil rights continuing education training.

Trumbull County and the city of Warren administer and answer each fair housing complaint, and then refer each complainant to Community Legal Aid for any legal advice and assistance needed.

The city of Niles maintains an online complaint form which can be used to submit complaints about properties throughout the city, but also any fair-housing issues. The city administers the complaint form and works quickly to proactively address issues and prevent further problems.

The Trumbull County Housing Collaborative (TCHC) meets bi-monthly and focuses on issues ranging from housing to homelessness. TCHC normally invites a speaker who will often present about fair housing issues. TCHC is comprised of the following core organizations:

- Apprisen
- Catholic Charities
- City of Warren
- Coleman
- Direction Home
- ECCC
- ECCC
- Help Network
- Legal Aid
- Salvation Army
- Someplace Safe
- SSVF
- St. Vincent DePaul
- Sunshine Warren Homes
- TC Planning Co
- TMHA
- TMHRB
- Urban League
- Warren City Schools
- WRILC
- YWCA

Table 2 shows a summary of projects completed in Trumbull County between 2018 and 2021.

Table 2: Projects Completed in Trumbull County between 2018 and 2021

Grant Year	Grant Funding	Type of Assistance	Address Amount P		Persons	Race	Hispanic
2018	CHIP/HOME	Housing Rehab	1380 Sixth Street SW, Warren, OH 44485	\$32,824.51	1	Black/African American	N
2018	CHIP/HOME	Housing Rehab	1709 Baker St SW, Warren, OH 44485	\$25,883.21	1	Black/African American	N
2018	CHIP/HOME	Housing Rehab	181 Euclid Blvd., Youngstown, OH 44505	\$29,300.00	5	Black/African American	N
2018	CHIP/HOME	Housing Rehab	3055 Ridge Avenue SE, Warren, OH 44484	\$33,240.00	1	White	N
2018	CHIP/HOME	Housing Rehab	3250 Reeves Rd NE, Warren, OH 44483	\$26,860.00	2	White	N

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2018	CHIP	Repair	1738 Morris Street, Mineral Ridge, OH 44440	\$14,240.00	5	White	N
2018	CHIP	Repair	3420 Draper Ave. SE, Warren, OH 44484	\$13,530.30	1	White	N
2018	CHIP	Repair	36 Norwick Dr., Youngstown, OH 44505	\$14,690.00	2	White	N
2018	CHIP	Repair	513 Murray Hill Dr., Youngstown, OH 44505	\$14,765.00	1	Black/African American	N
2018	CHIP	Repair	6984 Hoagland Blackstub Road, Cortland, OH 44410	\$9,034.00	1	White	N
2018	CHIP	Emergency Rent/Mtg. Assistance	2950 Belmar Dr., Youngstown, OH 44505	\$921.00	1	White	N
2018	CHIP	Emergency Rent/Mtg. Assistance	83B Trumbull Ct., Newton Falls, OH 44444	\$1,125.00	4	White	N
2018	CHIP	Emergency Rent/Mtg. Assistance	557 Nellie St., Apt. 1, Masury, OH 44438	\$1,350.00	2	White	Υ
2018	CHIP	Emergency Rent/Mtg. Assistance	2513 Cardinal Drive, Youngstown, OH 44505	\$1,251.98	1	Am. Indian, Alaska Native & Black/African American	N
2018	CHIP	Emergency Rent/Mtg. Assistance	3041 Green Acres Dr. Apt 3, Youngstown, OH 44505	\$1,650.00	4	Black/African American	N
2019	HOME	Rehab	3254 Crestview Ave SE, Warren, OH 44484	\$31,975.00	1	White	Υ
2020	HOME	Rehab	7800 Chestnut Street, Masury, OH 44438	\$79,870.00	4	White	N
2021	CHIP/HOME	Housing Rehab	1260 Youngstown- Kingsville Road, Vienna, OH 44473	\$25,860.00	2	White	N
2021	CHIP/HOME	Housing Rehab	1418 Townsend Ave., Youngstown, Ohio 44505	Youngstown, Ohio		White	N
2021	CHIP/HOME	Housing Rehab	3055 Ridge Avenue SE, Warren, OH 44484	\$24,855.00	1	White	N
2021	CHIP/HOME	Housing Rehab	8235 Fairhill Drive NE, Warren, OH 44484	\$13,705.00	1	White	N
2021	CHIP/HOME	Housing Rehab	957 Adrian Circle, Girard, OH 44420	\$34,855.00	3	White	N
2021	CHIP	Repair	1611 Salt Springs Road, Mineral Ridge, OH 44440	\$17,080.00	2	White	N

2021	CHIP	Repair	3147 Pittsburgh Avenue, McDonald, OH 44437	\$17,655.00	1	White	N
2021	CHIP	Repair	336 Indiana Avenue, McDonald, OH 44437	\$20,110.00	2	White	N
2021	CHIP	Repair	8148 Warren-Sharon Road, Masury, OH 44438	\$21,330.00	2	White	N

DEMOGRAPHIC ANALYSIS

TOTAL POPULATION

Trumbull County is in northeast Ohio, along the Ohio-Pennsylvania boundary, between Cleveland and Pittsburgh. The county was incorporated on July 10, 1800, and was the seventh county established in the Northwest Territory. The county consists of seven cities, including Cortland, Girard, Hubbard, Newton Falls, Niles, Warren, and Youngstown; five villages, including Lordstown, McDonald, Orangeville, West Farmington, and Yankee Lake; and 24 townships.

The total population of Trumbull County was 201,749 in 2022, according to the United States Census Bureau American Community Survey 5-Year Estimates Program, a decrease of approximately 4.1% from the 2010 Decennial Census count of 210,312. The county lost 1,592 residents, a decrease of 0.8%, between 2017 and 2022 (the most current data available during the development of the 2019 and 2024 Ais). The cities of Warren and Niles also lost population between 2010 and 2022, at 5.7% and 6%, respectively. Warren and Niles also lost population between 2017 and 2022, at 2.6% and 2.7%, respectively. Between 1980 and 2022, Trumbull County lost 16.6% of its total population, while Warren lost a whopping 30.8% of its population while Niles lost 15.2% of its population over the same period. In recent years, the downward population trend can mostly be explained by a *natural decrease*, meaning more deaths than births are occurring annually, at a rate at which is greater than the net immigration to the county. Figure 1 shows the population trend in Trumbull County between 1980 and 2022.

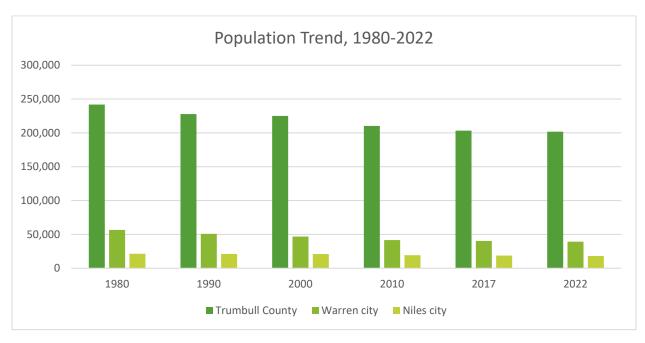


Figure 1: Population Trend in Trumbull County and Warren and Niles between 1980 and 2022

Of the persons living in Trumbull County in 2022, 50.9% were female, while 49.1% were male. The rate of female population was slightly higher in the cities of Warren and Niles, at 51.2% and 51.7%,

respectively. A total of 102,591 females lived in Trumbull County in 2022, while 20,073 lived in the city of Warren and 9,353 lived in the city of Niles.

Table 3 shows the population breakdown by age and sex in Trumbull County in 2022.

Table 3: Distribution of Age and Sex in Trumbull County and Warren and Niles in 2022

	Trumbull County		Nile	Niles city		n city
Male	99,158	49.1%	8,754	48.3%	19,131	48.8%
Female	102,591	50.9%	9,353	51.7%	20,073	51.2%
Under 5 years	10,583	5.2%	681	3.8%	2,546	6.5%
5 to 9 years	10,871	5.4%	699	3.9%	2,045	5.2%
10 to 14 years	12,131	6.0%	924	5.1%	2,358	6.0%
15 to 17 years	7,675	3.8%	646	3.6%	1,279	3.3%
18 and 19 years	4,351	2.2%	463	2.6%	956	2.4%
20 years	2,293	1.1%	258	1.4%	544	1.4%
21 years	2,255	1.1%	234	1.3%	624	1.6%
22 to 24 years	7,209	3.6%	732	4.0%	1,699	4.3%
25 to 29 years	12,135	6.0%	1,161	6.4%	3,149	8.0%
30 to 34 years	11,326	5.6%	1,163	6.4%	2,679	6.8%
35 to 39 years	10,766	5.3%	896	4.9%	2,269	5.8%
40 to 44 years	11,381	5.6%	1,292	7.1%	2,393	6.1%
45 to 49 years	11,874	5.9%	926	5.1%	1,938	4.9%
50 to 54 years	13,124	6.5%	1,257	6.9%	2,380	6.1%
55 to 59 years	13,782	6.8%	1,165	6.4%	2,397	6.1%
60 and 61 years	6,955	3.4%	595	3.3%	1,380	3.5%
62 to 64 years	8,928	4.4%	718	4.0%	1,789	4.6%
65 and 66 years	5,521	2.7%	452	2.5%	737	1.9%
67 to 69 years	8,222	4.1%	698	3.9%	1,281	3.3%
70 to 74 years	11,950	5.9%	1,243	6.9%	1,710	4.4%
75 to 79 years	7,884	3.9%	861	4.8%	1,168	3.0%
80 to 84 years	4998	2.5%	517	2.9%	899	2.3%
85 years and over	5535	2.7%	526	2.9%	984	2.5%

There were only 135 active members of the armed forces in the labor force in Trumbull County in 2022 and only 17 reported in the cities of Warren and Niles, according to Census estimates. The Census Bureau defines active military personnel as on active duty with the United States Army, Air Force, Navy, Marine Corps, or Coast Guard. Because the Census Bureau counts residents at their usual place of residence, those members of a household stationed elsewhere either stateside or overseas are not to be included on the census form. However, the definition of "military status" also includes veterans and the families of veterans. In Trumbull County, the rate of veterans per 100,000 people over the age of 18 was 8,861 in 2022 compared to 7,026 in Ohio. Those rates were 7,791 and 8,221 in Warren and Niles respectively. In fact, the rate of veterans per 100,000 persons over the age of 18 in Trumbull County is

within the top 30 percent of counties nationwide. A total of 14,209 veterans were living in Trumbull County in 2022, which was 8.9% of the population 18 and over. There were 2,412 veterans living in Warren and 1,246 living in Niles, respectively, in 2022. Although we have not included a map of active military members by census tract throughout Trumbull County, we have included a map of veteran population throughout the county. Both active military and veterans are protected classes in the state of Ohio and should be regarded as such when dealing with housing-related issues.

Between the completion of the previous AI in 2019 and the 2024 AI, the population in Trumbull County declined slightly by 0.8%, while the population in Niles and Warren declined by 2.7% and 2.6%, respectively. The breakdown of race and ethnicity remained largely the same, although the percentage of the population identifying as White alone in 2017 declined slightly by 2022 across the county. Homeownership rates increased slightly in the county, by 1.2%, and increased by 3% and 3.8% in Niles and Warren, respectively. Table 4 shows a comparison between 2017 (2019 AI) and 2022 (2024 AI) demographics in Trumbull County, and Niles and Warren. A lag of about one year exists in the American Community Survey, and therefore the 2017 data was the latest release when the 2019 AI was completed, and 2022 data is the latest release for the 2024 AI.

Table 4: Comparison of 2017 and 2022 Demographics in Trumbull County, and Niles and Warren

Demographic	Trumbull County	Niles city	Warren city
Population in 2022	201,749	18,107	39,204
Population in 2017	203,341	18,613	40,244
Change in population, 2017-2022	-1,592	-506	-1,040
Percent change in population, 2017-2022	-0.8%	-2.7%	-2.6%
Homeownership rate in 2022	71.7%	57.3%	54.7%
Renters in 2022	28.3%	42.7%	45.3%
Homeownership rate in 2017	70.6%	54.3%	50.9%
Renters in 2017	29.4%	45.7%	49.1%
Change in homeownership rate, 2017-2022	1.2%	3.0%	3.8%
Change in renters, 2017-2022	-1.2%	-3.0%	-3.8%
White population in 2022	85.7%	88.9%	62.4%
Black or African American population in 2022	7.8%	3.9%	27.6%
American Indian or Alaskan Native population in 2022	0.1%	0.1%	0.1%
Asian population in 2022	0.6%	1.3%	0.7%
Native Hawaiian or other Pacific Islander population in 2022	0.1%	0.1%	0.0%
Other race population in 2022	0.1%	0.1%	0.3%
Two or more races in 2022	3.7%	3.7%	5.2%
Hispanic Population in 2022	2.0%	1.9%	3.7%
Foreign born population in 2022	1.3%	2.0%	1.3%
White population in 2017	87.4%	90.3%	66.2%

Demographic	Trumbull County	Niles city	Warren city
Black or African American population in 2017	8.2%	5.7%	27.1%
American Indian or Alaskan Native population in 2017	0.2%	0.0%	0.1%
Asian population in 2017	0.5%	0.1%	0.4%
Native Hawaiian or other Pacific Islander population in 2017	0.0%	0.0%	0.0%
Other race population in 2017	0.1%	0.0%	0.2%
Two or more races in 2017	2.0%	2.2%	3.4%
Hispanic Population in 2017	1.7%	1.6%	2.7%
Foreign born population in 2017	1.5%	0.9%	1.4%
Change in White population, 2017-2022	-1.7%	-1.4%	-3.8%
Change in Black or African American population, 2017-2022	-0.4%	-1.9%	0.6%
Change in American Indian or Alaskan Native population, 2017-2022	-0.1%	0.1%	0.0%
Change in Asian population, 2017-2022	0.1%	1.1%	0.4%
Change in Native Hawaiian or other Pacific Islander population, 2017-2022	0.1%	0.1%	0.0%
Change in Other race population, 2017-2022	0.0%	0.1%	0.1%
Change in Two or more races, 2017-2022	1.6%	1.5%	1.8%
Change in Hispanic Population, 2017-2022	0.3%	0.3%	1.0%
Change in Foreign born population, 2017-2022	-0.1%	1.2%	-0.1%

RACE AND ETHNICITY, ORIGIN, AND ANCESTRY

Trumbull County is segregated along racial and ethnic lines. The population of Trumbull County was overwhelmingly White, with 85.7% of the population White alone/not Hispanic in 2022, compared to 77.2% statewide. Only 7.8% of the population in the county was Black or African American alone/not Hispanic in 2022, compared to 12.2% statewide. The county's three urban areas include Youngstown, OH; Newton Falls, OH; and Sharon-Hermitage, OH-PA; and accounted for 88.4% of the minority population in Trumbull County. The remainder of the county was 93.1% White alone/not Hispanic, with few areas of significant minority population. The population of Warren was mostly White alone/not Hispanic, at 62.4%, while 27.6% of the population was Black or African American alone/not Hispanic. The city of Niles was predominantly White alone/not Hispanic, at 88.9%, while only 3.9% of the population was Black or African American alone/not Hispanic. American Indians and Alaskan Natives, Asians, Native Hawaiians/Pacific Islanders, and those identifying with two or more races constituted only 4.5% of the population across Trumbull County. The Hispanic or Latino population of all races constituted only 2% of the total population.

Table 5 shows the breakdown of population by race and ethnicity in Trumbull County.

Table 5: Race and Ethnicity in Trumbull County and Warren and Niles in 2022

Туре	Ohio	Trumbull County	Niles city	Warren city
Population	11,774,683	201,749	18,107	39,204
White alone/not Hispanic-Latino	9,094,774	172,878	16,103	24,466
%	77.2%	85.7%	88.9%	62.4%
Black alone/not Hispanic-Latino	1,431,238	15,670	702	10,839
%	12.2%	7.8%	3.9%	27.6%
American Indian-Alaskan Native alone/not Hispanic-Latino	9,032	150	18	38
%	0.1%	0.1%	0.1%	0.1%
Asian alone/not Hispanic-Latino	281,238	1,157	229	290
%	2.4%	0.6%	1.3%	0.7%
Native Hawaiian-Pacific Islander alone/not Hispanic-Latino	3,574	167	22	0
%	0.0%	0.1%	0.1%	0.0%
Another race alone/not Hispanic-Latino	37,838	253	18	115
%	0.3%	0.1%	0.1%	0.3%
Two or more races/not Hispanic-Latino	422,364	7,377	667	2,020
%	3.6%	3.7%	3.7%	5.2%
Hispanic-Latino	494,625	4,097	348	1,436
%	4.2%	2.0%	1.9%	3.7%

Only 1.3% of the population in Trumbull County was foreign-born in 2022, compared to 4.9% statewide. The foreign-born population rate was 1.3% in Warren and 2% in Niles in 2022. There were several areas of a sizeable foreign-born population in southeastern Trumbull County in 2022, including areas of Bazetta Township, Hartford Township and Kinsman, Howland Township and the east side of Warren, and parts of Niles and Hubbard Township.

In Trumbull County, 75.5% of the population reported either single or multiple ancestry in 2022, which was almost the same as the state rate of 75.1%. This rate was consistent among the cities of Warren and Niles at 73.1% and 75.3%, respectively. Most persons reporting ancestry reported single ancestry, although approximately one-third of respondents reported multiple ancestry. Among those persons reporting ancestry, the most frequently reported groups were American, German, Italian, Irish, English, Pennsylvania German, Polish, and Slovak. In Warren, the most common ancestries were American, Italian, Irish, and German, while in Niles, the most common ancestries were American, Italian, Irish, German, and English. Many persons also reported other groups or were unclassified or not reported.

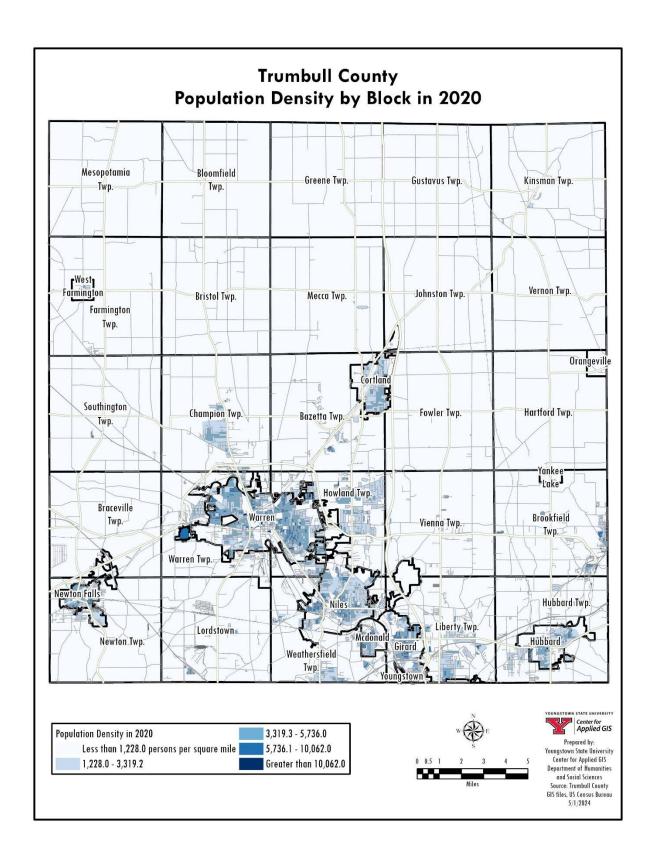
Table 6 shows the total number of foreign-born persons, and those reporting ancestry in Trumbull County in 2022.

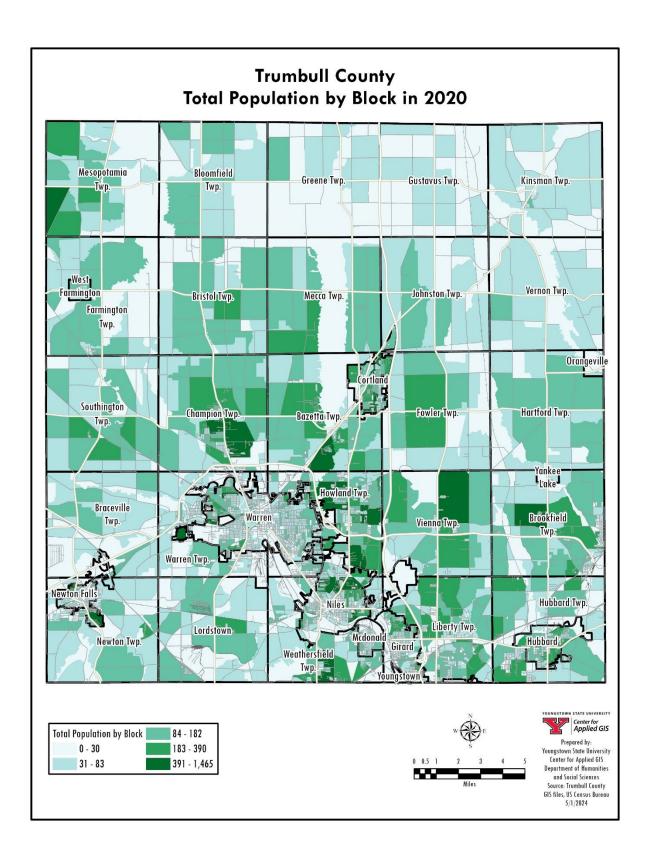
Table 6: Persons Reporting Single Ancestry in Trumbull County and Warren and Niles

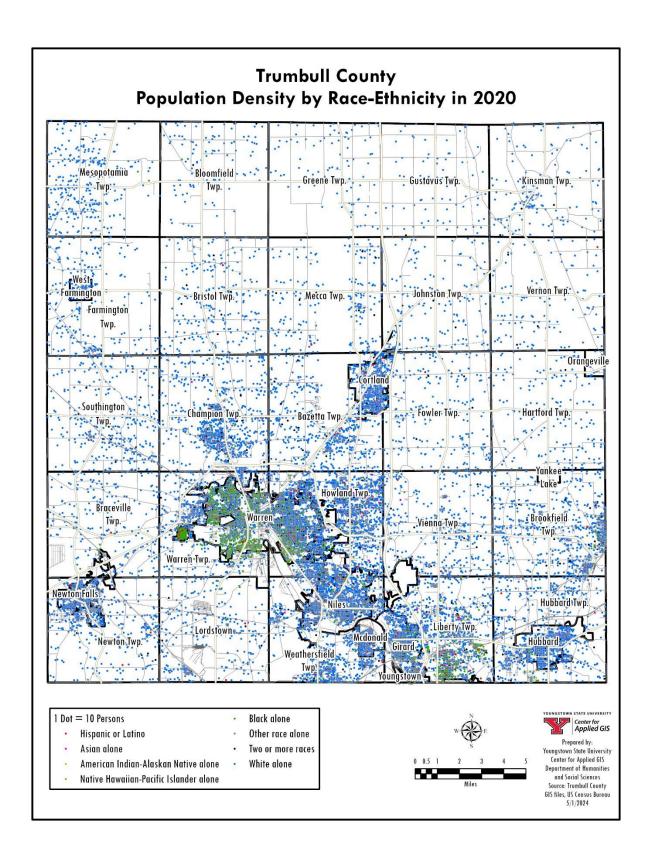
Ancestry	Trumbull	Niles city	Warren city	Ancestry	Trumbull	Niles	Warren
	County				County	city	city

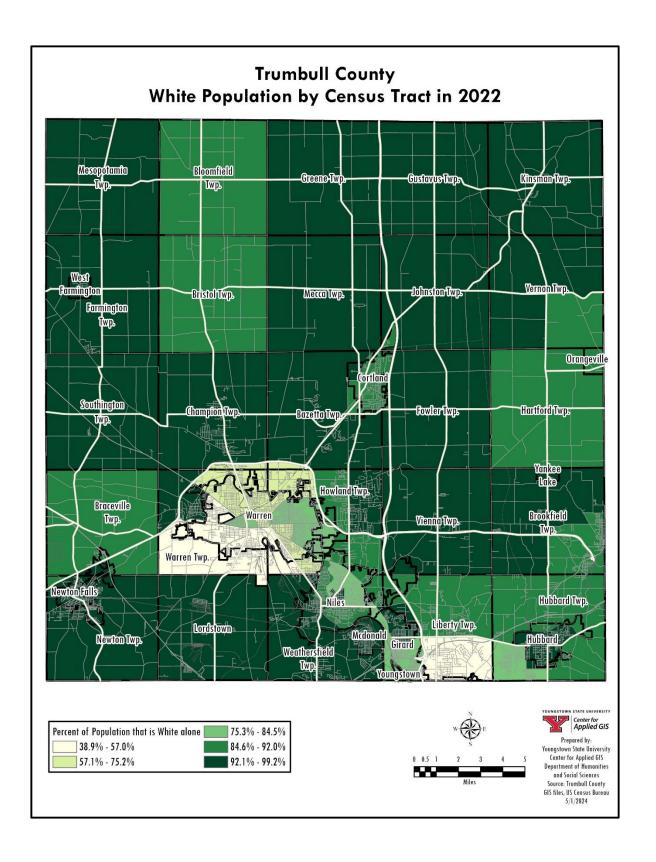
Total reporting ancestry	99,010	8,877	20,856	Canadian	125	0	0
American	40,101	3,457	7,554	Finnish	115	10	32
German	7,954	479	576	Czechoslovakian	108	4	33
Italian	7,903	1,454	1,016	Yugoslavian	105	0	61
Irish	4,628	739	922	French Canadian	99	0	19
English	4,405	361	394	Scandinavian	96	0	11
Pennsylvania German	3,755	0	17	Norwegian	82	16	11
Polish	1,775	81	235	Arab (Lebanese)	75	0	0
Slovak	1,717	132	166	Czech	66	0	0
European	996	110	85	Slavic	64	0	8
Hungarian	899	66	42	Iranian	53	0	53
Greek	698	12	326	Serbian	47	0	11
Scotch-Irish	565	106	100	Arab (Other Arab)	46	27	0
Croatian	550	85	0	Sub Saharan African (Other Sub Saharan African)	42	10	32
Scottish	520	157	147	Celtic	33	0	33
Dutch	450	60	27	Lithuanian	29	0	0
Romanian	386	63	20	Sub Saharan African (Nigerian)	29	0	29
Welsh	305	22	41	Austrian	28	0	0
Eastern European	286	28	7	Belgian	26	0	9
Ukrainian	274	29	33	Arab (Moroccan)	25	0	25
Russian	254	10	6	Albanian	23	0	0
West Indian (except Hispanic groups) (Jamaican)	249	0	249	Arab (Egyptian)	22	0	6
Swedish	216	6	32	Armenian	19	0	19
Swiss	192	0	0	Danish	17	17	0
British	180	19	0	Arab (Arab)	15	0	0
Slovene	150	8	13	Portuguese	11	0	0
French (except Basque)	140	0	12	Northern European	8	0	0
Sub Saharan African (African)	128	0	108	Turkish	7	0	0
Arab (Palestinian)	125	0	23	Other groups	17,794	1,309	8,313

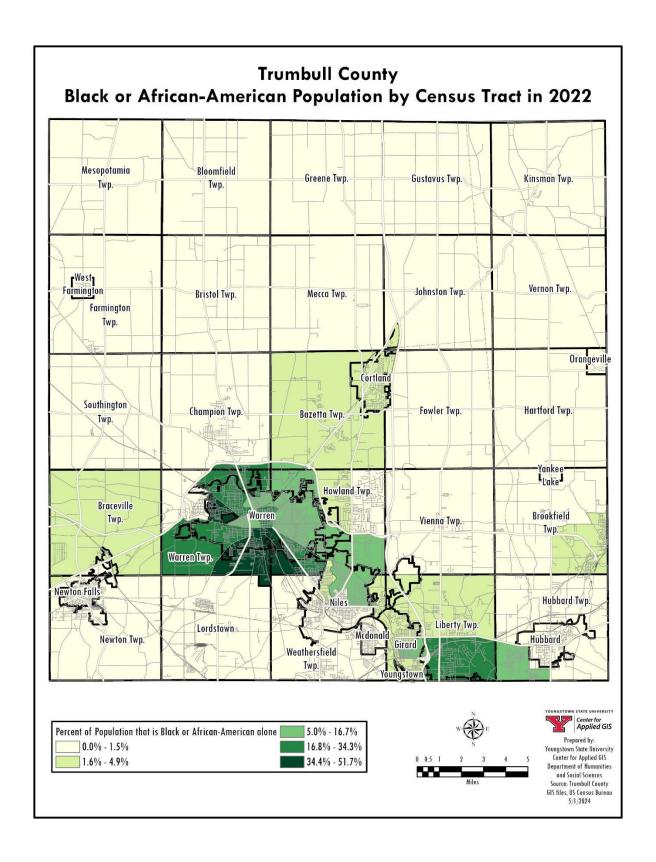
The following pages contain maps showing demographic characteristics of the population in Trumbull County in 2022.

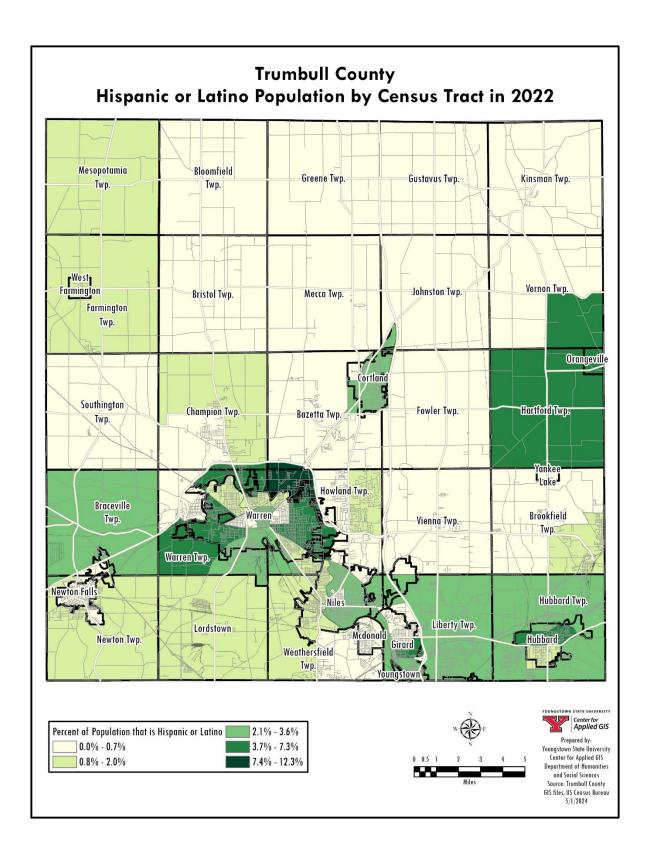


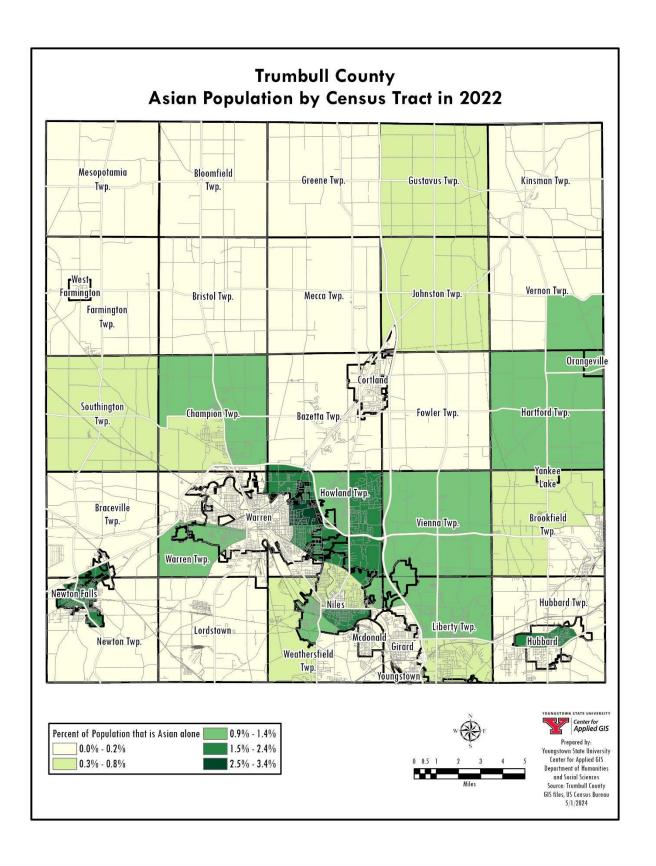


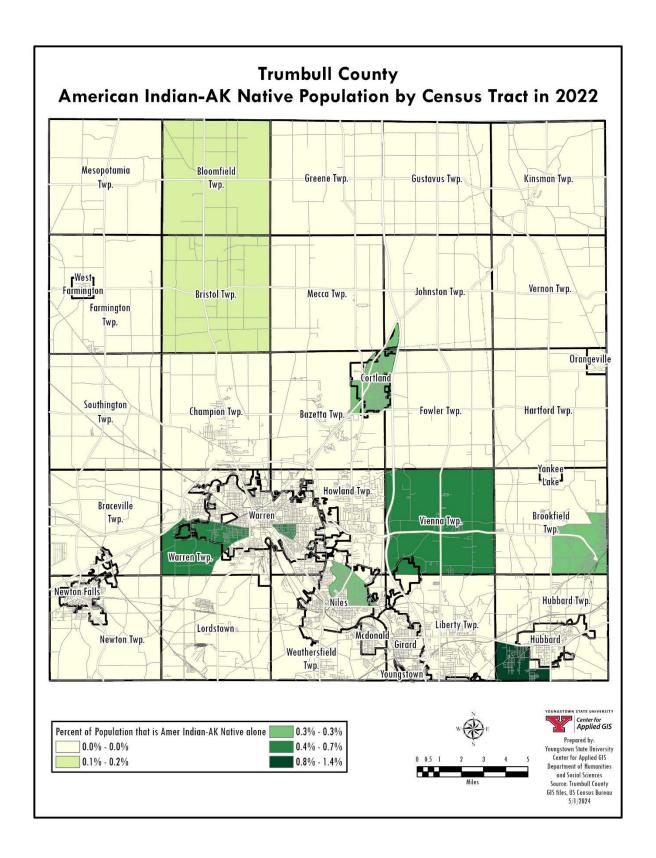


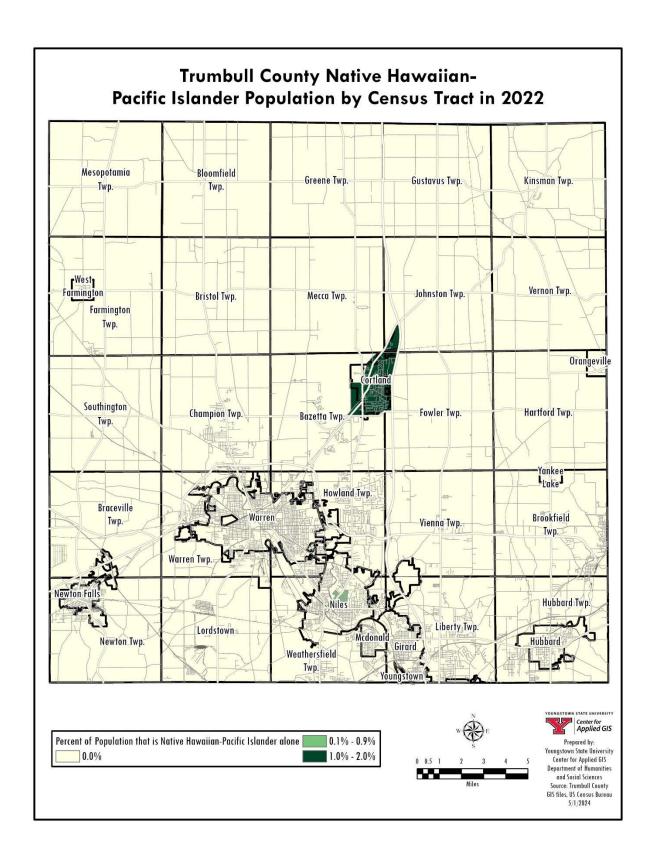


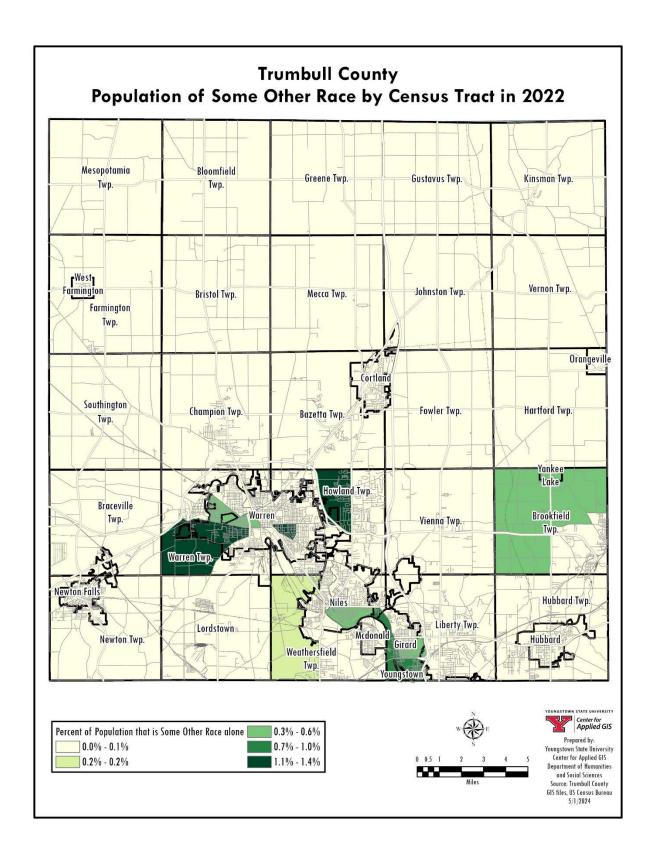


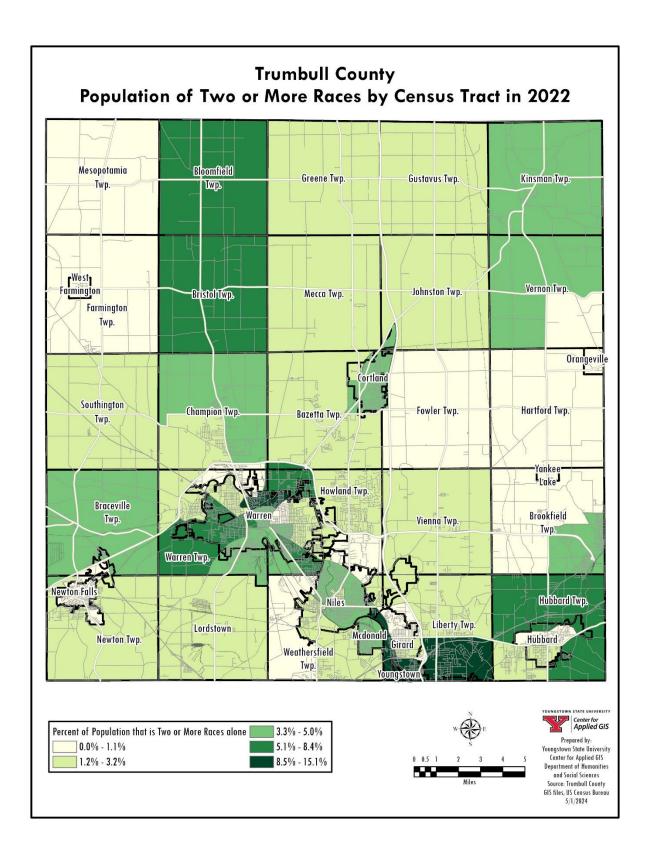


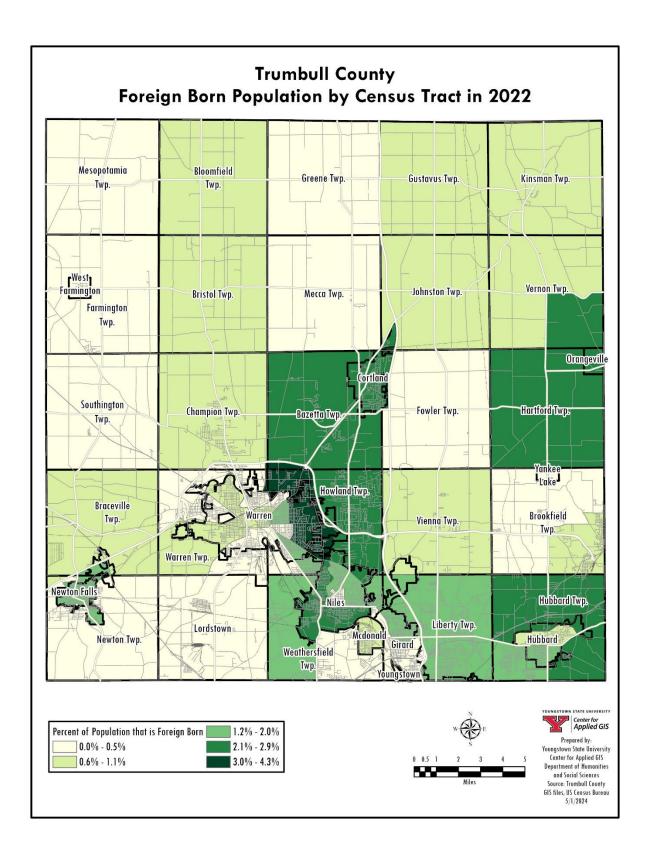


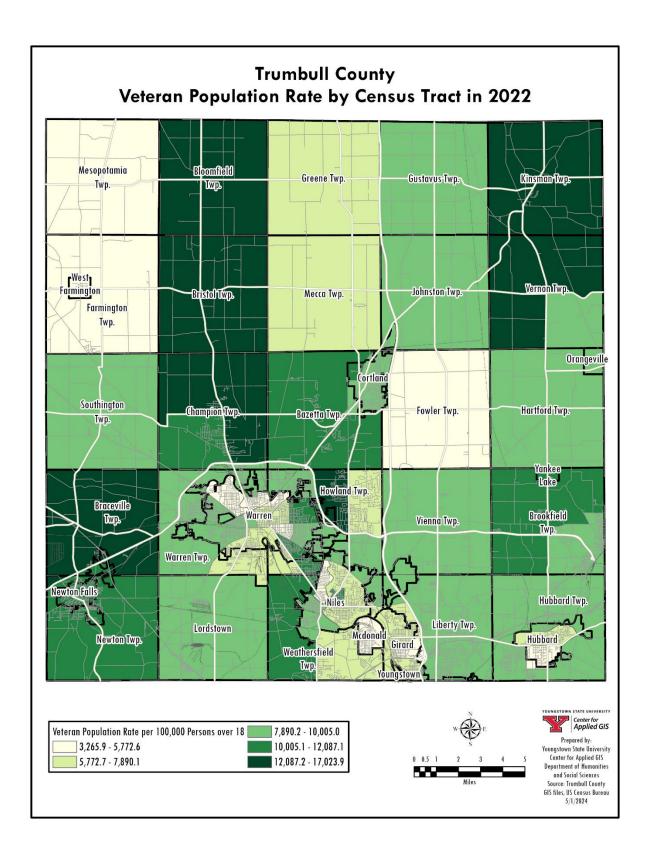


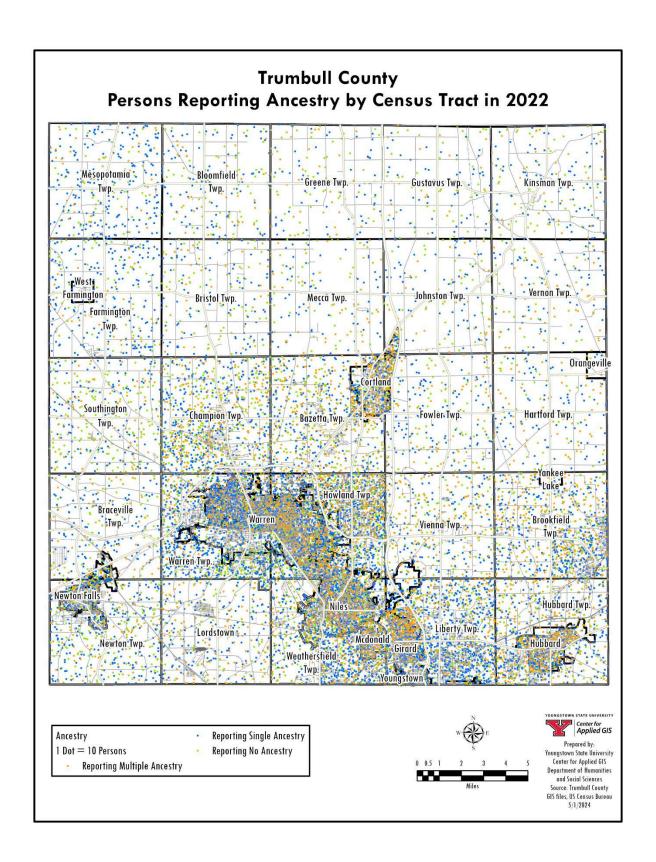












FAMILY CHARACTERISTICS

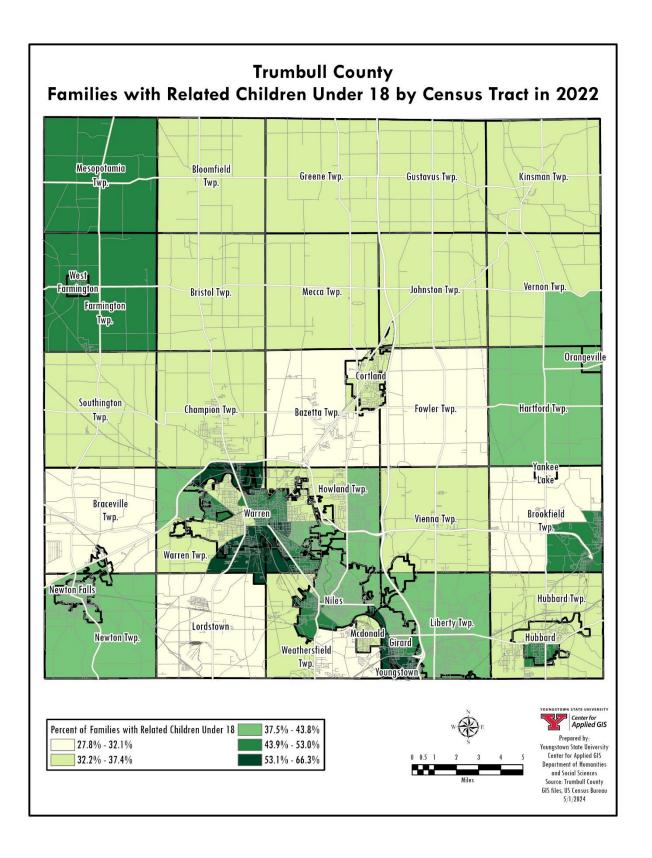
There was a total of 20,698 families with related children under the age of 18 living in Trumbull County in 2022. Of those families, 32.3% had a female householder with no husband present. In Warren, 57.6% of families with related children under the age of 18 had female householders with no husband present, while in Niles the rate of female householders with related children under the age of 18 and no husband present was 30.7%. In Niles, the rate of male householders having related children under the age of 18 with no wife present was 16.7%, while in Warren the rate was 11.5%, and countywide the rate was 11.1%. Only 27.7% of the families with children under 18 in Ohio had a female householder with no husband present, comparted to 57.6% in Warren in 2022.

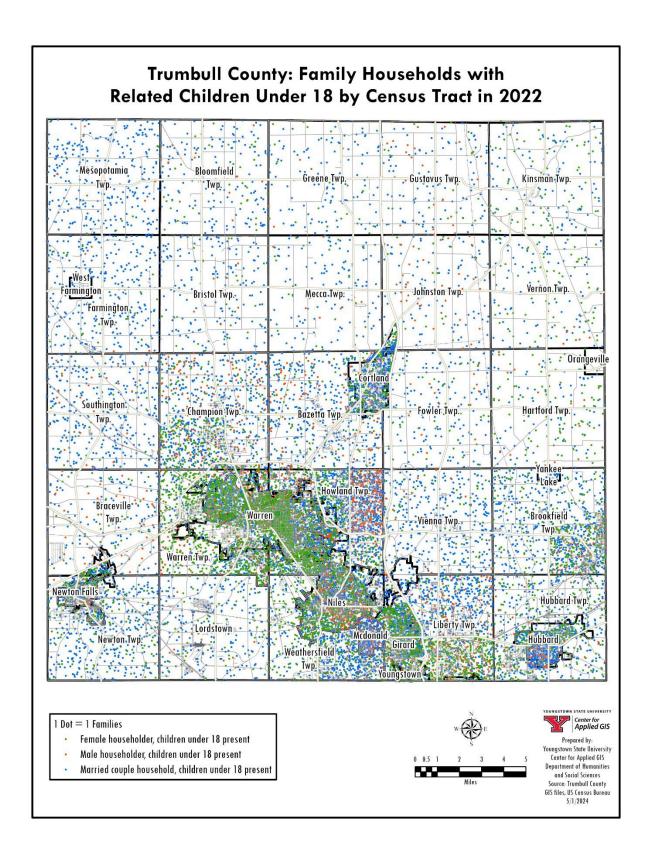
Table 7 shows characteristics of families in Trumbull County in 2022.

Table 7: Family Characteristics in Ohio, Trumbull County, and Warren and Niles

	Ohio	Trumbull County	Niles city	Warren city
Families	2,961,404	52,027	4,267	8,799
Married couple family with children under 18	839,422	11,716	929	1,260
%	28.3%	22.5%	21.8%	14.3%
Other family with children under 18	504,496	8,982	839	2,822
Total families with children under 18	1,343,918	20,698	1,768	4,082
%	45.4%	39.8%	41.4%	46.4%
Male householder with children under 18 and no wife present	132,506	2,296	296	470
%s	9.9%	11.1%	16.7%	11.5%
Female householder with children under 18 and no husband present	371,990	6,686	543	2,352
%	27.7%	32.3%	30.7%	57.6%

The following page contains a map showing family characteristics in Trumbull County in 2022.





ECONOMIC CHARACTERISTICS

Poverty continued to be concentrated in the census tracts in Warren in 2022. The 35% poverty rate in the Warren was much higher than that of the county (17.1%) or Niles (13.3%). Trumbull County and Warren both had poverty rates higher than the state average of 13.3%. Trumbull County's poverty rate was driven in large part by Warren, although townships in the northwest part of the county, as well as southern Liberty Township, had poverty rates higher than 20.9%. The poverty rate in the balance of Trumbull County outside Warren city was 13%. Warren city accounted for 38% of the persons living below the poverty level in Trumbull County in 2022, but only 18.6% of the population for whom poverty status had been determined.

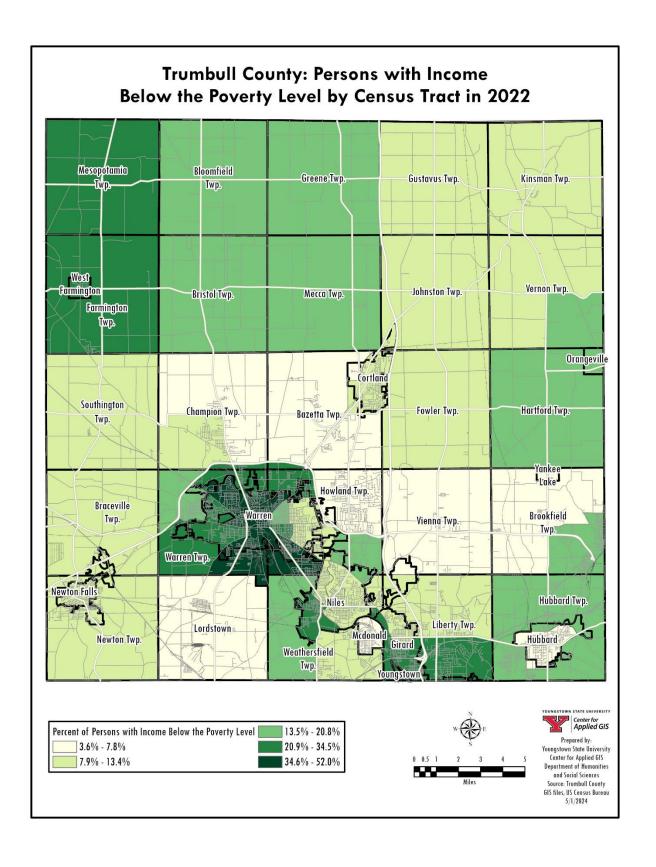
The median household income in Trumbull County in 2022 was \$53.537, \$33,296 in the city of Warren, and \$48,860 in the city of Niles. The city of Warren had the lowest median household income of any jurisdiction in the county in 2022. Several census tracts or neighborhoods in city of Warren and Warren Township had the lowest median household income, as well as the highest rates of poverty, in Trumbull County in 2022. For context, the median household income in Ohio in 2022 was \$66,990. The median household income in Warren therefore was less than half of that of the state.

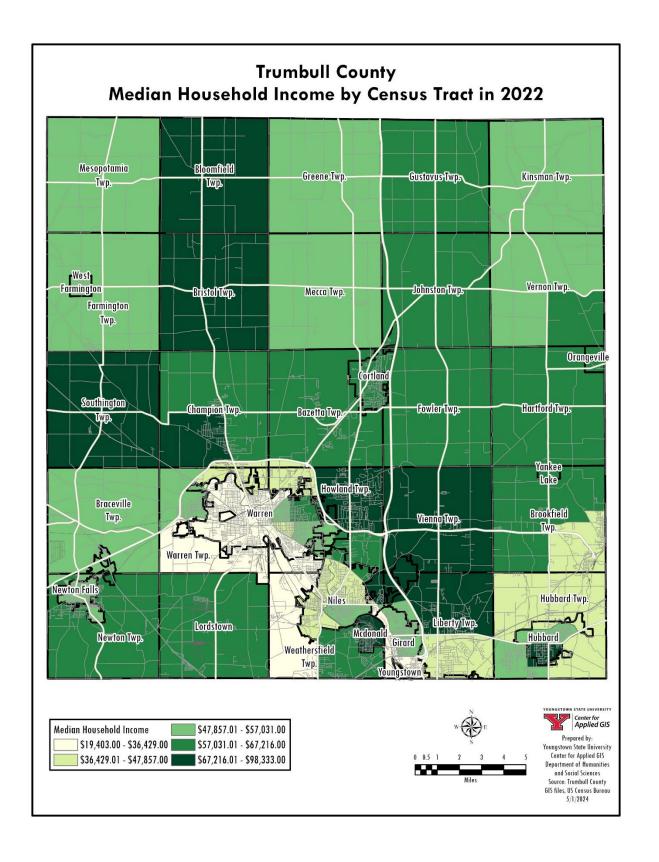
Table 8 shows economic characteristics in Trumbull County in 2022.

Table 8: Economic Conditions in Ohio, Trumbull County, and Warren and Niles

Geography	Ohio	Trumbull County	Niles city	Warren city	County outside Warren
Median household income	\$66,990	\$53,537	\$48,860	\$33,296	
Persons for whom poverty status has been determined	11,472,644	197,890	17,853	36,774	161,116
Persons with income below the poverty level	1,526,507	33,912	2,375	12,888	21,024
Poverty rate	13.3%	17.1%	13.3%	35.0%	13.0%

The following pages contain maps showing economic characteristics of the population of Trumbull County in 2022.





HOUSING CHARACTERISTICS

There were 85,042 occupied housing units in Trumbull County in 2022, only 28.3% of which were rentals. In the cities of Warren and Niles, 45.3% and 42.7% of the occupied housing units were rentals, respectively. Outside of Warren and Niles, 21.5% of the occupied housing units were rentals. Therefore, the concentration of rental properties in Trumbull County's urban areas limits opportunity to provide safe and affordable rental housing in outlying areas of Trumbull County that have historically been predominately white and more affluent.

In addition, the housing stock throughout Trumbull County, and particularly in Warren, is aging. The median year an owner-occupied residential structure was built in Warren was 1946 in 2024, while countywide the median year of construction was 1956. The median year of construction for dwellings in Niles was 1948. Trumbull County's rural areas also have an aging housing stock. Braceville, Brookfield, Gustavus, Hubbard, Kinsman, Warren, and Weathersfield Townships all have housing stock whose median year built is prior to 1960. Other urban communities, such as Girard, Hubbard city, and McDonald, have similarly aged housing stock. The age of the housing stock throughout the county continues to create lead hazard issues as well as issues with retrofitting older homes to make them accessible to those dealing with physical as well as mental and sensory disabilities. In Trumbull County, most of the population living with a disability lives in areas having the oldest housing stock.

The median value of owner-occupied housing units in Trumbull County was \$121,400 in 2022, compared to 183,300 statewide. The housing stock in the Warren was valued at a median value of \$74,300 while the median value of the housing stock in Niles was \$98,500. The median contract rent in Trumbull County was \$602 in 2022 compared to \$760 statewide, while median rent in Warren and Niles was \$577 and \$690, respectively. Over 32% of the rental units in the city of Warren had a contract rent under \$500 per month, while countywide that rate was 25.3%. The city of Niles had the most expensive rental housing out of the three entities, with only 13.3% of the rentals having their contract rent under \$500 per month. The cities of Warren and Niles both have rental registry programs. Niles' rental registry in particular captures most of the city's rental units.

Housing vacancy is common throughout Trumbull County but is most prevalent in urban areas such as Warren. The vacancy rate of Trumbull County is slightly higher than the statewide average of 8.8%. The vacancy rate in Warren is 13% while in Niles it is 11%. Despite the plethora of housing stock throughout the county, much of it is in poor condition and in many cases an immediate hazard to the health of current and potential tenants, as well as homeowners.

A total of 72,558 residential structures were in Trumbull County in 2024. Only 3.3% were owned by out-of-state or out-of-country owners, while 96.7% were owned by Ohio residents. In Warren, the rate of out-of-state or out-of-country ownership increased to 7.1%, while 92.9% of residential structures were owned by Ohio residents. In Niles, the percentage of residential structures owned by out-of-state, or out-of-country residents was 3.1%, while 96.9% were owned by Ohio residents.

Table 9 shows housing characteristics in Trumbull County in 2022.

Table 9: Housing Characteristics in Ohio, Trumbull County, and Warren and Niles

	Ohio	Trumbull County	Niles city	Warren city
Housing units	5,251,209	94,575	9,444	19,293
Occupied housing units	4,789,408	85,042	8,405	16,778
%	91.2%	89.9%	89.0%	87.0%
Vacant housing units	461,801	9,533	1,039	2,515
Vacancy rate of units	8.8%	10.1%	11.0%	13.0%
Owner-occupied units	3,200,314	61,012	4,819	9,180
Homeownership rate	66.8%	71.7%	57.3%	54.7%
Renter-occupied units	1,589,094	24,030	3,586	7,598
Rental rate	33.2%	28.3%	42.7%	45.3%
Cash rent under 500	255,859	6,088	476	2,471
%	16.1%	25.3%	13.3%	32.5%
Median contract rent	\$760	\$602	\$690	\$577
Median value owner-occupied housing	\$183,300	\$121,400	\$98,500	\$74,300

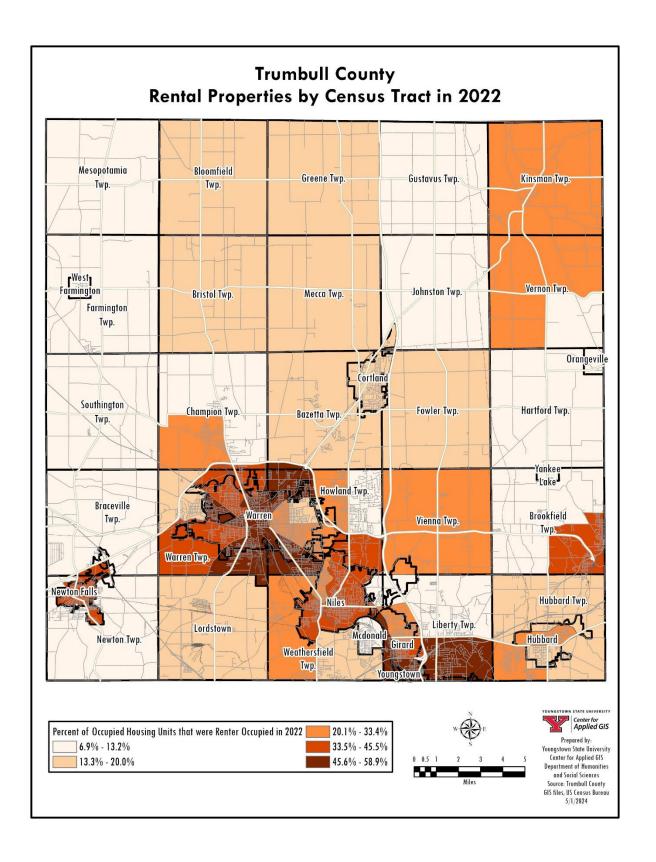
Table 10 shows the number of dwellings and year built in each municipality in Trumbull County in 2024.

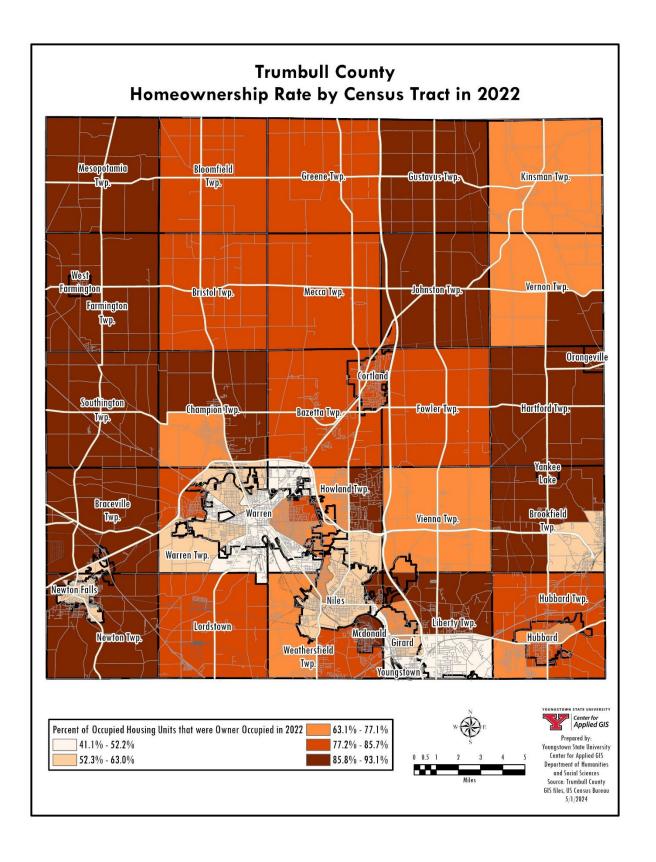
Table 10: Number of Dwellings and Year Built in Trumbull County

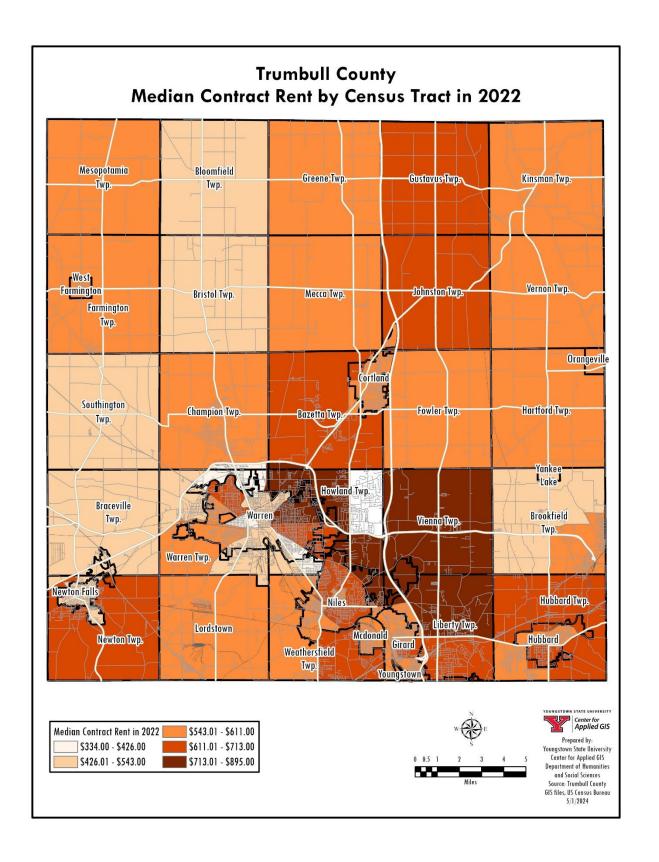
Place	Dwellings	Average Year Built	Median Year Built
BAZETTA	2,381	1973	1976
BLOOMFIELD	408	1953	1960
BRACEVILLE	1,056	1959	1958
BRISTOL	1,069	1952	1968
BROOKFIELD	3,156	1949	1951
CHAMPION	3,699	1964	1960
CORTLAND CITY	2,392	1974	1979
FARMINGTON	732	1972	1980
FOWLER	986	1959	1971
GIRARD CITY	3,613	1942	1949
GREENE	358	1951	1960
GUSTAVUS	326	1941	1956
HARTFORD	811	1954	1965
HOWLAND	6,823	1968	1966
HUBBARD	2,250	1953	1952
HUBBARD CITY	2,877	1953	1958
JOHNSTON	693	1961	1973
KINSMAN	709	1939	1946
LIBERTY	4,387	1962	1960
LORDSTOWN VILLAGE	1,139	1968	1974
MCDONALD VILLAGE	1,282	1956	1959

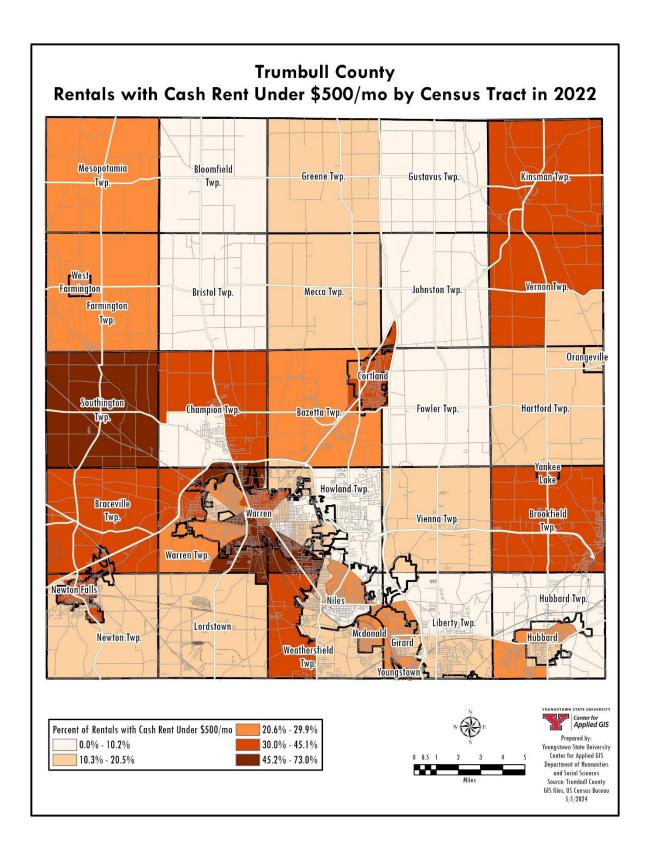
Place	Dwellings	Average Year Built	Median Year Built
MECCA	963	1964	1971
MESOPOTAMIA	693	1967	1982
NEWTON	1,542	1959	1965
NEWTON FALLS VILLAGE	1,540	1946	1941
NILES CITY	6,572	1943	1948
ORANGEVILLE VILLAGE	77	1920	1910
SOUTHINGTON	1,349	1960	1966
VERNON	530	1951	1968
VIENNA	1,414	1960	1961
WARREN	2,027	1948	1950
WARREN CITY	13,941	1940	1946
WEATHERSFIELD	2,781	1958	1959
WEST FARMINGTON VILLAGE	173	1923	1910
YANKEE LAKE VILLAGE	37	1960	1962
YOUNGSTOWN CITY	2	1941	1941
Countywide	74,788	1954	1956

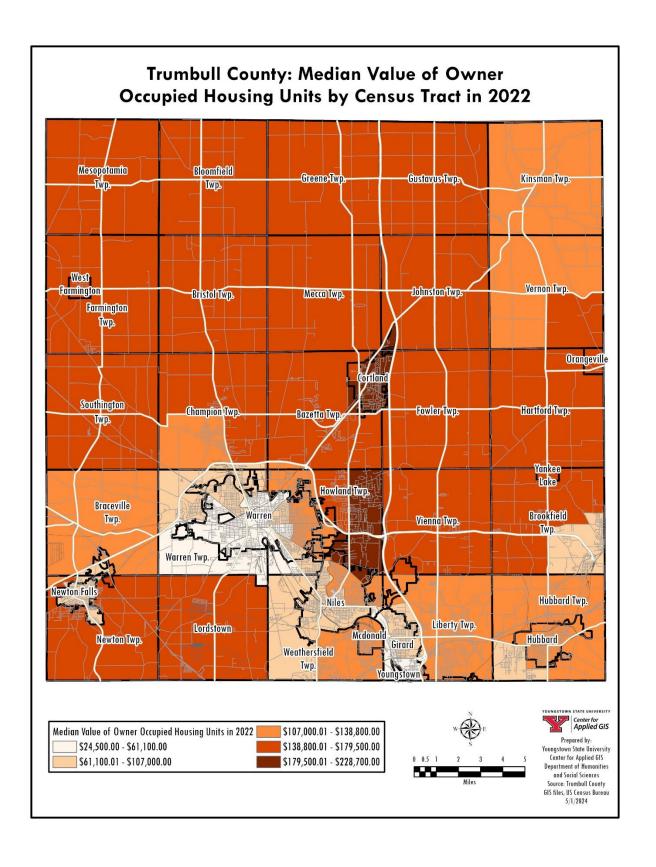
The following pages contain maps showing housing characteristics in Trumbull County in 2022 and 2024.

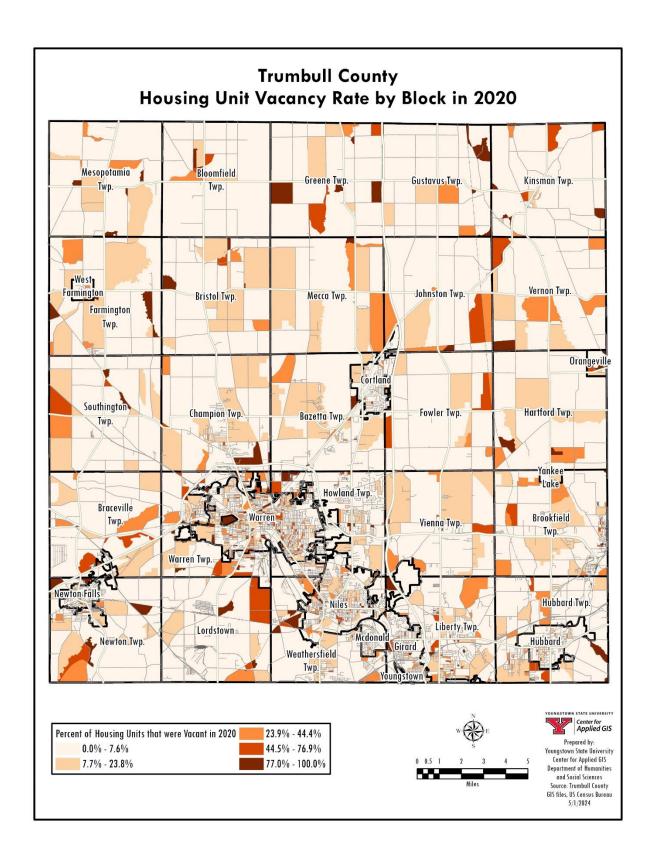


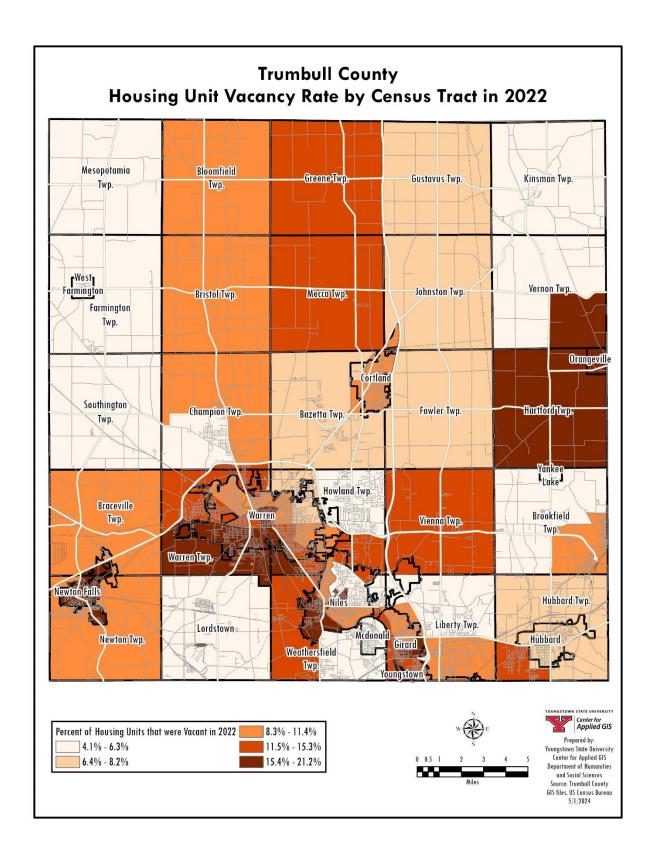


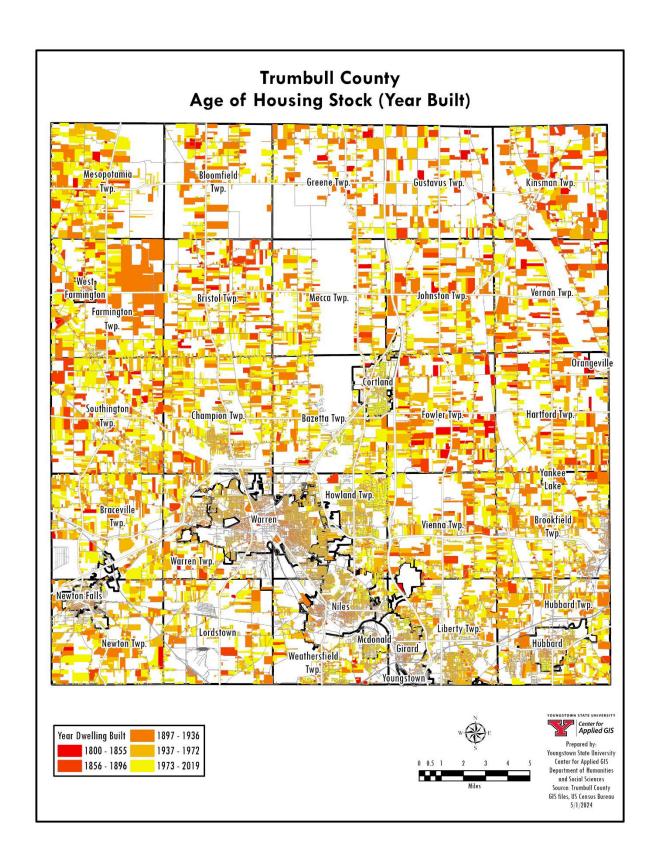


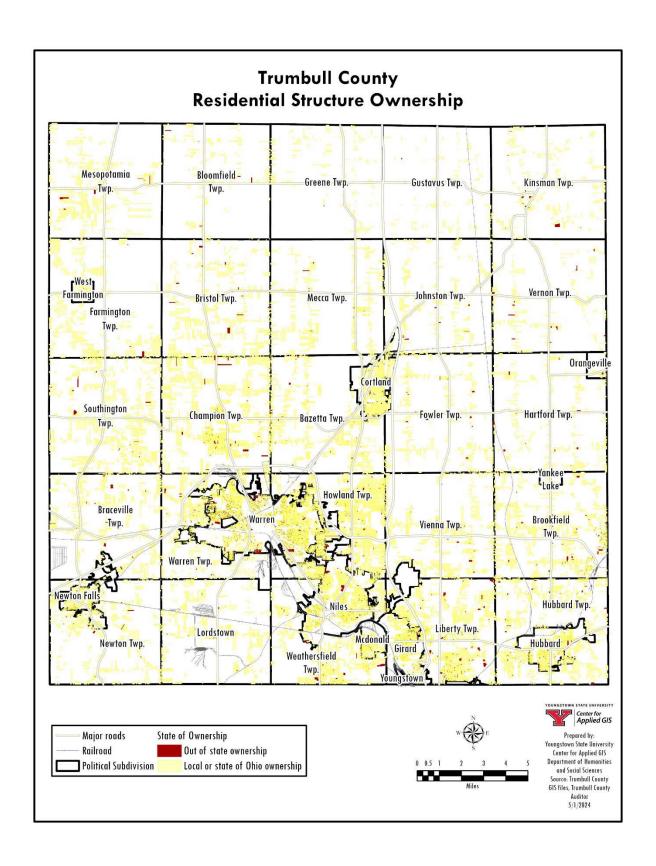












AFFORDABLE HOUSING PROVIDERS

The Trumbull County Housing Authority (TMHA) is a leader in providing clean, safe, and affordable housing to low-income residents in Trumbull County. According to TMHA, the agency also strives to promote self-sufficiency and upward mobility by developing public-private partnerships, homeownership, and entrepreneurial opportunities throughout the county. TMHA was established on June 20, 1934, as the Warren Housing Authority. All Housing Choice Vouchers (HCV) are provided through TMHA. The HCV program assists low-income persons and families, the elderly, and disabled persons find safe and affordable housing throughout the county. The vouchers aid with housing-related expenses.

The YWCA Mahoning Valley provides permanent supportive housing for homeless single women, and women with families. This facility is called the WINGS and is in Warren.

The Emmanuel Community Care Center (ECCC) provides permanent supportive housing for single parents with children, and transitional aged youth who are homeless and have a disability. ECCC works with Coleman Professional Services Shelter Plus Care Program and is in Girard.

Trumbull Neighborhood Partnership (TNP) receives funding from the Warren-Trumbull HOME Consortium. This funding is from the HUD Community Development Block Grant program, and is used to create lead safe, affordable housing for low-to-moderate income residents. TNP has completed seven additional vacant rehab or resale units in Trumbull County since 2019.

Table 11 contains a list of affordable housing unit locations in Trumbull County.

Table 11: Affordable Housing Providers in Trumbull County

Name	Туре	Address	City	ZIP	Notes	Provider
Clearwater Street	Single-family home	3295 Clearwater NW	Warren	44485		ТМНА
Draper Street	Townhouses or apartments	Draper St SE	Warren	44484		TMHA
Fairview Gardens	Townhouses or apartments	2035 Benton St SE	Warren	44484		TMHA
Forest Ridge Apartments	Townhouses or apartments	Orchard Ct	Mineral Ridge	44440		TMHA
Girard Scattered Sites	Duplex	Trumbull Hill	Girard	44420		TMHA
Highland Terrace	Townhouses or apartments	377 Lane Dr SW	Warren	44483		TMHA
Hilltop Gardens	Townhouses or apartments	8111 Addison Rd	Masury	44438		TMHA
Kenmore Apartments	Townhouses or apartments	2325 Plaza Ave	Warren	44484		TMHA
Lancer Court	Townhouses or apartments	Lancer Ct	Warren	44485		TMHA
Maryland Street	Single-family home	434 Maryland St NE	Warren	44483		TMHA
Reo Court	Townhouses or apartments	Reo Ct NW	Warren	44483		TMHA

Name	Туре	Address	City	ZIP	Notes	Provider	
Rio Terra Apartments	Townhouses or apartments	3600 Rio Vista	Leavittsburg	44430		ТМНА	
Trumbull Homes	Duplex	1970 Hazelwood Ave SE	Warren	44484		ТМНА	
Wick Street Homes	Single-family home	2330 Wick St	Warren	44484		TMHA	
Bentley Apartments	Townhouses or apartments	42 S Bentley Ave	Niles	44446	Affordable family units	ТМНА	
Eagle Creek	Townhouses or apartments	216 Myron St.	Hubbard	44425	Disabled Elderly	TMHA	
Girard Manor	Townhouses or apartments	430 Washington Ave.	Girard	44420	Disabled Elderly	ТМНА	
Heaton House	Townhouses or apartments	1123 North Rd.	Niles	44446	Disabled Elderly	TMHA	
Hubbard Manor	Townhouses or apartments	105 West Liberty St.	Hubbard	44425	Disabled Elderly	ТМНА	
McKinley Towers	Townhouses or apartments	425 Seneca St. Niles		44446	Disabled Elderly	ТМНА	
Morgandale Commons	Townhouses or apartments	2345 Plaza Ave. NE	Warren	44483	Disabled Elderly	ТМНА	
Northview	Townhouses or apartments	511 North Ave.	Girard	44420	Disabled Elderly	ТМНА	
Parkman Landing Senior Apartments	Townhouses or apartments	2501 Parkman Rd. NW	Warren	44485	Disabled Elderly	ТМНА	
Riverview-Buckeye	Townhouses or apartments	700 Buckeye St.	Warren	44485	Disabled Elderly	ТМНА	
The Elms	Townhouses or apartments	2300 Plaza Ave. NE	Warren	44483	Disabled Elderly	ТМНА	
Valley West	Townhouses or apartments	529 Brookfield Ave.	Masury	44438	Disabled Elderly	ТМНА	
West Park Manor	Townhouses or apartments	601 West Park Ave.	Hubbard	44425	Disabled Elderly	ТМНА	
Emmanuel Community Care Center	Permanent supportive housing	2 N State Street	Girard	44420		ECCC	
YWCA Mahoning Valley	Permanent supportive housing	121 Monroe Street	Warren	44483		YWCA	

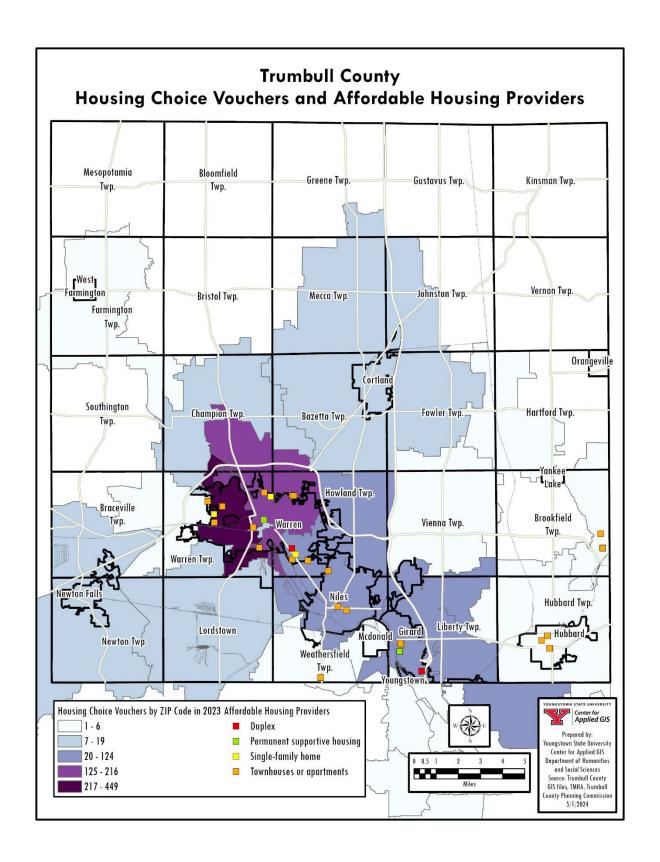
Table 12 contains a list of Housing Choice Vouchers (HCV) by ZIP code in Trumbull County. Most HCVs are concentrated in and around Warren.

Table 12: Housing Choice Vouchers by ZIP Code in Trumbull County

ZIP Code	HCV Count	Z	IP Code	HCV Count	ZIP Code	HCV Count
44410	10	4	4440	1	44491	2
44418	1	4	4444	9	44502	1
44420	53	4	4446	72	44504	6
44425	5	4-	4473	1	44505	74

ZIP Code	HCV Count	ZIP Code	HCV Count	ZIP Code	HCV Count
44430	2	44481	19	44509	1
44433	2	44483	216	44510	1
44435	5	44484	124	44511	1
44437	3	44485	449	44512	1
44438	2				

The following page contains a map showing the current location of affordable housing units in Trumbull County.



MAJOR EMPLOYERS AND MASS TRANSIT LINES

Data from *Reference Solutions* showed a total of 132 employers with 100 or more employees in Trumbull County in 2024. Most of these employers are concentrated in Trumbull County's urban areas and commercial core, particularly in Warren and Niles, and Howland and Liberty Townships. Other major employers are scattered throughout the balance of the county.

Multiple mass transit bus routes service the southern portion of Trumbull County and Warren. All of the Warren "suburban routes" are connected by the 28 Warren Express route that runs from downtown Youngstown in Mahoning County to downtown Warren in Trumbull County. All fixed routes are operated by the Western Reserve Transit Authority (WRTA), based in the city of Youngstown. WRTA has established the following fixed routes in Trumbull County:

1 Elm

Servicing retail and medical along Gypsy Lane and Belmont Avenue in Liberty Township.

10 Belmont

o Servicing retail along Belmont Avenue in Liberty Township.

• 14 Mosier

Servicing retail and medical along Gypsy Lane and Belmont Avenue in Liberty Township.

28 Warren Express

Servicing retail, medical, other major employers, and activity generators along US Route
 422 from the county boundary in Girard to the neighborhoods in southeast, central, and southwest Warren.

• 73 West

 Servicing residential areas and the Parkman Rd corridor, ending at Trumbull Plaza, on the northwest side of Warren.

• 74 Flm

 Serving residential areas and the Elm Rd corridor, ending at Walmart, on the northeast side of Warren.

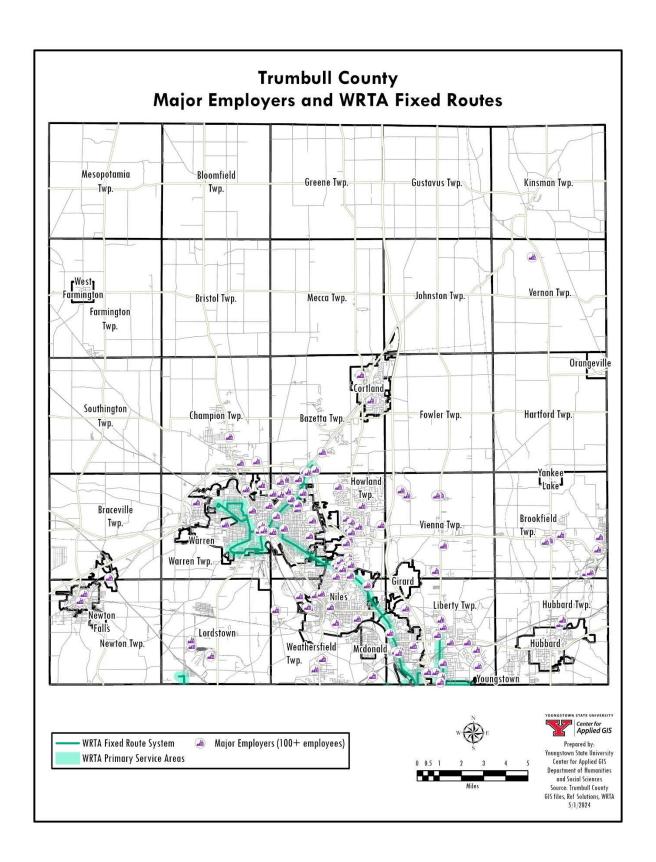
Trumbull County Transit is a joint venture between the Trumbull County Commissioners and the Trumbull County Transit Board and offers daily individual point-to-point rides on a first-come, first-serve basis. Rides are provided to any destination within Trumbull County, with a focus on senior riders.

Trumbull County Job and Family Services, the Senior Levy, SCOPE Senior Services, and Trumbull Area Agency on Aging District 11 also provide limited transportation services throughout Trumbull County.

In addition to these agencies, multiple communities provide transportation services to their residents. Those communities include the following:

- Girard non-handicapped accessible van for Girard residents
- Brookfield Township Non-Handicapped accessible van for Brookfield Township residents
- Newton Falls Transportation for Newton Falls residents
- Hubbard Senior Van Program for Hubbard City & Township residents

The following page contains a map showing the current location of major employers (100+ employees) and transit lines in Trumbull County.



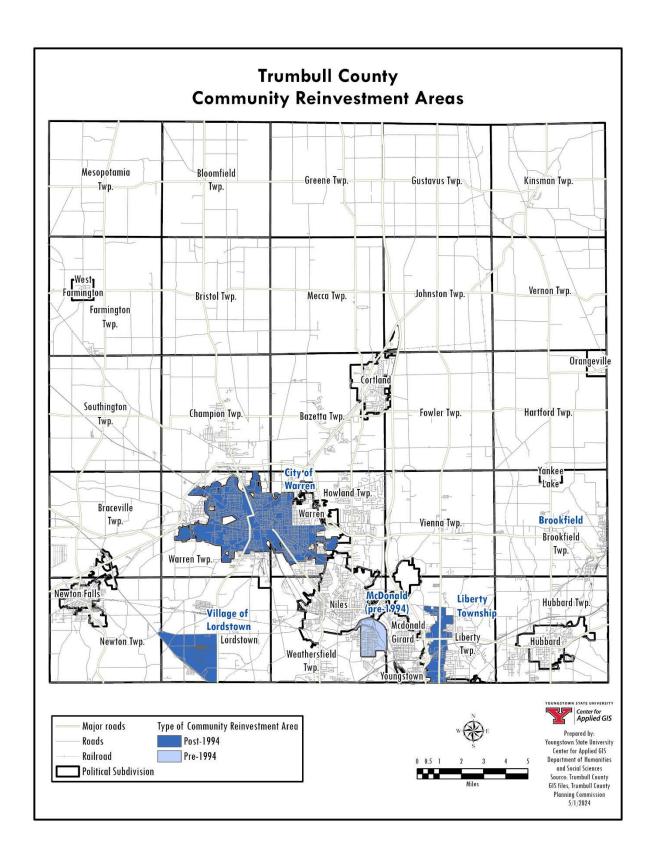
COMMUNITY REINVESTMENT AREAS

Community Reinvestment Areas (CRAs) are an area of land in which property owners can receive tax incentives for investing in real property improvements and development. Eligible activities include new construction or rehabilitation of housing, or commercial structures. CRAs are typically located in areas of disinvestment and abandonment, where investment has historically been discouraged. The CRA program was created in 1977 and underwent significant revisions in 1994. According to the Ohio Department of Development, communities that enacted CRA legislation prior to 1994 do not have the flexibility to restrict the types of projects eligible under the new CRA rules. Pre-1994 CRA legislation can only be amended twice before the area must be confirmed by the Director of Development under the post-1994 rules.

There are five CRAs are in Trumbull County, four of which are post-1994. These CRAs include the following:

- City of Warren Community Reinvestment Area.
- Village of Lordstown Community Reinvestment Area.
- Liberty Township Community Reinvestment Area (existing and expanded).
- Brookfield Township Community Reinvestment Area.
- Village of McDonald Community Reinvestment Area (pre-1994 CRA).

The following page contains a map showing the location of CRAs in Trumbull County.



COMMUNITY REINVESTMENT AND HOME MORTGAGE DISCLOSURE ACTS

Lending institutions are evaluated through the Community Reinvestment Act (CRA) to ensure that they are meeting the needs of the borrowers in their communities, particularly in low-income areas. The CRA was established as part of the Housing and Community Lending Act of 1977, and lending institutions are evaluated based on mortgage lending, small business lending, community development lending, and employee volunteerism. Banks that lend and have branch offices in Trumbull County, and that have been evaluated, have either outstanding or satisfactory ratings. Table 13 shows the most recent CRA Performance Evaluations for banks that lend and have branch offices in Trumbull County.

Table 13: CRA Performance Evaluations for Banks in Trumbull County

Exam Date	Bank Name	Exam Method	Rating
11/28/2016	Cortland Savings and Brokerage Company	Intermediate small bank	Satisfactory
8/30/2021	First National Bank of Pennsylvania	Large bank exam	Outstanding
2/3/2011	First Place Bank	Large bank exam	Satisfactory
3/20/2023	Home Federal Saving & Loan Association of Niles	Small bank	Satisfactory
2/1/2015	Home Savings & Loan Company of Youngstown	Large bank exam	Satisfactory
3/2/2020	JP Morgan Chase Bank	Large bank exam	Satisfactory
1/6/2020	KeyBank National Association	Large bank exam	Outstanding
6/1/2022	Premier Bank	Large bank exam	Satisfactory
2/1/2021	The Farmers' National Bank of Canfield	Large bank exam	Satisfactory
5/4/2020	The Huntington National Bank	Large bank exam	Outstanding
1/18/2022	US National Bank Association	Large bank exam	Outstanding

In addition to CRA performance evaluations, the Federal Financial Institutions Examination Council (FFIEC) was established in 1979 to provide uniform standards and promote uniformity in the supervision of financial institutions. The FFIEC is an interagency council and is made up of members from the Federal Reserve System, Federal Deposit Insurance Corporation, National Credit Union Administration, Office of the Comptroller of the Currency, and Consumer Financial Protection Bureau. Among the council's various reports are the Home Mortgage Disclosure Act (HMDA) aggregate and disclosure reports, which require lending institutions to submit annual disclosures about lending activity related to home mortgages and home improvements. These include conventional loans, and those through the Federal Housing Administration (FHA), Farm Security Administration/Rural Housing Service (FSA/RHS), and Veterans Administration (VA); and all refinancing, home improvement loans, loans on dwellings for 5 or more families, non-occupant Loans, and loans on manufactured home dwellings. Most loans originated in Trumbull County between 2018 and 2022 were either conventional home loans or refinancing of an existing owner-occupied dwelling. For the purposes of the AI, we have focused on home purchase loan patterns throughout the county between 2018 and 2022.

Trumbull County is segregated along racial or ethnic lines in the same way as many older legacy cities in the region. Those legacy cities that have experienced significant population loss and the migration of more affluent families to suburban areas tend to be heavily segregated along racial lines. This includes

the city of Warren in particular. Therefore, the pattern of lending for home purchase loans is impacted by the historic population trends and patterns of racial and ethnic minorities. The pattern of lending in the county lends itself to historic trends of segregation in the county. Whether applications were originated or denied, the frequency of applications received by lending institutions was lowest in the tracts having the highest concentration of minority population. The pattern of lending also followed that of the density of population in 2022 and patterns of disinvestment or abandonment were also apparent where lending was lowest throughout the county.

Most of the lending between 2018 and 2022 in Trumbull County was to White or Caucasian persons. The percentage of the total loans originated in Trumbull County by White or Caucasian persons was 83.2%, compared to 3.6% for Black or African American persons. Applicants having no race identified accounted for 11.5% of the total loan originations in the county. Persons of minority races were more likely to be denied home purchase loans then their White counterparts. Only when applying with one White person did applicants of minority races see their denial rates fall to levels equal to White applicants.

Table 14 shows the breakdown of loan applications originated and denied, and total applications, by race, in Trumbull County from 2018-2022.

Table 14: Home Purchase Loan Applications by Race and Year in Trumbull County

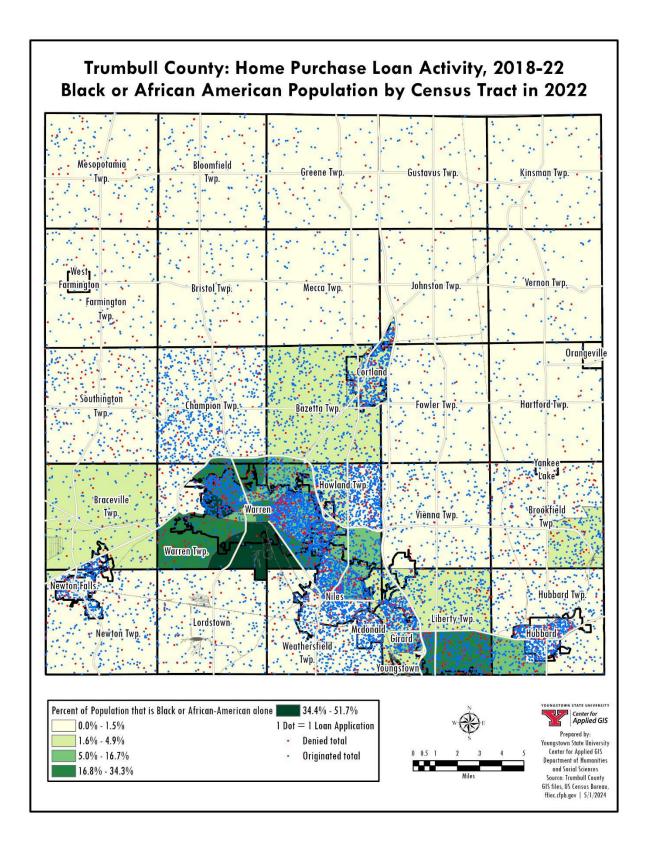
All applications	20	018	2	019	2	020	2	021	20)22	Total b	y type
2 or more minority races	0		1		1		1		4		7	
Loan Originated	0	0.0%	0	0.0%	0	0.0%	1	100.0%	2	50.0%	3	42.9%
Application denied	0	0.0%	0	0.0%	1	100.0%	0	0.0%	1	25.0%	2	28.6%
Application withdrawn by applicant	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	25.0%	1	14.3%
Purchased loan	0	0.0%	1	100.0%	0	0.0%	0	0.0%	0	0.0%	1	14.3%
American Indian or Alaska Native	4		4		10		15		10		43	
Loan Originated	3	75.0%	1	25.0%	9	90.0%	6	40.0%	7	70.0%	26	60.5%
Application denied	1	25.0%	2	50.0%	0	0.0%	3	20.0%	2	20.0%	8	18.6%
Application withdrawn by applicant	0	0.0%	1	25.0%	1	10.0%	5	33.3%	0	0.0%	7	16.3%
File closed for incompleteness	0	0.0%	0	0.0%	0	0.0%	1	6.7%	0	0.0%	1	2.3%
Preapproval request approved but not accepted	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	10.0%	1	2.3%
<u>Asian</u>	10		15		22		32		35		114	
Loan Originated	6	60.0%	11	73.3%	10	45.5%	23	71.9%	23	65.7%	73	64.0%
Application approved but not accepted	0	0.0%	0	0.0%	0	0.0%	1	3.1%	1	2.9%	2	1.8%
Application denied	1	10.0%	1	6.7%	3	13.6%	3	9.4%	1	2.9%	9	7.9%
Application withdrawn by applicant	2	20.0%	3	20.0%	7	31.8%	3	9.4%	9	25.7%	24	21.1%

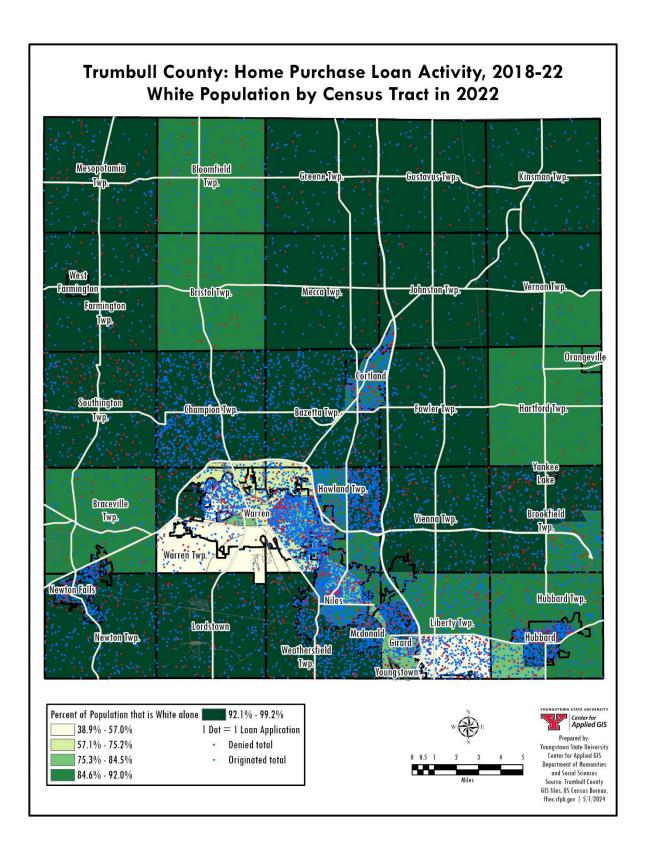
All applications	20	018	2	019	2	020	2	021	20)22	Total b	y type
File closed for	0	0.0%	0	0.0%	1	4.5%	1	3.1%	1	2.9%	3	2.6%
incompleteness Purchased loan	1	10.0%	0	0.0%	1	4.5%	1	3.1%	0	0.0%	3	2.6%
Black or African	104	10.075	92	0.070	116	11370	177	3.270	151	0.075	640	2.070
<u>American</u>												
Loan Originated	60	57.7%	54	58.7%	75	64.7%	113	63.8%	87	57.6%	389	60.8%
Application approved but not	2	1.9%	3	3.3%	5	4.3%	5	2.8%	1	0.7%	16	2.5%
accepted												
Application denied	13	12.5%	12	13.0%	10	8.6%	23	13.0%	27	17.9%	85	13.3%
Application withdrawn by applicant	18	17.3%	14	15.2%	18	15.5%	27	15.3%	31	20.5%	108	16.9%
File closed for incompleteness	2	1.9%	1	1.1%	5	4.3%	6	3.4%	1	0.7%	15	2.3%
Purchased loan	9	8.7%	8	8.7%	3	2.6%	2	1.1%	3	2.0%	25	3.9%
Preapproval request approved but not accepted	0	0.0%	0	0.0%	0	0.0%	1	0.6%	1	0.7%	2	0.3%
Joint (White + 1 Minority)	22		13		23		31		23		112	
Loan Originated	16	72.7%	7	53.8%	18	78.3%	22	71.0%	17	73.9%	80	71.4%
Application approved but not accepted	1	4.5%	1	7.7%	0	0.0%	0	0.0%	0	0.0%	2	1.8%
Application denied	1	4.5%	3	23.1%	1	4.3%	2	6.5%	2	8.7%	9	8.0%
Application withdrawn by applicant	0	0.0%	1	7.7%	2	8.7%	5	16.1%	3	13.0%	11	9.8%
File closed for	0	0.0%	1	7.7%	1	4.3%	0	0.0%	0	0.0%	2	1.8%
incompleteness Purchased loan	4	18.2%	0	0.0%	1	4.3%	2	6.5%	1	4.3%	8	7.1%
<u>Native Hawaiian or</u> <u>Other Pacific</u> <u>Islander</u>	2		1		4		1		3		11	
Loan Originated	0	0.0%	0	0.0%	0	0.0%	1	100.0%	2	66.7%	3	27.3%
Application denied	0	0.0%	1	100.0%	1	25.0%	0	0.0%	1	33.3%	3	27.3%
Application withdrawn by applicant	1	50.0%	0	0.0%	2	50.0%	0	0.0%	0	0.0%	3	27.3%
File closed for incompleteness	1	50.0%	0	0.0%	1	25.0%	0	0.0%	0	0.0%	2	18.2%
Race Not Available	735		873		864		1,124		1,246		4,842	
Loan Originated	182	24.8%	214	24.5%	238	27.5%	288	25.6%	312	25.0%	1,234	25.5%
Application approved but not accepted	7	1.0%	6	0.7%	4	0.5%	7	0.6%	13	1.0%	37	0.8%
Application denied	31	4.2%	42	4.8%	32	3.7%	45	4.0%	62	5.0%	212	4.4%
Application withdrawn by applicant	34	4.6%	41	4.7%	39	4.5%	73	6.5%	89	7.1%	276	5.7%
File closed for incompleteness	6	0.8%	20	2.3%	15	1.7%	13	1.2%	10	0.8%	64	1.3%
Purchased loan	473	64.4%	550	63.0%	536	62.0%	697	62.0%	757	60.8%	3,013	62.2%
Preapproval request denied	2	0.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	2	0.0%

All applications	20	018	20	019	20	020	2	021	20)22	Total b	y type
Preapproval request approved but not accepted	0	0.0%	0	0.0%	0	0.0%	1	0.1%	3	0.2%	4	0.1%
<u>White</u>	2,389		2,448		2,623		2,788		2,429		12,677	
Loan Originated	1,659	69.4%	1,706	69.7%	1,889	72.0%	1,972	70.7%	1,722	70.9%	8,948	70.6%
Application approved but not accepted	50	2.1%	44	1.8%	55	2.1%	43	1.5%	57	2.3%	249	2.0%
Application denied	215	9.0%	207	8.5%	197	7.5%	217	7.8%	187	7.7%	1,023	8.1%
Application withdrawn by applicant	231	9.7%	272	11.1%	331	12.6%	343	12.3%	344	14.2%	1,521	12.0%
File closed for incompleteness	45	1.9%	53	2.2%	51	1.9%	65	2.3%	43	1.8%	257	2.0%
Purchased loan	186	7.8%	165	6.7%	100	3.8%	139	5.0%	72	3.0%	662	5.2%
Preapproval request denied	1	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	0.0%
Preapproval request approved but not accepted	2	0.1%	1	0.0%	0	0.0%	9	0.3%	4	0.2%	16	0.1%
Countywide Totals												
Loan Originated	1,926	59.0%	1,993	57.8%	2,239	61.1%	2,426	58.2%	2,172	55.7%	10,756	58.3%
Application approved but not accepted	60	1.8%	54	1.6%	64	1.7%	56	1.3%	72	1.8%	306	1.7%
Application denied	262	8.0%	268	7.8%	245	6.7%	293	7.0%	283	7.3%	1,351	7.3%
Application withdrawn by applicant	286	8.8%	332	9.6%	400	10.9%	456	10.9%	477	12.2%	1,951	10.6%
File closed for incompleteness	54	1.7%	75	2.2%	74	2.0%	86	2.1%	55	1.4%	344	1.9%
Purchased loan	673	20.6%	724	21.0%	641	17.5%	841	20.2%	833	21.4%	3,712	20.1%
Preapproval request denied	3	0.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	3	0.0%
Preapproval request approved but not accepted	2	0.1%	1	0.0%	0	0.0%	11	0.3%	9	0.2%	23	0.1%
Countywide total by year	3,266		3,447		3,663		4,169		3,901		18,446	

The following maps show the distribution of loan applications received, and loans originated, throughout Trumbull County between 2018 and 2022, for home purchase loans. Loan types include conventional, and those through the FHA, FSA/RHS, and VA. As was previously stated, few loan applications were received, and likewise few loans were originated, in the areas of the county with a high concentration of minority population between 2018 and 2022.

The following pages show patterns of lending along with race in Trumbull County between 2018 and 2022.





IMPEDIMENTS TO FAIR HOUSING CHOICE

IMPEDIMENTS TO FAIR HOUSING CHOICE

Impediments to fair housing choice in Trumbull County have historically included:

- Historic segregation.
 - o Includes institutionalized segregation due to historic redlining and other policies that targeted persons of color and other currently protected classes.
- Not-In-My-Backyard (NIMBY) syndrome.
- Lack of public transportation to address historic segregation and provide access to medical facilities, employment centers, and other activity generators such as shopping centers.
- Access to housing for persons with disabilities.
 - The housing stock in Trumbull County, and particularly the city of Warren, is aged and difficult and expensive to retrofit.
- Lack of affordable housing in rural areas of the county, particularly in areas that historically have had a predominately white population.
- Institutionalized segregation through federal and state policy.
 - o CDBG and HOME Investments Partnership Program funds though HUD.
 - Tax credits, which must be used in low-income areas, thus hamstringing efforts to end historic segregation.
- Placement of recovery or sober houses throughout the county.
 - o Cities of Warren and Warren Township.
 - NIMBY syndrome is an issue throughout the county when discussing placement of recovery or sober houses.

In addition to these historical issues, impediments to fair housing choice in Trumbull County have been identified throughout this project. They include the following:

- Many of the impediments facing Trumbull County residents in 2019 are still in place in 2024.
- TNP offers accessibility modifications for LMI owner-occupants, and although there is a wait list, resources to support this endeavor exist. Modifications include ramps, and bathroom modifications, among other accessibility modifications. This begins to address an issue identified in 2019; the challenge of modifying or retrofitting aging housing stock for those with disabilities.
- There are a limited number of resources for landlords or tenants to make modifications to rental units.
- Funding through the Federal Home Loan Bank of Pittsburgh restricts projects to distressed
 census tracts, which limits the locations available to projects. This prevents county agencies
 from submitting competitive grant applications. Potential projects would include renovation or
 resale of vacant units and there are not enough suitable homes located in eligible areas.
- TNP is discussing balancing resource deployment (particularly for new construction or vacant rehabilitation) in low-to-moderate income (LMI) neighborhoods, which would increase the

- concentration of LMI households, but would be an investment in an LMI neighborhood) vs. resource deployment in middle- or moderate-income neighborhoods.
- TNP would like to see a template library of leases and land contracts made available for renters
 and landlords to use, that are fair and equitable. This could include a website where information
 can be housed and would serve as a central repository of this information for housing partners
 to share with clients. If this does already exist, then we should formulate a plan to share this
 information with and educate housing partners about its availability.
- There is an increasing need for accessible housing. A frequent challenge is residents who age in place but have a second-floor bathroom. With an aging population in Trumbull County, this is an important point.
- There exists in Niles a general desire to not add any additional low-income housing units. The preference is for moderate-income or well-managed low-income units, but there is no desire for new low-income housing.
- In Niles, there is a need to educate the community that multi-family units can be market-rate and owner-occupied, as a strong connection exists among residents that all multi-family units are rentals. However, many single-family homes are renter-occupied. Increasing knowledge about the different housing and financing types in the community would go a long way towards eliminating impediments to fair housing choice.
- We should encourage cities and villages to pass fair housing ordinances that prohibit source of income discrimination by landlords. Is this something that the county can adopt, like what Akron has passed?
- Multiple communities in Trumbull County have issued moratoriums on construction permits for new multi-family units, which is an impediment to fair housing choice, as many multi-family units are rentals.
- Landlords often discriminate based on familial status, ethnicity, and other protected classes.
- The landlord community tight knit in Trumbull County and they often use this to leverage the rents that they charge.
- There is a general lack of affordable and accessible housing. Although there is ample housing stock, much of it is unsafe and in poor condition for habitation.
- Monthly renter costs have skyrocketed over last couple of years.
- The COVID-19 pandemic skewed eviction and foreclosure rates (downward) due to long moratoriums on each. There is a hesitation to use these numbers to plan going forward.
- Rental ownership monopolies exist throughout the county, especially by out of state and out of country entities. Anecdotally, a large percentage of housing choice voucher properties are by companies or individuals in New Zealand.
- There has been demolition of apartment buildings, and replacing these structures with greenspace, not rebuilding. These include the Buckeye Apartments, Reeves Apartments, and others. This results in a loss of safe and affordable units.
- Many private developers in Trumbull County are not interested in building mixed use or infill housing.

- Housing Choice Vouchers are essentially worthless and often time out because the voucher is not worth enough to cover the rent that landlords expect.
- There are not enough Housing Choice Vouchers available in Trumbull County to meet demand.
- Many landlords avoid leases by executing "forever" land contracts instead.
- Transportation-WRTA routes and service have significantly decreased.
- Grant funds for rehabbing are highly competitive and very limited.
- There is a general lack of support from local elected officials and the community in general.
- There is profit in *not renting properties* and flipping clients. The way this works is by landlords charging non-refundable application fees that are hundreds of dollars and not renting the structure, or by securing a security deposit and first month's rent, knowing the renter cannot afford a second month. The renter is then evicted, and the process begins anew with a new renter.
- Eviction sealing is not allowed in Niles.
- A paradox exists in the county's urban areas in that tax credit points are higher in low-income areas, which leads to clustering of low-income housing in low-income areas, thus exacerbating the issue of segregation by income and race/ethnicity in the county.

PERSONS LEAST LIKELY TO APPLY

The least likely groups to reach out for assistance through the Fair Housing Program's complaint intake mechanism are senior and disabled persons, as well as any non-English speaking persons. Reaching out to the agencies that serve these special populations is critical towards keeping these protected groups of people informed of their rights under the Fair Housing Act.

Disabled persons in Trumbull County are served through the Western Reserve Independent Living Center and the Trumbull County Mental Health and Recovery Board and their sub-contractors, while Youth Build and Commonwealth of Youngstown frequently assist with ramp construction.

Other entities that provide services to the elderly and disabled population in Trumbull County include Area Agency on Aging District XI, SCOPE of Trumbull County, Emmanuel Community Care Center, Catholic Charities, the Trumbull County Senior Levy Office, the Veteran's Services Office (local and federal), the Trumbull County Transit System, Western Reserve Transit Authority, and Trumbull County Department of Job and Family Services. Many of these service and housing providers are members of a group known as the Trumbull County Housing Collaborative.

CONCLUSIONS AND ACTION STEPS

CONCLUSIONS

Trumbull County continues to be a diverse but highly segregated place. The population of the county is overwhelmingly White alone/not Hispanic and most of the minority population lives within the urban areas such as Warren and other communities along the Mahoning River. The geographic balance of the county is almost entirely comprised of White alone/not Hispanic persons. Historic segregation runs generations deep, and its roots can be traced to institutionalized racism such as redlining and restrictive covenants which often specified that a property could only be sold to a White person. The issues of redlining and restrictive covenants oftentimes made it almost impossible for a person of color to purchase real property from the 1930s to the passage of the Civil Rights Act in 1964.

Due to these issues, several impediments to fair housing choice were identified in Trumbull County during the previous AI update in 2019. Those included, but were not limited to, a lack of education about fair housing issues available not only to landlords but to tenants, as well; a plethora of affordable housing, but a lack of accessible housing to those persons with disabilities; the historic segregation issues that continue to plague Trumbull County as well as the Mahoning Valley region in general; and a pervasive "Not In My Backyard" (NIMBY) syndrome that also runs generations deep throughout the county and region. NIMBY is particularly pervasive in the suburbs and rural areas. In response to the identification of those impediments, four broad goals were proposed to address the issues of impediments to fair housing choice in Trumbull County in 2019: 1.) education, 2.) reducing segregation, 3.) increasing the supply of accessible housing, and 4.) the development of a team to ensure that the goals and action steps outlined below are implemented in a timely fashion. Many of the impediments to fair housing choice that existed in 2019 still exist in 2024, including racial and ethnic segregation and the NIMBY syndrome that has persisted for generations in Trumbull County. The COVID-19 pandemic also made public outreach efforts nearly impossible for a two-year period after the completion of the 2019 Al, delaying many efforts to affirmatively further fair housing in Trumbull County and Warren and Niles. The county has made gains in increasing the supply of accessible housing through Trumbull Neighborhood Partnership's efforts to rehabilitate and retrofit an aging housing stock, particularly in Warren. The county also continues to educate local leaders and the public about fair housing issues in the Trumbull County through its fair housing training program and various materials, publications, and training.

COMMUNITY FEEDBACK TO ADDRESS CURRENT IMPEDIMENTS TO FAIR HOUSING CHOICE

The following objectives to address the current impediments to fair housing choice have been identified in Trumbull County, through the community feedback process and the public meeting held on May 28, 2024, in Niles.

 Implement a fair housing testing program. Implement the program only when and if tangible evidence exists of fair housing issues. There should be plenty of oversight of such a testing program.

- Encourage local realtors to participate in fair housing training and educate them about fair housing issues and impediments to fair housing choice.
- Increase funding to complete home repairs in Trumbull County, particularly modifications for seniors and accessibility for persons with disabilities (Trumbull Neighborhood Partnership).
- Increase the number of housing units and persons impacted by modifications to aging housing for elderly and persons with disabilities, continuing the work started by Trumbull Neighborhood Partnership.
- Compile a list of all housing and fair housing initiatives and programs in Trumbull County.
- Restrict out-of-state and out-of-country ownership of rental units through local ordinances and
 resident organizing campaigns. Track out-of-state and out-of-country ownership using data from
 the Trumbull County Auditor's Office.
- Increase the supply of safe and affordable housing in Trumbull County, particularly in urban areas, by acquiring tax delinquent structures and rehabilitating them into safe and affordable units.
- Create incentives, such as tax abatements, for developers to construct mixed-use and mixedincome infill housing. This could include, among other incentives, long term tax abatements, assistance with public infrastructure, matching funds, and 10% housing set aside for lowincome.
- Increase the use of Housing Choice Vouchers since HUD has now given housing inspectors more authority to fail rentals for items that are not fixed properly.
- Increase the value of Housing Choice Vouchers to meet the expenses facing renters in 2024.
- Identifying and lobbying for funding for landlords to use to bring their rentals to code and require landlords to rent to low-income persons and families as a condition of the funding.
- Use the "Detroit Model" to create more housing stock, including applying for Rocket Mortgage funding, and funding from Community Reinvestment Area programs, Carol Peterson grants, Susan Peterson Fund, and Federal Home Loan Banks.
- Establish by ordinance and enforce a right to counsel for any renter in an eviction proceeding.
- Increase WRTA bus service in Warren and throughout the county, linking low-income, elderly, disabled, veteran, and minority residents, and households with no vehicle access, to employment, shopping, and medical centers.
- Educate local elected officials, community leaders, and residents about impediments to fair housing choice and fair housing issues, through fair housing training.
- Encourage local representatives in Congress to increase funding for the Housing Choice Voucher program as the current levels of funding do not allow the county to meet demand.
- Reach out to local councilpersons with fair housing materials and the AI document to educate and market fair housing materials and programs to residents and constituents.
- Develop more mixed-income housing, which works well in other parts of the country, and in legacy cities such as Pittsburgh (middle income persons need housing, as well). However, politically this is a tough sell.

Trumbull County, Warren, and Niles, in collaboration with their community partners and stakeholders, have identified the following broad goals on which to focus to affirmatively further fair housing choice in Trumbull County over the next five years. The county, cities, and community stakeholders have also developed the objectives, or action steps, to fulfill these goals. The objectives, or action steps, are included in the next section in the action plan matrix. The four broad goals to affirmatively further fair housing choice in Trumbull County include the following:

- Education
- Increase Supply and Improve Condition of Housing
- Increase Accessibility to Housing and Activity Centers
- Increase Funding for Housing Initiatives and Projects

ACTION PLAN

The following action steps should be taken by Trumbull County and Warren and Niles to affirmatively further fair housing throughout the county and implement the 2024 AI.

Table 15: Action Plan to Affirmatively Further Fair Housing

Action Steps	Cost	Funding	Timeframe	Partners/Responsible Entities				
GOAL: Education								
Objective: Continue to implement fair housing training throughout Trumbull County.	Low	CDBG	Short (ongoing)	Trumbull County Niles Warren Community Legal Aid				
Objective: Implement fair housing testing in Trumbull County by hiring an entity with ample experience in testing. Each fair housing contact is responsible for their own testing program.	Medium	CDBG	Medium	Trumbull County Niles Warren				
Objective: Provide education to local elected officials, community leaders, and residents about fair housing issues, and provide materials and the Al document to local municipalities and townships to distribute to their constituents.	Low	CDBG	Short (ongoing)	Trumbull County Niles Warren Other communities in Trumbull County Community Legal Aid				
Objective: Compile a list of housing and fair housing initiatives and programs in Trumbull County using 211 as an existing means of distribution and develop a flyer for distribution at local events.	Low	CDBG	Short	Trumbull County Niles Warren Community Legal Aid TMHA TCBDD TNP MHRB JFS TCAP TNP TCHC Stark Trumbull Area Realtors				
GOAL: Increase	Supply a	and Improve Cond	dition of Ho	ousing				

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Action Steps	Cost	Funding	Timeframe	Partners/Responsible Entities
Objective: Increase supply of safe and affordable housing in Trumbull County, by acquiring tax delinquent structures and rehabilitating them into safe and affordable units.	High	CDBG HUD Grants FHLB	Long	Trumbull County Niles Warren TNP TMHA Housing partners and developers TCLRC
Objective: Increase use of Housing Choice Vouchers (HCV) as the required inspections for HCVs are more rigorous.	High	CDBG HUD Grants	Long	Trumbull County Niles Warren TMHA Landlords
Objective: Petition local representatives in Congress to increase funding for the Housing Choice Voucher (HCV) program.	Low	Local efforts	Short	Trumbull County Niles Warren Other municipalities
Objective: Develop mixed-income housing in urban and suburban areas.	High	CDBG HUD Grants FHLB	Long	Trumbull County Niles Warren TNP TMHA Housing partners and developers TCLRC
GOAL: Increase A	Accessibil	lity to Housing an	nd Activity	Centers
Objective: Continue to retrofit aging housing units for elderly and aging in place, and persons with disabilities.	High	CDBG HUD Grants FHLB CDS	Long	Trumbull County Niles Warren TNP TMHA CRA Representative
Objective: Increase WRTA bus service in Warren and Trumbull County.	High	WRTA	Medium	Trumbull County Niles Warren Other municipalities State of Ohio WRTA Eastgate

Action Steps	Cost	Funding	Timeframe	Partners/Responsible Entities
Objective: Increase the value of Housing Choice Vouchers (HCV) to meet the expenses of renters in 2024.	High	HUD	Medium	Trumbull County Niles Warren TMHA Local TCHC and Nonprofits
Objective: Trumbull County will advocate for the implementation of ordinances to restrict out-of-state and out-of-country ownership of rental units. Research whether home rule townships can enact, as well.	Low	Eligible local communities	Short	Niles Warren Other municipalities
GOAL: Increase F	unding f	or Housing Initia	tives and F	Projects
Objective: Create incentives for developers to construct mixed-use and mixed-income infill housing.	High	Grants such as Welcome Home Ohio, CHIP, and HOME	Long	Trumbull County Niles Warren TCLRC
Objective: Identify funding available for landlords to bring their rental properties to code.	High	CDBG HUD Grants	Medium (ongoing)	Trumbull County Niles Warren TNP TCLRC Landlords
Objective: Use the "Detroit Model" to increase safe and affordable housing and identify funding sources.	High	CDBG HUD Rocket Mortgage Community Reinvestment Area Carol Peterson Fund/FHLB	Long	Trumbull County Niles Warren TNP TCLRC TCHC
Increase funding for home repairs for landlords and homeowners	High	CDBG CHIP HOME HUD Grants	Long	Trumbull County Niles Warren TNP TCLRC TCAP

APPENDIX A: COMMENTS FROM PUBLIC MEETING

The following is a list of comments recorded from public discussion that took place in the city of on May 28, 2024.

- Landlords often discriminate based on familial status, ethnicity, and other protected classes.
- The landlord community tight knit in Trumbull County and they often use this to leverage the rents that they charge.
- There is a general lack of affordable and accessible housing. Although there is ample housing stock, much of it is unsafe and in poor condition for habitation.
- Monthly renter costs have skyrocketed over last couple of years.
- The COVID-19 pandemic skewed eviction and foreclosure rates (downward) due to long moratoriums on each. There is a hesitation to use these numbers to plan going forward.
- Rental ownership monopolies exist throughout the county, especially by out of state and out of
 country entities. Anecdotally, a large percentage of housing choice voucher properties are by
 companies or individuals in New Zealand.
- There has been demolition of apartment buildings, and replacing these structures with greenspace, not rebuilding. These include the Buckeye Apartments, Reeves Apartments, and others. This results in a loss of safe and affordable units.
- Many private developers in Trumbull County are not interested in building mixed use or infill housing.
- Housing Choice Vouchers are essentially worthless and often time out because the voucher is not worth enough to cover the rent that landlords expect.
- Many landlords avoid leases by executing "forever" land contracts instead.
- Transportation-WRTA routes and service have significantly decreased.
- Grant funds for rehabbing are highly competitive and very limited.
- There is a general lack of support from local elected officials and the community in general.
- There is profit in not renting properties and flipping clients. The way this works is by landlords charging non-refundable application fees that are hundreds of dollars and not renting the structure, or by securing a security deposit and first month's rent, knowing the renter cannot afford a second month. The renter is then evicted, and the process begins anew with a new renter.
- Eviction sealing is not allowed in Niles.

APPENDIX B: FAIR HOUSING TRAINING SCHEDULE, 2024-2026

Trumbull County's fair housing training schedule for 2024-2026 is included in the following table:

Table 16: Trumbull County's Fair Housing Training Schedule for 2024-2026

Target Population or Target Area	Training Location	Training Location	Description of Training	Year	Date & Time
City of Girard – Target Population/Area	Girard Multi- Generational Center	Girard Multi-Generational Center 443 Trumbull Avenue Girard, OH 44420	Fair Housing Right and Complaint Process	2024	Q1 – March 5, 2024 @ 9:00am
Veterans Services- Organization Requirement	Trumbull County Veterans Services Commission	Trumbull County Veterans Services Commission 253 E Market Street Warren, Ohio 44481	Overview of Federal, State, and Local Fair Housing Laws	2024	Q2- May 22, 2024 @10:00am
Limited Clientele (Elderly and Disabled)	Warren SCOPE	Warren SCOPE YWCA 375 N Park Avenue Warren, Ohio 44481	Fair Housing Rights and Complaint Process for Elderly and Disabled Populations	2024	Q2– June 21, 2024 @ 2:00pm
Limited Clientele (Homeless)	Trumbull County Housing Collaborative	Trumbull County Housing Collaborative Meeting YWCA 375 N Park Ave Warren, OH 44481	Overview of Federal, State & Local Fair Housing Laws	2024	Q3- July 9, 2022 @ 2:00pm
General Population	Trumbull County Fairgrounds	Trumbull County Fairgrounds 899 Everett Hull Road Cortland, Ohio 44410	Fair Housing Rights and Complaint Process	2024	Q3 – July 11, 2024 @ 10:00am
Trumbull Metropolitan Housing Authority- Organization Requirement	ТМНА	TMHA 4076 Youngstown Rd SE Warren, Ohio 44484	Overview of Federal, State & Local Fair Housing Laws	2024	Q3 –July 24, 2024 @ 10:00am
Howland Township- Target Population/Area	Howland SCOPE	Howland SCOPE 8273 High Street Warren, Ohio 44484	Fair Housing Rights and Complaint Process	2024	Q3 – September 10, 2024 @ 10:00am
Warren City Schools- Organization/School Requirement	Warren City Schools	Warren City Schools 105 High Street Warren, Ohio 44481	Overview of Federal, State & Local Fair Housing Laws	2024	Q4- TBD (sometime in October)
Limited Clientele (Elderly and Disabled) in Target Population Area	Girard Multi- Generational Center	Girard Multi-Generational Center 443 Trumbull Avenue Girard, Ohio 44420	Fair Housing Rights and Complaint Process for Elderly and Disabled Populations	2024	Q4- October 15, 2024 @ 9:00am
Stark Trumbull Area Board of Realtors- Organization Requirement	Stark Trumbull Area Board of Realtors	Stark Trumbull Area Board of Realtors TBD	CEU Seminar for Realtors	2025	Q1- TBD
Trumbull County Zoning Inspectors Association- Organization Requirement	Trumbull County Zoning Inspectors Association	Trumbull County Zoning Inspectors Association TBD	Overview of Federal, State & Local Fair Housing Laws	2025	Q2-TBD

Target Population or Target Area	Training Location	Training Location	Description of Training	Year	Date & Time
Girard Multi- Generational Center - Organization Requirement	Girard Multi- Generational Center	Girard Multi-Generational Center 443 Trumbull Avenue Girard, Ohio 44420	Fair Housing Rights and Complaint Process for Elderly and Disabled Populations	2025	Q2-TBD
Elderly and Disabled/CHIP	Lordstown S.C.O.P.E.	Lordstown SCOPE 1776 Salt Springs Rd Warren, Ohio 44481	Fair Housing Rights and Complaints Process	2025	O2-TBD
General Population	Trumbull County Fairgrounds	Trumbull County Fairgrounds 889 Everett Hull Road Cortland, Ohio 44410	Fair Housing Rights and Complaint Process	2025	Q3-TBD
Limited Clientele (Homeless)	Trumbull County Housing Collaborative	Trumbull County Housing Collaborative Meeting YWCA 375 N Park Ave Warren, Ohio 44481	Fair Housing Rights and Complaint Process	2025	Q3-TBD
Limited Clientele (Elderly and Disabled) in Target Population Area	Howland SCOPE	Howland SCOPE 8273 High Street Warren, Ohio 44484	Fair Housing Rights and Complaint Process	2025	Q4-TBD
Trumbull County Continuum of Care/CHIP	YWCA	YWCA of Warren 375 North Park Ave Warren, Ohio 44481	Fair Housing Rights and Complaint Process	2026	Q1-TBD
General Population/CHIP	Warren- Trumbull Public Library	Warren-Trumbull County Library Liberty Location 415 Churchill Hubbard Rd Youngstown, Ohio 44505	Fair Housing Rights and Complaint Process	2026	Q3-TBD

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