ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR ST. JOSEPH COUNTY

2020-2024

St. Joseph County Housing Consortium

City of South Bend City of Mishawaka St. Joseph County













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Executive Summary

The St. Joseph County Housing Consortium is an entitlement community for the HOME Investment Partnership (HOME) Program. The Cities of South Bend and Mishawaka, Indiana are entitlement communities under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG) and together with the County of St. Joseph, Indiana comprise the St. Joseph County Housing Consortium. In accordance with the Housing and Community Development Act of



1974, as amended, each entitlement community must "affirmatively further fair housing." In order to demonstrate that the entitlement community is "affirmatively furthering fair housing," each community must conduct a Fair Housing Analysis which identifies any impediments to fair housing choice and what steps it will take to affirmatively further fair housing. HUD advises communities that the Analysis of Impediments to Fair Housing should also address the Fair Housing Act, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 109 of Title I of the Housing and Community Development Act of 1974, Title II of the Americans with Disabilities Act of 1990, Architectural Barriers Act of 1968, Age Discrimination Act of 1975, Title IX of the Education Amendments Act of 1972, Executive Order 11063, Executive Order 11246, Executive Order 12892, Executive Order 12898, Executive Order 13166, and Executive Order 13217.

The HUD Fair Housing and Equal Opportunity (FHEO) Office has advised Federal entitlement communities to update their Analysis of Impediments (AI) to Fair Housing Choice to coincide with their Five Year Consolidated Plan, and then every five (5) years thereafter. As part of its Annual Action Plan, each City must additionally sign certifications every year stating that the Cities will affirmatively further fair housing. This means that the Cities will conduct an Analysis of Impediments to Fair Housing Choice (AI), take appropriate actions to overcome the effects of any impediments identified through the AI, and maintain records reflecting what analysis and corrective actions were taken.

St. Joseph County previously prepared an Analysis of Impediments to Fair Housing Choice in 2014. The St. Joseph County Housing Consortium has prepared this 2020-2024 Analysis of Impediments to Fair Housing Choice (AI) in cooperation with the City of South Bend and the City of Mishawaka. The findings produced through this analysis will be further addressed in each City's FY 2020-2024 Five Year Consolidated Plan.

This analysis focuses on the status and interaction of six (6) fundamental conditions within St. Joseph County:





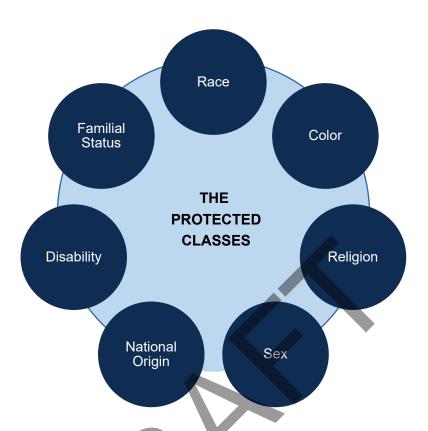
- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financial assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities for minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

The Fair Housing Act was originally passed in 1968 to protect buyers and renters from discrimination from sellers and landlords by making it unlawful to refuse to sell or rent property to persons included under the category of a protected class. The Fair Housing Act prohibits discrimination against persons based on their *race*, *color*, *religion*, *sex*, *national origin*, *disability*, or *familial status* in the sale, rental, and financing of housing.









As population shifts and economic trends grow, Fair Housing issues vary drastically between jurisdictions and regions. Therefore, the St. Joseph County Housing Consortium is taking a more efficient and proactive approach towards affirmatively furthering fair housing choice for County residents on both a local level and a regional level.

The collaboration between the City of South Bend, Indiana, the City of Mishawaka, Indiana, and St. Joseph County has produced beneficial insight into the issues affecting the housing market of St. Joseph County. While certain fair housing issues are regional in scale, this AI strives to identify strategies and goals it can take to address the barriers that are impacting Fair Housing Choice for the County's residents.

The methodology employed to undertake this Analysis of Impediments included:

Research

- A review was performed of the City of South Bend's, City of Mishawaka's and St. Joseph County's zoning ordinances.
- The most recent demographic data for the County was analyzed from the U.S.
 Census, which included general, demographic, housing, economic, social, and disability characteristics.





- A review of the U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy (HUD-CHAS) data was undertaken.
- A review of financial lending institutions through the Home Mortgage Disclosure
 Act (HMDA) database was completed.
- A review of the real estate and mortgage practices was undertaken.
- Home mortgage foreclosure data was also reviewed.

In-Person Meetings/Interviews

- Meetings were conducted with the following:
 - o IN*Source
 - Logan Center
 - La Casa de Amistad
 - Catholic Workers
 - o Cross Community CDC
 - o St. Joseph County Area Planning Commission
 - o 1st Source Bank
 - Communitywide FCU
 - o Mutual Bank
 - Teachers Credit Union
 - Community Homebuyers
 - Halpin Slough, PC, Attorneys
 - Notre Dame FCU
 - Lake City Bank
 - South Bend Continuum of Care
 - Mayor's Office of Human Rights
 - Mayor's Office of Diversity & Inclusion
 - Indiana Small Business Development Center
 - South Bend Career Pathways
 - Women's Entrepreneurship Initiative
 - Doulos Chapel
 - Mt. Carmel Missionary Baptist Church
 - Broadway Christian Parish United Methodist Church
 - United Religious Community of St. Joseph County
 - St. Joseph County Department of Health
 - Housing Authority of the City of South Bend
 - Housing Authority of the City of Mishawaka
 - o 466 Works
 - Neighborhood Development





- Place Builders, Inc.
- Near Northwest Neighborhood, Inc.
- Habitat for Humanity
- o Hurry Home
- South Bend Heritage Fund
- o BCE2 (Southeast)
- o River Park Neighborhood Association
- Near West Side Neighborhood Organization
- Near Northwest Neighborhood
- Veterans' Administration
- o Far North West Neighborhood Association
- Edgewater Neighborhood Association
- Kennedy Park Neighborhood Association
- Kankakee Wetlands Organic Gardens
- Oaklawn Psychiatric Care
- HOPE Ministries
- Youth Service Bureau
- St. Margaret's House
- Center for the Homeless
- St. Joseph County Public Library
- Boys & Girls Club of St. Joseph's County
- Goodwill Bridges Out of Poverty
- AIDS Assist
- Upper Room Recovery
- o Dismas House
- o Transpo

Phone Interviews

- Phone interviews were conducted with the following:
 - Notre Dame Economic Justice Clinic
 - o REAL Services
 - Mishawaka Food Pantry
- Surveys were sent to each housing, social service, and community development agency that was invited to the roundtable discussions. Follow up phone calls were made when an organization neither returned a survey nor attended a meeting.

Analysis of Data

Low- and moderate-income areas were identified and mapped.





- Concentrations of minority populations were identified and mapped.
- Concentrations of owner-occupied and renter-occupied housing units were identified and mapped.
- Fair housing awareness in the community was evaluated.
- The locations of Housing Cost Burdens throughout the County were analyzed.
- The locations of CDBG and HOME expenditures throughout the area were analyzed.
- The Consortium's Five Year Goals and Objectives were reviewed.

Potential Impediments

- Public sector policies that may be viewed as impediments were analyzed.
- Private sector policies that may be viewed as impediments were analyzed.
- The status of previously identified impediments was analyzed.

Citizen Participation

- Electronic copies of a fair housing survey were made available to neighborhood groups through Nextdoor.com and through Neighborhood Resource Connection's listserv that goes out to all neighborhood organizations and associations. The online survey produced 133 responses in English and no responses in Spanish. See copy of survey form in the Appendix Section.
- The St. Joseph County Housing Consortium held two (2) Public Meetings to engage the public and local organizations/agencies and help identify issues impacting Fair Housing Choice. The First Public Meeting was held on Tuesday, April 23, 2019 at the St. Joseph County Public Library in South Bend and the Second Public Meeting was held on Wednesday, April 24, 2019 at the Mishawaka City Hall.
- Notices for the public meetings were published in the "The South Bend Tribune," the local newspaper of general circulation in the area, and in the Spanish language newspaper, "El Puente."
- The St. Joseph County Housing Consortium met with representatives from fifty (50) local housing, community development, realtors, and social service organizations through a series of small group discussions. These were held with the following types of organizations:
 - Local housing authorities
 - Advocacy organizations
 - Direct housing stakeholders
 - Social service providers
 - Office of Diversity and Inclusion
 - Planning organizations





- Faith-Based Organizations
- Local fair housing advocacy organizations
- Transportation groups
- Banks/financial organizations
- The St. Joseph County Housing Consortium conducted phone interviews with three (3) additional social service organizations who were unable to attend the public hearings or individual group meetings.
- The City of South Bend and the City of Mishawaka held meetings with the Logan Center and Oaklawn Psychiatric Care to obtain an understanding of the issues affecting persons with disabilities. Additionally, a phone interview was completed with the REAL Services to obtain the needs of disabled elderly in the region.
- The 2020-2024 Analysis of Impediments to Fair Housing Choice was made available on the City of South Bend's and the City of Mishawaka's website at https://southbendin.gov/department/community-investment/neighborhood-development/, https://mishawaka.in.gov/communitydevelopment, and a hardcopy was placed at the following locations beginning on November 1, 2019:
 - The St. Joseph County Public Library (all branches)
 - Mishawaka Public Library (all branches)
 - Walkerton Public Library
 - New Carlisle-Olive Township Public Library
 - City of South Bend Department of Community Investment
 - City of South Bend Office of the Clerk
 - City of Mishawaka Planning Department
- The St. Joseph County Housing Consortium held two Public Hearings on the "draft" 2020-2024 Analysis of Impediments on Wednesday, November 13 in the City of South Bend and in the City of Mishawaka.

Based on the data analysis and citizen participation process, the City staff in South Bend and Mishawaka identified the following issues impacting fair housing choice in St. Joseph County:

• Housing Opportunities:

- There is a shortage of affordable housing in St. Joseph County that is decent, safe, and sanitary.
- There is a lack of Federal and State funds for housing subsidies and the development of new affordable housing is not economically feasible for private developers.





- There is a shortage of affordable housing units in areas of opportunity where low-income persons and households may move.
- There is a lack of financing to support the purchase of affordable starter homes.
- There is enough vacant land for infill housing, but a lack of financial incentives to develop affordable housing on the vacant land by public, private, and nonprofit developers.

Housing Choice:

- Housing units that are deteriorated and below code standards tend to be available at affordable rents.
- Affordable housing units are concentrated in neighborhoods that are segregated by race or ethnicity in addition to income.
- The special needs population in St. Joseph County, particularly in the City of South Bend, has increased in the last 15 years, but landlords are frequently unwilling to make reasonable modifications and accommodations to their units.
- There are physical, economic, and social justice barriers that impede the development of new affordable and accessible housing in St. Joseph County.
- There is a lack of "mixed-income" housing being built in the County.

Cost Overburden:

- Lower household incomes create cost overburdened housing conditions;
 approximately 13.2% of homeowners and 40.4% of renters in the County are cost overburdened of 30% or more.
- The elderly, on fixed income, cannot afford to make the repairs, alterations, and accommodations to their homes to make them accessible to their needs.

• Disability/Accessibility:

- There is a lack of housing in the County that is accessible and affordable for the elderly, the disabled, and persons with special needs.
- The denial by some landlords to make reasonable modifications and accommodations limits the amount of accessible units in the County that are for rent for persons with special needs.

Fair Housing:

- Zoning ordinances that were meant to prevent student rentals have been farreaching, and have negatively affected protected classes.
- Tenants and homebuyers do not always file housing discrimination complaints when renting or buying a home.
- Predatory loans in the region are common. As a result, foreclosure and eviction rates are high.





- Persons with Limited English Proficiency (LEP) do not always have a fair housing choice.
- There is a lack of cooperation on the part of landlords to address accessibility issues.
- There is a lack of awareness of tenants' rights, including what reasonable modifications and accommodations are.

Access/Mobility:

- The limited public transportation network in the County is not convenient for lower income households to go to: work, health care, shopping, etc., which limits the choices where a low-income household can live.
- Landlords will frequently refuse to make reasonable modifications and accommodations.
- Families and individuals have a right to live wherever they chose if affordable housing is available outside areas of concentration of low income or racial concentration.

Using these findings, the Cities of South Bend and Mishawaka developed the following impediments for the 2020-2024 Analysis of Impediments to Fair Housing Choice and defined specific goals and strategies to address each impediment.

• Impediment 1: Fair Housing Education and Outreach

There is a need to educate persons about their rights under the Fair Housing Act and to raise community awareness to affirmatively further fair housing choice, especially for low-income residents, minorities, and the disabled population.

Goal: Improve the public's, realtors', and landlords' and local officials' knowledge and awareness of the Fair Housing Act, related laws, regulations, and requirements to affirmatively further fair housing throughout St. Joseph County.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the Cities of South Bend and Mishawaka, and St. Joseph County:

- 1-A: Continue to promote Fair Housing awareness through media, seminars, and training to provide educational opportunities for all persons to learn about their rights under the Fair Housing Act and Americans with Disabilities Act.
- 1-B: Continue to prepare and distribute literature and informational material concerning fair housing issues, an individual's housing rights, and a landlord's responsibilities to comply with the Fair Housing Act by making reasonable accommodations.





- 1-C: Educate residents that they have the right to live outside concentrated areas of poverty.
- 1-D: Work with the local Board of Realtors to educate and promote fair housing.
- 1-E: Strive for better intergovernmental cooperation between state and local partners, as well as community groups, to effectively identify and address potential barriers to affordable housing choice.
- 1-F: Publish forms, informational material, etc. in both English and Spanish.

• Impediment 2: Quality of Rental Housing vs. Affordability

St. Joseph County has a limited supply of rental housing that is decent, safe, sound and affordable and 41.8% of all households are cost overburdened and they spend 30% or more of their net monthly income on housing.

Goal: Increase the supply of affordable rental housing through new construction and rehabilitation activities.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the Cities of South Bend and Mishawaka, and St. Joseph County:

- 2-A: Continue to support and encourage community organizations to rehabilitate rental housing.
- 2-B: Continue to enforce local codes and ordinances, and develop a Rental Registry Program in the City of Mishawaka and St. Joseph County.
- 2-C: Promote and encourage the public housing authorities to offer Section 8
 Housing Choice Voucher holders the option to convert to homeownership.
- 2-D: Continue to fund the Community Homebuyers Corporation's downpayment assistance program for qualifying individuals, including tenants that wish to buy homes.
- 2-E: Continue to fund rental assistance to lower housing costs for the very low income, mentally disabled, special needs populations, and homeless.

• Impediment 3: Lack of Quality Affordable Homeowner Housing

There is a lack of resources for low- and moderate-income households to purchase a home. Many houses that are available for purchase are in need of substantial rehabilitation work.





Goal: Increase the supply of various types of affordable housing by new construction and rehabilitation activities.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the Cities of South Bend and Mishawaka, and St. Joseph County:

- 3-A: Support financially, the purchase of small starter homes at affordable prices for low- and moderate-income residents throughout St. Joseph County.
- 3-B: Support and promote the development of affordable infill housing on vacant land.
- 3-C: Continue to fund the Community Homebuyers Corporation's downpayment assistance program for low- and moderate-income homebuyers.
- 3-D: Support and promote the rehabilitation of owner-occupied homes under the South Bend/UEA Pilot Home Repair Program.
- 3-E: Provide financial and development incentives to private developers and non-profits to construct and/or rehabilitate affordable housing.
- 3-F: Encourage and promote the development, construction, and/or rehabilitation of mixed-income housing in areas that are not low-moderate income.

• Impediment 4: Continuing Need for Accessible Housing Units

As an older built-up environment, there is a lack of accessible housing units in St. Joseph County. Since 53.2% of the County's housing units were built over 60 years ago and do not have accessibility features, while 13.7% of the County's population is classified as disabled.

Goal: Increase the number of accessible units for the physically disabled and developmentally delayed through new construction and rehabilitation of existing housing.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the Cities of South Bend and Mishawaka, and St. Joseph County:

- 4-A: Promote programs to increase the amount of accessible housing through rehabilitation of existing housing stock for homeowners and renters.
- 4-B: Encourage the development of new construction of accessible and visitable housing through financial or development incentives.
- 4-C: Continue to enforce ADA and Fair Housing requirements for landlords to make "reasonable accommodations" for tenants who are disabled.





 4-D: Continue to promote programs to assist elderly homeowners with accessibility improvements to their properties so they may remain in their own homes.

Impediment 5: Economic Issues Affecting Housing Choice

There is a lack of economic opportunities in the County which prevents low-income households from increasing their income and limits the choice to live outside areas of concentrated poverty.

Goal: The local economy will provide new job opportunities, which will increase household income, and will promote fair housing choice.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the Cities of South Bend and Mishawaka, and St. Joseph County:

- 5-A: Strengthen partnerships that enhance local businesses, expand the tax base, and create a more sustainable economy for residents and businesses.
- 5-B: Support and enhance workforce development and skills training that results in increased job opportunities and a living wage.
- 5-C: Continue to support programming that enhances entrepreneurship and small business development, expansion, and retention within low- and moderate-income, and minority neighborhoods.
- 5-D: Continue to promote and encourage economic development with local commercial and industrial firms to expand their operations and increase employment opportunities.

• Impediment 6: Impacted Areas of Concentration

There are specific areas throughout the County where the concentration of low-income persons and minorities exceeds 70% of the area's population.

Goal: Promote the de-concentration of minorities outside the Northwestern and Southeastern sections of the City of South Bend to reduce minority concentration.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the Cities of South Bend and Mishawaka, and St. Joseph County:

 6-A: Support, promote, and plan for affordable housing developments outside areas of minority concentration.







- 6-B: Market and promote housing opportunities for minorities outside areas of minority concentration.
- 6-C: Provide assistance to minority households to locate their residences outside areas of high minority concentration.









I. Introduction

The City of South Bend, IN and the City of Mishawaka, IN are both entitlement communities under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG) Program. Additionally, the Cities of South Bend Mishawaka joined with St. Joseph County to form a HOME Consortium and are eligible for the HOME Investment Partnership (HOME) Program. South Bend is also an entitlement community for the Emergency Solutions Grant (ESG) program. In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to demonstrate that the entitlement community is "affirmatively further fairing housing," the community must conduct a Fair Housing Analysis which identifies any impediments to fair housing choice and what steps it will take to affirmatively further fair housing. The HUD Fair Housing and Equal Opportunity (FHEO) Office has advised the Federal entitlement communities to prepare a new Analysis of Impediments to Fair Housing Choice to coincide with the Five Year Consolidated Plan, and then every five (5) years thereafter.

HUD defines "fair housing choice" as:

"The ability of persons, regardless of race, color, religion, sex, national origin, familial status, or handicap, of similar income levels to have available to them the same housing choices"

This Analysis of Impediments to Fair Housing Choice consists of the following six (6) conditions:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financial assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding





assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

HUD-FHEO suggests that communities conducting an Analysis of Impediments should consider the policies concerning "visitability," in Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and the Fair Housing Act. Housing that is "visitable" means that it has the most basic level of accessibility that enables persons with disabilities to visit the home of a friend, family member, or neighbor.

- "Visitable" housing has at least one accessible means of ingress/egress, and all interior and bathroom doorways have as a minimum a 32-inch clear opening.
- Section 504 of the Rehabilitation Act (24 CFR Part 8), known simply as "Section 504," prohibits discrimination against persons with disabilities in any program receiving Federal financial assistance.
- The Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, and 225) (ADA) prohibits discrimination against persons with disabilities in all programs and activities sponsored by state and local governments.
- The Fair Housing Act requires property owners to make reasonable modifications to units and/or public areas in order to allow a disabled tenant to make full use of the housing unit. Additionally, property owners are required to make reasonable accommodations to rules or procedures to afford a disabled tenant the full use of the housing unit.

In regard to local zoning ordinances, the Fair Housing Act prohibits local government from making zoning or land use decisions, or implementing land use policies that exclude or discriminate against persons of a protected class.

The Cities of South Bend and Mishawaka previously prepared an Analysis of Impediments to Fair Housing Choice for St. Joseph County, Indiana in 2014. The Cities of South Bend and Mishawaka have prepared this 2020-2024 Analysis of Impediments to Fair Housing Choice (AI) as the member Cities of the St. Joseph County Housing Consortium. The findings produced through this analysis will be further addressed in each City's FY 2020-2024 Five Year Consolidated Plan.

The document is designed to act as a planning tool, providing the St. Joseph County Housing Consortium with the necessary framework to strategically address any identified impediments to fair housing choice over the next five (5) years and







continue to make modifications based on events and activities in the community during that time period.

In order to affirmatively further fair housing, the Cities of South Bend and Mishawaka must look beyond the boundaries of St. Joseph County and coordinate fair housing with Elkhart County, IN and Cass County, MI including the Cities of Elkhart, IN and Niles, MI. Fair housing choice is the central goal of the AI, which stresses that opportunities should be available to low-income residents and members of the protected classes who may want to live in or around St. Joseph County.









II. Background Data

Description - St. Joseph County

St. Joseph County, commonly called St. Joe County by residents, is a county located in the U.S. State of Indiana. As of the Census 2010, the population was 266,931, making it the fifth-most populous county in Indiana. Formed in 1830, it was named for the St. Joseph River which flows through it toward Lake Michigan. The county seat is South Bend.

St. Joseph County is part of the South Bend–Mishawaka, IN-MI, Metropolitan Statistical Area.

<u>Description – South Bend City</u>

South Bend is the county seat of, St. Joseph County, Indiana, on the St. Joseph River near its southernmost bend. As of the 2010 census, the city had a total of 101,168 residents; its Metropolitan Statistical Area had a population of 318,586 and Combined Statistical Area of 721,296. It is the fourth-largest city in Indiana, serving as the economic and cultural hub of Northern Indiana. The University of Notre Dame is located just to the north in the unincorporated neighborhood known as Notre Dame, Indiana, and is an integral contributor to the region's economy.

The area was originally settled in the early 19th century by fur traders and was established as a city in 1865. The St. Joseph River shaped South Bend's economy through the mid-20th century. River access assisted heavy industrial development such as that of the Studebaker Corporation, the Oliver Chilled Plow Company, Bendix Brakes, and other large corporations to locate in the City.

The population of South Bend declined after 1960, when it had a peak population of 132,445. This was chiefly due to migration to suburban areas as well as the demise of Studebaker and other heavy industry. Today, the largest industries in South Bend are health care, education, small business, and tourism. Remaining large corporations include Crowe Horwath, Honeywell, and AM General.

Recently, the city population has started to grow for the first time in nearly fifty years. The old Studebaker plant and surrounding area, now called "Ignition Park," is being redeveloped as a technology center to attract new industry.

The city has also been featured in national news coverage for Mayor Pete Buttigieg, who has achieved recognition for his various economic development projects within the city, his position as the youngest mayor to be elected in a city







of more than 100,000 residents, and his essay in which he came out as the first openly gay executive in the State of Indiana. The city attracted further attention when Buttigieg announced he would campaign in the 2020 Democratic Party presidential primaries.

Description – Mishawaka City

Mishawaka's recorded history began with the discovery of bog iron deposits at the beginning of the 1830s. Settlers arriving to mine the deposits founded the town of St. Joseph Iron Works in 1831. Within a few years, the town had a blast furnace, a general store, a tavern, and about 200 residents. Business prospered, and in 1833 St. Joseph Iron Works, Indiana City, and two other adjacent small towns were incorporated to form the City of Mishawaka.

In September 1872, a fire destroyed three quarters of Mishawaka's business district. However, the citizens rebuilt and attracted new industry. The Dodge Manufacturing Company, Perkins Windmills and the Mishawaka Woolen and Rubber Company (later Ball Band, then Uniroyal) all helped the town to prosper. Mishawaka grew through both industry and agriculture. In the late 19th century, Mishawaka became known as the "Peppermint Capital of the World", since the area's rich black loam soil produced great quantities of mint.

From 1906 to 1915, Mishawaka was the manufacturing home of the luxurious American Simplex motor car. Four American Simplex autos entered the first Indianapolis 500 in 1911. One Simplex crashed, killing the mechanic riding with the driver, while the other Mishawaka cars finished sixth, eighth and twentieth.

Ball Band made rubber garments and was hit by a major strike in 1931. It flourished in the 1940s, but finally closed in 1997 in the face of cheaper imports. Manufacturing in Mishawaka peaked in the 1940s and began a slow decline due to industrial restructuring. The economic base shifted to retail services and smaller industry.

In 1979, University Park Mall opened north of Mishawaka. In 1990, AM General began producing the Hummer in its Mishawaka plant. The MV-1 is a purpose-built taxicab and replaces the planned Standard Taxi; it was developed in collaboration with AM General. The car is built in Mishawaka at an AM General plant. AM General began making Mercedes vehicles at this plant in 2015.





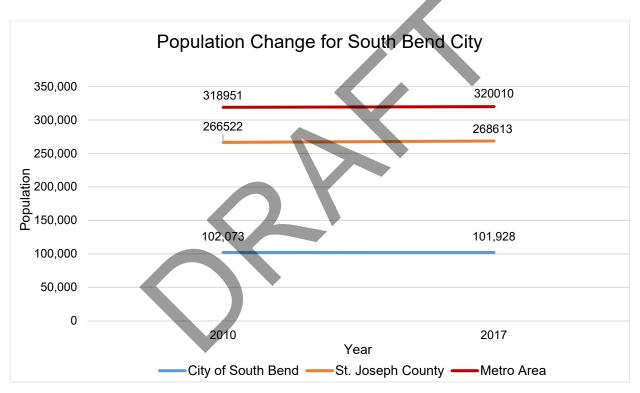


A. Population, Race, Ethnicity, and Religion

Population – South Bend City

South Bend City's population decreased from 102,073 people in 2010 to 101,928 people in 2017 (a decrease of 0.14 percent).

From 2010 to 2017, South Bend City's population decrease whereas St. Joseph County's and the Metro Area's populations increased.



Source: 2010 U.S. Census and 2013-2017 ACS

Population - Mishawaka City

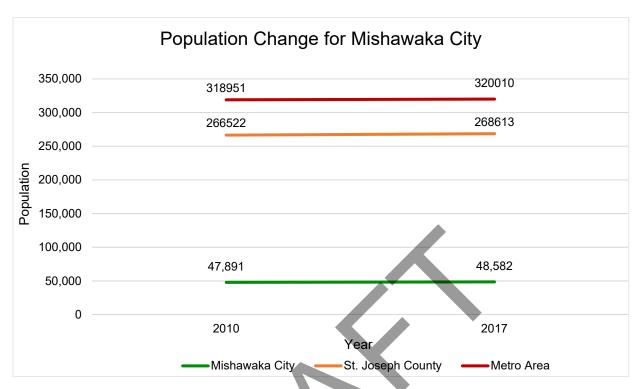
Mishawaka City's population increased from 47,891 in 2010 to 48,582 people in 2017 (an increase of 1.44 percent).

From 2010 to 2017, Mishawaka City's population increased at a faster rate than St. Joseph County's and the Metro Area's rate.









Source: 2010 U.S. Census and 2013-2017 ACS

Population - St. Joseph County

St. Joseph County's population increased from 266,522 in 2010 to 268,613 people in 2017 (an increase of 0.78 percent).

Over the same period, South Bend City's population decreased from 102,073 people in 2010 to 101,928 people in 2017 (a decrease of 0.14 percent) while Mishawaka City's population increased from 47,891 in 2010 to 48,582 people in 2017 (an increase of 1.44 percent). The Metro Area at large saw a population increase from 318,951 people in 2010 to 320,010 people in 2017 (an increase of 0.33 percent).

From 2010 to 2017, St. Joseph County's population increased at a faster rate than the Metro Area suggesting faster growth in the County than the surrounding area. Within the County, South Bend City's population decreased over the period whereas Mishawaka City's population increased. Specifically, Mishawaka's population increased at a faster rate than St. Joseph County's, suggesting that Mishawaka City is experiencing faster growth than the surrounding areas.







Race - St. Joseph County

The following table highlights the racial composition of St. Joseph County as shown in the 2010 U.S. Census and in 2017.

Race and Hispanic or Latino Population in St. Joseph County

Race and	2010 U.S.	Census	2013-2017 ACS	
Hispanic or Latino	#	%	#	%
Total	266,522	-	268,613	-
One race	258,905	97.1%	260,171	96.9%
White alone	212,853	79.9%	212,328	79.0%
Black or African American alone	32,951	12.4%	34,814	13.0%
American Indian and Alaska Native alone	1,060	0.4%	1,152	0.4%
Asian alone	4,905	1.8%	5,822	2.2%
Native Hawaiian and Other Pacific Islander alone	177	0.1%	273	0.1%
Some other race alone	6,959	2.6%	5,782	2.2%
Hispanic or Latino	18,404	6.9%	22,423	8.3%

Source: 2010 U.S. Census and 2013-2017 ACS

The most common race identified in St. Joseph County in 2010 was White alone with 212,853 residents comprising of 79.9 percent of the population. The second most common race identified in St. Joseph County in 2010 was Black or African American alone with 32,951 residents comprising of 12.4 percent of the population.

The most common race identified in St. Joseph County in 2017 was White alone with 212,328 residents comprising of 79.0 percent of the population. The second most common race identified in St. Joseph County in 2017 was Black or African American alone with 34,814 residents comprising of 13.0







percent of the population.

There was not any change in proportional representation in St. Joseph County from 2010 to 2017 that was larger than 5.0 percentage points.

Race - South Bend City

The following table highlights the racial composition of South Bend City as shown in the 2010 U.S. Census and in 2017.

Race and Hispanic or Latino Population in South Bend City

itace and		tillo i opulatio	ii iii Soutii Belia City		
Race and	2010 U.S.	Census	2013-2017 ACS		
Hispanic or Latino	#	%	#	%	
Total	102,073	-	101,928	-	
One race	97,587	95.6%	97,598	95.8%	
White alone	64,657	63.3%	64,363	63.1%	
Black or African American alone	25,997	25.5%	26,910	26.4%	
American Indian and Alaska Native alone	487	0.5%	481	0.5%	
Asian alone	1,490	1.5%	1,465	1.4%	
Native Hawaiian and Other Pacific Islander alone	33	0.0%	120	0.1%	
Some other race alone	4,923	4.8%	4,259	4.2%	
Hispanic or Latino	12,129	11.9%	14,686	14.4%	

Source: 2010 U.S. Census and 2013-2017 ACS

The most common race identified in South Bend City in 2010 was White alone with 64,657 residents comprising of 63.3 percent of the population. The second most common race identified in South Bend City in 2010 was Black or African American alone with 25,997 residents comprising of 25.5 percent of the population.







The most common race identified in South Bend City in 2017 was White alone with 64,363 residents comprising of 63.1 percent of the population. The second most common race identified in South Bend City in 2017 was Black or African American alone with 26,910 residents comprising of 26.4 percent of the population.

There was not any change in proportional representation in South Bend City from 2010 to 2017 that was larger than 5.0 percentage points.

Race – Mishawaka City

The following table highlights the racial composition of Mishawaka City as shown in the 2010 U.S. Census and in 2017.

Race and Hispanic or Latino Population in Mishawka City

Race and	2010 U.S.	Census	2013-2017 ACS		
Hispanic or Latino	#	%	#	%	
Total	47,891	-	48,582	-	
One race	46,718	97.6%	46,676	96.1%	
White alone	41,485	86.6%	41,261	84.9%	
Black or African American alone	3,224	6.7%	3,517	7.2%	
American Indian and Alaska Native alone	283	0.6%	367	0.8%	
Asian alone	893	1.9%	947	1.9%	
Native Hawaiian and Other Pacific Islander alone	123	0.3%	65	0.1%	
Some other race alone	710	1.5%	519	1.1%	
Hispanic or Latino	2,048	4.3%	3,066	6.3%	

Source: 2010 U.S. Census and 2013-2017 ACS







The most common race identified in Mishawaka City in 2010 was White alone with 41,485 residents comprising of 86.6 percent of the population. The second most common race identified in Mishawaka City in 2010 was Black or African American alone with 3,224 residents comprising of 6.7 percent of the population.

The most common race identified in Mishawaka City in 2017 was White alone with 41,261 residents comprising of 84.9 percent of the population. The second most common race identified in Mishawaka City in 2017 was Black or African American alone with 3,517 residents comprising of 7.2 percent of the population.

There was not any change in proportional representation in Mishawaka City from 2010 to 2017 that was larger than 5.0 percentage points.

Ethnicity - St. Joseph County

The following table highlights the ethnicities of St. Joseph County residents at the time of the 2010 U.S. Census and in 2017.

Ethnicity and Ancestry in St. Joseph County

	2010 U.S. C	2010 U.S. Census		I7 ACS
ANCESTRY	#	%	#	%
Total population	266,522	-	268,613	-
American	12,056	4.5%	17,656	6.6%
Arab	1,372	0.5%	1,193	0.4%
Czech	989	0.4%	1,130	0.4%
Danish	817	0.3%	622	0.2%
Dutch	7,104	2.7%	5,192	1.9%
English	22,539	8.5%	16,981	6.3%
French (except Basque)	7,792	2.9%	5,271	2.0%
French Canadian	1,298	0.5%	913	0.3%
German	67,432	25.3%	57,574	21.4%
Greek	1,145	0.4%	1,019	0.4%







Hungarian	8,972	3.4%	8,512	3.2%
Irish	41,265	15.5%	32,672	12.2%
Italian	12,001	4.5%	11,574	4.3%
Lithuanian	656	0.2%	508	0.2%
Norwegian	2,350	0.9%	1,983	0.7%
Polish	31,955	12.0%	27,978	10.4%
Portuguese	405	0.2%	337	0.1%
Russian	1,628	0.6%	1,271	0.5%
Scotch-Irish	3,995	1.5%	1,842	0.7%
Scottish	4,114	1.5%	3,542	1.3%
Slovak	391	0.1%	563	0.2%
Sub-Saharan African	2,272	0.9%	2,952	1.1%
Swedish	5,105	1.9%	3,446	1.3%
Swiss	1,502	0.6%	1,008	0.4%
Ukrainian	424	0.2%	654	0.2%
Welsh	1,380	0.5%	1,361	0.5%
West Indian (excluding Hispanic origin groups)	289	0.1%	560	0.2%

Source: 2010 Census and 2013-2017 ACS

The most common ancestral group identified in St. Joseph County in 2010 was German with 67,432 residents comprising of 25.3 percent of the population. The second most common ancestral group identified in St. Joseph County in 2010 was Irish with 41,265 residents comprising of 15.5 percent of the population.

The most common ancestral group identified in St. Joseph County in 2017 was German with 57,574 residents comprising 21.4 percent of the population. The second most common ancestral group identified in St. Joseph County in 2017 was Irish with 32,672 residents comprising of 12.2 percent of the population.







There was not any change in proportional representation in St. Joseph County from 2010 to 2017 that was larger than 5.0 percentage points.

Ethnicity – South Bend City

The following table highlights the ethnicities of South Bend City residents at the time of the 2010 U.S. Census and in 2017.

Ethnicity and Ancestry in South Bend City

Lumoit	2010 U.S. C	*	2013-201	I7 ACS
ANCESTRY	#	%	#	%
Total population	102,073	-	101,928	-
American	3,845	3.8%	4,578	4.5%
Arab	131	0.1%	287	0.3%
Czech	264	0.3%	234	0.2%
Danish	88	0.1%	178	0.2%
Dutch	2,222	2.2%	1,335	1.3%
English	6,318	6.2%	4,974	4.9%
French (except Basque)	2,323	2.3%	1,925	1.9%
French Canadian	422	0.4%	141	0.1%
German	19,199	18.8%	16,215	15.9%
Greek	308	0.3%	278	0.3%
Hungarian	2,904	2.8%	2,755	2.7%
Irish	12,089	11.8%	9,435	9.3%
Italian	3,341	3.3%	3,581	3.5%
Lithuanian	176	0.2%	103	0.1%
Norwegian	459	0.4%	570	0.6%
Polish	10,370	10.2%	8,196	8.0%
Portuguese	54	0.1%	55	0.1%
Russian	730	0.7%	374	0.4%
Scotch-Irish	1,065	1.0%	565	0.6%







Scottish	1,319	1.3%	1,070	1.0%
Slovak	131	0.1%	150	0.1%
Sub-Saharan African	1,248	1.2%	1,771	1.7%
Swedish	1,638	1.6%	954	0.9%
Swiss	343	0.3%	415	0.4%
Ukrainian	214	0.2%	290	0.3%
Welsh	372	0.4%	484	0.5%
West Indian (excluding Hispanic origin groups)	117	0.1%	133	0.1%

Source: 2010 U.S. Census and 2013-2017 ACS

The most common ancestral group identified in South Bend City in 2010 was German with 19,199 residents comprising of 18.8 percent of the population. The second most common ancestral group identified in South Bend City in 2010 was Irish with 12,089 residents comprising of 11.8 percent of the population.

The most common ancestral group identified in South Bend City in 2017 was German with 16,215 residents comprising of 15.9 percent of the population. The second most common ancestral group identified in South Bend City in 2017 was Irish with 9,435 residents comprising of 9.3 percent of the population.

There was not any change in proportional representation in South Bend City from 2010 to 2017 that was larger than 5.0 percentage points.

Ethnicity – Mishawaka City

The following table highlights the ethnicities of Mishawaka City residents at the time of the 2010 U.S. Census and in 2017.

Ethnicity and Ancestry in Mishawaka City

	2010 U.S. Census		2013-2017 ACS	
ANCESTRY	#	%	#	%
Total population	47,891	-	48,582	-
American	2,478	5.2%	4,896	10.1%







Arab	475	1.0%	287	0.6%
Czech	121	0.3%	63	0.1%
Danish	245	0.5%	141	0.3%
Dutch	1,499	3.1%	1,078	2.2%
English	4,681	9.8%	3,066	6.3%
French (except Basque)	1,835	3.8%	1,145	2.4%
French Canadian	278	0.6%	258	0.5%
German	13,286	27.7%	10,656	21.9%
Greek	104	0.2%	214	0.4%
Hungarian	1,337	2.8%	1,527	3.1%
Irish	7,382	15.4%	5,954	12.3%
Italian	2,331	4.9%	2,281	4.7%
Lithuanian	77	0.2%	102	0.2%
Norwegian	428	0.9%	421	0.9%
Polish	4,612	9.6%	4,362	9.0%
Portuguese	62	0.1%	30	0.1%
Russian	311	0.6%	366	0.8%
Scotch-Irish	847	1.8%	366	0.8%
Scottish	764	1.6%	925	1.9%
Slovak	103	0.2%	35	0.1%
Sub-Saharan African	437	0.9%	563	1.2%
Swedish	1,045	2.2%	699	1.4%
Swiss	299	0.6%	148	0.3%
Ukrainian	93	0.2%	98	0.2%
Welsh	186	0.4%	221	0.5%
West Indian (excluding Hispanic origin groups)	80	0.2%	31	0.1%

Source: 2010 U.S. Census and 2013-2017 ACS







The most common ancestral group identified in Mishawaka City in 2010 was German with 13,286 residents comprising of 27.7 percent of the population. The second most common ancestral group identified in Mishawaka City in 2010 was Irish with 7,382 residents comprising of 15.4 percent of the population.

The most common ancestral group identified in Mishawaka City in 2017 was German with 10,656 residents comprising of 21.9 percent of the population. The second most common ancestral group identified in Mishawaka City in 2017 was Irish with 5,954 residents comprising of 12.3 percent of the population.

The only change in proportional representation in Mishawaka City from 2010 to 2017 that was larger than 5.0 percentage points was the 5.8 percentage point decrease in residents who identified as ethnically German.

Another way to consider racial distribution in a community is to look at the dissimilarity indices for an area. The **Dissimilarity Index (DI)** is based on the data from the 2010 U.S. Census and ACS data which measures whether one particular group is evenly distributed across census tracts in the metropolitan area in the same way as another group. More specifically, the index represents the extent to which the distribution of any two (2) groups (racial, ethnic, etc.) differs across census tracts. While there are limitations due to outside factors and scale size, the Dissimilarity Index can provide an effective method of analyzing segregation and identifying trends in a community.

A high value indicates that the two groups tend to live in different tracts. Dissimilarity Index values between 0 and 39 generally indicate low segregation; values between 40 and 54 generally indicate moderate segregation; and values between 55 and 100 generally indicate a high level of segregation. However, context is important in interpreting the dissimilarity index. The index measures the degree two groups are segregated in a particular geographic area; however, the index alone does not provide the location of the segregation within the geographic area.

Brown University has provided metro-area dissimilarity indices for 1990 to 2010. Governing Magazine has provided the dissimilarity index based on the 2013-2017 ACS Five Year Estimates. Data was not available at the City or County levels.







Dissimilarity Index in the South Bend-Mishawaka, IN-MI MSA

Racial/Ethnic Dissimilarity	South Bend-Mishawaka, IN- MI MSA				
Index	1990	2000	2010	2017	
Black / White	62.0	58.4	51.4	53.1	
Hispanic / White	41.0	48.0	46.3	45.0	
Asian or Pacific Islander/White	40.0	36.7	36.0	-	

Source: 2000 U.S. Census & 2013-2017 ACS Estimates

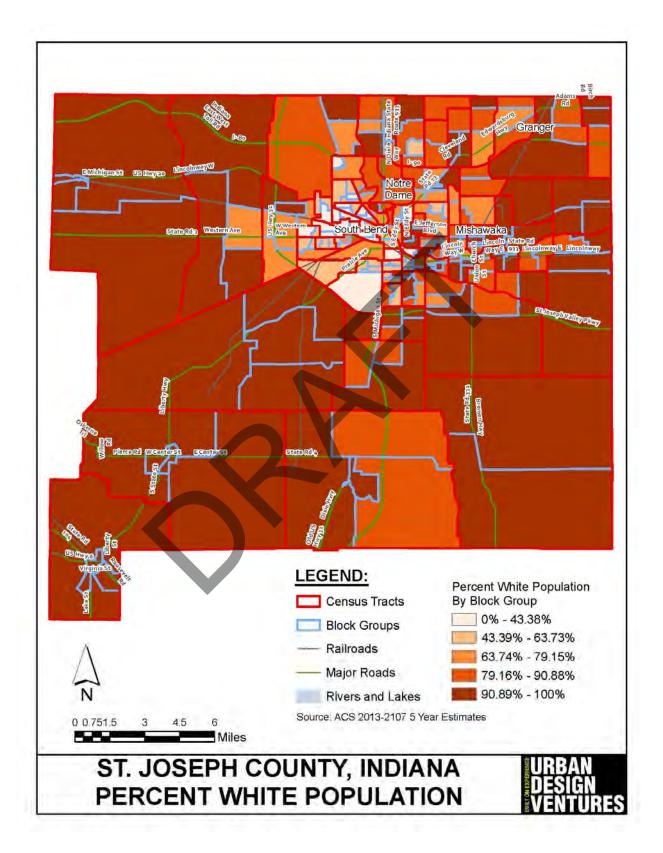
The Dissimilarity Index (DI) trends among social/ethnicities in the South Bend-Mishawaka, IN-MI MSA have diverged based on the race or ethnicity. The South Bend area had been growing less segregated from 1990 to 2010 in terms of White residents and African American/Black residents. However, the region has become more segregated between White and African American/Black residents since 2010. Meanwhile, the dissimilarity index between White and Hispanic residents in the MSA increased from 1990 to 2000, and has decreased steadily since 2010. Data for the dissimilarity index between White and Asian residents in 2017 was unavailable.







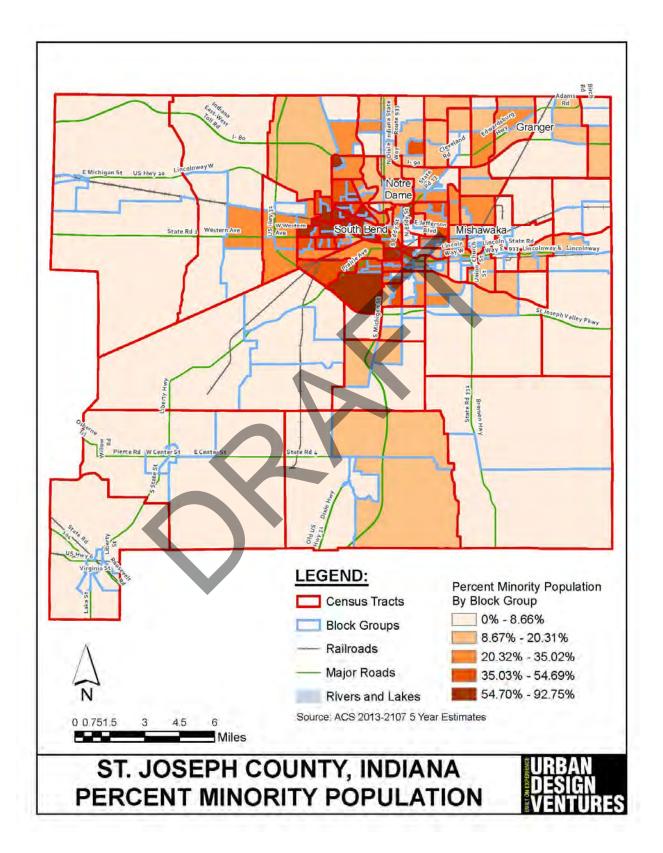












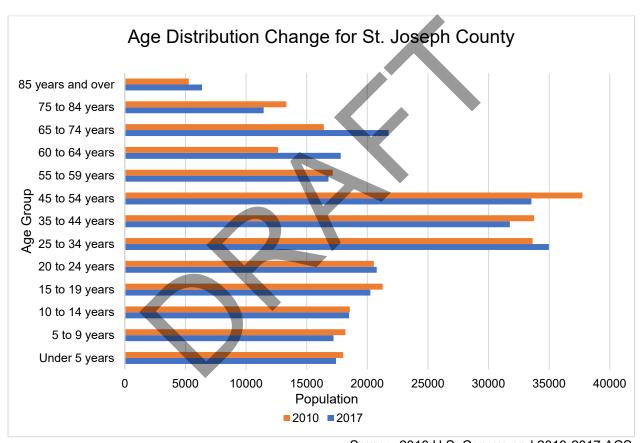






Age - St. Joseph County

The following chart illustrates age distribution in St. Joseph County at the time of the 2010 U.S. Census and 2013-2017 ACS. The Census shows that currently, children under 20 years of age represent 27.3 percent of the population; 32.5 percent of the population is between 20 and 45 years of age; 25.4 percent of the population is 45 to 65; and 14.8 percent of the population is 65 years of age and older. The median age is 36.5 years of age.



Source: 2010 U.S. Census and 2013-2017 ACS

Age - South Bend City

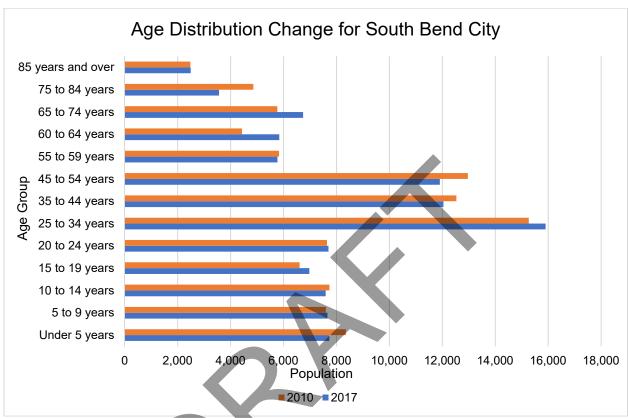
The following chart illustrates age distribution in South Bend City at the time of the 2010 U.S. Census and 2013-2017 ACS. The Census shows that currently, children under 20 years of age represent 29.4 percent of the population; 35.0 percent of the population is between 20 and 45 years of age; 23.1 percent of the population is 45 to 65; and 12.5 percent of the







population is 65 years of age and older. The median age is 33.4 years of age.



Source: 2010 U.S. Census and 2013-2017 ACS

Age - Mishawaka City

The following chart illustrates age distribution in Mishawaka City at the time of the 2010 U.S. Census and 2013-2017 ACS. The Census shows that currently, children under 20 years of age represent 25.2 percent of the population; 37.3 percent of the population is between 20 and 45 years of age; 22.1 percent of the population is 45 to 65; and 15.4 percent of the population is 65 years of age and older. The median age is 35.4 years of age.









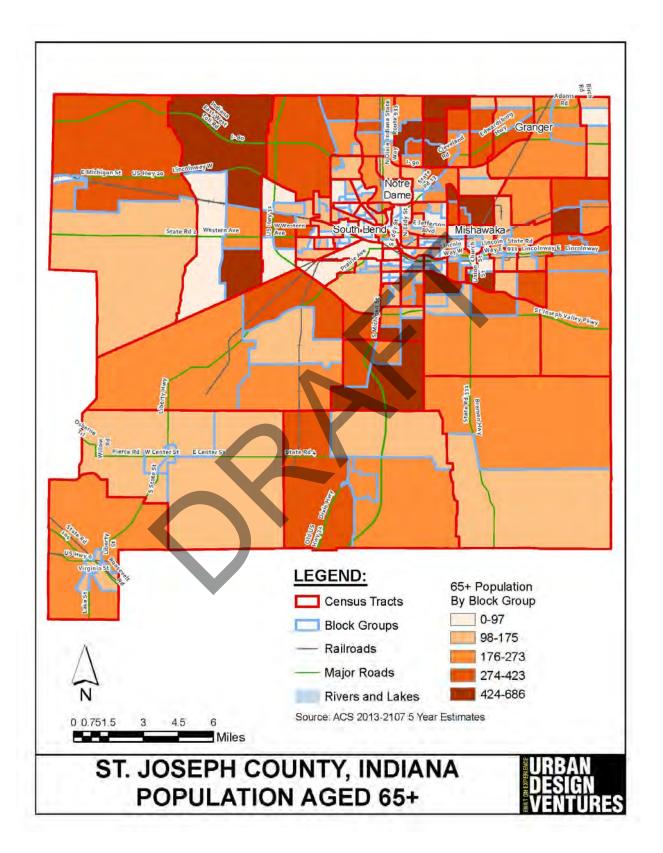


Source: 2010 U.S. Census and 2013-2017 ACS





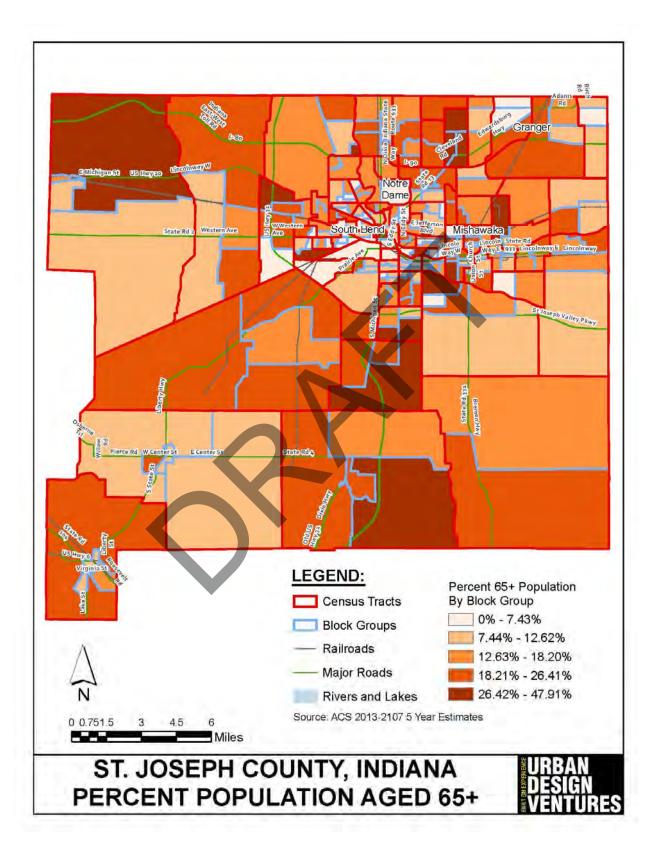


















Religion - St. Joseph County

The U.S. Census does not collect data on the religious affiliations of the population in the United States. In an effort to better understand the religious affiliations of the residents of St. Joseph County, the County used the data made available by The Association of Religion Data Archives (ARDA). ARDA surveys the congregation members, their children, and other people who regularly attend church services within counties across the country. Although this data appears to be the most comprehensive data that is available, it is unfortunately not entirely complete as it does not accurately include traditional African American denominations. The total number of regular attendees was adjusted in 2010 (the most recent year for which data is available) to represent the population including historic African American denominations. However, the total value cannot be disaggregated to determine the distribution across denominational groups.

The table below shows the distribution of residents of St. Joseph County across various denominational groups, as a percentage of the population which reported affiliation with a church.

Religious Affiliation in St. Joseph County

	199	00	200	00	201	10
	#	%	#	%	#	%
Total Population:	247,052	•	265,559	•	266,931	-
Evangelical Protestant	28,265	11.4%	24,479	9.2%	27,567	10.3%
Black Protestant	972	0.4%	0	0.0%	3,300	1.2%
Mainline Protestant	24,612	10.0%	22,376	8.4%	85,517	32.0%
Catholic	62,723	25.4%	63,209	23.8%	52,666	19.7%
Orthodox	0	0.0%	1,156	0.4%	1,226	0.5%
Other	2,548	1.0%	4,930	1.9%	4,650	1.7%
Total Adherents:	119,120	48.2%	116,150	43.7%	174,926	65.5%







Unclaimed: 12	27,932 51.8%	149,409	56.3%	92,005	34.5%
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Source: The Association of Religion Data

The most common religious affiliation identified St. Joseph County in 1990 was Catholic with 62,723 adherents comprising of 25.4 percent of the population. The second most common religious affiliation identified in St. Joseph County in 1990 was Evangelical Protestant with 28,265 adherents comprising of 11.4 percent of the population.

The most common religious affiliation identified in St. Joseph County in 2010 was Mainline Protestant with 85,517 adherents comprising of 32.0 percent of the population. The second most common religious affiliation identified in St. Joseph County in 2010 was Catholic with 52,666 adherents comprising of 19.7 percent of the population.

The changes in proportional representation of religious groups in St. Joseph County from 1990 to 2010 that were larger than 5.0 percentage points were the changes in Mainline Protestants and Catholics. The number of Mainline Protestants in St. Joseph County increased from 24,612 adherents in 1990 to 85,517 adherents in 2010, a proportional representation increase of 22.1 percent (from 10.0 percent in 1990 to 32.0 percent in 2010). The number of Catholics in St. Joseph County decreased from 62,723 adherents in 1990 to 52,666 adherents in 2010, a proportional representation decrease of 22.1 percent (from 25.4 percent in 1990 to 19.7 percent in 2010).

B. Households

Household Tenure - St. Joseph County

According to the U.S. Census for 2010, there were 114,207 housing units in St. Joseph County. Of these housing units, 100,540 (88.0 percent) were occupied and 13,667 (12.0 percent) were vacant. Of the occupied housing units, 71,879 (71.5 percent) were owner-occupied and 28,661 (28.5 percent) were renter-occupied.

According to the 2017 ACS 5-Year estimates, there were 116,078 housing units in St. Joseph County. Of these housing units, 100,694 (86.7 percent) were occupied and 15,384 (13.3 percent) were vacant. Of the occupied



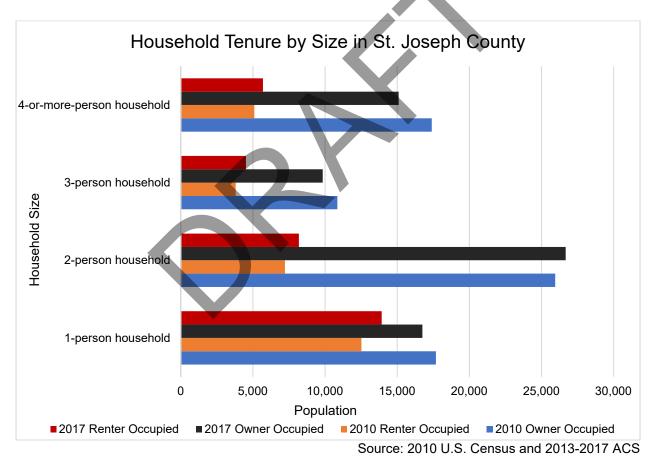




housing units, 68,361 (67.9 percent) were owner-occupied and 32,333 (32.1 percent) were renter-occupied.

From 2010 to 2017 there was a 1,871 unit increase in the total number of housing units, a 154 unit increase (1.3 percentage point decrease) in the number of occupied units, and a 1,717 unit increase (1.3 percentage point increase) in the number of vacant units. The number of owner-occupied units decreased by 3,518 units (3.6 percentage point decrease) and the number of renter-occupied units increased by 3,672 (3.6 percentage point increase).

There were not any significant changes in Household Tenure in St. Joseph County from 2010 to 2017.



Household Tenure – South Bend City

According to the U.S. Census for 2010, there were 47,227 housing units in South Bend City. Of these housing units, 39,364 (83.4 percent) were occupied and 7,863 (16.6 percent) were vacant. Of the occupied housing







units, 24,350 (61.9 percent) were owner-occupied and 15,014 (38.1 percent) were renter-occupied.

According to the 2017 ACS 5-Year estimates, there were 47,280 housing units in South Bend City. Of these housing units, 39,025 (82.5 percent) were occupied and 8,255 (17.5 percent) were vacant. Of the occupied housing units, 22,335 (57.2 percent) were owner-occupied and 16,690 (42.8 percent) were renter-occupied.

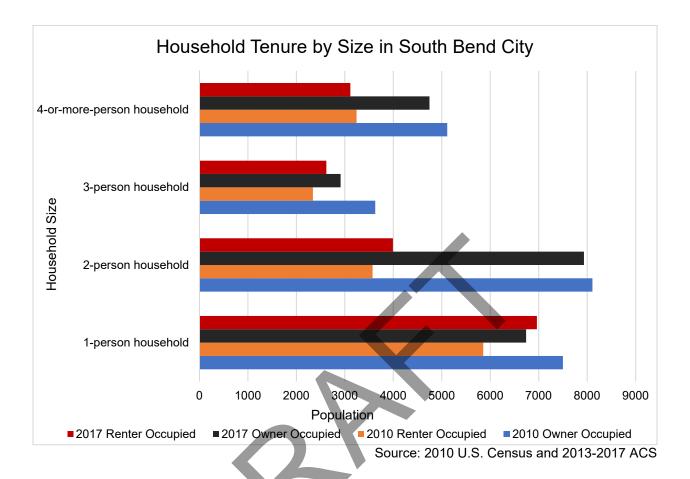
From 2010 to 2017 there was a 53 unit increase in the total number of housing units, a 339 unit decrease (0.9 percentage point decrease) in the number of occupied units, and a 392 unit increase (0.9 percentage point increase) in the number of vacant units. The number of owner-occupied units decreased by 2,015 units (4.7 percentage point decrease) and the number of renter-occupied units increased by 1,676 units (4.7 percentage point increase).

There were not any significant changes in Household Tenure in South Bend City from 2010 to 2017.









Household Tenure - Mishawaka City

According to the U.S. Census for 2010, there were 24,345 housing units in Mishawaka City. Of these housing units, 21,144 (86.9 percent) were occupied and 3,201 (13.1 percent) were vacant. Of the occupied housing units, 11,401 (53.9 percent) were owner-occupied and 9,743 (46.1 percent) were renter-occupied.

According to the 2017 ACS 5-Year estimates, there were 24,363 housing units in Mishawaka City. Of these housing units, 20,568 (84.4 percent) were occupied and 3,795 (15.6 percent) were vacant. Of the occupied housing units, 10,334 (50.2 percent) were owner-occupied and 10,234 (49.8 percent) were renter-occupied.

From 2010 to 2017 there was an 18 unit increase in the total number of housing units, a 576 unit decrease (2.5 percentage point decrease) in the number of occupied units, and a 594 unit increase (2.5 percentage point increase) in the number of vacant units. The number of owner-occupied units

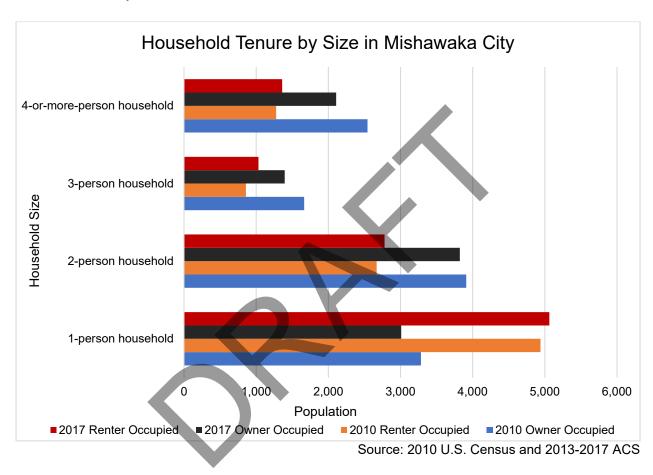






decreased by 1,067 units (3.7 percentage point decrease) and the number of renter-occupied units increased by 491 (3.7 percentage point increase).

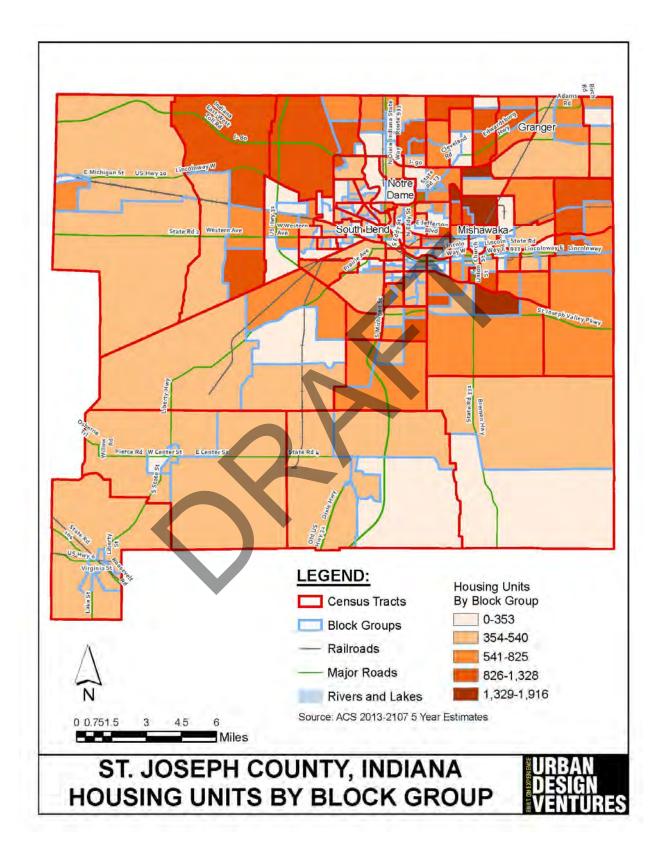
There were not any significant changes in Household Tenure in Mishawaka City from 2010 to 2017.







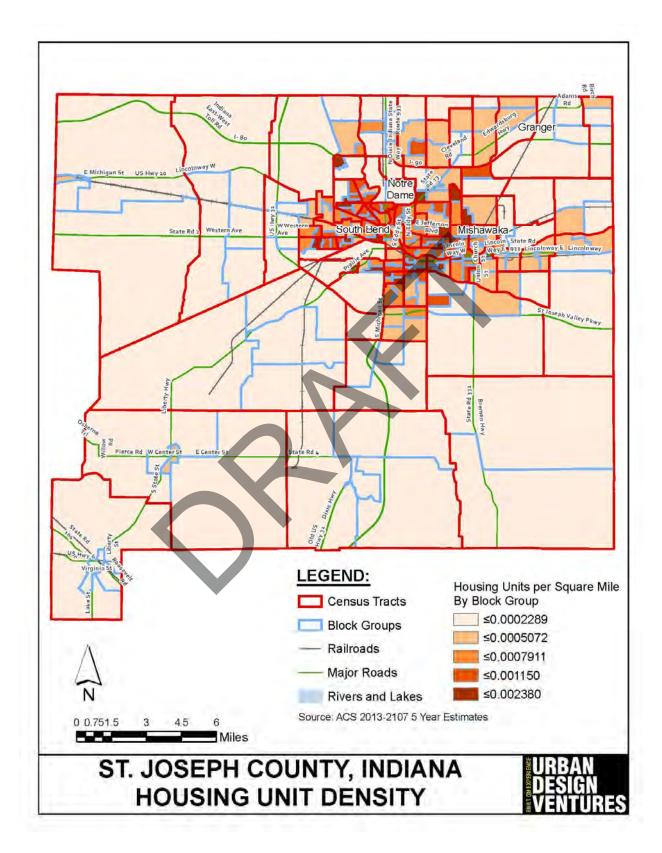








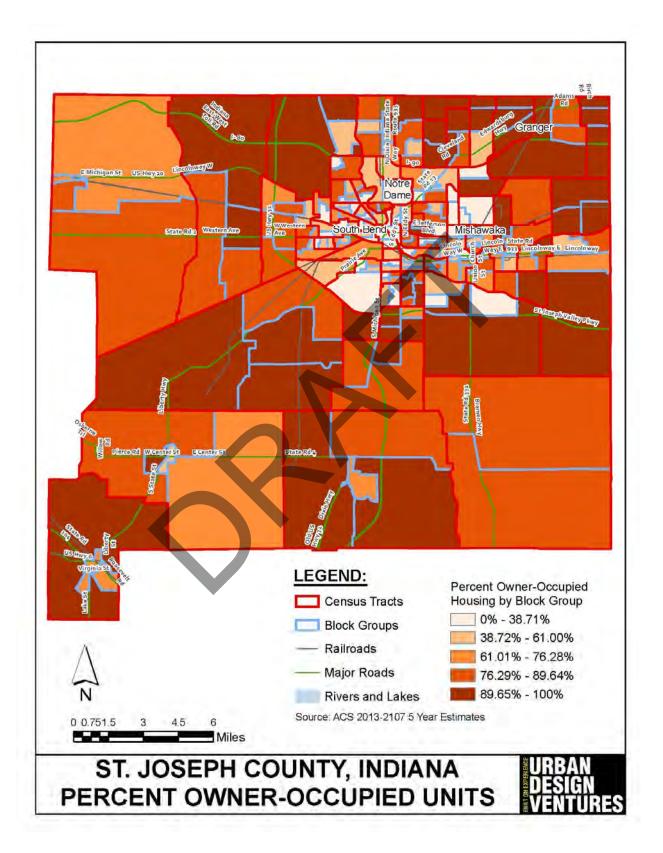








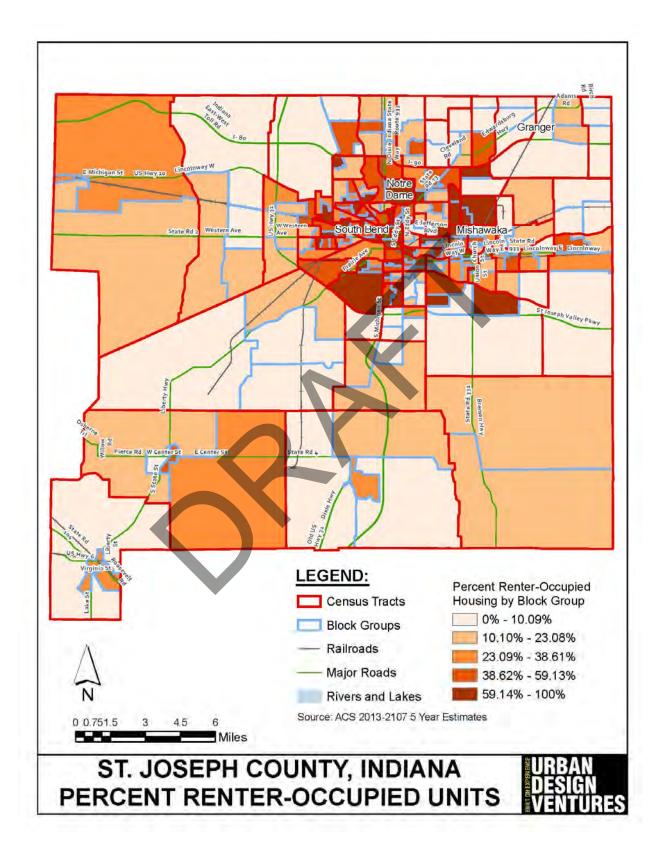








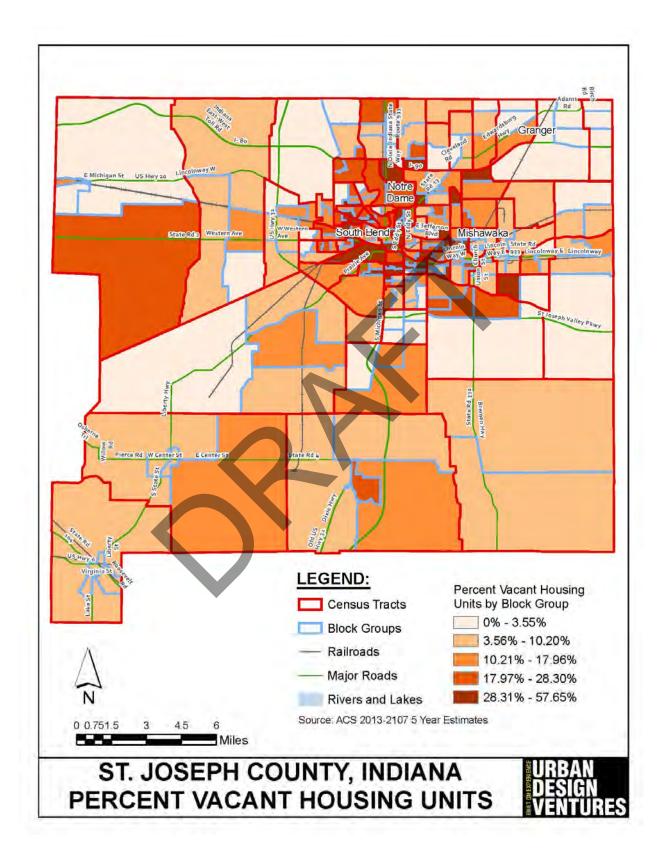


















Household Tenure by Race and Ethnicity – St. Joseph County

The tables below compare homeowners and renters by race and ethnicity in St. Joseph County.

Household Type by Race and Ethnicity in St. Joseph County

Cohort	2010 U.S.		2013-2017 ACS		
Cohort	#	%	#	%	
Householder who is White alone	84,238	83.8%	82,976	82.4%	
Householder who is Black or African American alone	11,794	11.7%	12,460	12.4%	
Householder who is American Indian and Alaska Native alone	359	0.4%	397	0.4%	
Householder who is Asian alone	1,364	1.4%	1,921	1.9%	
Householder who is Native Hawaiian and Other Pacific Islander alone	72	0.1%	43	0.0%	
Householder who is some other race alone	1,665	1.7%	1,451	1.4%	
Householder who is two or more races	1,048	1.0%	1,451	1.4%	
Householder who is Hispanic or Latino	4,092	4.1%	4,809	4.8%	
Householder who is not Hispanic or Latino	82,070	81.6%	79,897	79.3%	

Household Tenure by Race and Ethnicity in St. Joseph County

		2010 U.S. Census				2013-2017 ACS			
Cohort	Owner	%	Renter	%	Owner	%	Renter	%	
Householder who is White alone	64,835	90.2%	19,403	67.7%	61,305	89.7%	21,671	67.1%	
Householder who is Black or African American alone	4,456	6.2%	7,337	25.6%	4,266	6.2%	8,194	25.3%	
Householder who is American Indian and Alaska Native alone	216	0.3%	143	0.5%	212	0.3%	185	0.6%	
Householder who is Asian alone	791	1.1%	573	2.0%	974	1.4%	947	2.9%	







Householder who is Native Hawaiian and Other Pacific Islander alone	72	0.1%	0	0.0%	43	0.1%	0	0.0%
Householder who is some other race alone	863	1.2%	803	2.8%	888	1.3%	558	1.7%
Householder who is two or more races	647	0.9%	401	1.4%	673	1.0%	778	2.4%
Householder who is Hispanic or Latino	2,372	3.3%	1,720	6.0%	2,984	4.4%	1,825	5.6%
Householder who is not Hispanic or Latino	63,469	88.3%	18,601	64.9%	59,325	86.8%	20,572	63.6%

Source: 2010 U.S. Census and 2013-2017 ACS

Homeownership rates continue to decline in the County. Homeowners represented 71.5 percent (71,879 households) of all households in 2010 and 67.9 percent (68,361 households) of all households in 2017. In response, rental rates increased in the County. Renters represented 28.5 percent (28,661 households) of all households in 2010 and 32.1 percent (32,333 households) of all households in 2017.

There were not any significant shifts in Household Tenure from 2010 to 2017 in St. Joseph County.

Household Tenure by Race and Ethnicity - South Bend City

The tables below compare homeowners and renters by race and ethnicity in South Bend City.

Household Type by Race and Ethnicity in South Bend City

Cohort	2010 U.S.	Census	2013-2017 ACS		
3011311	#	%	#	%	
Householder who is White alone	27,931	71.0%	26,555	68.0%	
Householder who is Black or African American alone	9,019	22.9%	9,859	25.3%	
Householder who is American Indian and Alaska Native alone	197	0.5%	191	0.5%	







Householder who is Asian alone	439	1.1%	559	1.4%
Householder who is Native Hawaiian and Other Pacific Islander alone	24	0.1%	14	0.0%
Householder who is some other race alone	1,189	3.0%	1,077	2.8%
Householder who is two or more races	566	1.4%	770	2.0%
Householder who is Hispanic or Latino	2,688	6.8%	3,338	8.6%
Householder who is not Hispanic or Latino	26,568	67.5%	24,446	62.6%

Household Tenure by Race and Ethnicity in South Bend City

Oalhart		2010 U.S.	Census		2013-2017 ACS			
Cohort	Owner	%	Renter	%	Owner	%	Renter	%
Householder who is White alone	19,553	80.3%	8,378	55.8%	17,800	79.7%	8,755	52.5%
Householder who is Black or African American alone	3,433	14.1%	5,585	37.2%	3,262	14.6%	6,597	39.5%
Householder who is American Indian and Alaska Native alone	122	0.5%	75	0.5%	130	0.6%	61	0.4%
Householder who is Asian alone	244	1.0%	195	1.3%	207	0.9%	352	2.1%
Householder who is Native Hawaiian and Other Pacific Islander alone	24	0.1%	0	0.0%	14	0.1%	0	0.0%
Householder who is some other race alone	633	2.6%	556	3.7%	628	2.8%	449	2.7%
Householder who is two or more races	341	1.4%	225	1.5%	294	1.3%	476	2.8%
Householder who is Hispanic or Latino	1,607	6.6%	1,081	7.2%	2,102	9.4%	1,236	7.4%
Householder who is not Hispanic or Latino	18,701	76.8%	7,867	52.4%	16,430	73.6%	8,016	48.0%

Source: 2010 U.S. Census and 2013-2017 ACS







Homeownership rates continue to decline in the City. Homeowners represented 61.9 percent (24,350 households) of all households in 2010 and 57.2 percent (22,335 households) of all households in 2017. In response, rental rates increased in the City. Renters represented 38.1 percent (15,014 households) of all households in 2010 and 42.8 percent (16,690 households) of all households in 2017.

There were not any significant shifts in Household Tenure from 2010 to 2017 in South Bend City.

Household Tenure by Race and Ethnicity - Mishawaka City

The tables below compare homeowners and renters by race and ethnicity in Mishawaka City.

Household Type by Race and Ethnicity in Mishawaka City

Household Type by K	2010 U.S.		•	17 ACS
Cohort	#	%	#	%
Householder who is White alone	18,637	88.1%	18,260	88.8
Householder who is Black or African American alone	1,541	7.3%	1,361	6.6%
Householder who is American Indian and Alaska Native alone	63	0.3%	84	0.4%
Householder who is Asian alone	434	2.1%	417	2.0%
Householder who is Native Hawaiian and Other Pacific Islander alone	34	0.2%	3	0.0%
Householder who is some other race alone	219	1.0%	128	0.6%
Householder who is two or more races	215	1.0%	315	1.5%
Householder who is Hispanic or Latino	541	2.6%	678	3.3%
Householder who is not Hispanic or Latino	18,403	87.0%	17,797	86.5%







Household Tenure by Race and Ethnicity in Mishawaka City

Ochart	2010 U.S. Census				2013-2017 ACS			
Cohort	Owner	%	Renter	%	Owner	%	Renter	%
Householder who is White alone	10,979	96.3%	7,658	78.6%	9,887	95.8%	8,373	81.8%
Householder who is Black or African American alone	148	1.3%	1,393	14.3%	179	1.7%	1,182	11.6%
Householder who is American Indian and Alaska Native alone	34	0.3%	29	0.3%	30	0.3%	54	0.5%
Householder who is Asian alone	103	0.9%	331	3.4%	43	0.4%	374	3.7%
Householder who is Native Hawaiian and Other Pacific Islander alone	34	0.3%	0	0.0%	3	0.0%	0	0.0%
Householder who is some other race alone	34	0.3%	185	1.9%	95	0.9%	33	0.3%
Householder who is two or more races	68	0.6%	146	1.5%	97	0.9%	218	2.1%
Householder who is Hispanic or Latino	103	0.9%	438	4.5%	343	3.3%	335	3.3%
Householder who is not Hispanic or Latino	10,911	95.7%	7,492	76.9%	9,654	93.4%	8,143	79.6%

Source: 2010 U.S. Census and 2013-2017 ACS

Homeownership rates continue to decline in the City. Homeowners represented 53.9 percent (11,401 households) of all households in 2010 and 50.2 percent (10,334 households) of all households in 2017. In response, rental rates increased in the City. Renters represented 46.1 percent (9,743 households) of all households in 2010 and 49.8 percent (10,234 households) of all households in 2017.

There were not any significant shifts in Household Tenure from 2010 to 2017 in Mishawaka City.



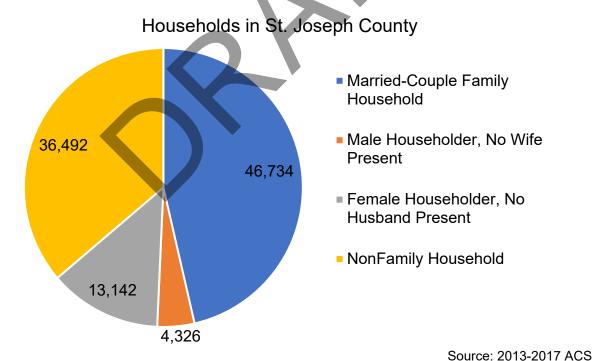




Families - St. Joseph County

In 2010, there were a total of 100,540 households in St. Joseph County. Non-family households comprised 35.4 percent (35,570 households) of all households. In 2017, there were a total of 100,694 households, of which 36.2 percent (36,492 households) comprised of non-family households. The total number of households in St. Joseph County increased by 154 units from 2010 to 2017, as did the total number of non-family households (922 unit increase), an increase of 0.8 percentage points. A non-family household is defined as a householder living alone or with others not related by family.

In 2017, non-family households comprised 36.2 percent of all households, married-couple family households comprised 46.4 percent of all households, female householders with no husband present comprised 13.1 percent of all households, and male householders with no wife present comprised 4.3 percent of all households in St. Joseph County. The chart below illustrates the breakdown of households by type in St. Joseph County as of 2017 using data from the 2013-2017 ACS.



Families - South Bend City

In 2010, there were a total of 39,364 households in South Bend City. Non-family households comprised 40.9 percent (16,093 households) of all

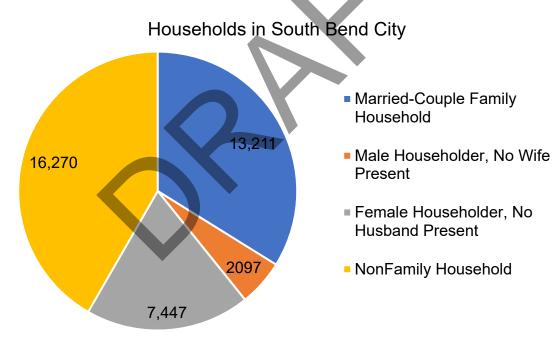






households. In 2017, there were a total of 39,025 households, of which 41.7 percent (16,270 households) comprised of non-family households. The total number of households in South Bend City decreased by 339 units from 2010 to 2017, whereas the total number of non-family households increased by 177 units (0.8 percentage point increase). A non-family household is defined as a householder living alone or with others not related by family.

In 2017, non-family households comprised 41.7 percent of all households, married-couple family households comprised 33.8 percent of all households, female householders with no husband present comprised 19.1 percent of all households, and male householders with no wife present comprised 5.4 percent of all households in the City. The chart below illustrates the breakdown of households by type in South Bend City as of 2017 using data from the 2013-2017 ACS.



Source: 2013-2017 ACS

Families - Mishawaka City

In 2010, there were a total of 21,144 households in Mishawaka City. Non-family households comprised 45.0 percent (9,519 households) of all households. In 2017, there were a total of 20,568 households, of which 47.2 percent (9,702 households) comprised of non-family households. The total number of households in Mishawaka City decreased by 576 units from 2010

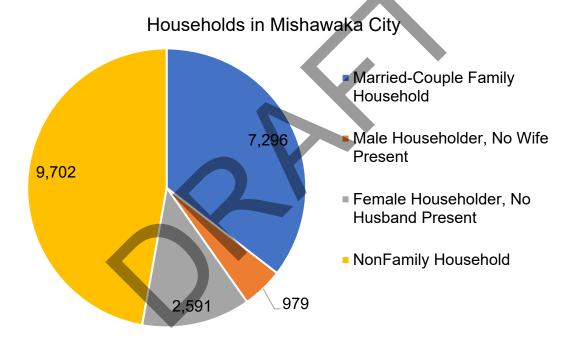






to 2017, whereas the total number of non-family households increased by 183 units (2.2 percentage point increase). A non-family household is defined as a householder living alone or with others not related by family.

In 2017, non-family households comprised 47.2 percent of all households, married-couple family households comprised 35.5 percent of all households, female householders with no husband present comprised 12.6 percent of all households, and male householders with no wife present comprised 4.7 percent of all households in the County. The chart below illustrates the breakdown of households by type in Mishawaka City as of 2017 using data from the 2013-2017 ACS.



Source: 2013-2017 ACS

C. Income and Poverty

Household Income

The median household income in St. Joseph County increased by 7.79 percent (\$3,477 increase) from \$44,644 in 2010 to \$48,121 in 2017. The median household income in the City of South Bend is lower than that of the County, at \$34,761. It increased by 7.71 percent (\$2,680 increase) from \$34,761 in 2010 to \$37,441 in 2017. In the City of Mishawaka, household







income increased by 6.12 percent (\$2,295 increase) from \$37,526 in 2010 to \$39,821 in 2017.

Household Income - St. Joseph County

The table below compares the distribution of household income according to the 2006-2010 American Community Survey and the 2013-2017 American Community Survey.

Household Income in St. Joseph County

	2006-201	0 ACS	2013-2017 ACS		
Items	Number of Households	Percentage	Number of Households	Percentage	
Total Households	100,540		100,694	-	
Less than \$10,000	7,407	7.4%	7,763	7.7%	
\$10,000 to \$14,999	5,905	5.9%	5,244	5.2%	
\$15,000 to \$24,999	13,482	13.4%	12,479	12.4%	
\$25,000 to \$34,999	12,727	12.6%	11,142	11.1%	
\$35,000 to \$49,999	16,115	16.0%	15,078	14.9%	
\$50,000 to \$74,999	18,997	18.9%	18,729	18.6%	
\$75,000 to \$99,999	11,422	11.4%	11,851	11.8%	
\$100,000 to \$149,999	9,634	9.6%	11,522	11.4%	
\$150,000 to \$199,999	2,540	2.5%	3,290	3.3%	
\$200,000 or more	2,311	2.3%	3,596	3.6%	
Median Household Income	\$44,644	-	\$48,121	-	
Mean Household Income	\$59,204	-	\$66,247	-	

Source: 2006-2010 and 2013-2017 ACS

<u>Household Income – South Bend City</u>

The table below compares the distribution of household income according to the 2006-2010 American Community Survey and the 2013-2017 American Community Survey.







Household Income in South Bend City

	2006-201	0 ACS	2013-2017 ACS		
Items	Number of Households	Percentage	Number of Households	Percentage	
Total Households	39,364	-	39,025	-	
Less than \$10,000	4,340	11.0%	4,744	12.2%	
\$10,000 to \$14,999	2,798	7.1%	2,730	7.0%	
\$15,000 to \$24,999	6,504	16.6%	5,681	14.6%	
\$25,000 to \$34,999	6,153	15.6%	4,854	12.4%	
\$35,000 to \$49,999	6,624	16.8%	6,306	16.2%	
\$50,000 to \$74,999	6,583	16.7%	6,968	17.9%	
\$75,000 to \$99,999	3,297	8.4%	3,494	8.9%	
\$100,000 to \$149,999	2,058	5.2%	2,867	7.3%	
\$150,000 to \$199,999	616	1.6%	644	1.6%	
\$200,000 or more	391	1.0%	737	1.9%	
Median Household Income	\$34,761		\$37,441	-	
Mean Household Income	\$46,711	-	\$52,434	-	

Source: 2006-2010 and 2013-2017 ACS

Household Income - Mishawaka City

The table below compares the distribution of household income according to the 2006-2010 American Community Survey and the 2013-2017 American Community Survey.

Household Income in Mishawaka City

	2006-201		2013-2017 ACS		
Items	Number of Households	Percentage	Number of Households	Percentage	
Total Households	21,144	-	20,568	-	
Less than \$10,000	1,894	9.0%	1,456	7.1%	
\$10,000 to \$14,999	1,656	7.8%	1,173	5.7%	
\$15,000 to \$24,999	3,587	17.0%	3,354	16.3%	
\$25,000 to \$34,999	2,759	13.0%	3,114	15.1%	
\$35,000 to \$49,999	3,665	17.3%	3,723	18.1%	
\$50,000 to \$74,999	3,962	18.7%	3,789	18.4%	
\$75,000 to \$99,999	1,784	8.4%	1,955	9.5%	
\$100,000 to \$149,999	1,344	6.4%	1,475	7.2%	







\$150,000 to \$199,999	249	1.2%	311	1.5%
\$200,000 or more	244	1.2%	218	1.1%
Median Household Income	\$37,526	-	\$39,821	-
Mean Household Income	\$48,428	-	\$50,312	-

Source: 2006-2010 and 2013-2017 ACS

The U.S. Department of Housing and Urban Development (HUD) sets income limits that determine eligibility for assisted housing programs including the Public Housing, Section 8 project-based, Section 8 Housing Choice Voucher, Section 202 housing for the elderly, and Section 811 housing for persons with disabilities programs. HUD develops income limits based on Median Family Income estimates and Fair Market Rent area definitions for each metropolitan area, parts of some metropolitan areas, and each non-metropolitan county.

The Median Income for a family of four in the Metro Area was \$48,681 for 2017 which increased to \$52,500 in 2019.

The table below identifies the FY 2019 HUD Income Limits applicable to the South Bend-Mishawaka Metro Area.

South Bend-Mishawaka, IN-MI Metro Area Section 8 Income Limits for FY 2019

Income Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low (30%) Income Limits	\$13,800	\$16,910	\$21,330	\$25,750	\$30,170	\$34,590	\$39,010	\$43,300
Very Low (50%) Income Limits	\$23,000	\$26,250	\$29,550	\$32,800	\$35,450	\$38,050	\$40,700	\$43,300
Low (80%) Income Limits	\$36,750	\$42,000	\$47,250	\$52,500	\$56,700	\$60,900	\$65,100	\$69,300

Source: HUD Section 8 Income Limits

The following table highlights the current low- and moderate-income population in St. Joseph County. The block groups that have a population of







more than 51% low- and moderate-income are highlighted in the following table. St. Joseph County has an overall low- and moderate-income population of 43.5%.









Low- and Moderate-Income Population for the St. Joseph County Jurisdiction, IN

COUNTY	TRACT	BLOCK GROUP	LOWMOD	LOWMODUNIV	LOWMODPCT
St. Joseph County	000100	1	480	630	76.19%
St. Joseph County	000100	2	550	825	66.67%
St. Joseph County	000100	3	375	530	70.75%
St. Joseph County	000200	1	385	915	42.08%
St. Joseph County	000200	2	1125	1315	85.55%
St. Joseph County	000200	3	860	960	89.58%
St. Joseph County	000200	4	385	620	62.10%
St. Joseph County	000301	1	605	985	61.42%
St. Joseph County	000301	2	595	835	71.26%
St. Joseph County	000301	3	270	800	33.75%
St. Joseph County	000302	1	1310	1740	75.29%
St. Joseph County	000302	2	280	695	40.29%
St. Joseph County	000400	1	615	695	88.49%
St. Joseph County	000400	2	690	735	93.88%
St. Joseph County	000400	3	730	975	74.87%
St. Joseph County	000500	1	510	785	64.97%
St. Joseph County	000500	2	405	695	58.27%
St. Joseph County	000600	1	550	920	59.78%
St. Joseph County	000600	2	590	690	85.51%
St. Joseph County	000600	3	455	540	84.26%
St. Joseph County	000700	1	310	655	47.33%
St. Joseph County	000700	2	290	730	39.73%
St. Joseph County	000800	1	225	1025	21.95%
St. Joseph County	00800	2	170	700	24.29%
St. Joseph County	000900	1	285	555	51.35%
St. Joseph County	000900	2	255	370	68.92%
St. Joseph County	001000	1	800	1040	76.92%
St. Joseph County	001000	2	630	730	86.30%
St. Joseph County	001000	3	440	545	80.73%
St. Joseph County	001000	4	310	625	49.60%
St. Joseph County	001100	1	230	1155	19.91%
St. Joseph County	001100	2	365	1160	31.47%
St. Joseph County	001100	3	890	1605	55.45%
St. Joseph County	001100	4	345	975	35.38%
St. Joseph County	001200	1	295	745	39.60%







	004000	۱ ۵	405	700	45.000/
St. Joseph County	001200	2	105	700	15.00%
St. Joseph County	001200	3	160	895	17.88%
St. Joseph County	001300	1	1005	1490	67.45%
St. Joseph County	001300	2	315	805	39.13%
St. Joseph County	001400	1	340	485	70.10%
St. Joseph County	001400	2	305	710	42.96%
St. Joseph County	001400	3	325	810	40.12%
St. Joseph County	001400	4	850	1065	79.81%
St. Joseph County	001500	1	325	420	77.38%
St. Joseph County	001500	2	385	590	65.25%
St. Joseph County	001500	3	285	570	50.00%
St. Joseph County	001500	4	790	905	87.29%
St. Joseph County	001600	1	145	990	14.65%
St. Joseph County	001600	2	250	1185	21.10%
St. Joseph County	001700	1	685	760	90.13%
St. Joseph County	001700	2	390	585	66.67%
St. Joseph County	001900	1	240	455	52.75%
St. Joseph County	001900	2	755	875	86.29%
St. Joseph County	002000	1	645	735	87.76%
St. Joseph County	002000	2	1185	1240	95.56%
St. Joseph County	002100	1	500	570	87.72%
St. Joseph County	002100	2	425	510	83.33%
St. Joseph County	002200	1	825	1185	69.62%
St. Joseph County	002200	2	440	540	81.48%
St. Joseph County	002200	3	440	600	73.33%
St. Joseph County	002200	4	605	745	81.21%
St. Joseph County	002300	1	490	650	75.38%
St. Joseph County	002300	2	525	775	67.74%
St. Joseph County	002400	1	565	940	60.11%
St. Joseph County	002400	2	860	975	88.21%
St. Joseph County	002400	3	930	1135	81.94%
St. Joseph County	002500	1	605	825	73.33%
St. Joseph County	002500	2	685	1310	52.29%
St. Joseph County	002600	1	485	860	56.40%
St. Joseph County	002600	2	470	930	50.54%
St. Joseph County	002600	3	440	1020	43.14%
St. Joseph County	002700	1	725	975	74.36%
St. Joseph County	002800	1	935	1430	65.38%
St. Joseph County	002800	2	630	930	67.74%







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St. Joseph County	002900	1	700	1055	66.35%
St. Joseph County	003000	1	480	555	86.49%
St. Joseph County	003000	2	670	1130	59.29%
St. Joseph County	003100	1	455	685	66.42%
St. Joseph County	003100	2	485	700	69.29%
St. Joseph County	003100	3	745	965	77.20%
St. Joseph County	003100	4	615	825	74.55%
St. Joseph County	003100	5	315	475	66.32%
St. Joseph County	003200	1	660	1195	55.23%
St. Joseph County	003200	2	260	1235	21.05%
St. Joseph County	003200	3	240	745	32.21%
St. Joseph County	003200	4	260	945	27.51%
St. Joseph County	003200	5	80	780	10.26%
St. Joseph County	003300	1	295	700	42.14%
St. Joseph County	003300	2	150	955	15.71%
St. Joseph County	003300	3	230	355	64.79%
St. Joseph County	003300	4	615	825	74.55%
St. Joseph County	003400	1	705	815	86.50%
St. Joseph County	003400	2	1005	1260	79.76%
St. Joseph County	003400	3	1150	1300	88.46%
St. Joseph County	003400	4	465	695	66.91%
St. Joseph County	003500	1	900	1315	68.44%
St. Joseph County	003500	2	1015	1555	65.27%
St. Joseph County	010100	1	505	785	64.33%
St. Joseph County	010100	2	510	700	72.86%
St. Joseph County	010100	3	255	660	38.64%
St. Joseph County	010100	4	490	695	70.50%
St. Joseph County	010200	1	615	815	75.46%
St. Joseph County	010200	2	425	565	75.22%
St. Joseph County	010200	3	610	975	62.56%
St. Joseph County	010200	4	575	1350	42.59%
St. Joseph County	010200	5	775	1590	48.74%
St. Joseph County	010300	1	395	560	70.54%
St. Joseph County	010300	2	605	2025	29.88%
St. Joseph County	010300	3	840	1365	61.54%
St. Joseph County	010300	4	310	730	42.47%
St. Joseph County	010300	5	485	895	54.19%
St. Joseph County	010400	1	520	1250	41.60%
St. Joseph County	010400	2	540	1090	49.54%







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St. Joseph County	010400	3	525	1030	50.97%
St. Joseph County	010500	1	225	905	24.86%
St. Joseph County	010500	2	340	1025	33.17%
St. Joseph County	010500	3	405	980	41.33%
St. Joseph County	010600	1	335	760	44.08%
St. Joseph County	010600	2	250	565	44.25%
St. Joseph County	010600	3	515	1075	47.91%
St. Joseph County	010600	4	570	850	67.06%
St. Joseph County	010700	1	450	865	52.02%
St. Joseph County	010700	2	185	410	45.12%
St. Joseph County	010700	3	165	415	39.76%
St. Joseph County	010700	4	320	535	59.81%
St. Joseph County	010700	5	525	1035	50.72%
St. Joseph County	010800	1	290	855	33.92%
St. Joseph County	010800	2	340	615	55.28%
St. Joseph County	010800	3	500	2050	24.39%
St. Joseph County	010800	4	155	1000	15.50%
St. Joseph County	010900	1	425	1285	33.07%
St. Joseph County	010900	2	565	1410	40.07%
St. Joseph County	010900	3	660	2340	28.21%
St. Joseph County	010900	4	450	2725	16.51%
St. Joseph County	011000	1	545	2160	25.23%
St. Joseph County	011000	2	360	1745	20.63%
St. Joseph County	011000	3	230	715	32.17%
St. Joseph County	011000	4	685	1870	36.63%
St. Joseph County	011100	1	675	1095	61.64%
St. Joseph County	011100	2	650	1480	43.92%
St. Joseph County	011100	3	610	1035	58.94%
St. Joseph County	011100	4	335	395	84.81%
St. Joseph County	011100	5	195	625	31.20%
St. Joseph County	011201	1	470	775	60.65%
St. Joseph County	011202	1	235	250	94.00%
St. Joseph County	011202	2	140	390	35.90%
St. Joseph County	011301	1	460	1240	37.10%
St. Joseph County	011301	2	365	680	53.68%
St. Joseph County	011301	3	640	935	68.45%
St. Joseph County	011301	4	660	1270	51.97%
St. Joseph County	011301	5	770	1120	68.75%
St. Joseph County	011302	1	910	2455	37.07%







St. Joseph County	011302	2	95	985	9.64%
St. Joseph County	011302	3	1325	2580	51.36%
St. Joseph County	011302	4	265	905	29.28%
St. Joseph County	011303	1	400	1245	32.13%
St. Joseph County	011303	2	155	480	32.29%
St. Joseph County	011303	3	385	580	66.38%
St. Joseph County	011303	4	380	875	43.43%
St. Joseph County	011303	5	115	1205	9.54%
St. Joseph County	011303	6	640	1290	49.61%
St. Joseph County	011304	1	305	2425	12.58%
St. Joseph County	011305	1	285	2075	13.73%
St. Joseph County	011305	2	445	2265	19.65%
St. Joseph County	011306	1	225	860	26.16%
St. Joseph County	011306	2	110	620	17.74%
St. Joseph County	011306	3	175	1485	11.78%
St. Joseph County	011403	1	360	2860	12.59%
St. Joseph County	011403	2	835	2250	37.11%
St. Joseph County	011403	3	105	820	12.80%
St. Joseph County	011404	1	275	3125	8.80%
St. Joseph County	011404	2	280	1465	19.11%
St. Joseph County	011404	3	130	2375	5.47%
St. Joseph County	011405	1	0	760	0.00%
St. Joseph County	011405	2	60	1270	4.72%
St. Joseph County	011405	3	105	1670	6.29%
St. Joseph County	011406	1	345	1115	30.94%
St. Joseph County	011406	2	330	2345	14.07%
St. Joseph County	011406	3	220	1670	13.17%
St. Joseph County	011501	1	2055	2430	84.57%
St. Joseph County	011501	2	675	1050	64.29%
St. Joseph County	011503	1	435	1245	34.94%
St. Joseph County	011503	2	210	510	41.18%
St. Joseph County	011504	1	500	1540	32.47%
St. Joseph County	011505	1	70	875	8.00%
St. Joseph County	011505	2	860	1840	46.74%
St. Joseph County	011506	1	1105	1990	55.53%
St. Joseph County	011506	2	1430	2915	49.06%
St. Joseph County	011601	1	590	2445	24.13%
St. Joseph County	011601	2	495	2410	20.54%
St. Joseph County	011601	3	650	3480	18.68%







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St. Joseph County	011602	1	970	2820	34.40%
St. Joseph County	011602	2	475	1480	32.09%
St. Joseph County	011602	3	220	1975	11.14%
St. Joseph County	011602	4	560	1570	35.67%
St. Joseph County	011701	1	590	2240	26.34%
St. Joseph County	011701	2	1210	1600	75.63%
St. Joseph County	011702	1	40	1640	2.44%
St. Joseph County	011702	2	620	1005	61.69%
St. Joseph County	011702	3	1335	1780	75.00%
St. Joseph County	011702	4	1690	3260	51.84%
St. Joseph County	011702	5	210	665	31.58%
St. Joseph County	011801	1	125	1520	8.22%
St. Joseph County	011802	1	695	2585	26.89%
St. Joseph County	011802	2	120	890	13.48%
St. Joseph County	011802	3	880	1695	51.92%
St. Joseph County	011802	4	440	1305	33.72%
St. Joseph County	011900	1	285	1200	23.75%
St. Joseph County	011900	2	355	1130	31.42%
St. Joseph County	011900	3	465	1755	26.50%
St. Joseph County	012000	1	330	1280	25.78%
St. Joseph County	012000	2	190	890	21.35%
St. Joseph County	012000	3	165	1015	16.26%
St. Joseph County	012000	4	145	635	22.83%
St. Joseph County	012100	1	350	1140	30.70%
St. Joseph County	012100	2	285	630	45.24%
St. Joseph County	012100	3	610	1000	61.00%
St. Joseph County	012100	4	300	1095	27.40%
St. Joseph County	012200	1	320	1285	24.90%
St. Joseph County	012200	2	365	780	46.79%
St. Joseph County	012200	3	390	865	45.09%
St. Joseph County	012300	1	300	815	36.81%
St. Joseph County	012300	2	290	980	29.59%
St. Joseph County	012300	3	585	970	60.31%
St. Joseph County	012300	4	325	855	38.01%
St. Joseph County	012400	1	400	1335	29.96%
St. Joseph County	012400	2	250	745	33.56%
TOTA	AL		111,060	255,515	43.47%
				20	urce: HIID Eychange

Source: HUD Exchange







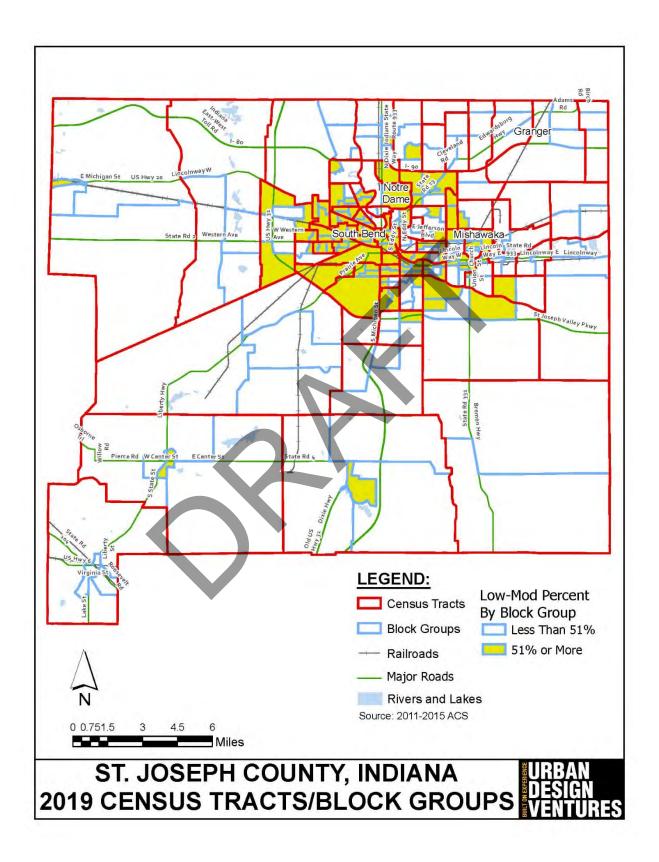
The following map illustrates areas of St. Joseph County with concentrations of low- and moderate-income residents. These Census Block Groups that are above 51% low- and moderate-income. They are mostly concentrated in the City of South Bend, and partially concentrated in the City of Mishawaka. Additionally, a map of low- and moderate-income block groups with an overly of all majority-minority block groups shows that every minority-majority block group in the region is also greater than 51% low- and moderate-income.







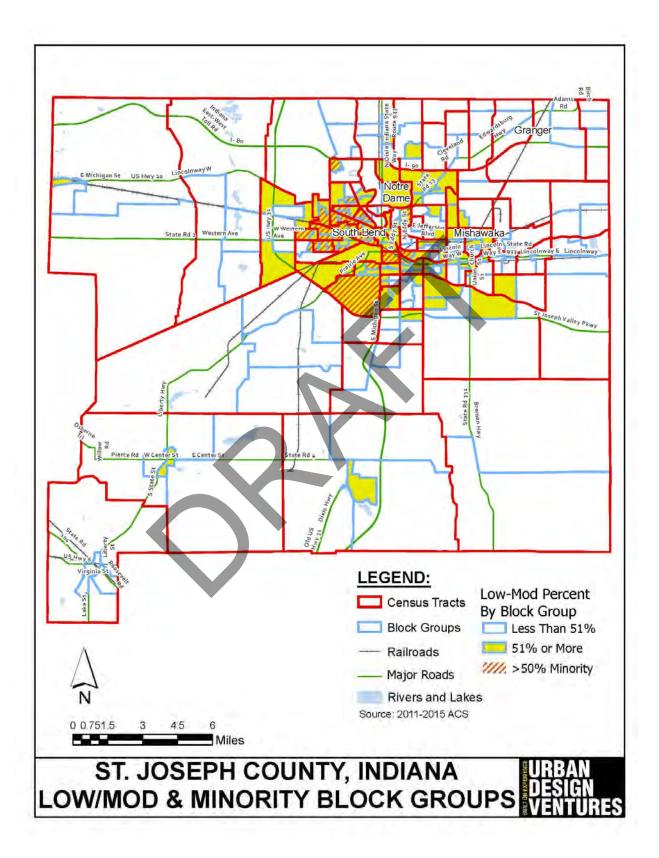












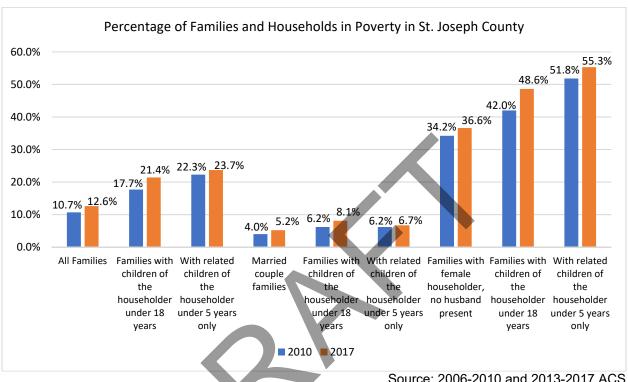






Family and Household Poverty - St. Joseph County

St. Joseph County's poverty statistics for families with children are highlighted in the chart below.



Source: 2006-2010 and 2013-2017 ACS

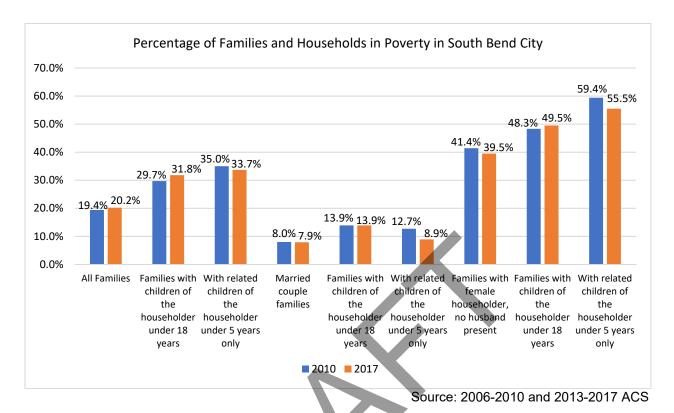
Family and Household Poverty - South Bend City

South Bend City's poverty statistics for families with children are highlighted in the chart below.









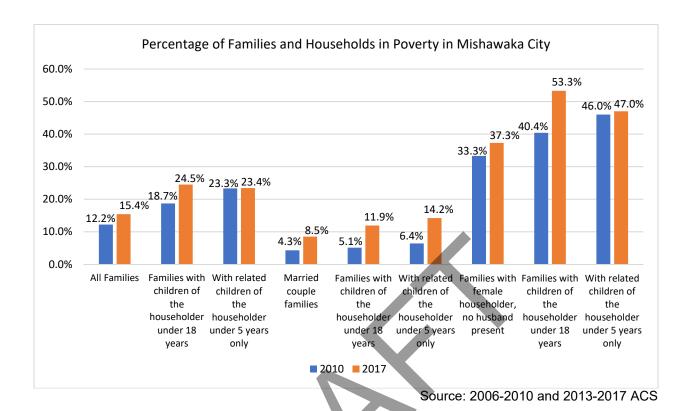
Family and Household Poverty – Mishawaka City

Mishawaka City's poverty statistics for families with children are highlighted in the chart below.









In St. Joseph County, the percentage of all families living in poverty experienced an increase from 10.7% in 2010 to 12.6% in 2017. The City of South Bend has a higher poverty rate than St. Joseph County as a whole, and it increased to 20.2% in 2017. The City of Mishawaka had a larger increase in poverty levels than the County as a whole from 2010 to 2017, increasing by 3.2 percentage points to 15.4% of the City. The percentage of female-headed householders with no husband present and with children under 18 years in poverty was 34.2% in 2010 and increased to 36.6% in 2017. However, the percentage of female-headed households with no husband present and with children under 18 years old in poverty decreased substantially, from 42.0% in 2010 to 48.6% in 2017. Though the percentage of single mothers in poverty was high in the City of South Bend, it remained relatively stable in that same time period. In the City of Mishawaka, however, the number of families with a single female householder and children under 18 years old rose from 40.4% in 2010 to 53.3% in 2017.







D. Employment

Occupation - St. Joseph County

In 2010, according to 2010 ACS Estimates, the total number of eligible workers (population 16 years and over) in St. Joseph County was 207,819 persons. In 2010, 65.4 percent (135,880 persons) of eligible workers were in the labor force and 6.2 percent (12,942 persons) of eligible workers in the work force were unemployed.

In 2017, according to 2017 ACS Estimates, the total number of eligible workers (population 16 years and over) in St. Joseph County was 211,358 persons. In 2017, 63.6 percent (134,450 persons) of eligible workers were in the labor force and 4.1 percent (8,633 persons) of eligible workers in the work force were unemployed.

Workers in 2017 had a mean travel time to work of 21.0 minutes.

Per the 2013-2017 American Community Survey, an estimated 31.7 percent (31,896 households) of households in St. Joseph County receive income from Social Security. The mean Social Security Income for 2017 was \$19,117.

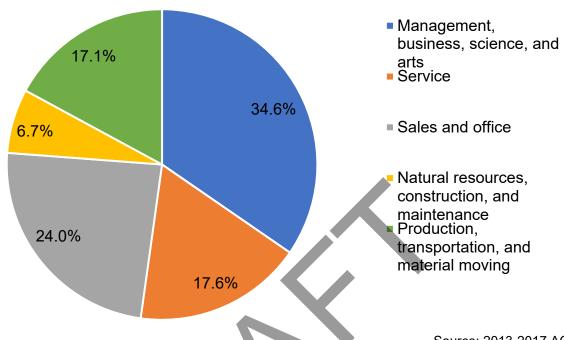
The following charts outline the distribution of workers in St. Joseph County by occupation.



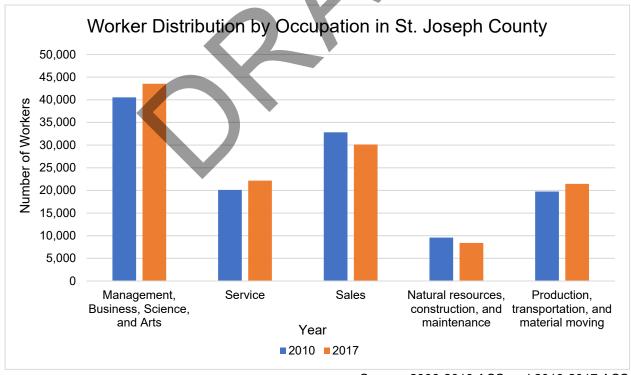




Occupations in St. Joseph County



Source: 2013-2017 ACS

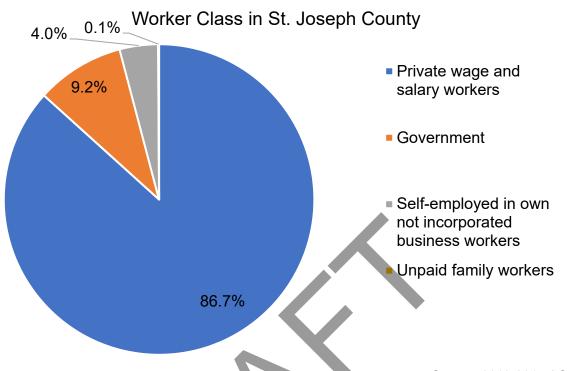


Source: 2006-2010 ACS and 2013-2017 ACS









Source: 2013-2017 ACS

Occupation - South Bend City

In 2010, according to 2010 ACS Estimates, the total number of eligible workers (population 16 years and over) in South Bend City was 76,898 persons. In 2010, 64.6 percent (49,652 persons) of eligible workers were in the labor force and 8.7 percent (6,681 persons) of eligible workers in the work force were unemployed.

In 2017, according to 2017 ACS Estimates, the total number of eligible workers (population 16 years and over) in South Bend City was 49,702 persons. In 2017, 64.4 percent (49,702 persons) of eligible workers were in the labor force and 5.8 percent (4,459 persons) of eligible workers in the work force were unemployed.

Workers in 2017 had a mean travel time to work of 19.9 minutes.

Per the 2013-2017 American Community Survey, an estimated 29.3 percent (11,443 households) of households in the South Bend City receive income from Social Security. The mean Social Security Income for 2017 was \$17,355.



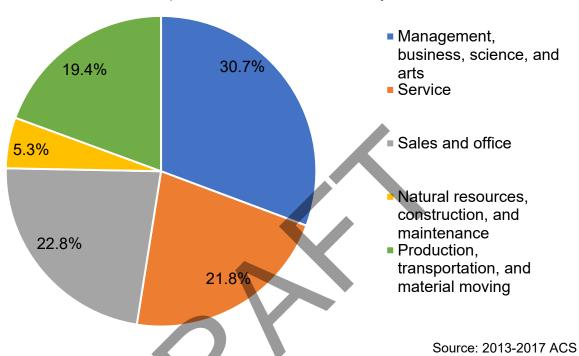


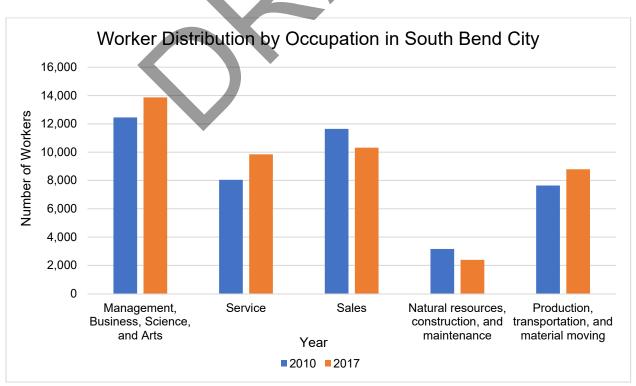




The following charts outline the distribution of South Bend City workers by occupation.

Occupations in South Bend City



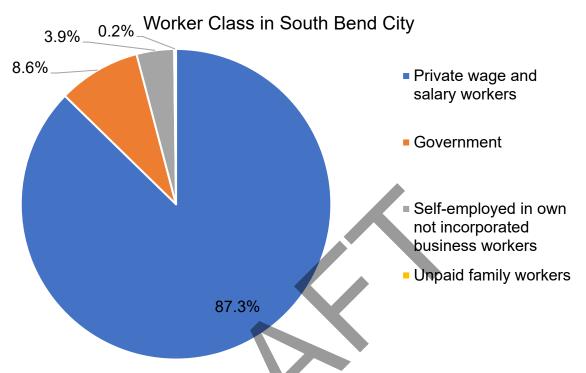








Source: 2006-2010 ACS and 2013-2017 ACS



Source: 2006-2010 ACS and 2013-2017 ACS

Occupation - Mishawaka City

In 2010, according to 2010 ACS Estimates, the total number of eligible workers (population 16 years and over) in Mishawaka City was 38,279 persons. In 2010, 68.0 percent (26,029 persons) of eligible workers were in the labor force and 5.8 percent (2,219 persons) of eligible workers in the work force were unemployed.

In 2017, according to 2017 ACS Estimates, the total number of eligible workers (population 16 years and over) in Mishawaka City was 38,431 persons. In 2017, 66.0 percent (25,350 persons) of eligible workers were in the labor force and 4.1 percent (1,593 persons) of eligible workers in the work force were unemployed.

Workers in 2017 had a mean travel time to work of 20.8 minutes.

Per the 2013-2017 American Community Survey, an estimated 31.3 percent (6,448 households) of households in Mishawaka City receive income from Social Security. The mean Social Security Income for 2017 was \$17,725.



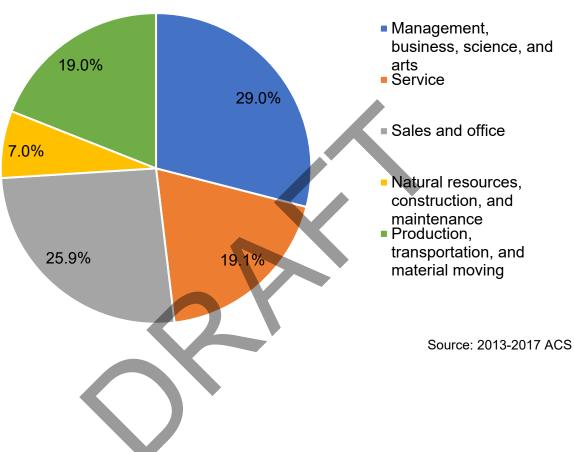






The following charts outline the distribution of Mishawaka City workers by occupation.

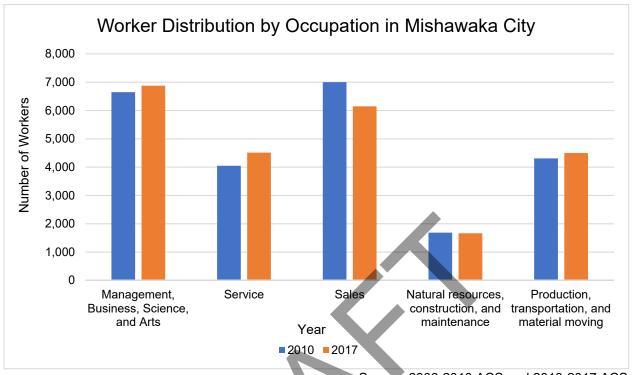




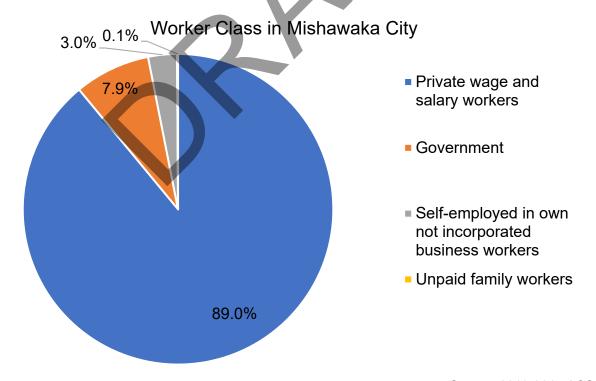












Source: 2013-2017 ACS

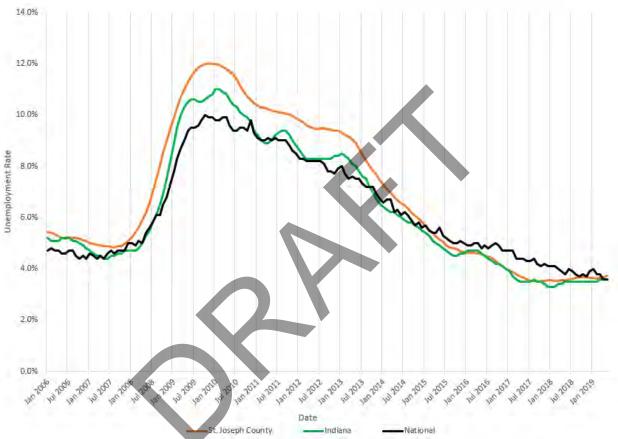






<u>Unemployment Rate - St. Joseph County</u>

The unemployment rate for St. Joseph County is shown below with the unemployment rate in the State of Indiana and nationally.



Source: Bureau of Labor Statistics and St. Louis FRED Database

From January 2006 to April 2015, the County unemployment rate was an average of 1.1 percentage points higher than the national unemployment rate and an average of 0.8 percentage points higher than the State unemployment rate. From April 2015 to May 2019, the County unemployment rate was an average of 0.4 percentage points lower than the national unemployment rate. Over the same period, the County and State unemployment rates were similar within +/- 0.3 percentage points.

The trends suggest that from January 2013 to January 2017 the unemployment rate in St. Joseph County decreased at a faster rate than the national average and has steadied around 3.6% as of January 2017.







E. Housing Profile

Slightly less than half of the County's housing stock (44.8%) was built prior to 1970, which coincides with the County's growth and decline. Only 1.5% of its housing stock was built after 2009. The oldest housing stock in the region is within the City of South Bend; approximately 26.6% of the City's housing stock was built prior to 1939 and two-fifths (40.7%) was built prior to 1970. The following chart illustrates the year that housing structures were built in St. Joseph County based on the 2013-2017 American Community Survey.

Housing Profile – St. Joseph County

The following table chart details the year that housing structures were built in St. Joseph County as of 2017.

Year Structure Built in St. Joseph County

Housing Profile	2006-2010 ACS		2013-2017 ACS	
3	#	%	#	%
Total Housing Units	87,140	76.3%	86,907	74.8%
Built 2010 or newer	-	-	1,738	1.5%
Built 2000 to 2009	8,915	7.8%	10,181	8.8%
Built 1990 to 1999	13,595	11.9%	15,425	13.3%
Built 1980 to 1989	11,037	9.7%	10,841	9.3%
Built 1970 to 1979	15,478	13.6%	16,133	13.9%
Built 1960 to 1969	11,359	9.9%	12,515	10.8%
Built 1950 to 1959	17,535	15.4%	15,660	13.5%
Built 1940 to 1949	12,494	10.9%	12,637	10.9%
Built 1939 or earlier	23,794	20.8%	20,948	18.0%

Source: 2013-2017 ACS

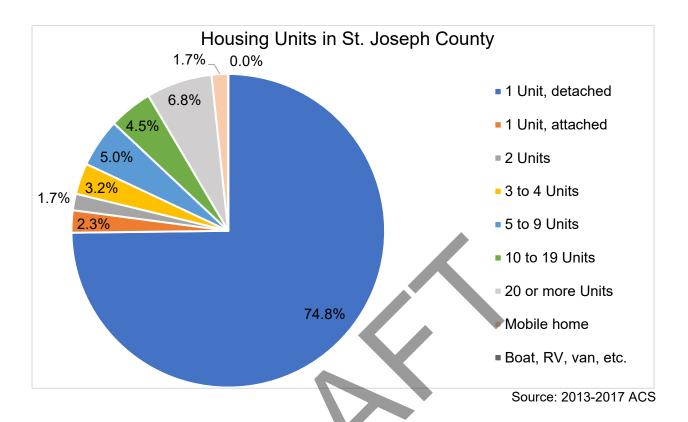
The majority of housing units in St. Joseph County are 1-unit detached comprising of 74.8 percent (86,907 units) of housing units.

The following graph illustrates the composition of the housing stock in St. Joseph County as of 2017.









Housing Profile - South Bend City

The following table chart details the year that housing structures were built in South Bend City as of 2017.

Year Structure Built in South Bend City

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Housing Profile	2006-209	10 ACS 2013-2017 A		017 ACS	
	#	%	#	%	
Total Housing Units	47,227	-	47,280	-	
Built 2010 or newer	1	-	782	1.6%	
Built 2000 to 2009	1,912	4.0%	2,065	4.4%	
Built 1990 to 1999	2,713	5.7%	3,177	6.7%	
Built 1980 to 1989	3,188	6.8%	2,799	5.9%	
Built 1970 to 1979	4,499	9.5%	4,739	10.0%	
Built 1960 to 1969	4,719	10.0%	5,521	11.7%	
Built 1950 to 1959	9,750	20.6%	8,561	18.1%	
Built 1940 to 1949	7,305	15.5%	7,079	15.0%	
Built 1939 or earlier	13,141	27.9%	12,557	26.6%	

Source: 2006-2010 ACS and 2013-2017 ACS

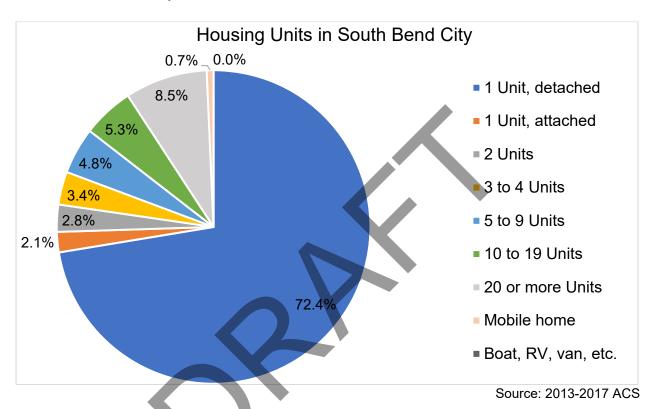






The majority of housing units in South Bend City are 1-unit detached comprising 72.4 percent (34,254 units) of housing units.

The following graph illustrates the composition of the housing stock in South Bend City as of 2017.



Vacant Lots in the City of South Bend

As the result of the 2013 "1,000 Houses in 1,000 Days" Initiative, the City of South Bend owns a large number of vacant lots on scattered sites. Over the course of the program, the City had taken action on 1,122 properties, and had managed 689 vacant lots by the end of the program in 2015. The City of South Bend currently owns twenty-five (25) scattered site lots. City ownership is interim and the City is determining the best and most productive uses for the lots. Potential projects include infill housing and side lot sales.

Housing Profile – Mishawaka City

The following table chart details the year that housing structures were built in Mishawaka City as of 2017.







Year Structure Built in Mishawaka City

Housing Profile	2006-201	0 ACS	2013-2017 ACS		
g .	#	%	#	%	
Total Housing Units	24,345	-	24,363	-	
Built 2010 or newer	-	-	166	0.7%	
Built 2000 to 2009	2,393	9.8%	2,779	11.4%	
Built 1990 to 1999	3,488	14.3%	4,143	17.0%	
Built 1980 to 1989	2,680	11.0%	2,557	10.5%	
Built 1970 to 1979	4,019	16.5%	4,359	17.9%	
Built 1960 to 1969	2,285	9.4%	1,939	8.0%	
Built 1950 to 1959	2,511	10.3%	2,214	9.1%	
Built 1940 to 1949	1,844	7.6%	2,082	8.5%	
Built 1939 or earlier	5,125	21.1%	4,124	16.9%	
				0040 0047 400	

Source: 2013-2017 ACS

The majority of housing units in Mishawaka City are 1-unit detached comprising 50.6 percent (12,337 units) of housing units.

The following graph illustrates the composition of the housing stock in Mishawaka City as of 2017.

As shown in the previous charts, single-unit detached houses remain the most prevalent type of housing in the County by a wide margin. The number of 1-unit attached homes increased, while the number of 1-unit detached showed a slight decrease. All other housing types stayed fairly consistent or has a slight change in their prevalence.

The median value of owner-occupied homes in St. Joseph County in 2010 was \$116,300 compared to \$95,500 in the City of Mishawaka and \$86,700 in the City of South Bend. The 2013-2017 American Community Survey estimates that the median value of owner-occupied homes in St. Joseph County has increased since 2010 to \$118,600 while the median housing values in the Cities of Mishawaka and South Bend decreased to \$93,900 and \$81,100 respectively. The latest available data from real estate listings presented a similar value of home values in the County; according to Zillow, the median list price of a home in St. Joseph County was \$127,000 in July of 2019.

The following table outlines the number of new units for which building permits were filed annually for the South Bend-Mishawaka IN-MI Core Base







Statistical Area (CBSA). The South Bend-Mishawaka IN-MI CBSA has seen a substantial decrease in the total number of new units constructed since 2003, although it has remained constant since 2018.

The table below contains data on the number of permits for residential construction issued by jurisdictions in the South Bend-Mishawaka, IN-MI Metro Area.

Units Authorized by Building Permits – South Bend-Mishawaka, IN-MI Metro Area

YEAR	Total	Single Family	Multi-Family	5+ Units
2018	738	419	319	316
2017	959	479	480	480
2016	405	337	68	66
2015	524	380	144	144
2014	512	342	170	168
2013	500	268	232	230
2012	642	219	423	419
2011	467	238	229	226
2010	383	238	145	132
2009	348	299	49	37
2008	830	400	430	407
2007	1,250	718	532	485
2006	1,299	725	574	570
2005	1,382	1,108	274	266
2004	1,361	1,117	244	242
2003	1,366	1,197	169	151

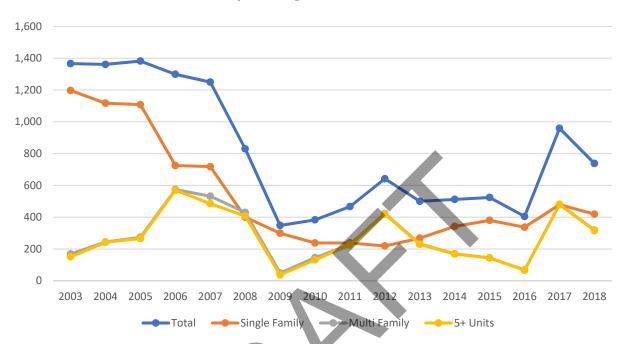
Source: SOCDS Building Permits Database, HUD







Units Authorized by Building Permits - South Bend-Mishawaka



Source: SOCDS Building Permits Database, HUD

The area has seen an overall decrease in the total number of new units constructed most notably Multi-Family homes. Across the 15-year period, an average of 64.2 percent of new units each year were for single family units.

The year with the highest number of units authorized was 2005 and the year with the highest number of single-family units was 2003. The average number of total units authorized per year in the years following the 2008-2009 housing crash was 13% fewer than the average number of total units authorized per year in the years preceding the 2008-2009 housing crash. In general, this data would suggest that the South Bend-Mishawaka, IN-MI Metro Area housing market has not recovered from the 2008-2009 market collapse.







F. Financing

Owner Costs - St. Joseph County

The median monthly housing cost for owner-occupied households was \$859 in 2010 and \$775 in 2017. The median monthly housing cost for owner-occupied households decreased by 9.78 percent (\$84) from 2010 to 2017. Dollar amounts have been adjusted for inflation.

The following table illustrates mortgage status and selected monthly owner costs in 2010 and 2017.

Monthly Owner Costs in St. Joseph County

	2006-201	0 ACS	2013-2017 ACS	
Monthly Owner Cost	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	71,879	71.5%	68,361	67.9%
Less than \$300	8,122	11.3%	9,067	13.3%
\$300 to \$499	10,926	15.2%	12,170	17.8%
\$500 to \$799	13,513	18.8%	14,137	20.7%
\$800 to \$999	11,213	15.6%	10,442	15.3%
\$1,000 to \$1,499	17,107	23.8%	14,630	21.4%
\$1,500 to \$1,999	6,829	9.5%	5,001	7.3%
\$2,000 or more	4,169	5.8%	2,914	4.2%
No Cash Rent	-	-	-	-
Median (dollars)	\$859	-	\$775	-

Source: 2006-2010 and 2013-2017 American Community Survey

The following table illustrates housing costs for owner-households in 2010 and 2017 according to the 2006-2010 ACS and the 2013-2017 ACS.









Monthly Owner Costs as a Percentage of Household Income in St. Joseph County

Monthly Owner Costs	2006-201	10 ACS 2013-2017 ACS		
Owner Costs as a % of Income	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	71,879	71.5%	68,361	67.9%
Less than \$20,000	8,625	12.0%	6,625	9.7%
Less than 20 percent	1,366	1.9%	1,181	1.7%
20 to 29 percent	1,509	2.1%	976	1.4%
30 percent or more	5,750	8.0%	4,468	6.6%
\$20,000 to \$34,999	11,860	16.5%	9,695	14.2%
Less than 20 percent	4,385	6.1%	4,176	6.1%
20 to 29 percent	2,516	3.5%	1,966	2.9%
30 percent or more	4,960	6.9%	3,553	5.2%
\$35,000 to \$49,999	11,716	16.3%	9,950	14.5%
Less than 20 percent	4,744	6.6%	4,922	7.2%
20 to 29 percent	3,810	5.3%	3,415	5.0%
30 percent or more	3,163	4.4%	1,613	2.3%
\$50,000 to \$74,999	15,670	21.8%	14,487	21.2%
Less than 20 percent	8,482	11.8%	10,088	14.8%
20 to 29 percent	5,175	7.2%	3,544	5.2%
30 percent or more	2,013	2.8%	855	1.2%
\$75,000 or more	23,792	33.1%	27,052	39.6%
Less than 20 percent	19,335	26.9%	24,464	35.8%
20 to 29 percent	3,810	5.3%	2,251	3.3%
30 percent or more	647	0.9%	337	0.5%
Zero or negative income	216	0.3%	552	0.8%
No cash rent	-	-	-	-

Source: 2006-2010 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30 percent or more of its monthly income on housing costs. In 2010, 23.0 percent (16,532 units) of owner-occupied units were cost burdened and 15.8 percent (10,826 units) of owner-occupied households in 2017 were cost burdened.







Owner Costs - South Bend City

The median monthly housing cost for owner-occupied households was \$766 in 2010 and \$700 in 2017. The median monthly housing cost for owner-occupied households decreased by 8.62 percent (\$66) from 2010 to 2017. Dollar amounts have been adjusted for inflation.

The following table illustrates mortgage status and selected monthly owner costs in 2010 and 2017.

Monthly Owner Costs in South Bend City

	2006-201	0 ACS	2013-2017 ACS	
Monthly Owner Cost	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	24,350	61.9%	22,335	57.2%
Less than \$300	3,117	12.8%	3,449	15.5%
\$300 to \$499	4,188	17.2%	4,185	18.7%
\$500 to \$799	5,674	23.3%	5,496	24.6%
\$800 to \$999	4,432	18.2%	3,729	16.7%
\$1,000 to \$1,499	4,821	19.8%	4,181	18.7%
\$1,500 to \$1,999	1,388	5.7%	789	3.5%
\$2,000 or more	731	3.0%	506	2.3%
No Cash Rent		-	-	-
Median (dollars)	\$766	-	\$700	-

Source: 2006-2010 and 2013-2017 American Community Survey

The following table illustrates housing costs for owner-households in 2010 and 2017 according to the 2006-2010 ACS and the 2013-2017 ACS.

Monthly Owner Costs as a Percentage of Household Income in South Bend City

Owner Costs as a % of Income	2006-201	0 ACS	2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	24,350	61.9%	22,335	57.2%
Less than \$20,000	3,628	14.9%	2,831	12.7%
Less than 20 percent	463	1.9%	584	2.6%







20 to 29 percent	633	2.6%	403	1.8%
30 percent or more	2,532	10.4%	1,844	8.3%
\$20,000 to \$34,999	5,235	21.5%	3,882	17.4%
Less than 20 percent	1,705	7.0%	1,646	7.4%
20 to 29 percent	1,047	4.3%	809	3.6%
30 percent or more	2,484	10.2%	1,427	6.4%
\$35,000 to \$49,999	4,456	18.3%	3,858	17.3%
Less than 20 percent	1,875	7.7%	1,851	8.3%
20 to 29 percent	1,680	6.9%	1,430	6.4%
30 percent or more	901	3.7%	577	2.6%
\$50,000 to \$74,999	5,187	21.3%	5,049	22.6%
Less than 20 percent	3,190	13.1%	3,653	16.4%
20 to 29 percent	1,583	6.5%	1,194	5.3%
30 percent or more	414	1.7%	202	0.9%
\$75,000 or more	5,722	23.5%	6,503	29.1%
Less than 20 percent	4,992	20.5%	6,065	27.1%
20 to 29 percent	633	2.6%	374	1.7%
30 percent or more	97	0.4%	64	0.3%
Zero or negative income	122	0.5%	212	0.9%
No cash rent	-	-	-	-

Source: 2006-2010 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30 percent or more of its monthly income on housing costs. In 2010, 26.4 percent (6,428 units) of owner-occupied units were cost burdened and 18.5 percent (4,114 units) of owner-occupied households in 2017 were cost burdened.

Owner Costs – Mishawaka City

The median monthly housing cost for owner-occupied households was \$807 in 2010 and \$736 in 2017. The median monthly housing cost for owner-occupied households decreased by 8.80 percent (\$71) from 2010 to 2017. Dollar amounts have been adjusted for inflation.

The following table illustrates mortgage status and selected monthly owner costs in 2010 and 2017.









Monthly Owner Costs in Mishawaka City

	2006-201	0 ACS	2013-2017 ACS	
Monthly Owner Cost	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	11,401	53.9%	10,334	50.2%
Less than \$300	1,482	13.0%	1,286	12.4%
\$300 to \$499	1,893	16.6%	1,861	18.0%
\$500 to \$799	2,246	19.7%	2,570	24.9%
\$800 to \$999	2,143	18.8%	1,890	18.3%
\$1,000 to \$1,499	2,713	23.8%	1,976	19.1%
\$1,500 to \$1,999	616	5.4%	492	4.8%
\$2,000 or more	308	2.7%	259	2.5%
No Cash Rent	-			-
Median (dollars)	\$807	-	\$736	-

Source: 2006-2010 and 2013-2017 American Community Survey

The following table illustrates housing costs for owner-households in 2010 and 2017 according to the 2006-2010 ACS and the 2013-2017 ACS.

Monthly Owner Costs as a Percentage of Household Income in Mishawaka City

Owner Costs as a % of Income	2006-201		2013-201	2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage	
Owner-Occupied Housing Units	11,401	53.9%	10,334	50.2%	
Less than \$20,000	1,915	16.8%	1,073	10.4%	
Less than 20 percent	274	2.4%	197	1.9%	
20 to 29 percent	296	2.6%	137	1.3%	
30 percent or more	1,345	11.8%	739	7.2%	
\$20,000 to \$34,999	2,052	18.0%	1,898	18.4%	
Less than 20 percent	775	6.8%	867	8.4%	
20 to 29 percent	467	4.1%	421	4.1%	
30 percent or more	809	7.1%	610	5.9%	
\$35,000 to \$49,999	2,041	17.9%	1,921	18.6%	
Less than 20 percent	958	8.4%	873	8.4%	







20 to 29 percent	604	5.3%	743	7.2%
30 percent or more	479	4.2%	305	3.0%
\$50,000 to \$74,999	2,611	22.9%	2,452	23.7%
Less than 20 percent	1,596	14.0%	1,714	16.6%
20 to 29 percent	775	6.8%	636	6.1%
30 percent or more	239	2.1%	102	1.0%
\$75,000 or more	2,770	24.3%	2,883	27.9%
Less than 20 percent	2,451	21.5%	2,586	25.0%
20 to 29 percent	274	2.4%	245	2.4%
30 percent or more	46	0.4%	52	0.5%
Zero or negative income	11	0.1%	107	1.0%
No cash rent	-	-	-	-

Source: 2006-2010 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30 percent or more of its monthly income on housing costs. In 2010, 25.6 percent (2,919 units) of owner-occupied units were cost burdened and 17.6 percent (1,808 units) of owner-occupied households in 2017 were cost burdened.

According to www.zillow.com, the median list price for a two-bedroom housing unit in the City of South Bend was \$73,000 in July 2019, \$118,000 in the City of Mishawaka, and \$127,000 for St. Joseph County as a whole. The average price per square foot in the City of South Bend is \$95 in the same time period, \$96 in the City of Mishawaka, and \$104 in St. Joseph County.

Foreclosures

According to www.realtytrac.com, St. Joseph County had 142 foreclosures at a rate of 1 in every 2,137 in July, 2019, the City of South Bend had 91 homes in foreclosure at a rate of 1 in every 1,719 as of July of 2019, and the City of Mishawaka had 38 foreclosures in the same time period at a rate of 1 in every 3,412. This means that 13 foreclosures in the County were outside of the Cities of South Bend and Mishawaka.

The City of South Bend's foreclosures rates had historically been some of the highest in the United States. When the foreclosure crisis occurred in 2008, South Bend's foreclosure rates peaked, but other Cities overtook







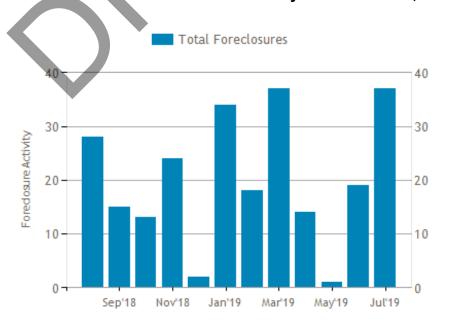


South Bend. The foreclosure rate in the City still remains higher than that of the State of Indiana, which has a foreclosure rate of 1 in every 3,159.

Number of Foreclosures in St. Joseph County, IN



Number of Foreclosures in the City of South Bend, IN











Number of Foreclosures in the City of Mishawaka, IN



The number of foreclosures for St. Joseph County was at its highest in January of 2019 with 68 foreclosures. Foreclosures in the City of Mishawaka also peaked at this point at 17 foreclosures. The City of South Bend frequently made up a large percentage of the number of foreclosures in St. Joseph County, and peaked in both March 2019 and July 2019 at 38 foreclosures. While foreclosures can negatively impact a community, it offers a chance for the County and non-profit housing agencies to purchase homes and resell them to low-income households.







Renter Costs - St. Joseph County

The median monthly housing cost for renter-occupied households was \$683 in 2010; and \$743 in 2017. The median monthly housing cost for renter-occupied households increased by 8.78 percent (\$60) from 2010 to 2017. Dollar amounts have been adjusted for inflation.

The following table illustrates mortgage status and selected monthly renter costs in 2010 and 2017.

Selected Monthly Renter Costs in St. Joseph County

	2006-201	0 ACS	2013-2017 ACS	
Monthly Renter Cost	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Renter-Occupied Housing Units	28,661	28.5%	32,333	32.1%
Less than \$300	1,863	6.5%	1,890	5.9%
\$300 to \$499	4,385	15.3%	3,307	10.2%
\$500 to \$799	12,382	43.2%	12,610	39.0%
\$800 to \$999	5,331	18.6%	7,089	21.9%
\$1,000 to \$1,499	2,608	9.1%	4,374	13.5%
\$1,500 to \$1,999	373	1.3%	671	2.1%
\$2,000 or more	287	1.0%	273	0.8%
No Cash Rent	1,433	5.0%	2,119	6.6%
Median (dollars)	\$683	-	\$743	-

Source: 2006-2010 and 2013-2017 American Community Survey

The following table illustrates housing costs for owner-households in 2010 and 2017 according to the 2006-2010 ACS and the 2013-2017 ACS.

Selected Monthly Renter Costs as a Percentage of Household Income in St. Joseph County

,	2006-201		2013-2017 ACS	
Renter Costs as a % of Income	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Renter-Occupied Housing Units	28,661	28.5%	32,333	32.1%
Less than \$20,000	9,687	33.8%	9,680	29.9%
Less than 20 percent	315	1.1%	204	0.6%







20 to 29 percent	1,032	3.6%	912	2.8%
30 percent or more	8,340	29.1%	8,564	26.5%
\$20,000 to \$34,999	7,337	25.6%	7,333	22.7%
Less than 20 percent	774	2.7%	522	1.6%
20 to 29 percent	2,923	10.2%	2,486	7.7%
30 percent or more	3,640	12.7%	4,325	13.4%
\$35,000 to \$49,999	4,270	14.9%	4,856	15.0%
Less than 20 percent	1,720	6.0%	1,478	4.6%
20 to 29 percent	2,006	7.0%	2,885	8.9%
30 percent or more	545	1.9%	493	1.5%
\$50,000 to \$74,999	3,267	11.4%	3,983	12.3%
Less than 20 percent	2,494	8.7%	2,793	8.6%
20 to 29 percent	631	2.2%	1,100	3.4%
30 percent or more	143	0.5%	90	0.3%
\$75,000 or more	2,006	7.0%	3,053	9.4%
Less than 20 percent	1,949	6.8%	2,855	8.8%
20 to 29 percent	57	0.2%	162	0.5%
30 percent or more	0	0.0%	36	0.1%
Zero or negative income	659	2.3%	1,309	4.1%
No cash rent	1,433	5.0%	2,119	6.6%

Source: 2006-2010 and 2013-2017 American Community Survey

Gross Rent as a Percentage of Household Income in St. Joseph County

Rental Cost as a % of Income	2006-201	010 ACS 2013-2017		7 ACS
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Rental Units paying rent	26,560	-	28,905	-
Less than 15 percent	3,507	13.2%	3,994	13.8%
15 to 19 percent	3,710	14.0%	3,858	13.4%
20 to 24 percent	3,348	12.6%	3,828	13.2%
25 to 29 percent	3,300	12.4%	3,717	12.9%
30 to 34 percent	2,077	7.8%	2,293	7.9%
35 percent or more	10,618	40.0%	11,215	38.8%
Not computed	2,101	-	3,428	-

Source: 2006-2010 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30 percent or more of its monthly income on housing costs. In 2010, 44.2







percent (12,668 units) of renter-occupied units were cost burdened and 41.8 percent (13,508 units) of renter-occupied households in 2017 were cost burdened.

In 2010, 23.0 percent (16,532 units) of owner-occupied households were cost burdened whereas 44.2 percent (12,668 units) of renter-occupied households were cost burdened. In 2017, 15.8 percent (10,826 units) of owner-occupied households were cost burdened whereas 41.8 percent (13,508 units) of renter-occupied households were cost burdened.

Renter Costs - South Bend City

The median monthly housing cost for renter-occupied households was \$690 in 2010; and \$741 in 2017. The median monthly housing cost for renter-occupied households increased by 7.39 percent (\$51) from 2010 to 2017. Dollar amounts are adjusted for inflation.

The following table illustrates mortgage status and selected monthly renter costs in 2010 and 2017.

Selected Monthly Renter Costs in South Bend City

	2006-201	10 ACS 2013-2017 ACS		7 ACS
Monthly Renter Cost	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Renter-Occupied Housing Units	15,014	38.1%	16,690	42.8%
Less than \$300	1,096	7.3%	1,344	8.0%
\$300 to \$499	2,357	15.7%	1,909	11.4%
\$500 to \$799	6,246	41.6%	6,135	36.8%
\$800 to \$999	2,688	17.9%	3,817	22.9%
\$1,000 to \$1,499	1,501	10.0%	2,032	12.2%
\$1,500 to \$1,999	210	1.4%	335	2.0%
\$2,000 or more	150	1.0%	107	0.7%
No Cash Rent	766	5.1%	1,011	6.0%
Median (dollars)	\$690	-	\$741	-

Source: 2006-2010 and 2013-2017 American Community Survey

The following table illustrates housing costs for owner-households in 2010 and 2017 according to the 2006-2010 ACS and the 2013-2017 ACS.









Selected Monthly Renter Costs as a Percentage of Household Income in South Bend City

Selected Monthly Renter					
	2006-201	0 ACS	2013-201	/ ACS	
Renter Costs as a % of Income	Number of Housing Units	Percentage	Number of Housing Units	Percentage	
Renter-Occupied Housing Units	15,014	38.1%	16,690	42.8%	
Less than \$20,000	5,420	36.1%	5,580	33.4%	
Less than 20 percent	180	1.2%	183	1.1%	
20 to 29 percent	556	3.7%	590	3.5%	
30 percent or more	4,684	31.2%	4,807	28.8%	
\$20,000 to \$34,999	4,294	28.6%	3,793	22.7%	
Less than 20 percent	450	3.0%	323	1.9%	
20 to 29 percent	1,772	11.8%	1,214	7.3%	
30 percent or more	2,072	13.8%	2,256	13.5%	
\$35,000 to \$49,999	2,132	14.2%	2,305	13.8%	
Less than 20 percent	781	5.2%	649	3.9%	
20 to 29 percent	1,006	6.7%	1,358	8.1%	
30 percent or more	345	2.3%	298	1.8%	
\$50,000 to \$74,999	1,351	9.0%	1,863	11.2%	
Less than 20 percent	961	6.4%	1,343	8.0%	
20 to 29 percent	330	2.2%	478	2.9%	
30 percent or more	60	0.4%	42	0.3%	
\$75,000 or more	616	4.1%	1,166	7.0%	
Less than 20 percent	601	4.0%	1,096	6.6%	
20 to 29 percent	0	0.0%	54	0.3%	
30 percent or more	15	0.1%	16	0.1%	
Zero or negative income	435	2.9%	972	5.8%	
No cash rent	766	5.1%	1,011	6.1%	

Source: 2006-2010 and 2013-2017 American Community Survey

Gross Rent as a Percentage of Household Income in South Bend City

	2006-201	0 ACS	2013-2017	ACS
Rental Cost as a % of Income	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Rental Units paying rent	13,805	-	14,707	-
Less than 15 percent	1,248	9.0%	1,742	11.8%
15 to 19 percent	1,712	12.4%	1,852	12.6%







20 to 24 percent	1,644	11.9%	1,811	12.3%
25 to 29 percent	2,029	14.7%	1,883	12.8%
30 to 34 percent	1,117	8.1%	1,114	7.6%
35 percent or more	6,055	43.9%	6,305	42.9%
Not computed	1,209	-	1,983	-

Source: 2006-2010 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30 percent or more of its monthly income on housing costs. In 2010, 47.8 percent (7,177 units) of renter-occupied units were cost burdened and 44.5 percent (7,419 units) of renter-occupied households in 2017 were cost burdened.

In 2010, 26.4 percent (6,428 units) of owner-occupied households were cost burdened whereas 47.8 percent (7,177 units) of renter-occupied households were cost burdened. In 2017, 18.5 percent (4,144 units) of owner-occupied households were cost burdened whereas 44.5 percent (7,419 units) of renter-occupied households were cost burdened.

Renter Costs - Mishawaka City

The median monthly housing cost for renter-occupied households was \$662 in 2010; and \$730 in 2017. The median monthly housing cost for renter-occupied households increased by 10.27 percent (\$68) from 2010 to 2017. Dollar amounts are adjusted for inflation.

The following table illustrates mortgage status and selected monthly renter costs in 2010 and 2017.

Selected Monthly Renter Costs in Mishawaka City

Ociceted Monthly Renter Oosts in Mishawaka Oity					
	2006-2010 ACS		2013-2017 ACS		
Monthly Renter Cost	Number of Housing Units	Percentage	Number of Housing Units	Percentage	
Renter-Occupied Housing Units	9,743	46.1%	10,234	49.8%	
Less than \$300	555	5.7%	306	3.0%	
\$300 to \$499	1,647	16.9%	1,130	11.0%	
\$500 to \$799	4,628	47.5%	4,529	44.3%	
\$800 to \$999	1,841	18.9%	2,401	23.5%	
\$1,000 to \$1,499	672	6.9%	1,194	11.7%	







\$1,500 to \$1,999	68	0.7%	200	2.0%
\$2,000 or more	136	1.4%	69	0.7%
No Cash Rent	195	2.0%	405	4.0%
Median (dollars)	\$662	-	\$730	-

Source: 2006-2010 and 2013-2017 American Community Survey

The following table illustrates housing costs for owner-households in 2010 and 2017 according to the 2006-2010 ACS and the 2013-2017 ACS.

Selected Monthly Renter Costs as a Percentage of Household Income in Mishawaka City

ociocio moneny reme		2006-2010 ACS 2013-2017 ACS		
Renter Costs as a % of Income	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Renter-Occupied Housing Units	9,743	46.1%	10,234	49.8%
Less than \$20,000	3,322	34.1%	2,784	27.2%
Less than 20 percent	97	1.0%	0	0.0%
20 to 29 percent	322	3.3%	180	1.8%
30 percent or more	2,903	29.8%	2,604	25.4%
\$20,000 to \$34,999	2,280	23.4%	2,694	26.3%
Less than 20 percent	273	2.8%	150	1.4%
20 to 29 percent	799	8.2%	1,082	10.6%
30 percent or more	1,208	12.4%	1,462	14.3%
\$35,000 to \$49,999	1,598	16.4%	1,760	17.2%
Less than 20 percent	731	7.5%	556	5.4%
20 to 29 percent	682	7.0%	1,061	10.4%
30 percent or more	185	1.9%	143	1.4%
\$50,000 to \$74,999	1,345	13.8%	1,312	12.8%
Less than 20 percent	1,169	12.0%	939	9.2%
20 to 29 percent	127	1.3%	347	3.4%
30 percent or more	49	0.5%	26	0.2%
\$75,000 or more	848	8.7%	1,076	10.5%
Less than 20 percent	838	8.6%	1,016	9.9%
20 to 29 percent	10	0.1%	42	0.4%
30 percent or more	0	0.0%	18	0.2%
Zero or negative income	156	1.6%	203	2.0%
No cash rent	195	2.0%	405	4.0%

Source: 2006-2010 and 2013-2017 American Community Survey







Gross Rent as a Percentage of Household Income in Mishawaka City

	2006-201	10 ACS 2013-		017 ACS	
Rental Cost as a % of Income	Number of Housing Units	Percentage	Number of Housing Units	Percentage	
Rental Units paying rent	9,385	-	9,626	-	
Less than 15 percent	1,585	16.9%	1,360	14.1%	
15 to 19 percent	1,528	16.3%	1,301	13.5%	
20 to 24 percent	1,054	11.2%	1,495	15.5%	
25 to 29 percent	888	9.5%	1,217	12.7%	
30 to 34 percent	816	8.7%	826	8.6%	
35 percent or more	3,514	37.4%	3,427	35.6%	
Not computed	358	-	608	-	

Source: 2006-2010 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30 percent or more of its monthly income on housing costs. In 2010, 44.6 percent (4,345 units) of renter-occupied units were cost burdened and 41.5 percent (4,253 units) of renter-occupied households in 2017 were cost burdened.

In 2010, 25.6 percent (2,919 units) of owner-occupied households were cost burdened whereas 44.6 percent (4,345 units) of renter-occupied households were cost burdened. In 2017, 17.6 percent (1,808 units) of owner-occupied households were cost burdened whereas 41.5 percent (4,253 units) of renter-occupied households were cost burdened.

The 2018 HUD Fair Market Rents and HOME Rent Limits for the Metro Area are shown in the table below.

Fair Market Rents (FMR) and HOME Rent Limits for the Metro Area

Rent	FY 2018	FY 2019	Change in FMR 2018 to 2019
Efficiency	\$547	\$530	-\$17
One-Bedroom	\$689	\$652	-\$37
Two-Bedroom	\$858	\$810	-\$48







Three-Bedroom	\$1,100	\$1,047	-\$53
Four-Bedroom	\$1,169	\$1,095	-\$74

Source: U.S. Department of Housing and Urban Development

Fair Market Rents (FMRs) are primarily used to determine payment standard amounts for HUD assisted housing. The High HOME Rent Limit for an area is the lesser of the Section 8 Fair Market Rent (FMR) for the area or a rent equal to 30% of the annual income of a family whose income equals 65% of the area median income, as determined by HUD. The Low HOME Rent Limit for an area is 30% of the annual income of a family whose income equals 50% of the area median income, as determined by HUD, capped by the High HOME Rent Limit. HUD's Economic and Market Analysis Division calculates the HOME rents each year using the FMRs and the Section 8 Income Limits.

The area median rent is estimated to be \$741 according to the 2013-2017 ACS data, while the median rent in St. Joseph County for a two-bedroom apartment is \$850 according to Zillow in July, 2019. The average rents posted commercially exceed the area median rent and fair market rents but only by a small factor. The rental market in St. Joseph County is competitive and assisted rental housing units do not disproportionately impact the market forces dictating rents in the area.

G. Household Types

Based on a comparison between the 2010 and 2017 population, St. Joseph County had a 0.6% increase in its population. The population increase was 1,682 persons, but the housing supply only increased by 154 households. The population of the City of South Bend and St. Joseph County have been relatively stable. However, there are neighborhoods of the City of South Bend and the City of Mishawaka with poor housing stock. The poor housing stock is being demolished without replacement. The median income of the area increased by 8% from \$44,644 to \$48,121. This increase in median income represents a change in nominal dollars and not a change in real dollars. In order to calculate the change in real dollars, the Consumer Price Index is used to calculate the inflation rate for a given period. Between 2010 and 2017, the cumulative inflation rate was approximately 12.4%, meaning that the \$44,644.00 median income in 2010 would be \$50,184.99 if it were







expressed in terms of 2017 dollars. By taking into consideration the rate of inflation, the median income in St. Joseph County has not kept up with the rate of inflation.

Changes Between 2010 & 2017

Demographics	2010	2017	% Change
Population	266,931	268,613	+0.63%
Households	100,540	100,694	+0.15%
Household Median Income	\$44,644	\$48,121	+7.79%

Data Source: 2010 Census (Base Year), 2013-2017 American Community Survey

Note:

According to the U.S. Census Bureau the following notes were issued in regard to the CHAS (Comprehensive Housing Affordability Strategy) and the discrepancies in adding up the totals in the following tables. As with the CHAS 2000 and all other special tabulations of Census data, the Census Bureau requires that the CHAS data be rounded. The rounding scheme is as follows: 0 remains 0; 1-7 rounds to 4; 8 or greater rounds to nearest multiple of 5. This causes discrepancies when adding up smaller geographies and when adding up data within CHAS tables. Consider a city where the CHAS data indicate that there were 4 renter households with extremely low income and 4 owner households with extremely low income. One might be tempted to conclude that there are 8 total households with extremely low income. If another CHAS table indicates that there are actually a total of 15 extremely low income households, that would appear to be contradictory. This situation is the result of rounding. The County could have 6 renter households with extremely low income and 7 owner households with extremely low income, which is a total of 13 extremely low income households; but all of these numbers would be rounded, to 4, 4, and 15.

Number of Households Table

	0-30% AMI	>30-50% AMI	>50-80% AMI	>80- 100% AMI	>100% AMI
Total Households *	12,475	12,415	18,500	10,084	44,705
Small Family Households *	4,568	3,739	5,935	3,720	23,539







	0-30% AMI	>30-50% AMI	>50-80% AMI	>80- 100% AMI	>100% AMI
Large Family Households *	940	829	1,379	794	3,264
Household contains at least one person 62-74 years of age	1,474	2,328	3,648	2,034	9,928
Household contains at least one person age 75 or older	1,386	2,778	3,400	1,464	2,909
Households with one or more children 6 years old or younger *	2,772	1,916	2,794	1,418	3,887

Data Source: 2011-2015 CHAS

Of all households, less than half (44.4%) have a higher income than the HUD Area Median Income (AMI) for the South Bend-Mishawaka, IN-MI, MSA. This includes both small and large family households, though there are few large family households under 100% AMI. The remaining 55.6% of total households make less than the AMI, with the largest remaining group (15.0% of total households) being those making between 50-80% of AMI. Households that make 30% of AMI have an annual income of \$14,436; as HUD defines affordable housing as paying no more than 30% of income on rent, this leaves low-income households with less than \$1,203 per month (without taking tax out) to spend on housing. The largest housing problem in the St. Joseph County is housing affordability. According to the 2013-2017 ACS data, an estimated 41.8% of all renter households are cost overburdened by 30% or more in the County, and an estimated 15.8% of all owner households are cost overburdened by 30% or more. Approximately 20.1% of owner occupied households with a mortgage are cost overburdened by 30% or more, compared to only 8.4% of owner occupied households without a mortgage.

Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100 % AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Substandard Housing - Lacking complete plumbing or kitchen facilities	95	95	85	35	310	58	19	79	25	181







	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100 % AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	59	100	20	15	194	0	19	20	4	43
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	179	107	64	134	484	45	189	210	60	504
Housing cost burden greater than 50% of income (and none of the above problems)	3,860	1,509	249	70	6,688	2,140	1,227	593	72	4,032
Housing cost burden greater than 30% of income (and none of the above problems)	875	2,933	2,088	230	6,126	730	1,610	2,575	850	5,765
Zero/negative Income (and none of the above problems)	1,173	0	0	0	1,173	499	0	0	0	499

Data Source: 2011-2015 CHAS

The following table illustrates the discrepancies between homeowners and renters regarding housing problems. While there are more owner-occupied housing units than renter-occupied units (72.0% to 28.0%, respectively), renters face a much higher rate of housing problems.







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

	Renter						Owner				
	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100 % AMI	Total	
Having 1 or more of four housing problems	5,190	1,818	424	249	7,681	2,245	1,457	903	158	4,763	
Having none of four housing problems	2,094	4,470	6,759	2,834	16,157	1,285	4,660	10,420	6,865	23,230	
Household has negative income, but none of the other housing problems	1,173	0	0	0	1,173	499	0	0	0	499	

Data Source: 2011-2015 CHAS

While more owners facing severe housing problems than renters, renters have a much higher rate.

Cost Overburdened Greater Than 30%

		Re	enter		Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	
Small Related	2,640	1,841	667	5,148	1,023	791	1,113	2,927	
Large Related	449	254	130	833	244	279	194	717	
Elderly	904	810	553	2,267	829	1,354	1,189	3,372	
Other	2,050	1,749	1,013	4,812	789	494	738	2,021	
Total need by income	6,043	4,654	2,363	13,060	2,885	2,918	3,234	9,037	

Data Source: 2011-2015 CHAS







For those cost overburdened by more than 30%, renters are more likely to be highly affected; renter-occupied households are much likelier to be cost overburdened than owners.

Cost Overburdened Greater Than 50%

	Renter			Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
Small Related	2,320	589	14	2,923	808	342	214	1,364
Large Related	355	44	20	419	169	55	29	253
Elderly	605	270	114	989	510	567	243	1,320
Other	1,820	640	94	2,554	659	272	139	1,070
Total need by income	5,100	1,543	242	6,885	2,146	1,236	625	4,007

Data Source: 2011-2015 CHAS

For those who are cost overburdened by more than 50%, renters making up are more highly affected than owners based on the total number of households.

Overcrowding Conditions

		Renter				Owner				
	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Single family households	188	207	84	109	588	45	154	110	64	373
Multiple, unrelated family households	25	4	0	20	49	0	59	129	0	188
Other, non-family households	25	4	0	15	44	0	0	0	0	0
Total need by income	238	215	84	144	681	45	213	239	64	561

Data Source: 2011-2015 CHAS

The following three (3) maps illustrate census tracts where there is overcrowding for Extremely Low, Very Low, and Low Income Households.





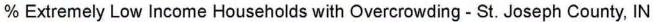


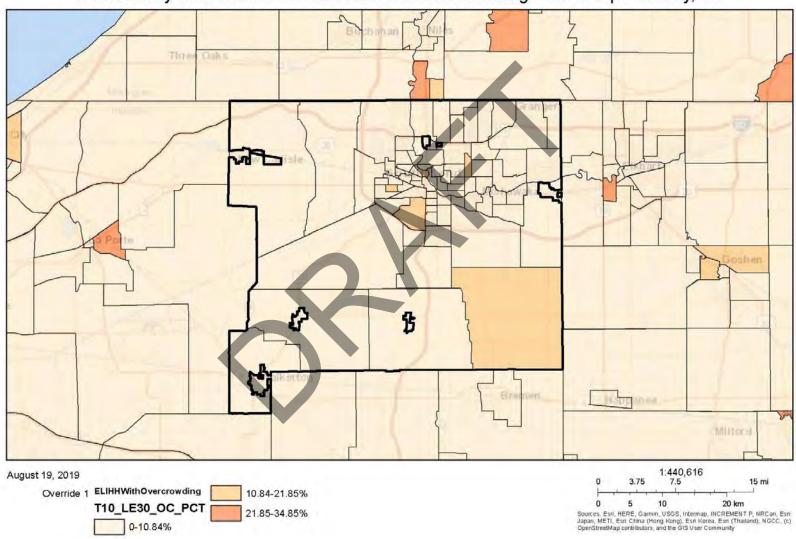
- Percentage Extremely Low Income Households with Overcrowding
- Percentage Very Low Income Households with Overcrowding
- Percentage Low Income Households with Overcrowding







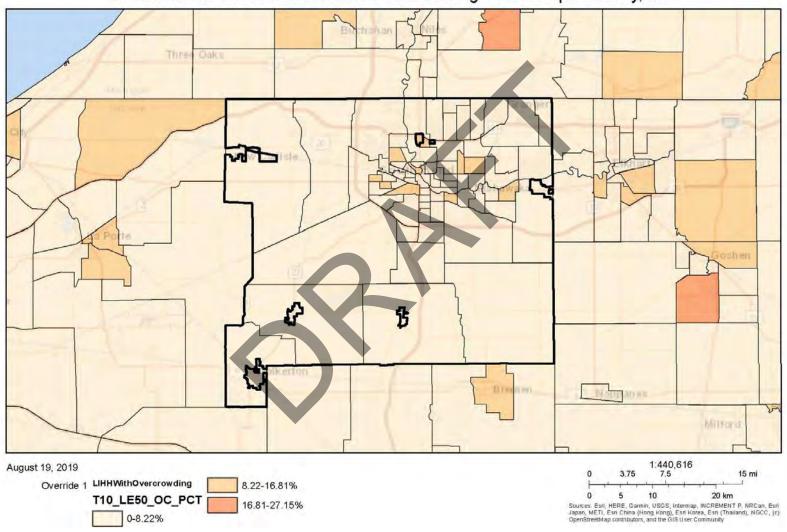








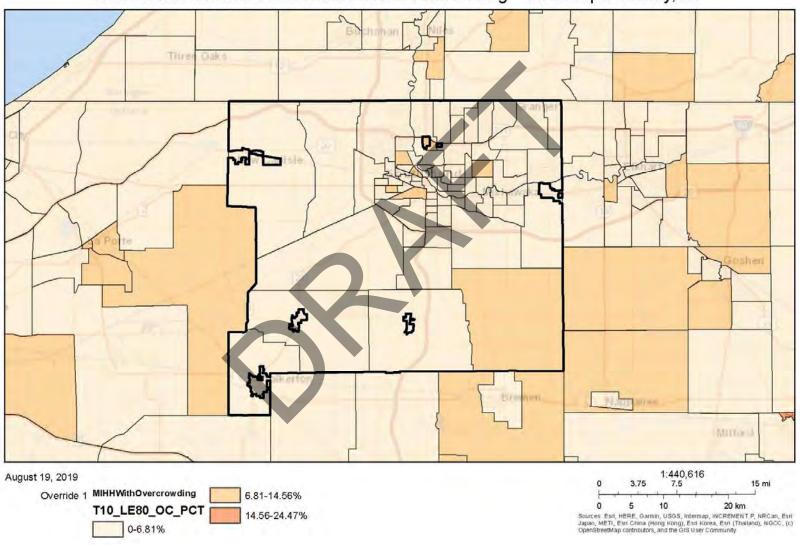
% Low Income Households with Overcrowding - St. Joseph County, IN







% Moderate Income Households with Overcrowding - St. Joseph County, IN









H. Cost Overburden

Overall, there is a shortage of decent, affordable housing in St. Joseph County. Many of the Cities' and County's lower income households are paying more than 30% of their total household income on housing related costs. The following information was noted: 9,664 White households were cost overburdened by 30% to 50%, and 7,084 White households were severely cost over burdened by greater than 50%; 2,614 Black/African American households were cost overburdened by 30% to 50%, and 3,005 Black/African American households were severely cost overburdened by greater than 50%; 259 Asian households were cost overburdened by 30% to 50%, and 168 Asian households were severely cost overburdened by greater than 50%; 84 American Indian/Alaska Native households were severely cost overburdened by 30 to 50% and 40 were severely cost overburdened by greater than 50%; and lastly, 784 Hispanic households were cost overburdened by 30% to 50%, and 649 Hispanic households were severely cost overburdened by greater than 50%.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	71,717	13,668	11,179	1,693
White	60,295	9,664	7,084	827
Black / African American	6,063	2,614	3,005	665
Asian	1,105	259	168	99
American Indian, Alaska Native	183	84	40	0
Pacific Islander	49	0	0	0
Hispanic	3,270	784	649	45

Data Source: 2011-2015 CHAS

Black/African American households were disproportionately affected by a housing cost overburden in St. Joseph County. Black/African American households were considered to be severely cost overburdened, where 26.8% of the total cases of households that were considered cost







overburdened by greater than 50%. This is fourteen percentage points higher than the 12.4% of the total number of households that the Black/African American category comprises

A total of 9,664 White households were considered cost overburdened by between 30% and 50%, which is 70.7% of the total cases of households that were considered cost overburdened by between 30% and 50%. This number is below the 82.4% of the total number of households that the White category comprises. A total of 2,614 Black/African American households were considered cost overburdened by between 30% and 50%, which is 19.1% of the total cases of households that were considered cost overburdened by between 30% and 50%. This number is above the 12.4% of the total number of households that the Black/African American category comprises, but is not considered disproportionate by HUD's criteria. A total of 259 Asian households were considered cost overburdened by between 30% and 50%, which is 1.9% of the total cases of households that were considered cost overburdened by between 30% and 50%. This number is comparable to the 1.9% of the total number of households that the Asian category comprises. A total of 84 American Indian/Alaska Native households are cost overburdened between 30% and 50%, which is 0.6% of the total cases of households that were considered cost overburdened between 30% and 50%. This number is slightly above the 0.4% of the total number of households that the American Indian/Alaska Native category comprises. A total of 784 Hispanic households were considered cost overburdened by between 30% and 50%, which is 5.7% of the total cases of households that were considered cost overburdened by between 30% and 50%. This number is slightly above the 4.8% of the total number of households that the Hispanic category comprises.

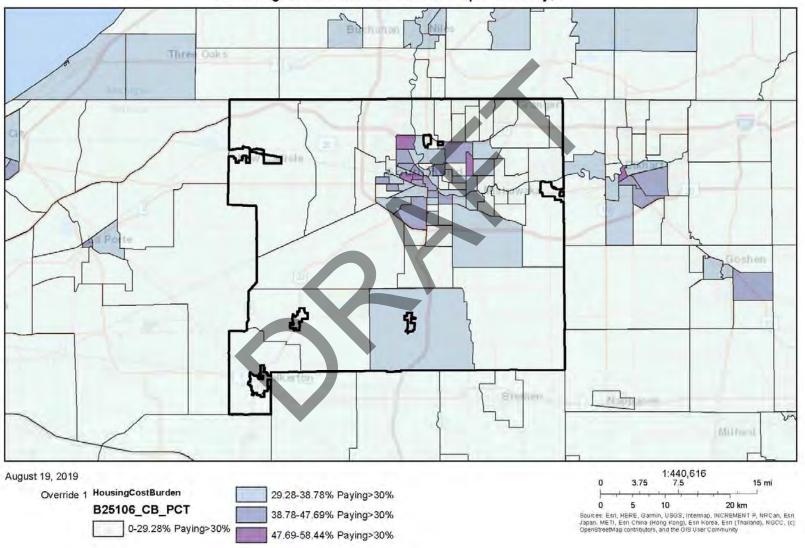
The following four (4) maps illustrate census tracts where there are housing cost overburdens for all households, Extremely Low, Very Low, and Low Income Households.

- Housing Cost Burden
- Percentage Extremely Low Income Households with Severe Cost Burden
- Percentage Very Low Income Households with Severe Cost Burden
- Percentage Low Income Households with Severe Cost Burden





Housing Cost Burden - St. Joseph County, IN

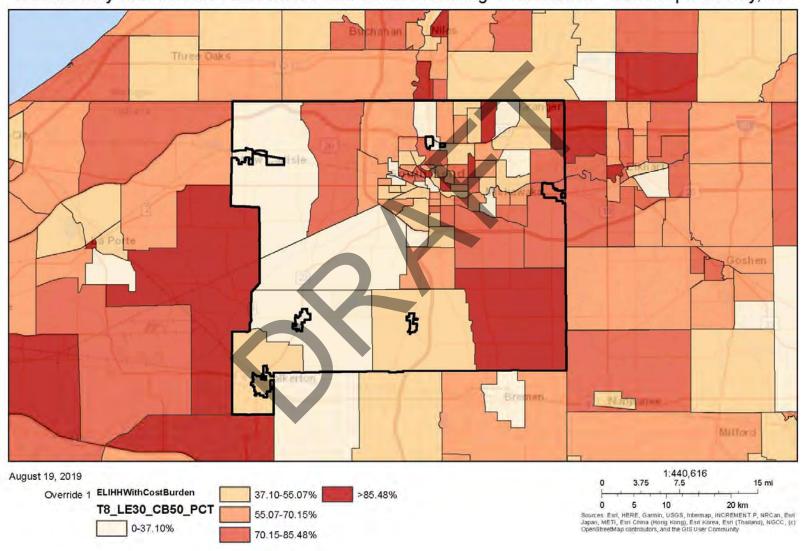








% Extremely Low Income Households with Severe Housing Cost Burden - St. Joseph County, IN

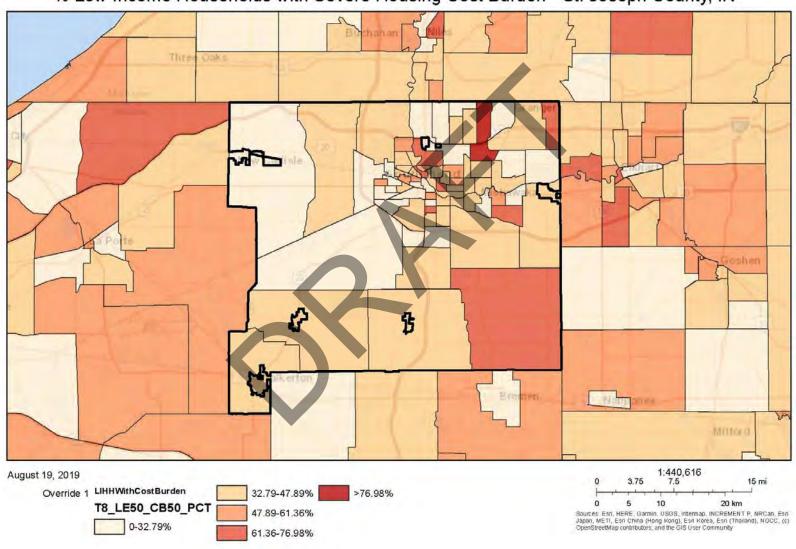








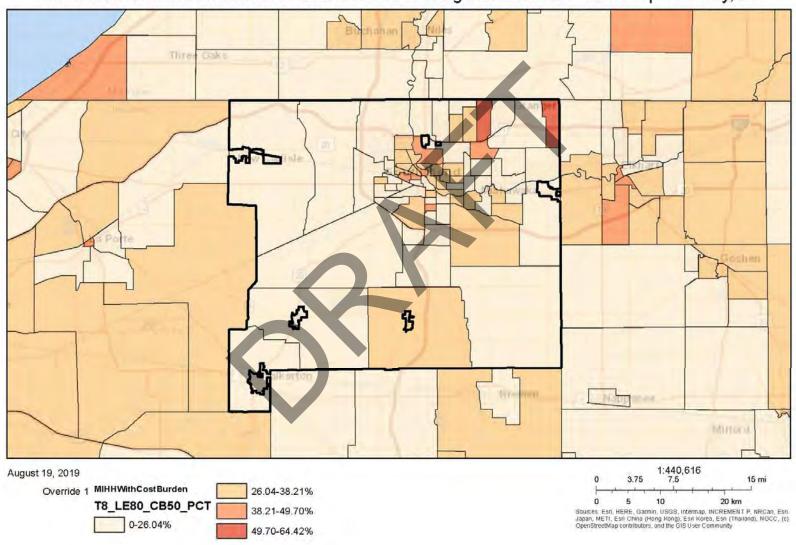
% Low Income Households with Severe Housing Cost Burden - St. Joseph County, IN







% Moderate Income Households with Severe Housing Cost Burden - St. Joseph County, IN









A total of 11,179 White households were considered severely cost overburdened by greater than 50%, which is 63.3% of the total cases of households that were considered cost overburdened by greater than 50%. This number is below the 82.4% of the total number of households that the White category comprises. A total of 168 Asian households were considered severely cost overburdened by greater than 50%, which is 1.5% of the total cases of households that were considered cost overburdened by greater than 50%. This number is slightly lower than the 1.9% of the total number of households that the Asian population comprises. A total of 40 American Indian/Alaska Native households are cost overburdened between 30% and 50%, which is 0.4% of the total cases of households that were considered cost overburdened between 30% and 50%. This number is comparable to the 0.4% of the total number of households that the American Indian/Alaska Native category comprises. A total of 649 Hispanic households were considered severely cost overburdened by greater than 50%, which is 5.8% of the total number of households that were considered cost overburdened by greater than 50%. This number is slightly higher than the 4.8% of the total number of households that the Hispanic category comprises.

I. Housing Problems

A household is considered to have a housing problem if it meets one of the four (4) HUD designated housing problems; The four housing problems are: lacks complete kitchen facilities; lacks complete plumbing facilities; has more than one person per room; and is cost burden greater than 30%. The following tables illustrate the disproportionate needs in St. Joseph County:

0%-30% of Area Median Income (Extremely Low Income)

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	
Jurisdiction as a whole	9,045	1,771	1,672	
White	5,380	1,172	817	
Black / African American	2,760	409	665	







Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Asian	148	25	99
American Indian, Alaska Native	10	8	0
Pacific Islander	0	0	0
Hispanic	570	115	40

Data Source: 2011-2015 CHAS

The following map illustrates the location by Census Tract where extremely low-income households have severe housing problems.

^{*}The four housing problems are:

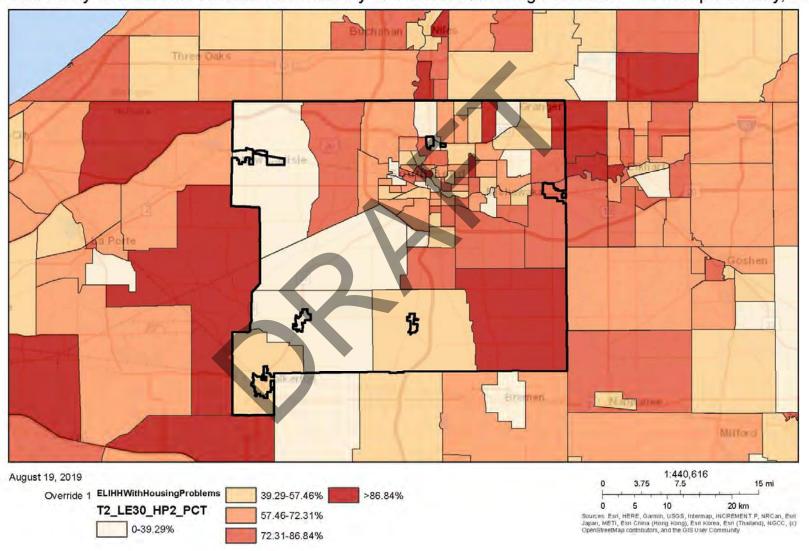
^{1.} Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%







% Extremely Low Income Households with Any of 4 Severe Housing Problems - St. Joseph County, IN









30%-50% of Area Median Income (Low-Income)

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,812	4,599	0
White	4,917	3,555	0
Black / African American	1,885	575	0
Asian	97	48	0
American Indian, Alaska Native	44	23	0
Pacific Islander	0	0	0
Hispanic	745	320	0

Data Source: 2011-2015 CHAS

The following map illustrates the location by Census Tract where very low-income households have severe housing problems.

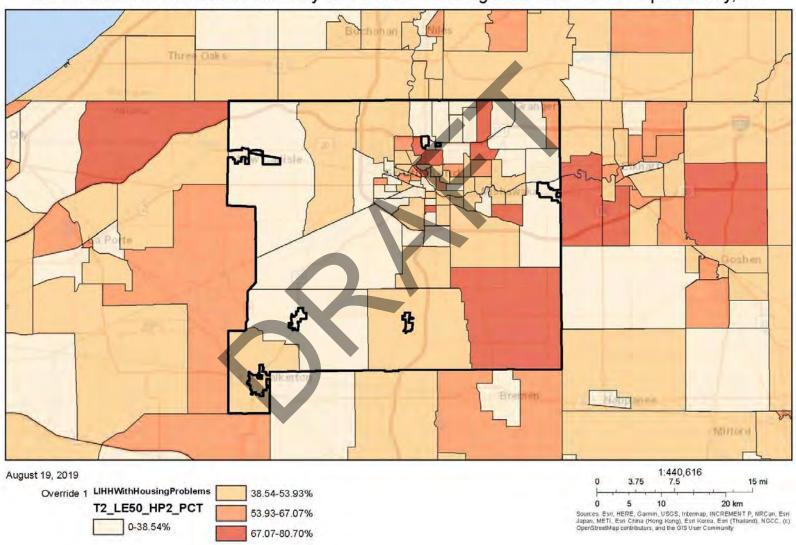
^{*}The four housing problems are:

^{1.} Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%





% Low Income Households with Any of 4 Severe Housing Problems - St. Joseph County, IN









50%-80% of Area Median Income

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,988	12,515	0
White	4,404	9,530	0
Black / African American	883	1,944	0
Asian	139	89	0
American Indian, Alaska Native	70	60	0
Pacific Islander	0	0	0
Hispanic	360	773	0

Data Source: 2011-2015 CHAS

The following map illustrates the location by Census Tract where low-income households have severe housing problems.

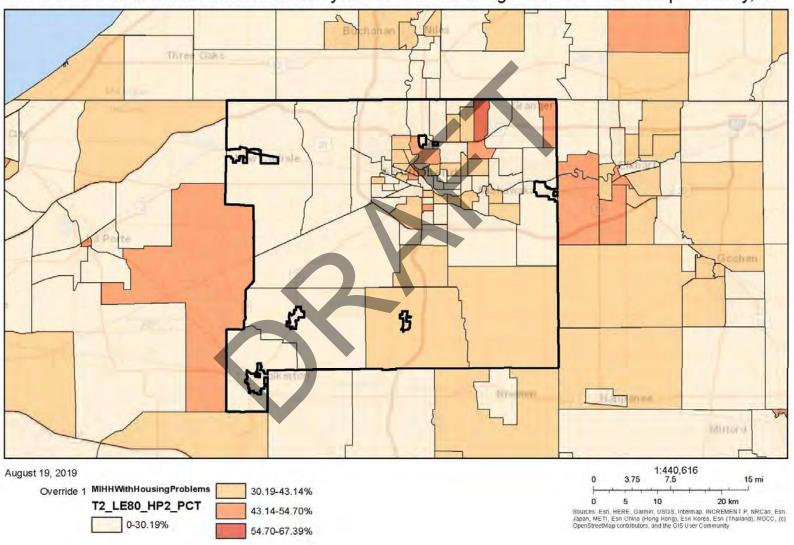
^{*}The four housing problems are:

^{1.} Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%





% Moderate Income Households with Any of 4 Severe Housing Problems - St. Joseph County, IN









80%-100% of Area Median Income

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,474	8,604	0
White	1,149	7,344	0
Black / African American	160	729	0
Asian	40	59	0
American Indian, Alaska Native	4	8	0
Pacific Islander	0	0	0
Hispanic	105	294	0

Data Source: 2011-2015 CHAS

The racial composition of households in St. Joseph County, according to the 2013-2017 American Community Survey, was 82.4% White; 12.4% African American/Black; 1.9% Asian; 0.4% American Indian and Alaska Native; and 0.04% Native Hawaiian or Pacific Islander. The Hispanic or Latino population was 4.8%. In the 0%-30% and 30%-50% of Area Median Income categories, African American/Black households in St. Joseph County had one or more housing problems, with a disproportionate need at 30.5% and 24.1%, respectively.

J. Disabled Households

<u>Disabled Population – St. Joseph County</u>

The following table includes the 2013-2017 ACS estimates for the number of disabled individuals in St. Joseph County. The total population of disabled persons in St. Joseph County is estimated to be 36,454 persons which represents 13.7 percent of the total population of St. Joseph County. The two largest disability types are ambulatory and independent living difficulties.

^{*}The four housing problems are:

^{1.} Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%







Disabled Persons in St. Joseph County

Disabled i ersons in ot. Joseph County							
Disability Status of the Civilian	2006-2	010 ACS	2013-2017 ACS				
Non-Institutional Population	#	%	#	%			
Total Civilian Population	264,896	-	266,134	-			
Total Population with a disability	34,365	13.0%	36,454	13.7%			
Population under 5 years	21	0.1%	171	1.0%			
With a hearing difficulty	21	0.1%	132	0.8%			
With a vision difficulty	0	0.0%	59	0.3%			
Population 5 to 17 years	3,376	7.0%	3,237	6.9%			
With a hearing difficulty	278	0.6%	384	0.8%			
With a vision difficulty	482	1.0%	396	0.8%			
With a cognitive difficulty	2,635	5.5%	2,761	5.9%			
With an ambulatory difficulty	341	0.7%	410	0.9%			
With a self-care difficulty	487	1.0%	556	1.2%			
Population 18 to 64 years	17,348	10.5%	19,439	11.9%			
With a hearing difficulty	4,226	2.6%	4,153	2.5%			
With a vision difficulty	2,822	1.7%	3,290	2.0%			
With a cognitive difficulty	7,432	4.5%	8,806	5.4%			
With an ambulatory difficulty	7,835	4.8%	9,076	5.6%			
With a self-care difficulty	2,778	1.7%	3,667	2.2%			
With an independent living difficulty	5,762	3.5%	7,643	4.7%			
Population 65 years and over	13,620	39.6%	13,607	35.3%			
With a hearing difficulty	6,035	17.6%	5,671	14.7%			
With a vision difficulty	2,655	7.7%	2,424	6.3%			
With a cognitive difficulty	3,231	9.4%	3,331	8.6%			
With an ambulatory difficulty	8,977	26.1%	8,699	22.6%			
With a self-care difficulty	2,514	7.3%	2,995	7.8%			
With an independent living difficulty	5,859	17.0%	5,550	14.4%			
SEX							
Male	16,218	12.6%	17,620	13.7%			
Female	18,147	13.3%	18,834	13.7%			
HISPANIC/LATINO ORIGIN							
White alone	28,210	13.3%	29,116	13.8%			
Black or African American alone	4,565	13.8%	5,458	15.9%			
American Indian and Alaska Native alone	209	20.8%	347	30.8%			
Asian alone	127	2.6%	250	4.3%			
Native Hawaiian and Other Pacific Islander alone	0	0.0%	3	1.1%			
Some other race alone	306	5.2%	435	7.6%			
Two or more races	785	9.9%	845	10.1%			







White alone, not Hispanic or Latino	27,289	13.5%	27,981	14.3%
Hispanic or Latino (of any race)	1,483	7.8%	1,767	7.9%

Source: 2006-2010 and 2013 – 2017 American Community Survey

Disabled Population - City of South Bend

The following table includes the 2013-2017 ACS estimates for the number of disabled individuals in South Bend City. The total population of disabled persons in South Bend is estimated to be 15,483 persons which represents 15.4 percent of the total population of the City. The two largest disability types are ambulatory and independent difficulties.

Disabled Persons in South Bend City

Disability Status of the Civilian	2006-20	010 ACS	2013-2017 ACS	
Non-Institutional Population	#	%	#	%
Total Civilian Population	100,614	-	100,394	-
Total Population with a disability	14,246	14.2%	15,438	15.4%
Population under 5 years	13	0.2%	97	1.3%
With a hearing difficulty	13	0.2%	58	0.8%
With a vision difficulty	0	0.0%	59	0.8%
Population 5 to 17 years	1,541	8.0%	1,675	8.6%
With a hearing difficulty	148	0.8%	177	0.9%
With a vision difficulty	275	1.4%	208	1.1%
With a cognitive difficulty	1,132	5.9%	1,399	7.2%
With an ambulatory difficulty	136	0.7%	198	1.0%
With a self-care difficulty	195	1.0%	289	1.5%
Population 18 to 64 years	7,689	12.7%	8,764	14.4%
With a hearing difficulty	1,666	2.8%	1,656	2.7%
With a vision difficulty	1,437	2.4%	1,554	2.6%
With a cognitive difficulty	3,060	5.1%	4,471	7.3%
With an ambulatory difficulty	3,835	6.3%	4,409	7.2%
With a self-care difficulty	1,264	2.1%	1,590	2.6%
With an independent living difficulty	2,709	4.5%	3,612	5.9%
Population 65 years and over	5,003	40.6%	4,902	39.8%
With a hearing difficulty	2,044	16.6%	1,879	15.3%
With a vision difficulty	878	7.1%	1,102	9.0%
With a cognitive difficulty	1,323	10.7%	1,176	9.6%
With an ambulatory difficulty	3,585	29.1%	3,179	25.8%
With a self-care difficulty	1,037	8.4%	117	9.1%
With an independent living difficulty	2,396	19.4%	2,261	18.4%







SEX				
Male	6,763	14.1%	7,031	14.6%
Female	7,483	14.2%	8,407	16.1%
HISPANIC/LATINO ORIGIN				
White alone	9,657	15.2%	9,840	15.6%
Black or African American alone	3,757	14.3%	4,702	17.7%
American Indian and Alaska Native alone	Х	Х	155	32.9%
Asian alone	X	X	38	2.6%
Native Hawaiian and Other Pacific Islander alone	Х	X	0	0.0%
Some other race alone	175	3.9%	335	7.9%
Two or more races	568	12.2%	368	8.6%
White alone, not Hispanic or Latino	9,100	15.9%	9,163	17.0%
Hispanic or Latino (of any race)	994	8.2%	1,090	7.5%

Source: 2006-2010 and 2013 - 2017 American Community Survey

Disabled Population - City of Mishawaka

The following table includes the 2013-2017 ACS estimates for the number of disabled individuals in Mishawaka. The total population of disabled persons in Mishawaka is estimated to be 7,257 persons which represents 15.0% percent of the total population of the City. The two largest disability types are ambulatory and hearing difficulties.

Disabled Persons in Mishawaka City

Disability Status of the Civilian Non-Institutional Population	2006-2010 ACS		2013-2017 ACS	
	#	%	#	%
Total Civilian Population	47,163	-	48,301	-
Total Population with a disability	7,681	16.3%	7,257	15.0%
Population under 5 years	0	0.0%	72	2.1%
With a hearing difficulty	0	0.0%	72	2.1%
With a vision difficulty	0	0.0%	0	0.0%
Population 5 to 17 years	925	12.1%	398	5.3%
With a hearing difficulty	66	0.9%	56	0.7%
With a vision difficulty	183	2.4%	44	0.6%
With a cognitive difficulty	712	9.3%	318	4.2%
With an ambulatory difficulty	183	2.4%	22	0.3%
With a self-care difficulty	186	2.4%	49	0.7%
Population 18 to 64 years	3,697	12.2%	3,750	12.5%
With a hearing difficulty	876	2.9%	794	2.6%
With a vision difficulty	601	2.0%	618	2.1%
With a cognitive difficulty	2,048	6.8%	1,612	5.4%







With an ambulatory difficulty	1,506	5.0%	1,810	6.0%
With a self-care difficulty	625	2.1%	629	2.1%
With an independent living difficulty	1,289	4.3%	1,300	4.3%
Population 65 years and over	3,059	46.0%	3,037	41.2%
With a hearing difficulty	1,445	21.7%	1,296	17.6%
With a vision difficulty	731	11.0%	537	7.3%
With a cognitive difficulty	819	12.3%	788	10.7%
With an ambulatory difficulty	1,835	27.6%	2,093	28.4%
With a self-care difficulty	564	8.5%	658	8.9%
With an independent living difficulty	1,286	19.3%	1,138	15.5%
SEX				
Male	3,166	14.9%	3,334	14.5%
Female	4,515	17.4%	3,923	15.5%
HISPANIC/LATINO ORIGIN				
White alone	7,073	17.3%	6,548	16.0%
Black or African American alone	2,132	7.9%	273	7.8%
American Indian and Alaska Native alone	Х	X	46	12.5%
Asian alone	X	X	59	6.2%
Native Hawaiian and Other Pacific Islander alone	Х	Х	3	4.6%
Some other race alone	X	X	71	13.7%
Two or more races	X	Х	257	13.5%
White alone, not Hispanic or Latino	6,876	17.3%	6,396	16.4%
Hispanic or Latino (of any race)	X	Х	236	7.7%

Source: 2006-2010 and 2013 – 2017 American Community Survey

St. Joseph County and the Cities of South Bend and Mishawaka recognize the need for accessible and visitable housing units. The County and the Cities ensure that multi-family housing developments which are rehabilitated or constructed using Federal funds, must comply with ADA requirements, and encourage visitable units beyond minimum requirements.

Another issue is a lack of affordable housing that is accessible. Public housing often has higher proportions of disabled residents and with most public housing consisting of 1-bedroom units, it is difficult for families and larger households with disabled members to find housing that is both accessible and affordable. The Housing Authority of South Bend and the Housing Authority of Mishawaka both respond to requests for reasonable accommodations and modifications in a timely manner.







While single-family housing is generally not accessible, the Fair Housing Act requires that multifamily properties built after 1991 meet Federal accessibility standards; therefore, multifamily housing units built after 1991 are in compliance with Federal Law and meet the minimum level of accessibility. However, as 50.9% of housing units in St. Joseph County were built prior to 1990, many of these units are more likely to have narrow halls, stairs, narrow doors, and little room for ramps to entrance doors.

The City of South Bend funds a variety of home repair and rehabilitation programs for both renter- and owner-occupied housing. These programs can be used to make accessibility improvements on the existing housing stock.

Government and Housing Authority Facilities:

St. Joseph County does not discriminate on the basis of disability for access to nor operations of its programs, services, or activities. If a resident of St. Joseph County requires additional assistance to gain access to County facilities, he or she may contact the City of South Bend's designated ADA Coordinator, Aladean M. DeRose. The Coordinator can be contacted at: 1200 County City Building, 227 West Jefferson Boulevard, South Bend, IN 46601; (phone) 574-235-9241. The ADA Coordinator for the City of South Bend has jurisdiction throughout all of St. Joseph County in partnership with the South Bend Human Rights Commission.

The Housing Authority of South Bend and the Mishawaka Housing Authority provide reasonable modifications upon request. When a tenant requests an accommodation, the Housing Authorities may verify the disability only to the extent necessary to ensure the applicants are entitled to the preference. However, the Housing Authority will not ask what the disability is. The process a tenant may go through to request modifications includes the contacting of a Building Manager or Tenant Selection Supervisor and providing any required documentation supporting the request. Once modifications are deemed reasonable, the work will be coordinated with the tenant; if the modifications are tantamount to those required for a fully accessible unit, the tenant/applicant will be placed on an Authority transfer/waiting list for the next available unit with the features requested, if so desired.







Public Infrastructure:

The City of South Bend and the City of Mishawaka each administer funds through the Federal Community Development Block Grant (CDBG) program to benefit low- and moderate-income areas. The City of South Bend prefers to fund accessibility improvement projects through its housing activities. The City of Mishawaka uses funds for ADA cub cuts, sidewalks, and street improvements.

Schools:

The Indiana Department of Education partners with IN*Source to provide information and training to assist in the implementation of 504 plans in area schools. School districts are responsible for the provision of special education and related services for every student with a disability under the Individuals with Disabilities Education Act (IDEA) and Section 504 of the Rehabilitation Act of 1973.









III. Review/Update to Original Plan

In FY 2014, the Cities of South Bend and Mishawaka, IN, completed a joint Analysis of Impediments to Fair Housing Choice (AI) to evaluate the housing conditions in St. Joseph County. The analysis was intended to focus on both Cities and the outlying areas of the County to serve as a basis for fair housing planning for the St. Joseph County Housing Consortium. The following paragraphs restate the identified impediments form the 2014 Analysis of Impediments to Fair Housing Choice and summarize the progress made on each for the time period of 2014 through 2019.

A. Summary of 2014 Impediments

- Impediment # 1: Racial and Ethnic Minority Concentrations:
 - There is minimal racial and ethnic integration between Whites, Black, and Hispanic across St. Joseph County and the Cities of South Bend and Mishawaka. The presence of racial and ethnic segregation can present challenges to fair housing as segregation has been linked to economic and service disparities.

Accomplishments:

The St. Joseph County Housing Consortium has taken the following actions to reach this goal:

- The Mayor of South Bend created a Diversity and Inclusion Officer through an Executive Order in 2016 which focuses on brining diversity and inclusion into the internal and external workforce, community, purchasing and contracting, and MWBE/Section 3 requirements. The Department gained jurisdiction in St. Joseph County in 2017.
- Impediment # 2: Individuals with Limited English Proficiency:
 - More than half of non-native English speakers reported speaking English less than very well. Limited capacity to







communicate can hinder an individuals' access to housing and public services that promote fair housing.

Accomplishments:

The Cities of South Bend and Mishawaka have taken the following actions to reach this goal:

- All advertisements for Community Planning public hearings in St. Joseph County are published in both English and Spanish.
- Community Homebuyers Corporation applications are available in Spanish.
- The Mayor of South Bend created a Diversity and Inclusion Officer through an Executive Order in 2016 which focuses on brining diversity and inclusion into the internal and external workforce, community, purchasing and contracting, and MWBE/Section 3 requirements. The Department gained jurisdiction in St. Joseph County in 2017.

Impediment # 3: Protected Class Status and Unemployment:

Significant variation was found in the unemployment rate of the county and cities across gender, race, and ethnicity. Unemployment can have severe implications for fair housing as it has real effects on disposable income for household expenses.

Accomplishments:

The St. Joseph County Housing Consortium has taken the following actions to reach this goal:

The Mayor of South Bend created a Diversity and Inclusion Officer through an Executive Order in 2016 which focuses on brining diversity and inclusion into the internal and external workforce, community, purchasing and contracting, and MWBE/Section 3 requirements. The Department gained jurisdiction in St. Joseph County in 2017.







Impediment # 4: Housing Rental Costs:

■ A disparity was found between the salary earned by minimum wage laborers and the fair market rent (FMR) established by the Department of Housing and Urban Development. The FMR for a two-bedroom apartment is \$714, which would require a minimum wage laborer to work 76 hours a week to afford the rent.

Accomplishments:

The St. Joseph County Housing Consortium has taken the following actions to reach this goal:

- o The St. Joseph County Housing Consortium partners with a variety of housing providers that perform housing rehabilitation.
- The City of South Bend assisted two (2) rental-occupied households in 2016, one (1) rental-occupied household with a rehabilitation in 2018, and four (4) rental-occupied households in 2019.
- The City of South Bend is discussing the creation of a Rental Registry with stakeholders. The Rental Registry will assist in ensuring that quality rental apartments are affordable.

Impediment # 5: Housing Affordability:

A disparity also exists in the affordability of housing sales. Median housing values have increased while median income has decreased. This study also shows a disparity in the affordability of a house across race and ethnicity with the housing prices of the area.

Accomplishments:

The St. Joseph County Housing Consortium has taken the following actions to reach this goal:

 The St. Joseph County Housing Consortium (through the City of South Bend) funded the Community Homebuyers Corporation with HOME funds in FY 2014-2019. The Community Homebuyers Corporation provides homebuyer loans to







populations in St. Joseph County that would not be able to secure a traditional mortgage. They assisted thirty-nine (39) homebuyers in 2016-2018.

- The St. Joseph County Housing Consortium supports the Hurry Home startup, which is designing a program to assist lowincome persons in obtaining a mortgage for starter homes.
- The City of South Bend, through its partners, rehabilitated sixteen (16) homeowner-occupied households with rehabilitation in 2017, nineteen (19) homeowner-occupied households in 2018, and fourteen (14) homeowner-occupied households in 2019.
- The City of South Bend, through its partners, assisted in the construction of ten (10) homeowner housing units in 2017, twelve (12) homeowner housing units in 2018, and fifteen (15) homeowner housing units in 2019.
- The City of South Bend, through its partners, assisted homeowners in providing four (4) mortgage subsidies in 2017 and two (2) mortgage subsidies in 2018.
- The City of Mishawaka partnered with Habitat for Humanity to develop sixteen (16) affordable homeowner housing units.

Impediment # 6: Protected Class Status and Household Size:

The majority of minority families have three or more persons within its household; however, the housing stock of rental units is primarily focused on one and two bedroom units. Lower rates of homeownership among minority households suggests that large minority families may have a more difficult time finding adequate rental housing with a sufficient number of bedrooms, which may result in overcrowding.

Accomplishments:

The St. Joseph County Housing Consortium has taken the following actions to reach this goal:

 The City of South Bend, through its partners, rehabilitated sixteen (16) homeowner-occupied households with rehabilitation in 2017, nineteen (19) homeowner-occupied households in







- 2018, and fourteen (14) homeowner-occupied households in 2019.
- The City of South Bend, through its partners, assisted in the construction of ten (10) homeowner housing units in 2017, twelve (12) homeowner housing units in 2018, and fifteen (15) homeowner housing units in 2019.
- o The City of South Bend, through its partners, assisted homeowners in providing four (4) mortgage subsidies in 2017 and two (2) mortgage subsidies in 2018.

• Impediment # 7: Opportunities to File Fair Housing Complaints:

St. Joseph County and the Cities of South Bend and Mishawaka have public ordinances to protect and enforce fair housing for its residents, including the point of contact for filing complaints. A lack of awareness to these contacts and a lack of consistency in the handling of complaints can lead to disparities in treatment across jurisdictions.

Accomplishments:

St. Joseph County has taken the following actions to reach this goal:

- The St. Joseph County Housing Consortium has continued to push and encourage the St. Joseph County Human Rights Commission to expand its reach into the City of Mishawaka and further into St. Joseph County.
- The City of South Bend funded Fair Housing outreach and education activities with CDBG funds in FY 2014-2019.
- The City of Mishawaka hosts several Fair Housing training workshops annually.

Impediment # 8: Unsupported Section 8 Vouchers:

Both the Housing Authority of Mishawaka and the St. Joseph County Housing Assistance Office (SHAO) report waiting lists for Section 8 Housing Voucher assistance. Due to financial constraints the SHAO has been unable to support all of the vouchers for which it has been approved.







Accomplishments:

The St. Joseph County Housing Consortium has taken the following actions to reach this goal:

- The St. Joseph County Housing Consortium partners with a variety of housing entities to provide affordable housing.
- The Housing Authority of South Bend and the Housing Authority of Mishawaka recruited Section 8 Landlords that provided housing that met quality standards form 2014-2019.

Impediment # 9: Housing Authority of South Bend:

During the study period, the Housing Authority of South Bend (HASB) was not available for interview. Other interviewees referenced reduced hours of operation and services due to financial constraints and organizational problems. Internal problems within HASB can limit the access of residents to housing services.

Accomplishments:

The City of South Bend has taken the following actions to reach this goal:

The Mayor of the City of South Bend encouraged the Housing Authority of South Bend to participate in the current Al. The Housing Authority of South Bend was an integral partner in developing the 2020 Al.

• Impediment # 10: Public Transit:

The Cities of South Bend and Mishawaka offer a public transportation services for its residents. Limited nighttime hours may restrict the commuting ability of second and third shift laborers and limited access to public transportation outside of city limits may limit the commute and access to services of low or moderate income populations that reside in the County.







Accomplishments:

The St. Joseph County Housing Consortium has taken the following actions to reach this goal:

 The St. Joseph County Housing Consortium has advocated to the State of Indiana for more funding for development activities, including the expansion of public transportation, in 2014-2019.

• Impediment # 11: Denial of Mortgage Applications:

An impediment to fair housing can also be seen in the ability of lower income and minority households to gain home loans. The primary causes of denial were related to the household's income. The rate of denial for Blacks and Asians remains higher than the rate for Whites. Hispanic households were also challenged as their denial rate has increased.

Accomplishments:

St. Joseph County has taken the following actions to reach this goal:

- The St. Joseph County Housing Consortium (through the City of South Bend) funded the Community Homebuyers Corporation with HOME funds in FY 2014-2019. The Community Homebuyers Corporation provides homebuyer loans to populations in St. Joseph County that would not be able to secure a traditional mortgage. They assisted thirty-nine (39) homebuyers in 2016-2018.
- The St. Joseph County Housing Consortium supports the Hurry Home startup, which is designing a program to assist lowincome persons in obtaining a mortgage for starter homes.
- The City of South Bend, through its partners, assisted homeowners in providing four (4) mortgage subsidies in 2017 and two (2) mortgage subsidies in 2018.







IV. Impediments to Fair Housing 2020

This AI was prepared jointly by the City of South Bend, IN and the City of Mishawaka, IN, as the St. Joseph County Housing Consortium AI. Housing barriers affecting residents of St. Joseph County were identified through a robust citizen participation process, which included a series of two (2) public meetings, twenty-three (23) small interview sessions (with City and County Departments, Housing Authority Staff, housing residents, and local housing groups), 3 phone interviews, and 135 completed resident surveys.

A. Fair Housing Complaints

1. South Bend Department of Diversity & Inclusion – Human Rights Commission

South Bend's Department of Diversity & Inclusion is a Department within the South Bend Mayor's Office. It provides access to the tools and resources that foster inclusive workplaces, diverse workforces, communities, and the city's procurement opportunities. The Human Rights Commission is staffed by co-directors

South Bend Department of
Diversity & Inclusion
Human Rights Commission
319 N. Niles Avenue
South Bend, Indiana 46617
574-235-9355
https://southbendin.gov/department/administration-finance/human-rights-commission

Diana Moya (Housing) and Crystal McCain (Employment) who have the fair housing, duty of enforcing equal employment, accommodations, and education. Their goal is to ensure equal employment opportunity for all individuals, and to provide legal recourse in the areas of discrimination. The City of South Bend funds the South Bend Human Rights Commission with CDBG funds to undertake Fair Housing activites. The Human Rights Commission will provide consultation to developers and city staff to ensure that rental and for sale units are marketed in accordance with the affirmative marketing rules of the U.S. Department of Housing and Urban Development. The Human Rights Commission ensures that all housing programs and services provided by St. Joseph County, municipalities, and the Human Rights Commission itself, are administered in a way that promotes fair housing without regard to race, national origin, religion, gender, disability, and familial status.







 South Bend Human Rights Commission Diana Moya, Co-Director

319 N. Niles Avenue 574-235-9355 <u>diversityandinclusion@southbendin.gov</u>

2. Indiana Civil Rights Commission

The Indiana Civil Rights Commission (ICRC) is tasked to enforce state laws that prohibit discrimination under the Indiana Civil Rights Laws & Regulations. Indiana enacted a public accommodations law in 1885. In 1945, the Indiana General Assembly created a Fair Employment and

Labor Act to "remove discrimination with respect to employment because of race, creed, color, national origin, or ancestry." The Indiana School Desegregation Law was passed in 1949. The Indiana Civil Rights Commission as currently constituted was created with enforcement powers in 1963. In 1965, the Indiana Civil Rights



Law was amended to prohibit discrimination in both rental and for sale

housing, which preceded the Fair Housing Act by three years.

The ICRC has its main office in Indianapolis. The ICRC investigates employment and housing discrimination complaints on behalf of the U.S. Equal Employment Opportunity Commission (EEOC) and

Indiana Civil Rights Commission Indiana Government Center North 100 North Senate Avenue, Room N300 Indianapolis, Indiana 46204 1-800-457-8283 (Voice) 1-855-463-5292 (Text)

the U.S. Department of Housing and Urban Development (HUD), respectively. The five cultural commissions of the State of Indiana were reorganized into three (3) commissions (Indiana Commission on the Social Status of Black Males, Indiana Commission for Women, and Dr. Martin Luther King, Jr. Indiana Holiday Commission). These commissions are now under the purview of the Indiana Civil Rights Commission. The goal of the Commission is to increase synergy and collaboration between these commissions.

The ICRC offers online reporting forms and hotlines to report bias and hate crimes, as well as an on-line way of filing a complaint regarding discrimination; the current law protects citizens in matters of







employment, education, public accommodations, housing, and commercial property.

The ICRC publishes an annual summary of docketed cases filed during the State's fiscal year (July 1st – June 30th). ICRC began only providing docketed cases that corresponded to a protected classes in 2017.

ICRC Filed Complaints in the State of Indiana

Category	2014	2015	2016	2017	2018	Total
Employment	798	682	346	324	500	2,650
Housing	170	160	92	166	155	743
Public Accommodations	113	111	47	66	85	422
Education	36	30	7	19	19	111
Credit	0	3	0	0	0	3
Total	1,118	988	492	575	761	1,929

Source: Indiana Civil Rights Commission Annual Reports, 2014, 2017-2018; & Monthly Reports, 2015-2016

Note: For FY 2014 through 2016, ICRC tracked cases on a monthly basis and shifted to annual reports in 2016, which accounts for the 2016-2017 drop in complaints.

ICRC Complaints by Protected Class

Category	2017	2018	Total
Disability	222	240	462
Race	159	228	387
Sex	72	31	103
Age	*	64	64
Retaliation	*	37	37
National Origin/ Ancestry	30	31	61
Religion	9	17	26







Familial Status	14	12	26
Color	0	4	4
Total	506	761	1,267

Source: Indiana Civil Rights Commission Annual Reports, 2017 & 2018 *Age and Retaliation were not protected classes that were tracked in 2017.

The ICRC operates a phone number for fair housing complaints (1-800-628-2909) to act as an alternative for online intake for those immediately experiencing housing discrimination. The toll-free hotline has helped ensure faster processing of housing complaints and faster relief to discrimination victims. The ICRC includes general information on the Fair Housing Act, as well as the complaint process, on its website.

3. Fair Housing & Equal Opportunity (FHEO-HUD)

The U.S. Department of Housing and Urban Development's (HUD's) Office of Fair Housing & Equal Opportunity (FHEO) receives complaints regarding alleged violations of the Federal Fair Housing Act. From January 1, 2014 to May 3, 2019,



131 fair housing complaints originated within St. Joseph County. Attached is a listing for all the FHEO Complaints received and the status or resolution of the complaint.

The fair housing complaints in St. Joseph County that were filed with HUD are disaggregated in the following table to illustrate the most common basis of complaints. In St. Joseph County, race (45.8%) was the most common basis for a complaint filed between January 1, 2014 and May 3, 2019, with disability (44.3%) and Sex (15.3%) as the second and third most common causes for complaint, respectively. It is important to note that forty-five (45) complaints identified a multiple basis in St. Joseph County. The following table compares the frequency of each basis of complaint for the City of South Bend, the City of Mishawaka, and all other areas of St. Joseph County. Complaints based on disability were the most common in the City of Mishawaka and St. Joseph County excluding the City of South Bend, at 9.2% of all complaints and 4.6% of total complaints in the County respectively.







Unsurprisingly, fair housing complaints were most common in the City of South Bend, which is the largest municipality in the County. 104 complaints were filed in South Bend, 18 were filed in Mishawaka, and 9 were filed in other municipalities in St. Joseph County.

The following table entitled "Basis for Housing Complaints" summarizes all of the complaints filed with the HUD Office of Fair Housing & Equal Opportunity between January 1, 2014 and May 3, 2019 in St. Joseph County.

Basis for Housing Complaints Between 01/01/2014 to 05/03/2019 for St. Joseph County, IN

Basis	including	h County (not South Bend or hawaka)	City of S	outh Bend	City of Mishawaka	
	Count*	% of County Complaints	Count*	% of County Complaints	Count*	% of County Complaints
Race	6	4.6%	53	40.5%	1	0.8%
Disability	6	4.6%	41	31.3%	12	9.2%
Familial Status	3	2.3%	15	11.5%	1	0.8%
National Origin	0	0.0%	8	6.1%	0	0.0%
Retaliation	0	0.0%	9	6.9%	3	2.3%
Sex	1	0.8%	16	12.2%	3	2.3%
Color	0	0.0%	0	0.0%	0	0.0%
Religion	0	0.0%	3	2.3%	0	0.0%

Source: U.S. Department of HUD-FHEO, Chicago Regional Office

*Note: Each complaint may include multiple bases, so the counts do not add up to the total number of complaints

Based on the previous table, race was the most common basis for a fair housing complaint, weighted heavily by complaints based on race in the City of South Bend at 40.5% of total fair housing complaints in the County. This differs from a national trend, where disability has overtaken race as the most common basis for a complaint. Racial







discrimination complaints make up 45.8% of all complaints filed in the entire St. Joseph County, with Disability (44.3%) and Sex (15.3%) as the second- and third-most stated basis. Familial Status and Retaliation were the fourth- and fifth-most common basis for all complaints in the County.

The following table illustrates how complaints were closed. There were 131 complaints filed in St. Joseph County from January 1, 2014 through May 3, 2019. However, some complaints had a multiple basis, so the following chart shows 179 complaints. Totals reflect the number of complaints with multiple bases considered. Of the 131 total complaints, seventeen (72) complaints were closed because of "no cause" and six (25) were "conciliated/settled," and six (6) were "administrative closures." In other words, over three-quarters (78.6%) of all complaints either lacked evidence or were easily settled.

How Complaints Were Closed in St. Joseph County, IN

		How Closed						
Basis	No Cause	Charged or FHAP Caused	Conciliated/ Settled	Administrative Closure	Complaint Withdrawn after Resolution	Open		
Race	33	8	10	4	-	5		
Familial Status	11	4	1		-	3		
Disability	27	6	16	3	2	4		
National Origin	6	1	-	-	ı	1		
Retaliation	9	1	2	-	-	-		
Color	-	-	-	-	-	-		
Sex	13	-	1	3	-	3		
Religion	1	-	1	-	-	_		
Total*	72	16	25	6	2	10		

Source: U.S. Department of HUD-FHEO, Chicago Regional Office

*Note: Each complaint may include multiple bases, so the counts do not add up to the total number of complaints







The following table illustrates the dates complaints were filed in St. Joseph County. The largest yearly number of complaints filed with HUD was in 2014 and 2016.

HUD Date Filed of Complaints St. Joseph County, IN

	St. Joseph County					
HUD Date Filed	Count	% of County Complaints				
2014	28	21.4%				
2015	25	19.1%				
2016	28	21.4%				
2017	15	11.5%				
2018	26	19.8%				
2019	9	6.9%				

Source: U.S. Department of HUD-FHEO, Chicago Regional Office





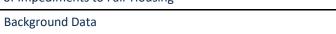


The following table entitled "HUD-FHEO Complaints" summarizes all of the complaints filed with the HUD Office of Fair Housing & Equal Opportunity between January 1, 2014 and May 3, 2019 in St. Joseph County.

HUD-FHEO Complaints for St. Joseph County, IN

Violation City	Filing Date	Bases	Issues	Closure Reason
South Bend	01/31/14	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	Charged or FHAP Caused
Granger	02/10/14	Race	Discriminatory refusal to sell and negotiate for sale	No Cause
South Bend	02/10/14	Disability	Discriminatory terms, conditions, privileges, or services and facilities	Charged or FHAP Caused
South Bend	03/26/14	Religion, Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/ Settlement
South Bend	04/03/14	Religion	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	No Cause
South Bend	04/15/14	Religion	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Conciliation/ Settlement
South Bend	04/16/14	Sex, Retaliation	Discrimination in terms/conditions/privileges relating to rental	No Cause
South Bend	04/28/14	Race	Discrimination in terms/conditions/privileges relating to rental	No Cause
South Bend	04/28/14	Disability	Failure to make reasonable accommodation	Conciliation/ Settlement
South Bend	05/01/14	Race, Retaliation	Discrimination in terms/conditions/privileges relating to sale; Discriminatory acts under Section 818 (coercion, Etc.)	No Cause
South Bend	05/13/14	Race	Discriminatory refusal to negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	No Cause
South Bend	06/10/14	Race, Sex	Discriminatory refusal to rent and negotiate for rental	Administrative Closure
South Bend	06/10/14	National Origin, Disability, Familial Status	Discriminatory refusal to rent and negotiate for rental; False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental; Steering	No Cause









Mishawaka	06/11/14	Race, Disability	Otherwise deny or make housing unavailable	No Cause
South Bend	07/09/14	Sex, Familial Status	Discrimination in terms/conditions/privileges relating to rental	No Cause
Mishawaka	07/14/14	Disability	Failure to make reasonable accommodation	No Cause
Mishawaka	07/18/14	Race	Discrimination in terms/conditions/privileges relating to rental	No Cause
South Bend	08/04/14	Disability	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	No Cause
South Bend	08/04/14	Disability	Discriminatory refusal to negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/ Settlement
Mishawaka	08/25/14	Sex	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No Cause
South Bend	09/11/14	Race, Familial Status	Discriminatory refusal to negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	No Cause
South Bend	10/14/14	Sex	Discrimination in the terms/conditions for making loans	No Cause
South Bend	10/14/14	Sex	Discrimination in the terms/conditions for making loans	No Cause
South Bend	10/23/14	Race	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	No Cause
South Bend	10/31/14	Race	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	Conciliation/ Settlement
Mishawaka	11/13/14	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Withdrawn after Resolution
Osceola	11/18/14	Disability, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities	No Cause
South Bend	11/18/14	Race, Sex	Discrimination in terms/conditions/privileges relating to sale	Administrative Closure
South Bend	01/06/15	Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No Cause
South Bend	01/15/15	Race	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	No Cause
South Bend	02/09/15	Race	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	No Cause







03/11/15	National Origin, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No Cause
04/22/15	Race, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No Cause
04/22/15	Disability	Steering	Conciliation/ Settlement
05/26/15	Familial Status	Discrimination in terms/conditions/privileges relating to rental	Conciliation/ Settlement
05/29/15	Sex	Discrimination in terms and conditions of membership; Discriminatory terms, conditions, privileges, or services and facilities	No Cause
05/29/15	Disability	Discrimination in terms/conditions/privileges relating to rental	No Cause
06/01/15	Race, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No Cause
06/12/15	Disability	Failure to make reasonable accommodation	Charged or FHAP Caused
06/22/15	Race	Discrimination in terms/conditions/privileges relating to rental	Conciliation/ Settlement
07/07/15	Race, Sex	Discriminatory financing (includes real estate transactions); Discrimination in the terms/conditions for making loans	Conciliation/ Settlement
07/13/15	Race	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No Cause
07/31/15	Race	Discriminatory acts under Section 818 (coercion, Etc.); Discriminatory acts under Section 901 (criminal)	Charged or FHAP Caused
08/03/15	Race	Discriminatory acts under Section 818 (coercion, Etc.)	Charged or FHAP Caused
08/13/15	Race	Discriminatory acts under Section 818 (coercion, Etc.)	No Cause
08/13/15	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No Cause
08/19/15	Race	Discriminatory acts under Section 818 (coercion, Etc.); Discriminatory acts under Section 901 (criminal)	Charged or FHAP Caused
09/15/15	Disability	Failure to make reasonable accommodation	Charged or FHAP Caused
10/12/15	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities	No Cause
10/19/15	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/ Settlement
	04/22/15 04/22/15 05/26/15 05/29/15 05/29/15 06/01/15 06/12/15 06/22/15 07/07/15 07/13/15 08/03/15 08/13/15 08/13/15 08/13/15 10/12/15	Origin, Disability 04/22/15 Race, Familial Status 04/22/15 Disability 05/26/15 Familial Status 05/29/15 Sex 05/29/15 Disability 06/01/15 Race, Disability 06/12/15 Disability 06/22/15 Race 07/07/15 Race, Sex 07/13/15 Race 08/03/15 Race 08/13/15 Race 08/13/15 Race 08/13/15 Disability 08/19/15 Race 09/15/15 Disability	Origin, Disability O4/22/15 Race, Carmilial Status O5/29/15 Disability O6/29/15 Disability O5/29/15 Disability O6/29/15 Disability O6/01/15 Disability O6/01/15 Race, Disability O6/01/15 Disability O6/01/15 Race O1/07/15 Pace O1/07/1







South Bend	10/23/15	National Origin, Familial Status, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	Charged or FHAP Caused
Osceola	10/29/15	Disability	Failure to make reasonable accommodation	No Cause
South Bend	12/22/15	Familial Status	Discriminatory refusal to rent and negotiate for rental; False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental	No Cause
South Bend	01/07/16	Race, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No Cause
South Bend	01/07/16	Race, Disability, Retaliation	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	No Cause
South Bend	01/11/16	Disability	Failure to make reasonable accommodation	Conciliation/ Settlement
South Bend	02/01/16	Race	Discriminatory refusal to sell; Discrimination in terms/conditions/privileges relating to sale; Steering; Otherwise deny or make housing unavailable	No Cause
Mishawaka	02/18/16	Disability	Failure to make reasonable accommodation	Conciliation/ Settlement
South Bend	03/15/16	National Origin, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No Cause
South Bend	03/24/16	Race	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No Cause
South Bend	03/31/16	Race	Discriminatory refusal to negotiate for rental; False denial or representation of availability; Discrimination in terms/conditions/privileges relating to rental	Conciliation/ Settlement
South Bend	04/20/16	Race	Discrimination in the terms/conditions for making loans	No Cause
South Bend	04/27/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/ Settlement
South Bend	05/09/16	National Origin	Discrimination in terms/conditions/privileges relating to rental	No Cause
South Bend	05/16/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/ Settlement
South Bend	05/17/16	Race	Otherwise deny or make housing unavailable	No Cause
South Bend	05/25/16	Retaliation	Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	No Cause
South Bend	05/26/16	Race	Discrimination in the selling of residential real property; Steering	No Cause



PACE SOUTH BEALING



South Bend	06/16/16	Disability	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	No Cause
South Bend	06/21/16	Disability	Failure to make reasonable accommodation	Conciliation/ Settlement
South Bend	07/21/16	Race, Familial Status	Discrimination in terms/conditions/privileges relating to rental	No Cause
South Bend	07/21/16	Race, Disability	Discriminatory refusal to negotiate for rental; False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental	Conciliation/ Settlement
South Bend	07/21/16	Disability	Failure to comply with advertising guidelines; Discrimination in terms/conditions/privileges relating to rental; Restriction of choices relative to a rental	Charged or FHAP Caused
South Bend	07/22/16	Race	Discrimination in terms/conditions/privileges relating to rental	No Cause
South Bend	08/09/16	Race, Familial Status	False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental; Steering	Charged or FHAP Caused
South Bend	09/06/16	Race	Discrimination in terms/conditions/privileges relating to rental	No Cause
Mishawaka	09/16/16	Sex	Discrimination in terms/conditions/privileges relating to rental	No Cause
South Bend	09/19/16	Familial Status	Discrimination in terms/conditions/privileges relating to rental	No Cause
South Bend	09/21/16	Race, Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/ Settlement
South Bend	10/13/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/ Settlement
Walkerton	12/02/16	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	Administrative Closure
South Bend	02/21/17	Race, Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/ Settlement
Mishawaka	04/05/17	Race, Sex	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No Cause
South Bend	04/24/17	Race	Discrimination in terms/conditions/privileges relating to rental	No Cause
South Bend	04/26/17	Race	Discrimination in terms/conditions/privileges relating to rental	Charged or FHAP Caused
South Bend	04/27/17	Race	Discrimination in terms/conditions/privileges relating to rental	Conciliation/ Settlement
South Bend	05/03/17	Race	Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts	Conciliation/ Settlement







07/24/17	Race, Familial Status	Discrimination in terms/conditions/privileges relating to rental	No Cause
08/18/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to provide reinforced walls for grab bars; Failure to provide usable kitchens and bathrooms	No Cause
09/18/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	No Cause
09/22/17	Disability	Discriminatory acts under Section 818 (coercion, Etc.); Discriminatory acts under Section 901 (criminal)	No Cause
09/28/17	Sex, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No Cause
11/22/17	Sex	Discrimination in terms/conditions/privileges relating to rental	No Cause
11/27/17	Race, Familial Status	False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental; Steering	Charged or FHAP Caused
11/29/17	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	No Cause
12/05/17	National Origin	Discriminatory refusal to sell and negotiate for sale, Discrimination in terms/conditions/privileges relating to sale	No Cause
01/04/18	Disability	Failure to make reasonable accommodation	Charged or FHAP Caused
01/25/18	Familial Status	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	No Cause
01/25/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	No Cause
02/09/18	Race	Discriminatory terms, conditions, privileges, or services and facilities	No Cause
03/30/18	Race, Familial Status	Otherwise deny or make housing unavailable	No Cause
04/04/18	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	Open
04/27/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Withdrawn after Resolution
04/30/18	Race	Discriminatory advertising, statements and notices	Charged or FHAP Caused
06/05/18	Race, Sex	Discrimination in terms/conditions/privileges relating to rental	No Cause
	08/18/17 09/18/17 09/22/17 09/28/17 11/22/17 11/27/17 11/29/17 12/05/17 01/04/18 01/25/18 02/09/18 03/30/18 04/04/18 04/27/18	Familial Status	Familial Status







Mishawaka	06/12/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No Cause
South Bend	06/19/18	Race, Disability	Discrimination in the terms/conditions for making loans	No Cause
South Bend	06/22/18	Race, Disability	Discriminatory refusal to rent	Administrative Closure
Mishawaka	07/09/18	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No Cause
Mishawaka	07/11/18	Retaliation	Otherwise deny or make housing unavailable; Other discriminatory acts	Conciliation/ Settlement
South Bend	07/16/18	Race	Discrimination in terms/conditions/privileges relating to rental	No Cause
South Bend	07/23/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	No Cause
Mishawaka	08/01/18	Race, Disability	Discrimination in terms/conditions/privileges relating to rental	No Cause
South Bend	08/01/18	Race, Sex	Discrimination in terms/conditions/privileges relating to sale; Discrimination in services and facilities relating to sale	Open
South Bend	08/24/18	Disability	Discrimination in terms/conditions/privileges relating to rental	Administrative Closure
South Bend	09/13/18	Race	Discriminatory advertising, statements and notices; Discriminatory advertisement - rental	Charged or FHAP Caused
Mishawaka	09/13/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Charged or FHAP Caused
Granger	09/14/18	Sex, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No Cause
South Bend	11/06/18	Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No Cause
South Bend	11/08/18	National Origin, Sex	Discriminatory terms, conditions, privileges, or services and facilities	No Cause
South Bend	11/14/18	Race, Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Open
South Bend	12/20/18	Race, Sex	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in services and facilities relating to rental	Administrative Closure
South Bend	02/06/19	Disability	Discrimination in terms/conditions/privileges relating to rental; Non-compliance with design and construction requirements (handicap); Failure to provide an accessible building entrance; Failure to permit reasonable modification; Failure to make reasonable accommodation	Open
South Bend	02/12/19	Race, Disability	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	Conciliation/ Settlement









South Bend	02/22/19	Race, Sex, Familial Status	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Open
Mishawaka	03/06/19	Disability	Discrimination in terms/conditions/privileges relating to rental	Open
South Bend	03/27/19	National Origin	Blockbusting; Other discriminatory acts	Open
South Bend	04/01/19	Race, Sex, Familial Status	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	Open
South Bend	04/10/19	Disability	Discrimination in terms/conditions/privileges relating to rental	Open
Mishawka	04/18/19	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	Open
Mishawaka	04/22/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/ Settlement

Source: U.S. Department of HUD-FHEO, Chicago Regional Office







National Trends

The U.S. Department of Housing and Urban Development (HUD) funds the Office of Fair Housing and Equal Opportunity (FHEO), whose mission is to eliminate discrimination, promote economic opportunity, and achieve diversity. FHEO leads the nation in the enforcement, administration, development, and public understanding of Federal fair housing policies and laws. FHEO enforces laws that protect people from discrimination on the basis of race, color, religion, sex, national origin, disability, and familial status. FHEO releases annual reports to Congress, which provide information regarding complaints received during the particular year. The following table highlights the frequency of such housing complaints for the years of 2014, 2015, 2016, and 2017 organized by basis of complaint.

HUD and FHAP Housing Complaints Nationwide

	FY 2014		FY 2015		FY 2016		FY 2017	
Basis	Number of Complaints	% of Total						
Disability	4,621	41%	4,605	42%	4,908	45%	4,865	59%
Race	2,383	21%	2,291	21%	2,154	20%	2,132	26%
Familial Status	1,051	9%	1,031	9%	882	8%	871	11%
National Origin	1,067	9%	898	8%	917	8%	834	10%
Sex	879	8%	915	8%	800	7%	826	10%
Religion	223	2%	225	2%	204	2%	800	10%
Color	146	1%	151	1%	143	1%	232	3%
Retaliation	867	8%	832	8%	785	7%	192	2%
Number of Complaints filed	11,237		10,948		10,793	3	8,186	

Source: HUD FY 2013-2017 Annual Reports on Fair Housing

Note: Complaints often allege more than one (1) basis of discrimination, and each base is counted as a complaint.

The majority of the HUD complaints filed nationwide in 2017 were on the basis of disability, making up 59% of all complaints received. Race







was next, making up 26% of all complaints, followed by familial status at 11%. As illustrated in the next chart, disability has become the most common basis of complaint, partially at the expense of racial complaints.

Chart IV-1 - 5-Year Trends in Bases of Complaints

70%

60%

40%

20%

2014

2015

2016

2017

Disability

Race

Source: HUD Enforcement Management Systems (HEMS), FY 2017 FHEO Annual Report

The HUD housing complaints filed in St. Joseph County were primarily based on race and disability, which are consistently the two most common causes for complaints across the nation as illustrated in the previous chart. Note: the percentages for each year do not equal 100% and the number of complaints each year do not equal the total complaints across all areas. This is because there is often more than one basis for the filing of a fair housing complaint.

4. Notre Dame Economic Justice Clinic

The Notre Dame Economic Justice Clinic is a nonprofit organization providing civil legal aid to low-income residents of the South Bend Region. The organization provides legal assistance so that people can understand their rights. Free legal representation in non-criminal matters such as eviction from housing, discrimination, family law, and consumer protection issues are also provided. The clinic is run by the







University of Notre Dame's Law School. The Notre Dame Economic Justice Clinic serves low- and moderate-income residents of St. Joseph County by providing assistance to residents who face eviction or foreclosure, who may be denied housing, or who are forced to live in substandard conditions. The Notre Dame Economic Justice Clinic has noted the high eviction rates in the City of South Bend, as well as the high foreclosure rates and predatory lending that takes place in the region.

In addition, the Notre Dame Economic Justice Clinic monitors housing practices and counsels victims of discrimination. The Clinic's policies and activities work as a legal enforcement in conjunction with the Human Rights Commissions' work to promote the awareness of fair housing requirements. The Economic Justice Clinic works specifically for tenants in the region as pro bono legal aid on fair housing issues. Much of this work is done in a landlord-tenant legal environment that is heavily weighted in favor of the landlords, and limits the resources of the clinic. The statewide landlord-tenant laws are a significant impediment to fair housing identified by the Notre Dame Economic Justice Clinic.

Notre Dame Economic Justice Clinic
 1111 Eck Hall of Law
 Notre Dame, IN 46556
 574-631-7795
 574-631-6725 (FAX)
 law.nd.edu/academics/experiential-courses/clinics-economic-justice-clinic

5. Housing and Human Services Agencies

The City of South Bend and the City of Mishawaka interviewed agencies offering housing and human services within St. Joseph County to obtain their input and gain insight into potential impediments to fair housing. The following agencies participated in the information gathering through roundtable discussions, individual meetings, phone interviews, or through surveys:

Housing Authority of South Bend







- The Housing Authority of the City of Mishawaka
- IN*Source
- The Logan Center
- La Casa De Amistad
- Catholic Worker of South Bend
- Cross Community CDC
- 1st Source Bank
- Communitywide FCU
- **Teachers Credit Union**
- Mutual Bank
- Community Homebuyers
- Notre Dame FCU
- Lake City Bank
- City of South Bend Code Enforcement
- Notre Dame Economic Justice Clinic
- South Bend Human Rights Commission
- Indiana Small Business Development Center
- South Bend Career Pathways
- Women's Entrepreneurship Initiative
- Doulos Chapel
- Mt. Carmel Missionary Baptist Church
- Broadway Christian Parish United Methodist Church
- United Religious Community of St. Joseph County
- St. Joseph County Department of Health
- 466 Works
- Place Builders, Inc.
- Neighborhood Development
- Near Northwest Neighborhood, Inc.
- **Habitat for Humanity**
- **Hurry Home**
- South Bend Heritage Fund
- Bowman Creek Educational Ecosystem
- River Park Neighborhood Association
- Northwest Neighborhood Organization
- Far Northwest Neighborhood Association
- **Veterans Administration**
- Southeast Organized Area Residents







- Neighborhood Resources Connection
- Kennedy Park Neighborhood Association
- Edgewater Place
- Kankakee Wetlands Organic Gardens
- Transpo
- Oaklawn Psychiatric Center
- HOPE Ministries
- Youth Service Bureau
- St. Margaret's House
- Center for the Homeless, Inc.
- St. Joseph County Public Library
- Boys and Girls Club of St. Joseph County
- Goodwill Bridges out of Poverty
- AIDS Ministries/AIDS Assist
- Upper Room Recovery
- Dismas House of South Bend

Each of these agencies provided feedback on their experience with housing-related issues in St. Joseph County. Complete summaries of meeting comments can be found in Appendix A. Below is a list of key points from each of the meetings.

Housing Issues

- There appears to be a lack of affordable housing that is decent in St. Joseph County.
- There appears to be a lack of accessible housing in St. Joseph County.
- Rental rates in St. Joseph County are inflated and do not reflect the low quality of the supply.
- There are a number of rental housing options that are owned by international companies and, as a result, leave their code violations unaddressed.
- There are "starter homes" available in stable neighborhoods that require moderate amounts of funds for rehabilitation, but the funding is not available for the purchase or rehabilitation of these homes.
- Landlords will rent individual bedrooms as full apartments, particularly in areas known to house a high number of students.







- With the shortage of affordable rental housing, it is suspected that some voucher holders are paying landlords extra money to rent their units.
- The local housing stock is older, and the cost of rehabilitation is higher than the value of the housing, even after the rehabilitation work is completed.
- Many of the rental housing units require lead-based paint abatement.
- The Comprehensive Housing Affordability Strategy (CHAS) data through HUD shows that 41.8% of all renters are cost overburdened in the County.
- The foreclosure rate in the City of South Bend is one of the highest foreclosure rates in the United States.
- The eviction rate in the City of South Bend is extremely high.
- Certain classes of people, such as ex-offenders, are unable to find housing and will rent from predatory landlords.

Social Services

- There are numerous social service programs provided in the County.
- More social service programs are needed to assist the mentally ill, including people with addictions in the County.
- Many social service programs assist the homeless, but they do not have a centralized intake location to evaluate the needs of their clients.
- With the reduction in Federal funds, there is a need for additional services to support the homeless population and those who are at-risk of becoming homeless.
- More permanent supportive housing is required for all homeless populations and subpopulations.
- Additional services are needed to assist the non-English speaking residents who are moving into the County.
- There is a gap in housing for people with disabilities who cannot make the move to independent housing.
- Fair housing complaints are occurring with the disabled population which need to be addressed.
- Increased funding for utility payments are needed for tenants who have economic problems or who lose their jobs.







- There is a need for more accommodations for victims of domestic violence.
- Additional services are needed for youth who are coming out of foster care placement.
- Additional support services are needed for persons coming out of institutions including: hospitalization, correctional facilities, and mental healthcare.

Public Policies

- Local zoning ordinances are consistently being revised and assistance is available to bring them into compliance with ADA and the Fair Housing Act.
- The City of South Bend is in the process of completely rewriting its zoning ordinance.
- There is a continuing need for education and training on tenant's rights and landlord's responsibilities under the Fair Housing Act.
- Municipalities in St. Joseph County are still allowed to annex land, although the City of South Bend has not done so in 30 years.
- Source of income is not a protected class in St. Joseph County, nor in the Cities of South Bend or Mishawaka.
- Affordable housing needs to be located throughout the County and not just within the urban core.
- The Mayor created an Office of Diversity and Inclusion to house the Human Rights Commission and address issues of racial disparity in the City of South Bend.
- The City of South Bend owns many vacant lots from its "1000 Houses in 1000 Days" Initiative and must decide on the best uses for those lots.
- The City of South Bend is attempting to create a landlord registry program to address some of the code issues in the City.
- There is a need to provide incentives to developers and businesses to create and develop affordable housing.

Transportation

- Transpo serves the Cities of South Bend and Mishawaka.
- Funding for public transit in the entire State of Indiana is proposed to freeze, which will make increasing service times and routes more difficult.







- There is a need for Sunday bus service, but funding is lacking.
- Many bus stops and shelters in the City of Mishawaka do not meet current accessibility standards.
- All buses have wheelchair lifts for accessibility purposes.
- The bus route map for Transpo has been relatively unchanged since the 1960s

Economic Development

- The City of South Bend has multiple TIF districts and the City of Mishawaka has one TIF district.
- A shopping center in the northern portion of the City of Mishawaka attracts shoppers from across the region.
- The former Studebaker Plant in the City of South Bend has been converted into a home for startup firms.
- There is a wealth gap between renters and homeowners in the County.
- Economic opportunities are needed in the County.
- The University of Notre Dame has become a larger investor in the surrounding communities and has encouraged alumni to stay and create tech startup firms.
- The South Shore Line connects the City of South Bend to Chicago and is a potential site for transit-oriented development.
- Many of the poorest areas of the City of South Bend and St.
 Joseph County are also food deserts and there is a need for fresh food in the area.
- There are two tech parks in the region, Ignition Park and Idea Park, which are located in opportunity zones, and there is additional land in St. Joseph County for future tech park development.







B. Public Sector

Part of the Analysis of Impediments is to examine the public policies of the jurisdiction and the impact on fair housing choice. The Local governments control land use and development through their comprehensive plans, zoning ordinances, subdivision regulations, and other laws and ordinances passed by the local governing body. These regulations and ordinances govern the types of housing that may be constructed, the density of housing, and various residential uses in a community. Local officials determine the community's commitment to housing goals and objectives. The local policies therefore determine if fair housing is to be promoted or passively tolerated.

This section of the Analysis of Impediments evaluates the Cities' and County's policies to determine if there is a commitment to affirmatively further fair housing.

1. CDBG Program

The City of South Bend

The City of South Bend annually receives from HUD approximately \$3,000,000 in CDBG funds. The City allocates its funds to housing construction, housing rehabilitation, operations for homeless shelters, public facilities, administration, and public services.

In particular, the City proposed to allocate FY 2020 CDBG funds as outlined in the following table to affirmatively further fair housing. The City of South Bend anticipates a reduction in the annual CDBG allocation in the coming years as a result of further cuts in the Federal budget.

FY 2020 CDBG Allocation for the City of South Bend, IN

Community Development Block Grant Program (CDBG)		
CDBG Administration	\$	402,000
Housing Construction	\$	1,026,510
Housing Rehabilitation	\$	1,148,281
Operations for Homeless Shelters	\$	239,835







Public Facilities	\$ 100,000
Public Services	\$ 90,000
Total:	\$ 3,006,626

In its FY 2020-2024 Five Year Consolidated Plan, the City of South Bend identified several goals to prioritize funding and address housing needs during this five-year period, as outlined in the following table:

City of South Bend, IN - Five Year Objectives

Housing Strategy - HSS

Objective

HSS-1 Homeownership Assistance – Promote and assist in developing homeownership opportunities for low- and moderate-income persons & families.

HSS-2 Housing Construction – Promote and assist in the development of new affordable housing, both rental and sales housing.

HSS-3 Housing Rehabilitation – Promote and assist in the preservation of existing owner and renter occupied housing stock in the City of South Bend.

HSS-4 Fair Housing – Affirmatively further fair housing by promoting fair housing choice throughout the City of South Bend.

HSS-5 Lead-Based Paint – Promote and assist in addressing lead-based paint in owner and renter occupied housing stock in the City of South Bend.

HSS-6 Housing Education – Promote and assist in educating homeowners, tenants, and new homebuyers in best practices for purchase and upkeep, affordable housing rentals, and foreclosure and eviction prevention.

HSS-7 Rental Assistance – Provide funds for tenant based rental assistance to make housing affordable to low- and moderate-income persons and families.

Homeless Strategy - HOM

Objective

HOM-1 Housing – Promote and assist in developing housing opportunities for persons and families experiencing homelessness, and those who are at-risk of becoming homeless.

HOM-2 Operation/Support – Promote and assist in program support services for the homeless.







HOM-3 Homeless Prevention – Promote and assist in anti-eviction and prevention of unfair housing practices which may contribute to homelessness.

HOM-4 Permanent Supportive Housing – Promote and assist in the development and supportive service provisions of permanent supportive housing options.

Other Special Needs Strategy - SNS

Objective

- **SNS-1 Housing** Promote and assist to increase the supply of affordable, decent, safe, sound, and accessible housing for the elderly, persons with disabilities, and persons with other special needs through rehabilitation of existing housing and new construction of accessible housing.
- **SNS-2 Social Services** Promote and assist in supporting social service programs and facilities for the elderly, persons with disabilities, and persons with other special needs.
- SNS-3 Accessibility Promote and assist in making accessibility improvements to owner occupied housing through rehabilitation and improve renter occupied housing by promoting reasonable accommodations for the physically disabled.

Community Development Strategy - CDS

Objective

- **CDS-1 Infrastructure** Improve the City's infrastructure through rehabilitation, reconstruction, and new construction of streets, walks, curbs, ADA ramps, retaining walls, sewer, linear lines, water, flood control, storm water management and separation, bridges, bike trails, green infrastructure, etc.
- **CDS-2 Community Facilities** Improve the City's parks, recreational centers, and public and community facilities through rehabilitation and new construction.
- **CDS-3 Public Services** Improve and increase public service programs for the youth, the elderly, disabled, and target income population, including feeding programs and social/welfare programs throughout the City.
- **CDS-4 Public Transit** Promote the development of additional bus routes and improve public transportation for low- and moderate-income persons.
- **CDS-5 Clearance** Remove and eliminate slum and blighting conditions through demolition of vacant and abandoned structures throughout the City.
- **CDS-6 Architectural Barriers** Remove architectural barriers and make public and community facilities accessible.
- **CDS-7 Public Safety** Improve public safety through upgrades to facilities, purchase of new equipment, crime prevention, community policing, and ability to respond to emergency situations.







CDS-8 Revitalization – Promote and assist in the stabilization of residential neighborhoods by removing slums and blight, assembling sites for new housing, rehabilitation of existing housing, and code enforcement.

CDS-9 Neighborhood Organizations – Improve capacity and encourage grassroots organizing and neighborhood development by neighborhood residents.

Economic Development Strategy - EDS

Objective

EDS-1 Employment – Support and encourage new job creation, job retention, employment, and job training services.

EDS-2 Financial Assistance – Support business and commercial growth through expansion and new development with technical assistance and low interest loan programs including Section 108 loans.

EDS-3 Development Program – Plan and promote the development and reuse of vacant commercial and industrial sites, and facilities.

EDS-4 Financial Incentives – Support and encourage new economic development through local, state and Federal tax incentives and programs.

Administration, Planning & Management Strategy - APM

Objective

APM-1 Management – Continue to provide sound and professional planning, program management and oversight for the successful administration of federally funded programs.

APM-1 Planning – Continue to develop and plan for special studies, environmental clearance, fair housing, and compliance with all Federal, state, and local laws and regulations.

The City of Mishawaka

The City of Mishawaka annually receives from HUD approximately \$500,000 in CDBG funds. The City allocates its funds to public facility improvements, housing rehabilitation, slums and blight removal, administration, and public services.

In particular, the City proposed to allocate FY 2020 CDBG funds as outlined in the following table to affirmatively further fair housing. The City of Mishawaka anticipates a reduction in the annual CDBG allocation in the coming years as a result of further cuts in the Federal budget.







FY 2020 CDBG Allocation for the City of Mishawaka, IN

Community Development Block Grant Program (CDBG)			
CDBG Administration	\$	93,085	
Public Facilities Improvements	\$	187,439	
Housing Rehabilitation	\$	100,000	
Public Services	\$	84,793	
Total:	\$	465,290	

In its FY 2020-2024 Five Year Consolidated Plan, the City of Mishawaka identified several goals to prioritize funding and address housing needs during this five-year period, as outlined in the following table:

City of Mishawaka, IN - Five Year Objectives

Housing Strategy - HSS

Objective

HSS-1 Homeownership Assistance – Promote and assist in developing homeownership opportunities for low- and moderate-income persons & families through down payment assistance.

HSS-2 Affordable Housing – Promote and assist in the development of new affordable housing through renovation of existing units.

HSS-3 Housing Construction – Promote and assist in the development of new affordable housing through construction of new units.

HSS-4 Housing Rehabilitation – Promote and assist in the preservation of existing owner-occupied housing stock in the City of Mishawaka thru the Summer of Service Program.

HSS-5 Accessibility – Promote and assist in making accessibility improvements to owner occupied housing through rehabilitation.

Homeless Strategy - HOM

Objective

HOM-1 Public Services – Improve and increase public services through funding to programs that target and serve homeless individuals.







Other Special Needs Strategy - SNS

Objective

SNS-1 Public Services – Improve and increase public service programs for the youth, the elderly, disabled, and target low income population, including feeding programs and social/welfare programs throughout the City.

Community Development Strategy - CDS

Objective

CDS-1 Infrastructure – Improve the City's infrastructure through rehabilitation, reconstruction, and new construction of streets, walks, curbs, ADA ramps, retaining walls, sewer, linear lines, water, flood control, storm water management and separation, bridges, bike trails, green infrastructure, etc.

CDS-2 Community Facilities – Improve the City's parks, recreational centers, and public and community facilities through rehabilitation and new construction.

CDS-3 Clearance – Remove and eliminate slum and blighting conditions through demolition of vacant and abandoned structures throughout the City.

Administration, Planning & Management Strategy - APM

Objective

APM-1 Management – Continue to provide sound and professional planning, program management and oversight for the successful administration of Federal, state, and local funded programs.

APM-2 Fair Housing – Affirmatively further fair housing by promoting fair housing choice throughout the City of Mishawaka.

The following attached maps illustrate the locations of CDBG funded activities in St. Joseph County:

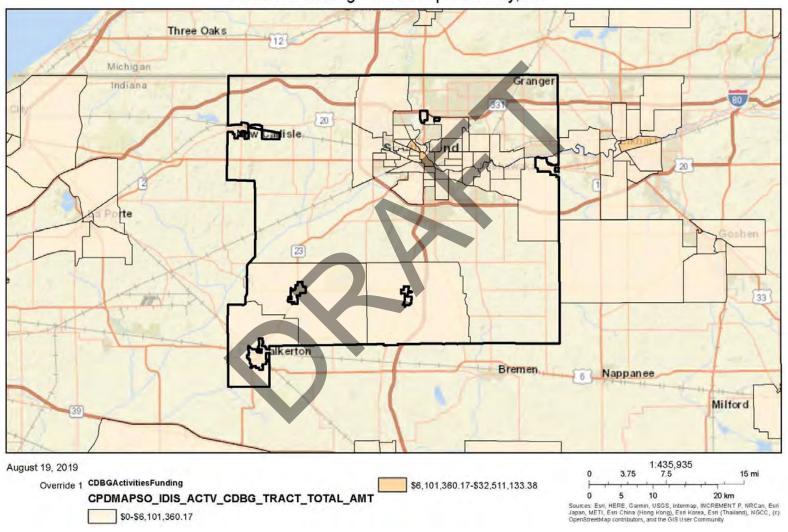
- CDBG Activities Funding
- CDBG Acquisition Activities
- CDBG Economic Development Activities
- CDBG Housing Activities
- CDBG Public Improvement Activities
- CDBG Public Service Activities
- CDBG All Activities







CDBG Funding - St. Joseph County, IN

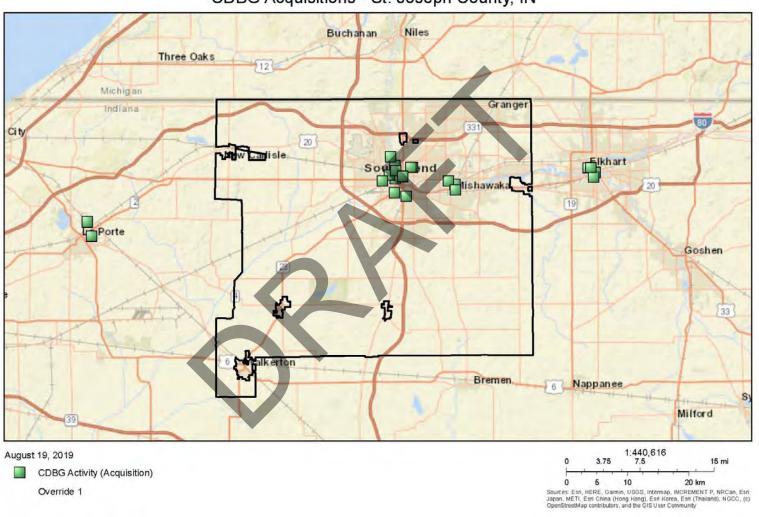








CDBG Acquisitions - St. Joseph County, IN

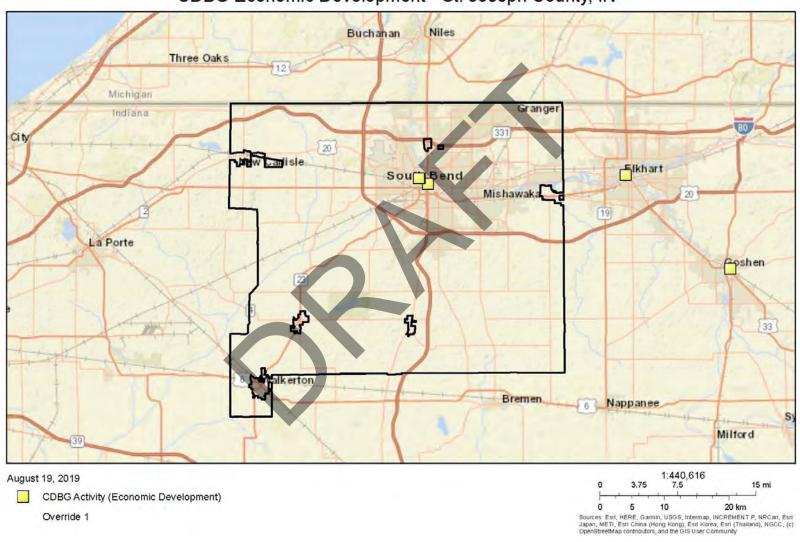








CDBG Economic Development - St. Joseph County, IN

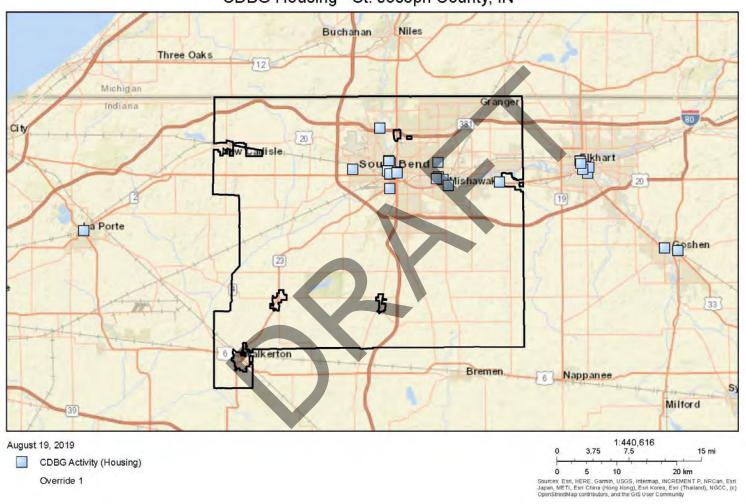








CDBG Housing - St. Joseph County, IN

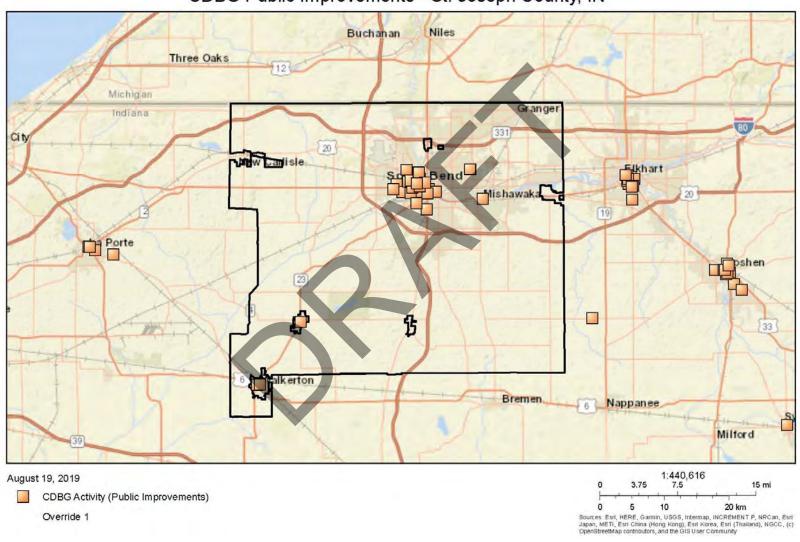








CDBG Public Improvements - St. Joseph County, IN

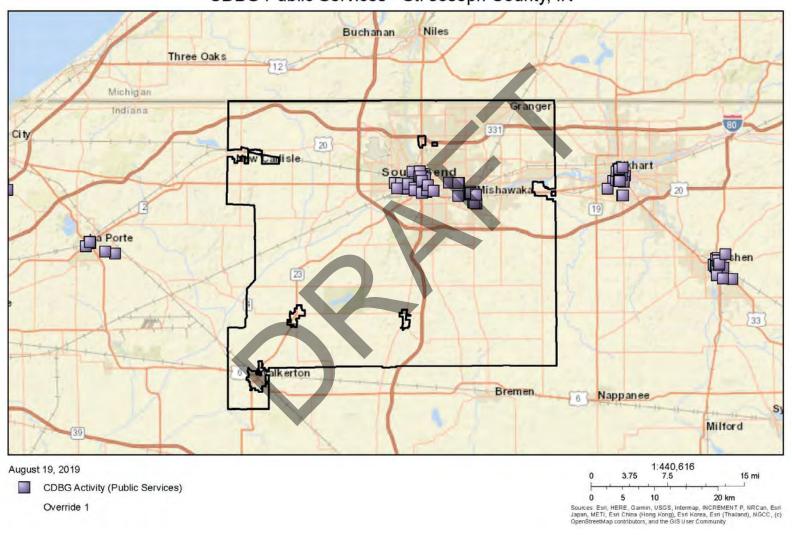








CDBG Public Services - St. Joseph County, IN



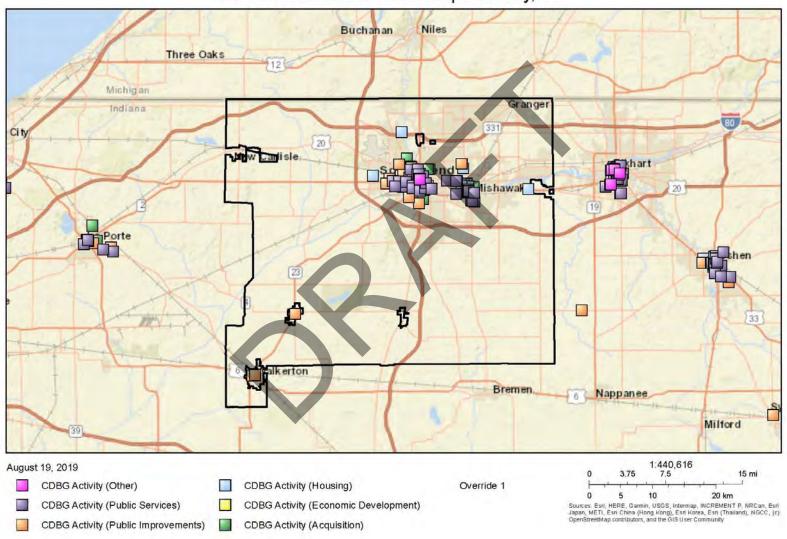








All CDBG Activities - St. Joseph County, IN









2. HOME Investment Partnership (HOME) Program

The St. Joseph County Housing Consortium

The St. Joseph County Housing Consortium is composed of the City of South Bend and the City of Mishawaka. The Housing Consortium undertakes activities in both Cities, as well as other unincorporated areas of the County. The City of South Bend is the Participating Jurisdiction for the Housing Consortium and annually receives from HUD approximately \$1,000,000 in HOME funds. The Housing Consortium allocates its funds to new construction and tenant-based rental assistance.

In particular, the Housing Consortium proposed to allocate FY 2020 HOME funds as outlined in the following table to affirmatively further fair housing. The St. Joseph County Housing Consortium anticipates a reduction in the annual HOME allocation in the coming years as a result of further cuts in the Federal budget.

FY 2020 HOME Allocation for the St. Joseph County Housing Consortium, IN

HOME Investment Partnership (HOME) Program			
HOME Administration	\$	40,000	
New Construction – Affordable Housing	\$	970,000	
Tenant-Based Rental Assistance	\$	107,488	
Total:	\$	1,117,488	

In its FY 2020-2024 Five Year Consolidated Plan, the St. Joseph County Housing Consortium identified several goals to prioritize funding and address housing needs during this five-year period, as outlined in the following table:







St. Joseph County Housing Consortium, IN - Five Year Objectives

Housing Strategy - HSS

Objective

HSS-1 Homeownership Assistance – Promote and assist in developing homeownership opportunities for low- and moderate-income persons & families.

HSS-2 Housing Construction – Promote and assist in the development of new affordable housing, both rental and sales housing.

HSS-3 Housing Rehabilitation – Promote and assist in the preservation of existing owner and renter occupied housing stock in St. Joseph County.

HSS-4 Fair Housing – Affirmatively further fair housing by promoting fair housing choice throughout St. Joseph County.

HSS-5 Lead-Based Paint – Promote and assist in addressing lead-based paint in owner and renter occupied housing stock in St. Joseph County.

HSS-6 Housing Education – Promote and assist in educating homeowners, tenants, and new homebuyers in best practices for purchase and upkeep, affordable housing rentals, and foreclosure and eviction prevention.

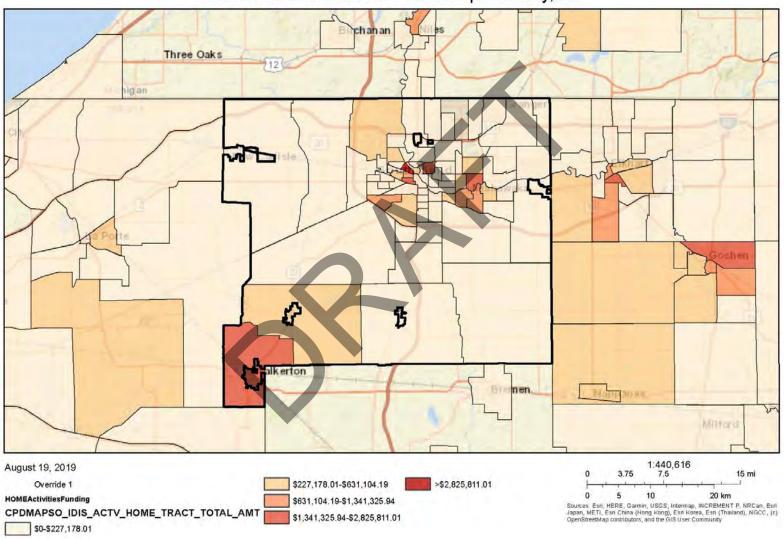
HSS-7 Rental Assistance – Provide funds for tenant based rental assistance to make housing affordable to low- and moderate-income persons and families.

The following attached map illustrate the locations of HOME funded activities in St. Joseph County:





HOME Funded Activities - St. Joseph County, IN









3. Emergency Solutions Grant (ESG) Program

The City of South Bend receives approximately \$200,000 in an Emergency Solutions Grant (ESG) annually for Countywide programs. ESG funds are used in conjunction with the Continuum of Care (CoC) funding to provide services to homeless individuals and families in the St. Joseph County region. The uses of the FY 2020 ESG allocation are outlined below:

FY 2020 ESG Allocation for the City of South Bend, IN

Emergency Solutions Grant (ESG) Program			
Shelter Operations	\$	130,952	
Rapid Rehousing	\$	85,301	
ESG Administration	\$	2,000	
Total:	\$	218,253	

4. Continuum of Care (CoC)

The City of South Bend is part of the IN Balance of State Continuum of Care, which includes 91 of the 92 Counties in the State. The Balance of State is split into sixteen (16) individual regions, which are overseen by regional planning councils and chairpersons that lead them. Regional CoCs hold regular meetings to develop and implement strategies for homeless alleviation and prevention. The City of South Bend is located in Region 2A, which includes only St. Joseph County.

A Working Group to address chronic homelessness was established in 2017 which brought together stakeholders to recommend strategies to serve homeless persons and prevent homelessness in the City of South Bend and St. Joseph County. The St. Joseph County - Region 2A Homeless Planning Council has adopted these recommendations to better serve the homeless population of the area. The working group was composed of the following:

- Business representatives
- Service providers
- Community members







- Public safety officers
- Officials in the criminal justice system
- Neighborhood advocates
- Academics
- Members of South Bend City staff

As a result, the St. Joseph County - Region 2A Homeless Planning Council developed Coordinated Entry and Street Outreach programs and implemented the VI-SPDAT as an assessment tool. These programs and tools are utilized by those providing services to the homeless in St. Joseph County. The working group determined that these strategies were needed to address the issue of homelessness in St. Joseph County:

- Adopt a Housing First Approach
- Add Permanent Supportive Housing units to St. Joseph County
- Construct an intake center to act as a single entry point for the CoC
- Coordinate data sharing across HMIS
- Create a "Community Identification System" for people seeking assistance from services of care.

5. Housing Authority of South Bend -

The Housing Authority of South Bend is the primary provider of affordable housing in St. Joseph County. It runs programs for both public housing and Section 8 Housing Choice Vouchers. All

Housing Authority of South Bend 501 Alonzo Watson Drive South Bend, Indiana 46601 (574) 235-9346 http://www.hasbonline.com

properties owned by HASB are public housing properties, and there are no project-based developments.

The Housing Authority of South Bend is recognized as a public body corporate and a "Public Housing Authority" of the U.S. Department of Housing and Urban Development and the State of Indiana. The Housing Authority is governed by a five (5) member Board of Commissioners and everyday operations are handled by an Executive Director.







The Housing Authority of South Bend's mission is to provide safe and affordable housing assistance to individuals and families in a manner that is respectful, professional, and service oriented. The HASB is committed to maximize its existing resources and work in partnership with the community to assist residents in reaching individual and family goals, including self-sufficiency, through education, increasing employment and homeownership opportunities. The Housing Authority of South Bend is no longer rated as a "troubled" agency by HUD.

The Housing Authority of South Bend owns and professionally manages family communities and elderly/disabled rental apartments. HASB has four (4) Asset Management Projects (AMP) that encompass nine (9) developments. There are 814 housing units that comprise these nine (9) developments. The waiting list for public housing is currently open, however there are 1,436 households on the waiting list.

The breakdown of households on the waiting lists are: 38.69% single-person households; 24.46% two-person households; 24.37% three-person households; 9.41% four-person households; and 3.04% five-person or greater households as of September 30, 2019 (the last waiting list available). With public housing occupancy at 95%, there is a greater demand than supply. However, public housing residents have been converting to Section 8, and the demand for public housing has decreased among households who qualify for Section 8.

The Housing Authority of South Bend has two homebuyer programs: one for Public Housing residents and one for Section 8 Residents. HASB allows potential homebuyers to hold money in an escrow account toward the purchase of a home. HASB also has a Family Self-Sufficiency program which utilizes escrow accounts to purchase a home.

The Housing Authority of South Bend administers 2,021 Section 8 Housing Choice Vouchers as of April 22, 2019. A total of 1,937 of these vouchers are living in Section 8 Housing. Demand for a quality Section 8 Housing rental exceeds the supply of decent, affordable rental units. Section 8 Housing is currently at 95% occupancy. There were 1,489 families/individuals on the Housing Choice Voucher waiting list as of September 30, 2019 (the most recent waiting list available). The waiting list is currently closed.







All HASB staff are required to attend one fair housing training seminar per year. The most recent seminar was held on April 25, 2019.

The Housing Authority of South Bend does not have any active resident councils. They have attempted to start resident councils multiple times, however the councils do not sustain themselves.

Public Housing -

The Housing Authority of South Bend (HASB) aims to address the needs of the extremely low-income, very low-income, and low-income residents of the City of South Bend and St. Joseph County. The mission of the HASB is to provide safe and affordable housing assistance to individuals and families in a manner that is respectful, professional, and service oriented.

HUD provides funding to the Housing Authority of South Bend through its Housing Choice Voucher Program. HASB owns and manages 814 public housing units. Additionally, HASB administers a Family Self Sufficiency Program that offers families an opportunity to participate in a program that provides them opportunity to work with a caseworker to develop a plan to gain access to education and job programs.

City of South Bend - Public Housing

Address	Owner/Manager	Units
Monroe Plaza – Monroe Circle, South Bend, IN 46601	Housing Authority of South Bend	91
Rabbi Albert M. Shulman Complex – 628 Western Avenue, South Bend, IN 46601	Housing Authority of South Bend	127
Laurel Court – Laurel Court, South Bend, IN 46601	Housing Authority of South Bend	42
South Bend Avenue – South Bend Avenue, South Bend, IN 46617	Housing Authority of South Bend	20
Westcott/The Quads – 501 Alonzo Watson Drive, South Bend, IN 46601	Housing Authority of South Bend	179
LaSalle Landing – Oak Park Court, South Bend, IN 46613	Housing Authority of South Bend	24







Harber Homes – Boston Drive, South Bend, IN 46619	Housing Authority of South Bend	54
Edison and Twyckenham – 3602 Edison Road & Twyckenham Drive, South Bend, IN 46615	Housing Authority of South Bend	38
Scattered Sites, South Bend, IN	Housing Authority of South Bend	239

Source: Housing Authority of South Bend

Section 8 -

The Housing Authority of South Bend oversees the Section 8 Housing Choice Voucher Program. Eligible participants who receive vouchers may search on their own for privately owned housing. The Housing Authority encourages voucher holders to locate in areas of high opportunity and outside R/ECAPs. Because the City's inventory of Section 8 Housing does not meet the demand for housing, many Section 8 Voucher holders attempt to "port out" of South Bend. The Housing Authority of South Bend grants extensions to Voucher Holders to assist them in finding a house in South Bend.

Additionally, Family Self-Sufficiency (FSS) programs are provided to Section 8 Housing Choice Voucher holders and public housing tenants. FSS program residents work with a case manager to develop goals that will, over a five (5) year period, lead to self-sufficiency. These goals may include education, specialized training, job readiness, job placement activities, and career advancement objectives. The goals for each participating family member are set out in Individual's Training and Service Plan. HASB has a baseline of 2,021 Section 8 Housing Choice Vouchers, with 1,937 of these vouchers in use. There were 13,520 applications on the waiting list as of April, 2019.

6. Housing Authority of City of Mishawaka –

The Housing Authority of the City of Mishawaka also operates programs for both public housing and Section 8 Housing Choice Vouchers in the City of

Mishawaka Housing Authority 601 E 11th Street Mishawaka, Indiana 46544 (574) 258-1656







Mishawaka. It is the second largest provider of public housing in St. Joseph County, Indiana.

The Mishawaka Housing Authority is recognized as a public body corporate and a "Small Housing Authority" of the U.S. Department of Housing and Urban Development and the State of Indiana. The Housing Authority has seven board members, all of whom are appointed by the Mayor with the consent of City Council. The housing Authority is considered a "high performer" by HUD.

The Housing Authority of the City of Mishawaka assists in meeting the public housing needs of the City of Mishawaka. The Housing Authority has three (3) properties with 299 units, and are at 97% occupancy. The Mishawaka Housing Authority is eligible for 345 Section 8 Housing Choice Vouchers. The Housing Authority of the City of Mishawaka has resident involvement in its two senior living facilities. Both councils are active. The Mishawaka Housing Authority does not have a Family Self-Sufficiency program.

The Mishawaka Housing Authority makes accommodations on request after the receipt of a doctor's note that certifies the need for accommodation. The Mishawaka Housing Authority currently has 41 accessible units, all of which are in the Riverview Towers elderly housing.

The Mishawaka Housing Authority owns and professionally manages one family community and two elderly/disabled rental apartments. Of the elderly/disabled rental apartments, one is a tax credit property. The Housing Authority has vacancy issues with its family property at Barbee Creek, and its tax credit property at Mary Phillips School.

The waiting list for public housing is currently open. The breakdown of the waiting list shows 347 families in need of public housing as of September 30, 2019 (the last waiting list available). With public housing occupancy at 97%, there is a greater demand than supply. Mishawaka Housing Authority staff receives yearly trainings in Fair Housing.







Public Housing -

The Mishawaka Housing Authority aims to address the needs of the extremely low-income, very low-income, and low-income residents of the City of Mishawaka and St. Joseph County.

HUD provides funding to the Mishawaka Housing Authority through its Public Housing and Housing Choice Voucher Programs. The Mishawaka Housing Authority owns and manages 299 apartments of subsidized and affordable housing. 41 of these apartments are accessible for elderly/disabled residents at River View Towers. There were 347 families on the public housing waiting list for the Mishawaka Housing Authority. Of these families, 241 (69.5% of families) were extremely low income and 106 (30.5% of families) were low income.

Mishawaka Housing Authority - Public Housing

Address	Owner/Manager	Units
River View – 500 Lincolnway East, Mishawaka, IN 46544	Mishawaka Housing Authority	113
Barbee Creek Village – 400 10 th Street, Mishawaka, IN 46544	Mishawaka Housing Authority	161
Mary Phillips School – Mishawaka, IN 46545	Mishawaka Housing Authority	25

Source: The Housing Authority of the City of Mishawaka

Section 8 -

The Mishawaka Housing Authority oversees the Section 8 Housing Choice Voucher Program in the City of Mishawaka. Eligible participants who receive vouchers may search for their own privately owned housing. The Housing Authority encourages voucher holders to locate in areas of high opportunity and outside R/ECAPs. Housing Choice Voucher holders from the City of South Bend will port in to the City of Mishawaka. The Mishawaka Housing Authority has a baseline of 345 Section 8 Housing Choice Vouchers, with 269 vouchers currently in use as of April, 2019 and 524 families on the waiting list as of September 2019. Of the families on the Section 8 waiting list, 366 were Black or African American (69.8% of families on the Waiting List), 70 families were White (13.4% of families on the Waiting List), and one







(1) family was Asian. Of all the families on the Waiting List, 19 (3.6%) were Hispanic.

7. St. Joseph County Housing Authority –

The St. Joseph County Housing Authority is recognized as a public body corporate and a "Small Housing Authority" of the U.S. Department of Housing and Urban Development and the State of Indiana.

St. Joseph County Housing Authority 2410 Grape Road, Suite 2 Mishawaka, IN 46545 (574) 233-9305

mail.sjcha@gmail.con

The St. Joseph County Housing Authority assists in meeting the public housing needs of St. Joseph County. The St. Joseph Housing Authority only administers Section 8 Housing Choice Vouchers in the areas of St. Joseph County outside of the Cities of South Bend and Mishawaka.

Section 8 -

Eligible participants who receive vouchers may search on their own for privately owned housing. The Housing Authority encourages voucher holders to locate in areas of high opportunity and outside R/ECAPs. The St. Joseph County Housing Authority has a baseline of 215 Section 8 Housing Choice Vouchers. Of these, 168 vouchers are under lease. The St. Joseph County Housing Consortium has an additional nine (9) VASH vouchers for Veterans which are administered on behalf of the State of Indiana. There are currently 671 families on the St. Joseph County Housing Authority waiting list, 102 of which have a disabled resident.

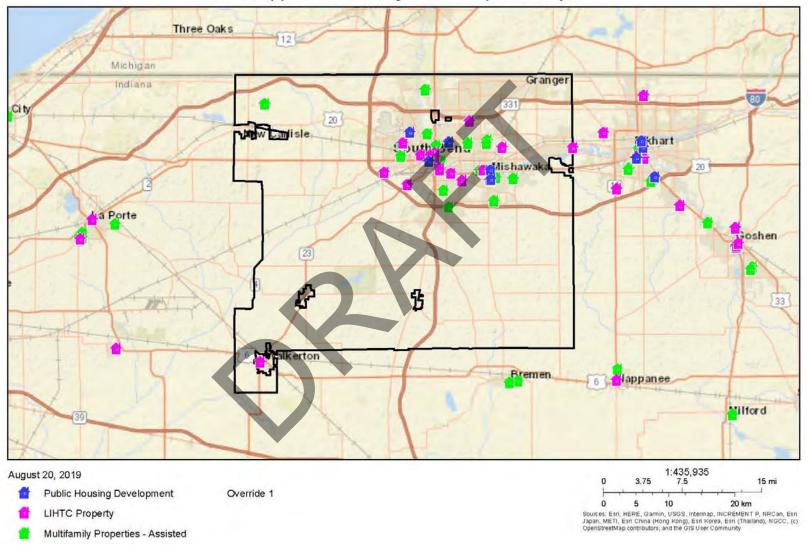
The following map illustrates all HUD multifamily properties in and around St. Joseph County.







HUD Supported Housing - St. Joseph County, IN









4. Family Self-Sufficiency (FSS) -

The housing Authority of South Bend (HASB) aims to address the needs of the extremely low-income, very low-income, and low-income residents of the City of South Bend. This mission of the Housing Authority of South Bend is to provide affordable housing in the most efficient and effective manner to income-qualified households in accordance with the rules and regulations prescribed by the U.S. Department of Housing and Urban Development, the State of Indiana, the City of South Bend, and/or any other entity providing funding for affordable housing programs. This was done through HASB assisting individuals and families through its public housing communities and Section 8 Project-Based units and the Housing Choice Vouchers. The Housing Authority promotes homeownership through its Family Self-Sufficiency Program.

Family Self-Sufficiency (FSS) programs are provided to Housing Choice Voucher holders and public housing tenants to transition from welfare to work or better paying jobs. The Head of Household works with the FSS staff to create a five-year plan, which lists steps they will take to pursue economic stability for their family. The plan includes goals to seek and maintain employment and become free of any welfare (cash) assistance received. Throughout the program, FSS staff helps families access government and community programs and services for financial aid, career training, job search, childcare, transportation, counseling, budgeting, credit repair, and even homeownership.

As the family progresses in their program, any rent increases caused by increases in salary, better jobs, or wages are deposited in an FSS savings account. At the end of five years, when the Head of Household completes their FSS goals and "graduates," they are eligible to receive money collected in this account. Past participants in FSS have returned to school, obtained living wage jobs, improved credit and finances, purchased vehicles, started businesses, and bought homes of their choice. Their futures become more secure as they build assets.

As of July, 2018, there were 60 families participating in the FSS program and all were Section 8 voucher holders. In addition, there was a Family Savings Account program which was available to residents who participate in the FSS Program. This program enables families to save funds to help with larger purchases, such







as education or homeownership. Current Housing Authority of South Bend tenants with the Housing Choice Voucher program or the Public Housing program are eligible to participate in the Family Self-Sufficiency program.

5. Low Income Housing Tax Credit -

The Low-Income Housing Tax Credit (LIHTC) Program was created under the Tax Reform Act of 1986 and is intended to attract private investment to develop affordable rental housing for low- and moderate-income households. This program provides a dollar-fordollar tax credit to reduce the developer's Federal income tax. The City of South Bend, the City of Mishawaka, and St. Joseph County promote the use of Low Income Housing Tax Credits. The following table shows LIHTC projects completed in St. Joseph County were outside the City of South Bend or the City of Mishawaka.

St. Joseph County, IN LIHTC Projects

Project Name / HUD ID Number	Project Address	Project City	Project ZIP Code	Total Number of Units	Total Low- Income Units
Arbors at Belleville Park I INA20030005	23291 Belleville Circle	South Bend	46619	104	104
Arbors at Belleville Park II INA20040005	23291 Belleville Circle	South Bend	46619	64	64
Arbors at Belleville Park III INA20070005	23291 Belleville Circle	South Bend	46619	40	38
Arbors at Ironwood Apts I INA20010082	1310 Blossom Drive	Mishawaka	46544	88	88
Arbors at Ironwood Apts II INA20010001	1310 Blossom Drive	Mishawaka	46544	40	40
Heritage Place at LaSalle Square INA20120085	3224 Ardmore Trail	South Bend	36628	72	72
Hoffman Hotel Apartments INA20160007	120 W LaSalle Avenue	South Bend	46601	48	48
Hope Transitional Housing INA20060088	432 S Lafayette Boulevard	South Bend	46601	22	22
St. Joseph County YWCA Residence INA20030125	1102 Fellows Street	South Bend	46601	30	26
New Heritage Homes Southeast INA20120110	501 Pennsylvania Avenue	South Bend	46601	54	54







South Bend Mutual Homes INA20080090	Scattered Sites	South Bend	46616	24	24
Prairie Apartments Phase I INA20080090	2630 Prairie Avenue	South Bend	46614	108	108
The Preserve at Fir Road INA20080115	2705 Spicer Lane	Mishawaka	46545	144	122

Source: http://lihtc.huduser.org/

6. HUD Assisted Housing -

HUD previously funded the Section 202 and Section 811 Supportive Housing programs to encourage and support the development of assisted housing in cities and counties across the country. The Section 202 Supportive Housing for the Elderly Program provided financial support for the construction, rehabilitation, or acquisition of supportive housing for the elderly. Similarly, the Section 811 Supportive Housing for the Disabled provided financial assistance for nonprofit organizations seeking to develop affordable, supportive housing for low-income adults with disabilities. The City of South Bend, the City of Mishawka, and St. Joseph County are supportive of the use of Section 202 and Section 811 Supporting Housing Programs, as well as the use of Low Income Housing Tax Credits (LIHTC).

7. Social Service Agencies -

The following table lists the organizations for the at-risk, homeless, or disabled populations in St. Joseph County.

Supportive Service Programs

Agency Name	Description
AIDS Ministries/AIDS Assist	AIDS Ministries/AIDS Assist helps support and enhance the lives of people infected with and affected by HIV and AIDS. They provide outreach and care services, as well as housing.
Boys & Girls Club of St. Joseph County	The Boys & Girls Club of St. Joseph County serves children throughout St. Joseph County with programming and a safe space for all children in the region.
Catholic Worker	Catholic Worker of South Bend provides food and shelter for the homeless in St. Joseph County.
Center for the Homeless	The Center for the Homeless is the lead entity for the St. Joseph County Continuum of Care. They provide emergency







	abolton the military at bounding and the control of the control of
	shelter, transitional housing, and housing for veterans. They also provide programs for adult self-sufficiency, children's support and development services, and mental health counseling.
Dismas House	Dismas House provides housing for the homeless with an emphasis on providing homes for ex-offenders. They encourage students to reside in Dismas House also offer warm meals to their residents.
Goodwill Bridges Out of Poverty	The Goodwill Bridges Out of Poverty program provides workforce and employment training, as well as financial management to individuals without jobs or with low-paying jobs.
Habitat for Humanity of St. Joseph County	Habitat for Humanity has a variety of programs to assist in providing quality housing for low- and moderate-income families, including homeownership programs, aging in place programs, and housing for victims of domestic violence.
HOPE Ministries	HOPE Ministries assists homeless individuals in St. Joseph County with housing, meals, and on-site healthcare.
IN*Source	IN*Source assists parents in St. Joseph County with the tools and training to work with children with a variety of disabilities, while also assisting the children with its programming.
La Casa de Amistad	La Casa de Amistad is a community center that works to provide bilingual and bicultural youths and adults with programming in St. Joseph County, with an emphasis on Hispanic/Latino culture.
Logan Center	The Logan Center supports people with intellectual and developmental disabilities in St. Joseph County. A wide variety of programs are run by the center for adults and children.
Mishawaka Food Pantry	The Mishawaka Food Pantry provides food for individuals in the City of Mishawaka and clothing for individuals throughout St. Joseph County that are experiencing homelessness.
Near Northwest Neighborhood, Inc.	Near Northwest Neighborhood is a neighborhood organization in South Bend with a housing component. Near Northwest Neighborhood will undertake housing rehabilitations in the neighborhood to preserve housing for residents.
Neighborhood Development Associates	Neighborhood Development Associates is a nonprofit housing corporation dedicated to the acquisition, development, and rehabilitation of affordable housing in the City of South Bend.
Notre Dame Economic Justice Clinic	The Notre Dame Economic Justice Clinic is a pro bono legal clinic run out of the Notre Dame University Law School. Among other types of legal complaints, the Clinic will handle fair housing cases in St. Joseph County.
Place Builders, Inc.	Place Builders is a construction company in St. Joseph County that frequently partners with developers of affordable housing.







REAL Services	REAL Services provides social services to seniors in the region, including meal delivery. REAL Services also acts as an advocate for the disabled elderly in the region.
South Bend Career Pathways	South Bend Career Pathways conducts workforce development in the region, with a focus on assisting unemployed or underemployed racial and ethnic minorities.
South Bend Heritage Foundation	South Bend Heritage Foundation creates affordable housing developments in the City of South Bend.
St. Joseph County Public Library	The St. Joseph County Public Library provides educational programming that serves youth, adults, and jobseekers in the County, while acting as a welcoming public space.
St. Margaret's House	St. Margaret's House is a day center that welcomes women and children who live in economic poverty. They also provide educational and emotional support programs for women at the facility.
Upper Room Recovery	Upper Room Recovery provides addiction services and a safe space for recovering addicts. They also provide a women's home for recovering addicts who are women.
Youth Services Bureau	Youth Services Bureau provides safety, shelter, and the opportunity to succeed for all youth with a variety of services, including emergency youth shelters, counseling programs, and a Drop In Center.
466 Works	466 Works is a non-profit development corporation designed to develop affordable housing and provide resources for rehabilitation for residents of the Southeast Neighborhood of South Bend.

8. Planning, Zoning, and Building Codes

St. Joseph County Zoning addresses the zoning ordinances for the City of South Bend, the Town of Lakeville, the Town of New Carlisle, the Town of North Liberty, the Town of Osceola, and the Town of Roseland, as well as the unincorporated areas of St. Joseph County. Reasonable accommodations in St. Joseph County must receive zoning approvals. Annexations are permitted in the State of Indiana provided they are contiguous and 100% of the residents of the annexed land approve of the annexation.

The City of South Bend's Zoning Ordinance received its last comprehensive update in 2004. Much of the housing in the region is single-family housing, and duplexes require variances as a result. Variances also must be requested for setbacks for housing. The City







of South Bend is in the process of updating the City's Zoning Ordinance for 2019.

Large, older single-family houses near Notre Dame University in the City of South Bend are frequently divided into households by-bedroom. The definition of family in the City of South Bend has been intentionally kept narrow to prevent these types of rental situations, as well as preventing the overcrowding of student housing.

The City of Mishawaka's Zoning Ordinance is designed to maintain a single-family housing, primarily residential character. The Zoning Ordinance allows for housing in commercial zones, but they are grandfathered in and if destroyed in a natural disaster, are razed for commercial property the area reverts back to its only commercial uses. Also, included is a special district for mobile homes. The Mishawaka Zoning Ordinance includes a definition of family of up to five unrelated people. It does not have a distance separation requirement for group homes. However, inspections of group homes are required on the part of police and fire departments, which could be considered discriminatory since it is not required for other multi-family developments.

Code Issues and Rental Registry

In the City of South Bend, code enforcement issues are common, particularly in rental housing, and the City is actively pursuing methods of resolving these issues. Windshield inspections are frequently conducted, as well as periodic walking inspections of rental properties. Code enforcement frequently cites absentee landlords for code deficient structures, as well as some overcrowded rental properties.

To combat the code issues with rental apartments in the region, the City of South Bend is in the process of creating a rental registry. The rental registry will allow for greater tenant protections in the City by documenting the landlords that are willing to address code issues for their clients, and the landlords that are not willingto do so.







U.S. Department of Housing and Urban Development (HUD)

HUD encourages its grantees to incorporate "visitability" principles into their designs. Housing that is "visitable" has the most basic level of accessibility that enables persons with disabilities to visit the home of a friend, family member, or neighbor. "Visitable" homes have at least one accessible means of egress/ingress for each unit, and all interior and bathroom doorways have 32-inch clear openings. At a minimum, HUD grantees are required to abide by all Federal laws governing accessibility for disabled persons.

Federal Requirements

Federal laws governing accessibility requirements include Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and the Fair Housing Act.

Section 504 of the Rehabilitation Act (24 CFR Part 8), known as "Section 504" prohibits discrimination against persons with disabilities in any program receiving Federal funds. Specifically, Section 504 concerns the design and construction of housing to ensure that a portion of all housing developed with Federal funds is accessible to those with mobility, visual, and/or hearing impairments.

The Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, and 225) (ADA) prohibits discrimination against persons with disabilities in all programs and activities sponsored by state and local governments. Specifically, ADA gives HUD jurisdiction over housing discrimination against persons with disabilities.

The Fair Housing Act was amended in 1988 to include persons with disabilities as a protected class, as well as to include design and construction requirements for housing developed with private or public funds. Specifically, this law requires property owners to make reasonable accommodations to units and/or public areas in order to allow the disabled tenant to make full use of the unit. Additionally, property owners are required to make reasonable accommodations to rules or procedures to afford a disabled tenant full use of the unit. As it relates to local zoning ordinances, the Fair Housing Act







prohibits local government from making zoning or land use decisions, or implementing land use policies that exclude or discriminate against persons of a protected class.

9. Taxes

Real estate property taxes may also impact housing affordability. This may not be an impediment to fair housing choice, but it does impact the affordability of housing.

The following table shows the millage rates for the jurisdictions in St. Joseph County.

St. Joseph County Property Taxes - 2018

	City/Town	School	County	Total
South Bend	3.5514	1.1685	0.6908	5.4107
Mishawaka	2.0516	1.1685	0.6908	3.9109
Roseland	0.5758	1.1685	0.6908	2.4351
Lincoln	0.3962	0.9667	0.6908	2.0537
Walkerton	2.0734	0.9667	0.6908	3.7309
New Carlisle	1.4045	1.1062	0.6908	3.2015
Taxes	Township	School	County	Total
Centre	0.4862	1.1685	0.6908	2.3455
Clay	0.3654	1.1685	0.6908	2.2247
Indian Village	0.3654	1.1685	0.6908	2.2247
German	0.3465	1.1685	0.6908	2.2058
Greene	0.1586	1.1685	0.6908	2.0179
Harris	0.3434	0.9076	0.6908	1.9418
Lincoln	0.0675	0.9667	0.6908	1.7250







Madison	0.0956	0.9076	0.6908	1.6940
Olive	0.1452	1.1962	0.6908	2.0322

Source: St. Joseph County Office of Assessment

The Residential Tax Abatement program is available to potential homeowners for consideration when thinking about homeownership. This allows homebuyers to phase in costs and lessen the immediate financial burden. There is also a legislative property tax cap for the State of Indiana, where the maximum tax paid after deductions is capped through a "circuit breaker" tax.

10. Transportation

Transportation plays an important aspect in determining where residents choose to live. Some families choose to live in an area that is more private than physically connected, while others place more emphasis on proximity to main arteries and highways for commuting to work.

Transpo

Transpo serves the City of South Bend, the City of Mishawaka, and the outlying areas of St. Joseph County, IN with 20 fixed routes and paratransit in the Cities of South Bend



and Mishawaka. Currently, there is no Sunday bus service.

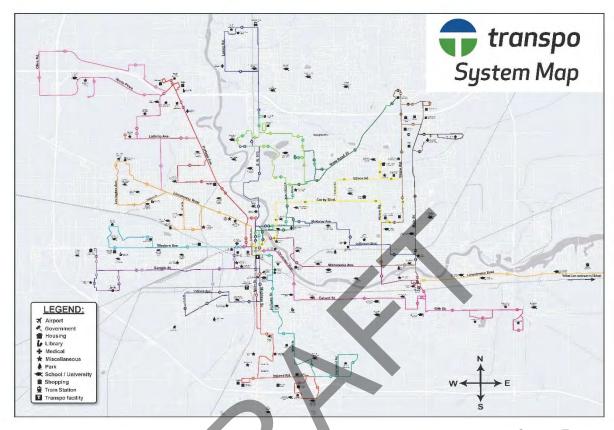
In 2018 and 2019, the number of riders for the fixed route services has been trending downward, while paratransit ridership has been increasing significantly. Transpo estimates that 80% of its fixed route ridership has no other form of transportation. Property taxes in the State of Indiana will freeze in 2020, and Transpo expects to lose a substantial amount of funding in that time period.

Transpo has 47 fixed route buses and 20 paratransit vehicles. Below is the service map for Transpo:









Source: Transpo

All Transpo buses are equipped with bike racks and handicap lifts. Currently, Transpo's goal is to replace its fleet of buses. Following replacement of the fleet, Transpo will attempt to sustain its current routes without cutting services given the coming budget constraints. Transpo is applying for Federal grants to complete its bus replacement activities.

11. Jobs and Workforce Development

Access to good employment affects housing choice. However, there can be disparities in access to good jobs. The City of South Bend has acknowledged these disparities and created the Office of Diversity and Inclusion to address the disparities in wealth resulting from the historic discrimination of certain protected classes. Stakeholders in the region have largely identified that racial and ethnic minorities and women are more likely to be disadvantaged financially, and therefore have limited housing choices.







Organizations and programs that are in place to develop the County's workforce, with an emphasis on diversity, include:

- The City of South Bend's Office of Diversity and Inclusion has a Diversity and Inclusion Plan with 3-5 specific goals in the areas of internal workforce, external workforce, and the makeup of the community. The Office performed a disparity study to create accountability and enforce the City's M/WBE ordinance for the first time since it was enacted in 1983. The Office has been working to create race and gender neutral measures to increase business development and support businesses at all levels from aspiration to scaling.
- South Bend Career Pathways provides training and workforce development classes. They have partnered with companies to enter the company and mentor or coach current employees and assist workers in additional professional development. They also provide soft skills, though the specific soft skills programs have been cut. They do a significant amount of outreach at community centers and churches, and have been successful in placement of employees after program completion.
- The Indiana Small Business Development Center focuses on entrepreneurship. They serve small businesses and recruit small businesses. Small businesses have trouble recruiting employees because they cannot fund the transportation and healthcare services that their employees often need.
- The Women's Entrepreneurship Initiative is an accelerator that is designed to assist women entrepreneurs in growing their businesses. This organization is designed to assist women in polishing a business plan and can gain access to high growth industries in the region.
- The City of South Bend has an Industrial Revolving Loan Fund which is designed to assist entrepreneurs in starting businesses in the Manufacturing, Communication, Wholesale trade, and Service Sectors. It provides low-interest gap financing to help companies expand their operations or assist in start-up.







12. Education

Education is often an important factor influencing the opportunities for where people choose to live. There are six (6) school districts in or partially in St. Joseph County, as well as charter schools and private schools. The six (6)



districts are: John Glenn School Corporation, Prairie United School Corporation, Penn-Harris-Madison Schools, School City of Mishawaka, South Bend Community School Corporation, and Union-North United School Corporation.

To ensure Indiana schools are performing, the State uses the Indiana Department of Education Compass, which is an online platform released annually in the Fall that provides a building level academic score to all schools. Additionally, the Compass Site informs the public of the academic performance measures of each school and provides local teachers, administrators, and parents an opportunity to compare the performance of local schools.

The following data table is provided through the Indiana DOE Compass and provides the enrollment numbers and racial makeup of all school districts in the County. St. Joseph County's public schools range from A rankings to D rankings. The school districts' grades from 2014 to 2017 are shown below.

School Performance Grades St. Joseph County, IN

District	2014	2015	2016	2017
John Glenn School Corp	Α	В	В	Α
Prairie United School Corp	В	В	В	В
Penn-Harris-Madison Schools	А	А	А	А
School City of Mishawaka	В	С	О	С
South Bend Community School Corp	С	D	С	С
Union-North United School Crop	В	С	В	В

Source: Indiana Department of Education







John Glenn School Corp

- 2,000 enrollment
- 89.7% White, 5.6% Hispanic
- 92.9% graduation rate

Prairie United School Corp

- 2,972 enrollment
- 85.7% White, 9.7% Hispanic, 3.7% Black
- 93.2% graduation rate

Penn-Harris-Madison Schools

- 11,496 enrollment
- 75.0% White, 6.3% Hispanic, 6.9% Black, 6.0% Asian, 5.3% Multiracial
- 96.9% graduation rate

School City of Mishawaka

- 5,423 enrollment
- 70.4% White, 9.3% Hispanic, 10.1% Black, 9.4% Multiracial
- 91.3% graduation rate

South Bend Community School Corp

- 17,225 enrollment
- 29.3% White, 22.7% Hispanic, 36.6% Black, 1.0% Asian, 10.1% Multiracial
- 77.7% graduation rate

Union-North United School Corp

- 1.223 enrollment
- 89.5% White, 5.2% Hispanic, 3.8% Multiracial
- 88.0% graduation rate

The South Bend Community School Corp is the most diverse school district in the region, and it is the only Minority-Majority school district in St. Joseph County. The graduation rate in South Bend is lower than the graduation rate for the State of Indiana (88.1%).







13. Section 3

HUD's definition of Section 3 is:

Section 3 is a provision of the Housing and Urban Development Act of 1968. The purpose of Section 3 to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State and local laws and regulations, be directed to low- and very low income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons.

The following are the guidelines that the City of South Bend's Department of Community Investment uses to accomplish Section 3 compliance:

- Notifying the Housing Authority of South Bend and local job training centers of new employment, training, or contracting opportunities resulting from the expenditure of funding covered by Section 3.
- Entering the Section 3 Clause into all covered contracts funded with CDBG and HOME funds.
- Assisting and actively cooperating with HUD in ensuring contractors and subcontractors comply with Section 3.
- Refraining from entering into contracts with contractors that are in violation of Section 3 regulations.
- Documenting actions taken to comply with Section 3 and submitting Section 3 summary reports.

During the preparation of this Analysis of Impediments study, no impediments or complaints were mentioned or filed based on the HUD Section 3 Requirements.







C. Private Sector

The private sector has traditionally been the greatest impediment to fair housing choice in regard to discrimination in the sale, rental, or advertising of dwellings, the provision of brokerage services, or in the availability of financing for real estate purchases. The Fair Housing Act and local laws prohibits such practices as



the failure to give the same terms, privileges, or information; charging different fees; steering prospective buyers or renters toward a certain area or neighborhood; or using advertising that discourages prospective buyers or renters because of race, color, religion, sex, handicap, familial status, national origin, and sexual orientation.

1. Community Homebuyers Corporation

The Community Homebuyers Corporation is a non-profit homeownership program in St. Joseph County. The program is a loan pool that is operated by a consortium of bankers and credit unions in the region in conjunction with the City of South Bend's Department of Community Investment. The Community Homebuyers Corporation has no minimum mortgage rate that they require to provide a homeownership loan.

Historically, the Community Homebuyers Corporation has struggled to expend all of its available funds. The CHC also struggles currently to market itself to populations with Limited English Proficiency (LEP), particularly to the City of South Bend's Hispanic community. This is due primarily to the lack of affordable housing. The median income in the region is low and only 41% of people in the County can afford the average mortgage loan. Loans disbursed by the Community Homebuyers Corporation traditionally have low delinquency rates and default rates. The banks and credit unions that make up the CHC partner with the City to provide homeowner education.

The CHC has considered expanding to rehabilitation and repair programs to help expend the money and address the additional rehabilitation needs of the community.







2. Newspaper/Magazine Advertising

Under Federal Law, no advertisement with respect to the sale or rental of a dwelling unit may indicate any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial status, or national origin. Under the Fair Housing Act Amendments, descriptions are listed in regard to the use of words, photographs, symbols, or other approaches that are considered discriminatory.

Real estate advertisements were reviewed from several real estate publications, including *The South Bend Tribune*. None of the advertisements in these publications contained language that prohibited occupancy by any protected class.

3. Private Financing

The Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.) requires any commercial institution that makes five (5) or more home mortgage loans, to report all home loan activity to the Federal Reserve Bank under the Home Mortgage Disclosure Act (HMDA). The annual HMDA data can be found online at www.ffiec.gov/hmda/ and is included in Part VII, Appendix C of this Analysis of Impediments. This analysis uses 2017 HMDA data to identify any discriminatory lending patterns between minority and non-minority households. The following two (2) tables provide an analysis of the HMDA data in the South Bend-Mishawaka, IN-MI Metropolitan Statistical Area (MSA).

It should be noted that the HMDA data pertains to the entire South Bend-Mishawaka, IN-MI MSA, which includes four (4) total counties (St. Joseph County, IN and Cass County, MI). While data for St. Joseph County is highlighted where possible, there are many differences between the County and the surrounding counties and municipalities that may provide some skewed outcomes.

The following table compares lending in St. Joseph County to the South Bend-Mishawaka, IN-MI MSA. Lending in St. Joseph County







has been extracted from the MSA data based on census tract. Conventional loans in St. Joseph County comprised 82.9% of the number of such loans in the MSA as a whole and 79.8% of the value of such loans.

HMDA Data Analysis for 2017

	Home Purchase Loans							
		SA / RHS k VA	Conventional		Refinancing		Home Improvement Loans	
	#	\$ Amount*	#	\$ Amount*	#	\$ Amount*	#	\$ Amount*
St. Joseph County	1,312	167,249	2,986	480,765	3,135	383,649	809	40,007
MSA/MD	1,593	202,605	3,603	602,525	4,045	524,587	1,015	55,074
% of metro area lending in St. Joseph County	82.4%	82.5%	82.9%	79.8%	77.5%	73.1%	79.7%	72.6%

*Note: Amounts in thousands

Source: https://www.ffiec.gov/hmda/

The following table shows the conventional loan applications in **St. Joseph County**. More than three-quarters (78.4%) of the loan applications in the County were originated, while eight percent (8.0%) were denied. County applicants had a much higher origination rate than the MSA as a whole, comprising 82.7% of all loans originated, as well as 82.2% of denied applications.







Disposition of Conventional Loans

		St. Joseph Coun	ty
	Count	% of St. Joseph County Applications	% of Total MSA Applications
Loans Originated	2,342	78.4%	82.7%
Approved, Not Accepted	168	5.6%	87.0%
Applications Denied	240	8.0%	82.2%
Applications Withdrawn	181	6.1%	81.2%
File Closed for Incompleteness	55	1.8%	85.9%

Source: https://www.ffiec.gov/hmda/







The following table outlines the disposition of conventional loans in the **South Bend-Mishawaka, IN-MI MSA** by income level (data for only St. Joseph County is not available). Loan applications from low-income households have the highest denial rates by a large margin, while upper-income households have the lowest denial rates and highest origination rates. The percentage of loans originated and percentage of applications denied are both correlated with income, whereas the higher the income level, the more likely the application will be approved and loan originated.

Disposition of Conventional Loans by Income Level in the South Bend-Mishawaka, IN-MI MSA – 2017

		cations eived	Loans Originated		Applications Approved, Not Accepted		Applications Denied			ications ndrawn	Applications Withdrawn or Closed for Incompleteness	
Income Level	Count	% of Total	Count	% of Total Income Level	Count	% of Total Income Level	Count	% of Total Income Level	Count	% of Total Income Level	Count	% of Total Income Level
Less than 50% of MSA Median	272	7.7%	181	6.6%	17	9.0%	61	21.5%	9	4.1%	4	6.3%
50-79% of MSA Median	786	22.4%	597	21.6%	51	27.0%	76	26.8%	37	17.1%	25	39.7%
80-99% of MSA Median	418	11.9%	334	12.1%	15	7.9%	20	7.0%	44	20.3%	5	7.9%
100-119% of MSA Median	383	10.9%	304	11.0%	25	13.2%	30	10.6%	18	8.3%	6	9.5%
120% or More of MSA Median	1,654	47.1%	1,344	48.7%	81	42.9%	97	34.2%	109	50.2%	23	36.5%
Total	3,513	100.0%	2,760	78.6%	189	5.4%	284	8.1%	217	6.2%	63	1.8%

Source: https://www.ffiec.gov/hmda/







The following tables show the disposition of conventional loans disaggregated by minority status and income level for the **South Bend-Mishawaka**, **IN-MI MSA**. The number of applications for conventional loans submitted by White applicants outnumbers minority applicants in each income level analyzed. White applicants have a higher origination rate and lower denial rate of conventional loans than minority applicants in all income categories.

Conventional Loan Disposition Rates by Minority Status, Less than 50% of MSA Median Income

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
White, Non- Hispanic	212	82.49%	152	71.70%	16	7.55%	34	16.04%	6	2.83%	4	1.89%
Minority, Including Hispanic	45	17.51%	24	53.33%	1	2.22%	18	40.00%	2	4.44%	0	0.00%
Total	257	100.00%	176	68.48%	17	6.61%	52	20.23%	8	3.11%	4	1.56%

Source: https://www.ffiec.gov/hmda/

The number of White, Non-Hispanic applicants, in this income category significantly outnumbers the number of minority applicants, including Hispanic applicants have a much lower origination rate and a much higher denial rate than White applicants with income less than 50% of the MSA median income.







Conventional Loan Disposition Rates by Minority Status, 50-79% of MSA Median Income

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
White, Non-Hispanic	614	84.92%	491	79.97%	37	6.03%	47	7.65%	25	4.07%	14	2.28%
Minority, Including Hispanic	109	15.08%	71	65.14%	10	9.17%	14	12.84%	9	8.26%	5	4.59%
Total	723	100.00%	562	77.73%	47	6.50%	61	8.44%	34	4.70%	19	2.63%

Source: https://www.ffiec.gov/hmda/

The number of White, Non-Hispanic applicants in this income category significantly outnumbers the number of minority applicants. Minority, including Hispanic households have a lower origination rate and a slightly higher denial rate.







Conventional Loan Disposition Rates by Minority Status, 80-99% of MSA Median Income

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
White, Non- Hispanic	348	87.88%	279	80.17%	13	3.74%	15	4.31%	38	10.92%	3	0.86%
Minority, Including Hispanic	48	12.12%	41	85.42%	2	4.17%	2	4.17%	2	4.17%	1	2.08%
Total	396	100.00%	320	80.81%	15	3.79%	17	4.29%	40	10.10%	4	1.01%

Source: https://www.ffiec.gov/hmda/

In the above table, the number of White, non-Hispanic applicants in this income category significantly outnumbers the number of minority applicants. Minority, including Hispanic households have a higher origination rate and a lower denial rate. However, these households only made up 12.12% of conventional loan applications in this income bracket.







Conventional Loan Disposition Rates by Minority Status, 100-119% of MSA Median Income

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	of Rec plication nority	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
White, Non- Hispanic	326	91.57%	264	80.98%	25	7.67%	19	5.83%	15	4.60%	3	0.92%
Minority, Including Hispanic	30	8.43%	22	73.33%	0	0.00%	7	23.33%	0	0.00%	1	3.33%
Total	356	100.00%	286	80.34%	25	7.02%	26	7.30%	15	4.21%	4	1.12%

Source: https://www.ffiec.gov/hmda/

In the above table, the number of White, non-Hispanic upper-income applicants significantly outnumbers the number of minority applicants. In this income category, minority applicants have a lower origination rate and a higher denial rate to white applicants.







Conventional Loan Disposition Rates by Minority Status, 120% or More of MSA Median Income

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	f R lica	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
White, Non- Hispanic	1,410	91.92%	1,167	82.77%	66	4.68%	72	5.12%	88	6.24%	17	1.21%
Minority, Including Hispanic	124	8.08%	94	75.81%	10	8.06%	8	6.45%	11	8.87%	1	0.81%
Total	1,534	100.00%	1,261	82.20%	76	4.95%	80	5.22%	99	6.45%	18	1.17%

Source: https://www.ffiec.gov/hmda/

In the above table, the number of White, non-Hispanic applicants in this income category significantly outnumbers the number of minority applicants. Compared to white applicants, minority, including Hispanic applicants have a lower origination rate and a slightly higher denial rate.

The following table offers a closer look at the denial rates of conventional loans by denial reason and income level. For applicants earning less than 50% of median income, the most common reason for denial is debt-to-income ratio, followed by credit history and collateral. For applicants earning 50-99% of median income, collateral was the most common reason for denial, followed by debt-to-income ratio, and then credit history. Overall, the most common reason for denial of conventional loans in the South Bend-Mishawaka, IN-MI MSA is collateral (26.88%), followed by debt-to-income ratio (23.66%) and credit history (19.89%).







Conventional Loan Denial Rates by Denial Reason and Income Level

		than 50% -ow)-79% iddle		99% - Middle)-119% Ipper		or More ligh		me Not ailable	Tota	l Denials
	Count	% of Income Level	Count	% of Total										
Debt- to-Income Ratio	16	55.17%	13	29.55%	3	25.00%	5	21.74%	7	9.33%	0	0.00%	44	23.66%
Employment History	0	0.00%	0	0.00%	0	0.00%	0	0.00%	1	1.33%	0	0.00%	1	0.54%
Credit History	6	20.69%	8	18.18%	2	16.67%	3	13.04%	17	22.67%	1	33.33%	37	19.89%
Collateral	4	13.79%	13	29.55%	5	41.67%	5	21.74%	23	30.67%	0	0.00%	50	26.88%
Insufficient Cash	1	3.45%	3	6.82%	0	0.00%	2	8.70%	1	1.33%	1	33.33%	8	4.30%
Unverifiable Information	0	0.00%	3	6.82%	0	0.00%	3	13.04%	3	4.00%	0	0.00%	9	4.84%
Credit Application Incomplete	0	0.00%	1	2.27%	2	16.67%	3	13.04%	12	16.00%	1	33.33%	19	10.22%
Mortgage Insurance Denied	0	0.00%	1	2.27%	0	0.00%	0	0.00%	0.00%	0.00%	0	0.00%	1	0.54%
Other	2	6.90%	2	4.55%	0	0.00%	2	8.70%	11	14.67%	0	0.00%	17	9.14%
Total Denials and % of Total	29	15.59%	44	23.66%	12	6.45%	23	12.37%	75	40.32%	3	1.61%	186	100.00%

Source: https://www.ffiec.gov/hmda/



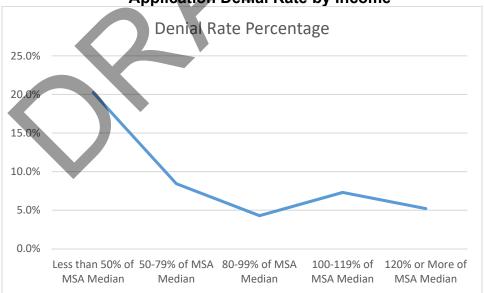




In summary, the HMDA data shows that approximately three-quarters (78.4%) of conventional loan applications in St. Joseph County County were originated, while eight percent (8.0%) were denied. County applicants had a much higher origination rate than that of the South Bend-Mishawaka, IN-MI MSA as a whole, comprising 82.7% of all loans originated. County applicants also had a much higher denial rate, at 82.2% of denied applications.

In the South Bend-Mishawaka, IN-MI MSA, the number of white applicants exceeds the number of minority applicants. Additionally, the origination rates are higher and denial rates lower for 'White' applicants than for 'Minority, including Hispanics' in every income category except for households at 80-99% Area Median Income, where origination rates are slightly better for minorities. As incomes decrease, denial rates increase, often due to these applicants being first-time homebuyers with little to no collateral, poor credit history, and debt. While denial rates decrease as income increases, minorities have higher denial rates even within the same income groups.

Chart IV-5 – Conventional Loan Application Denial Rate by Income



Source: https://www.ffiec.gov/hmda/

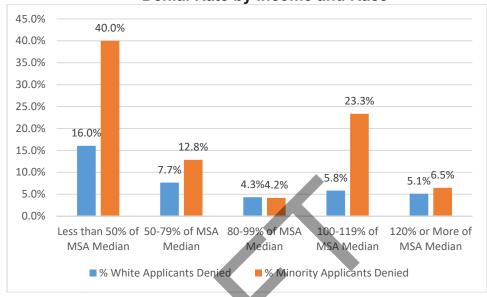








Chart IV-6 – Conventional Loan Application
Denial Rate by Income and Race



Source: https://www.ffiec.gov/hmda/

Based on this data analysis, there is the possibility that there are discriminatory lending practices in the MSA, as there are disparities between the origination and denial rates of minority and non-minority households. In every income category, White applicants have a higher loan origination rate and a lower denial rate than minority applicants. While denial rates decrease as income increases, minorities have higher denial rates even within the same income groups.

While this data provides an insight into lending patterns in the South Bend-Mishawaka, IN-MI MSA, it should be noted that data unique to the City level would yield more conclusive findings and provide a more accurate understanding of any existing lending issues in either City. However, this data is not available.

D. Citizen Participation

The South Bend Department of Community Investment and the Mishawaka Department of Community Development undertook a broad participation strategy for this Analysis of Impediments to Fair Housing Choice to engage as many individuals, organizations, and agencies as possible.







Stakeholders: The City of South Bend and the City of Mishawaka developed a list of stakeholders with direct knowledge of, and experience in, the housing market and issues affecting fair housing. Identified stakeholders were divided into the following categories:

- Public Housing Authorities
- Advocacy Organizations
- Neighborhood Organizations
- Direct Housing Stakeholders
- Social Service Providers
- Fair Housing Agencies
- Transportation Agencies
- Planning Organizations
- Banks/Mortgage Companies
- Workforce & Economic Development Organizations

Agency/Organization/Stakeholder Meetings: The City of South Bend and the City of Mishawaka contacted all identified organizations and agencies to set up smaller meetings consisting of similar organizations to hold more in-depth conversations.

- Housing Authorities April 22, 2019 (Housing Authority Offices) & April 25, 2019 (Mishawaka City Hall)
- Neighborhood Organizations April 22, 2019 (Near Northwest Neighborhood Center)
- Planning Organizations April 23, 2019 (County-City Building) & April 25, 2019 (Mishawaka City Hall)
- Diversity & Human Rights April 23, 2019 (County-City Building)
- Housing Providers April 23, 2019 (St. Joseph County Public Library)
- Advocacy Organizations April 23, 2019 (St. Joseph County Public Library)
- Faith-Based Organizations April 24, 2019 (Near Northwest Neighborhood Center)
- Social Services April 24, 2019 (Near Northwest Neighborhood Center)
- Public Transit April 24, 2019 (Near Northwest Neighborhood Center)
- Health Services April 24, 2019 (Near Northwest Neighborhood Center)
- Workforce & Economic Development April 24, 2019 (Near Northwest Neighborhood Center)
- Continuum of Care April 25, 2019 (Mishawaka City Hall)







 Banks/Mortgage Companies – April 26, 2019 (1st Source Bank Headquarters)

Any identified stakeholders that were not available to attend the meeting, as well as some of the aforementioned stakeholders, were then called to either (1) follow-up if they partook in either of the Community Meetings or (2) discuss fair housing issues with agencies/individuals who were unable to attend one of the Public Meetings.

Public Meetings: The City of South Bend and the City of Mishawaka also held two (2) Public Meetings to engage the public and local organizations/agencies and help identify issues impacting Fair Housing Choice. The First Public Meeting was held on Tuesday, April 23, 2019 at the South Bend Public Library and the Second Public Meeting was held on Wednesday, April 24, 2019 at the Mishawaka City Hall.

There were seventeen (17) resident attendees at the meeting held in the City of South Bend and two (2) resident attendees at the meeting held in the City of Mishawaka. Additionally, the twelve (12) scheduled meetings with various government staff, social service organizations, housing agencies, realtors, and banks were well-attended. Public Meetings were advertised in the "South Bend Tribune," the largest English-language newspaper in circulation in the area, and "El Puente" (Spanish) newspapers.

- The City of South Bend and the City of Mishawaka emailed Public Meeting and Stakeholder Meeting invitations to:
 - Advocacy Agencies
 - Banking Institutions
 - Workforce and Economic Development Organizations
 - Fair Housing Agencies
 - Housing Agencies
 - Housing Authorities
 - Planning Agencies
 - Social Service Agencies
 - Transportation Agencies

Additional Outreach: The City of South Bend and the City of Mishawaka also employed the following to encourage extensive engagement and participation:







- Invitations to the stakeholder meetings were sent out by the Cities prior to the meetings (April 22nd through April 26th).
- The City of South Bend and the City of Mishawaka conducted phone interviews with three (3) additional housing and social service organizations who were unable to attend the public hearings or individual group meetings.

Outreach to Persons with Disabilities: The City of South Bend and the City of Mishawaka held meetings with the Logan Center and Oaklawn Psychiatric Care to obtain an understanding of the issues affecting persons with disabilities. Additionally, a phone interview was completed with the REAL Services to obtain the needs of disabled elderly in the region.

Resident Surveys: The survey was available online in both English and Spanish and physical copies were placed on public display to encourage resident input. Links to the survey were also posted in Nextdoor neighborhood groups and shared through the Neighborhood Resource Connection's listsery that is sent to all neighborhood organizations and associations.

The online survey produced 135 responses. Actions to spread knowledge of the surveys included posting the survey on Nextdoor neighborhood groups, sending the survey to neighborhood organizations and associations for distribution, and emailing the link to interested parties. The information provided in these anonymous surveys were crucial in developing an accurate assessment of fair housing issues in the County.

The following is a summary of the 135 responses received:

Notable Characteristics

Some of the notable characteristics of respondents included (as a percentage of those that answered each question):

- The majority of respondents are female at 69.17%.
- The vast majority (87.88%) of respondents are White.
- Over one-third of the respondents were over the age of 60 (39.85%).
 More than half of respondents were over the age of 50 (61.65%).
- Of those that answered the question, 25.0% were low- to moderate-income for their family size.
- The majority, at 46.97%, come from two person households.
- 81.30% are homeowners.







 42.72% of respondents felt that residents of the County did not know how to report fair housing violations, and a further 45.63% were unsure whether residents know or do not know how to report violations.

The following is a list of needs/issues associated with different areas of community and economic development. Values were calculated as a percentage of those that answered each question.

Accessibility:

- 52.87% of respondents believe that there are is a need for curb and sidewalk improvements in the County.
- 20.69% believe there are not enough ramps leading to public facilities throughout the County.

Employment:

- Only 19.6% of respondents indicated that there are employment issues in the County.
- Of those that mention employment, 53.8% say there are jobs but the pay for them is too low.

Housing:

- 53.78% said that there are housing issues within St. Joseph County, and 36.62% of those respondents think affordability is the biggest issue.
- 62.18% believe there is a need for more affordable housing.
- 55.26% do not believe there is a need for more single-family housing.
- 63.25% do not believe there is a need for more rental housing.
- 41.38% cite property maintenance as an issue in their neighborhood.
- 59.65% of respondents believe there is a need for more accessible housing.
- Other housing issues, needs, and programs include vacant housing, lowquality housing, and lead-based paint.

Homelessness:

- 28.57% said that there is a need for services for the homeless in St. Joseph County.
- 28.95% of those that mentioned homelessness described the need for more shelters.

Fair Housing:

 Only 11.65% of respondents are aware that residents can make reasonable housing accommodation requests to their landlords.







 42.72% believed residents did not know who to contact, and 45.63% were unsure of who to contact.

Reasons Fair Housing Complaints Are Not Reported:

- 19.55% specifically mention fear of retaliation, including eviction, legal reprisal, and poor retreatment.
- 24.06% point to a lack of knowledge in reporting practices as a cause.
- The remaining 33.83% of respondents were not sure.

Transportation:

- 8.27% of respondents stated that there are problems or issues with public transportation in St. Joseph County.
- 59.77% of respondents believed that streets in the City needed to be addressed.

Other:

- 23.48% of respondents describe a need for greater health services, including mental health and addiction services.
- 45.98% of respondents believed that public safety was a concern in their neighborhood.

The following table illustrates the types of situations that may result in further discriminations and/or barriers to fair housing in St. Joseph County:

Resident Survey Results

	Strongly Agree	Agree	Neutral / Unsure	Disagree	Strongly Disagree
Concentration of subsidized housing in certain neighborhoods	25.26%	42.11%	25.26%	4.21%	3.16%
Lack of affordable housing in certain areas	35.11%	44.68%	13.83%	4.26%	2.13%
Lack of accessible housing for persons with disabilities	25.26%	43.16%	25.26%	4.21%	2.11%
Lack of accessibility in neighborhoods (i.e. curb cuts)	18.09%	31.91%	34.04%	13.83%	2.13%







Lack of fair housing education	29.79%	44.68%	18.09%	4.26%	3.19%
Lack of fair housing organizations in the County	20.88%	25.27%	39.56%	8.79%	5.49%
State or local laws and policies that limit housing choice	10.87%	15.22%	57.61%	7.61%	8.70%
Lack of knowledge among residents regarding fair housing	30.85%	39.36%	23.40%	4.26%	2.13%
Lack of knowledge among landlords and property managers regarding fair housing	20.21%	36.17%	23.40%	14.89%	5.32%
Lack of knowledge among real estate agents regarding fair housing	12.77%	18.09%	36.17%	21.28%	11.70%
Lack of knowledge among bankers/lenders regarding fair housing	13.98%	18.28%	37.63%	18.28%	11.83%
Other barriers	23.73%	13.56%	59.32%	1.69%	1.69%

Source: Citizen Survey

Additional Comments or Concerns:

Typical responses included:

- "We need to explore how to provide housing for people who have been evicted and for people that have committed a felony in the past."
- "There is not enough affordable housing. Gentrification of the Near West side is pushing the poor further west. Too many high-priced condos are being built. Slumlords are allowed to thrive because the poor, formerly incarcerated and families with children being denied decent housing. The poor are being relegated to certain neighborhoods."
- "This community is truly, truly a "skills-trade" desert. It has been extremely challenging to continue to live in this community when I can't get a plumber, an electrician, a handyman, because they are so booked with other clients."
- "Individuals that face discrimination are usually living with multiple barriers to healthier lifestyles like income inequality, health disparities, gaps in opportunities, education/training barriers, and a core circle of friends/family that face the same barriers. This means that reporting these concerns or violations is time restrictive and/or seems like a waste of time. When someone is constantly being told by our community that they don't matter or that their difficulties are not important, individuals







become trained to seek out solutions instead of seeking justice. Seeking justice is a luxury that most people (especially those being victimized) do not have the resources (time, transportation, formal language register, knowledge, access to communication types, etc.) to complete."

Public Meeting on the Draft Al Public Comments

The 2020-2024 Analysis of Impediments to Fair Housing Choice was made available on the City of South Bend's and the City of Mishawaka's website at https://southbendin.gov/department/community-investment/neighborhood-development/,

http://mishawaka.in.gov/communitydevelopment, and a hardcopy was placed at the following locations beginning on November 1, 2019:

- The St. Joseph County Public Library (all branches)
- Mishawaka Public Library (all branches)
- Walkerton Public Library
- New Carlisle-Olive Township Public Library
- City of South Bend Department of Community Investment
- City of South Bend Office of the Clerk
- City of Mishawaka Planning Department

The document was on public display for a period of thirty (30) days. Residents were encouraged to submit written or oral feedback on the Analysis of Impediments.

Based on the citizen participation process and fair housing analysis, the City of South Bend, the City of Mishawaka, and St. Joseph County staff identified the following fair housing issues:

Housing Opportunities:

- There is a lack of affordable housing in St. Joseph County that is decent, safe, and sanitary.
- There is a lack of Federal and State funds for housing subsidies and the development of new affordable housing is not economically feasible for private developers.
- There is a lack of affordable housing units in areas of opportunity where low-income persons and households may move.
- There is a lack of financing to support the purchase of affordable starter homes.







 There is enough vacant land for infill housing, but a lack of financial incentives to develop affordable housing on the vacant land.

Housing Choice:

- Housing units that are deteriorated and below code standards tend to be available at affordable rents.
- Housing units are concentrated in neighborhoods that are segregated by race or ethnicity in addition to income.
- The special needs population in St. Joseph County, particularly in the City of South Bend, has increased in the last 15 years, but landlords are frequently unwilling to make reasonable modifications and accommodations.
- There are physical, economic, and social justice barriers that impede the development of new affordable and accessible housing in St. Joseph County.
- There is a lack of "mixed-income" housing being built in the County.

Cost Overburden:

- Lower household incomes create cost overburden housing conditions; approximately 13.2% of homeowners and 40.4% of renters in the County are cost overburdened of 30% or more.
- The elderly, on fixed income, cannot afford to make the repairs, alterations, and accommodations to their homes to make them accessible to their needs.

Disability/Accessibility:

- There is a lack of housing in the County that is accessible and affordable for the elderly, the disabled, and persons with special needs.
- The denial by landlords to make reasonable modifications and accommodations limits the amount of accessible units in the County that are for rent for persons with special needs.

Fair Housing:

- Zoning ordinances that were meant to prevent student rentals have been far-reaching, and have negatively affected protected classes.
- Tenants and homebuyers do not always file housing discrimination complaints when renting or buying a home.
- Predatory loans in the region are common. As a result, foreclosure and eviction rates are high.







- Persons with Limited English Proficiency (LEP) do not always have a fair housing choice.
- There is a lack of cooperation on the part of landlords to address accessibility issues.
- There is a lack of awareness of tenants' rights, including what reasonable modifications and accommodations are.

Access/Mobility:

- The lack of public transportation in the County is not convenient for work, health care, shopping, etc., which limits the choices where a low-income household can live.
- Landlords will frequently refuse to make reasonable modifications and accommodations.
- Families and individuals have a right to live wherever they chose if affordable housing is available outside areas of concentration.

The St. Joseph County Housing Consortium held two Public Hearings on the "draft" 2020-2024 Analysis of Impediments on Wednesday, November 13 in the Cities of South Bend and Mishawaka.









V. Actions and Recommendations

The following impediments to fair housing choice and recommendations are presented to assist the Cities of South Bend and Mishawaka, and St. Joseph County to affirmatively further fair housing in the Region. The previously identified impediments to fair housing choice were discussed in Section III and progress was reported for each impediment. New and carried over impediments to Fair Housing Choice are presented on the pages that follow. Of the previously identified impediments, racial segregation, a lack of accessible housing, and economic barriers for racial and ethnic minorities are still present in St. Joseph County, despite the Cities' and County's best efforts, and based on economic conditions, will continue to be addressed by the City of South Bend, the City of Mishawaka, and St. joseph County.

Below is a list of impediments that were developed by the City of South Bend, the City of Mishawaka, and St. Joseph County for the shared 2020 Analysis of Impediments to Fair Housing Choice.

A. Impediments to Fair Housing Choice

Using these findings, the City of South Bend, the City of Mishawaka, and St. Joseph County developed the following impediments for the 2020-2024 Analysis of Impediments to Fair Housing Choice and defined specific goals and strategies to address each impediment.

• Impediment 1: Fair Housing Education and Outreach

There is a need to educate persons about their rights under the Fair Housing Act and to raise community awareness to affirmatively further fair housing choice, especially for low-income residents, minorities, and the disabled population.

Goal: Improve the public's, realtors', landlords', and local officials' knowledge and awareness of the Fair Housing Act, related laws, regulations, and requirements to affirmatively further fair housing throughout St. Joseph County.







Strategies: To meet this goal, the following activities and strategies may be undertaken by the Cities of South Bend and Mishawaka, and St. Joseph County:

- 1-A: Continue to promote Fair Housing awareness through media, seminars, and training to provide educational opportunities for all persons to learn about their rights under the Fair Housing Act and Americans with Disabilities Act.
- 1-B: Continue to prepare and distribute literature and informational material concerning fair housing issues, an individual's housing rights, and a landlord's responsibilities to comply with the Fair Housing Act by making reasonable accommodations.
- 1-C: Educate residents that they have the right to live outside concentrated areas of poverty.
- 1-D: Work with the local Board of Realtors to educate and promote fair housing.
- 1-E: Strive for better intergovernmental cooperation between state and local partners, as well as community groups, to effectively identify and address potential barriers to affordable housing choice.
- 1-F: Publish forms, informational material, etc. in both English and Spanish.

• Impediment 2: Quality of Rental Housing vs. Affordability

St. Joseph County has a limited supply of rental housing that is decent, safe, sound and affordable and 41.8% of all households are cost overburdened and they spend 30% or more of their net monthly income on housing.

Goal: Increase the supply of affordable rental housing through new construction and rehabilitation activities.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the Cities of South Bend and Mishawaka, and St. Joseph County:

 2-A: Continue to support and encourage community organizations to rehabilitate rental housing.







- 2-B: Continue to enforce local codes and ordinances, and develop a Rental Registry Program in the City of Mishawaka and St. Joseph County.
- 2-C: Promote and encourage the public housing authorities to offer Section 8 Housing Choice Voucher holders the option to convert to homeownership.
- 2-D: Continue to fund the Community Homebuyers Corporation's downpayment assistance program for qualifying individuals, including tenants that wish to buy homes.
- 2-E: Continue to fund rental assistance to lower housing costs for the very low income, mentally disabled, special needs populations, and homeless.

• Impediment 3: Lack of Quality Affordable Homeowner Housing

There is a lack of resources for low- and moderate-income households to purchase a home. Many houses that are available for purchase are in need of substantial rehabilitation work.

Goal: Increase the supply of various types of affordable housing by new construction and rehabilitation activities.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the Cities of South Bend and Mishawaka, and St. Joseph County:

- 3-A: Support financially, the purchase of small starter homes at affordable prices for low- and moderate-income residents throughout St. Joseph County.
- 3-B: Support and promote the development of affordable infill housing on vacant land.
- 3-C: Continue to fund the Community Homebuyers Corporation's downpayment assistance program for low- and moderate-income homebuyers.
- 3-D: Support and promote the rehabilitation of owner-occupied homes under the South Bend/UEA Pilot Home Repair Program.
- 3-E: Provide financial and development incentives to private developers and non-profits to construct and/or rehabilitate affordable housing.







 3-F: Encourage and promote the development, construction, and/or rehabilitation of mixed-income housing in areas that are not low-moderate income.

• Impediment 4: Continuing Need for Accessible Housing Units

As an older built-up environment, there is a lack of accessible housing units in St. Joseph County. Since 53.2% of the County's housing units were built over 60 years ago and do not have accessibility features, while 13.7% of the County's population is classified as disabled.

Goal: Increase the number of accessible units for the physically disabled and developmentally delayed through new construction and rehabilitation of existing housing.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the Cities of South Bend and Mishawaka, and St. Joseph County:

- 4-A: Promote programs to increase the amount of accessible housing through rehabilitation of existing housing stock for homeowners and renters.
- 4-B: Encourage the development of new construction of accessible and visitable housing through financial or development incentives.
- **4-C:** Continue to enforce ADA and Fair Housing requirements for landlords to make "reasonable accommodations" for tenants who are disabled.
- 4-D: Continue to promote programs to assist elderly homeowners with accessibility improvements to their properties so they may remain in their own homes.

• Impediment 5: Economic Issues Affecting Housing Choice

There is a lack of economic opportunities in the County which prevents low-income households from increasing their income and limits the choice to live outside areas of concentrated poverty.

Goal: The local economy will provide new job opportunities, which will increase household income, and will promote fair housing choice.







Strategies: To meet this goal, the following activities and strategies may be undertaken by the Cities of South Bend and Mishawaka, and St. Joseph County:

- 5-A: Strengthen partnerships that enhance local businesses, expand the tax base, and create a more sustainable economy for residents and businesses.
- 5-B: Support and enhance workforce development and skills training that results in increased job opportunities and a living wage.
- 5-C: Continue to support programming that enhances entrepreneurship and small business development, expansion, and retention within low- and moderate-income, and minority neighborhoods.
- 5-D: Continue to promote and encourage economic development with local commercial and industrial firms to expand their operations and increase employment opportunities.

• Impediment 6: Impacted Areas of Concentration

There are specific areas throughout the County where the concentration of low-income persons and minorities exceeds 70% of the area's population.

Goal: Promote the de-concentration of minorities outside the Northwestern and Southeastern sections of the City of South Bend to reduce minority concentration.

Strategies: To meet this goal, the following activities and strategies may be undertaken by the Cities of South Bend and Mishawaka, and St. Joseph County:

- 6-A: Support, promote, and plan for affordable housing developments outside areas of minority concentration.
- 6-B: Market and promote housing opportunities for minorities outside areas of minority concentration.
- 6-C: Provide assistance to minority households to locate their residences outside areas of high minority concentration.







B. Activities and Recommendations to Affirmatively Further Fair Housing

To affirmatively further fair housing, the following actions have, and will be, implemented by the City of South Bend, the City of Mishawaka, and St. Joseph County through their Fair Housing Plan through various activities noted below:

- 1. The South Bend Office of Diversity and Inclusion's Human Rights Department serves all of St. Joseph County in addressing Fair Housing Complaints. All municipalities within St. Joseph County will continue to support the expansion of the capabilities of the Human Rights Department.
- 2. South Bend's Human Rights will continue to enforce fair housing through public education and outreach.
- 3. The communities will partner with the Notre Dame Economic Justice Clinic to assist low income residents with free legal assistance to insure that they will have fair housing.
- 4. The City will continue to provide funds to report housing discrimination complaints.
- 5. The City will encourage testing and auditing of fair housing practices through its regional fair housing providers.
- 6. The Human Rights Commission will continue to educate and attempt to overcome any remaining "Not in My Back Yard" attitudes in the County through its fair housing providers.
- 7. The Cities will continue to make every attempt to increase geographic choice in housing by providing links on their websites for low-income households to use.
- 8. The City of South Bend will utilize vacant land to construct affordable housing.
- 9. The Human Rights Commission will continue to promote integration of public housing.
- The Housing Authorities will promote Section 8 Voucher landlords to rent to residents outside racially and ethnically concentrated areas of poverty.
- 11. The City of South Bend will continue to partner with neighborhood organizations to improve the quality of the affordable housing stock in the area for renters and homeowners.







- 12. The communities will continue to promote economic development programs to assist in providing quality jobs to residents that will enable them to access more housing options.
- 13. On an annual basis, the Cities of South Bend and Mishawaka and St. Joseph County will continue to declare April to be Fair Housing Month via proclamation, in conjunction with holding an annual fair housing workshop with partners.
- 14. The Human Rights Commission will continue to perform outreach to the public by providing updated housing discrimination information.
- 15. The City of South Bend will continue to support the Community Homebuyers Corporation to promote homeownership among low- and moderate-income residents.
- 16. The Human Rights Commission will continue to work with the Indiana Civil Rights Commission.









VI. Certification

Signature Page:

I hereby certify that this 2020-2024 Analysis of Impediments to Fair Housing Choice is in compliance with the intent and directives of the Community Development Block Grant (CDBG) Program, HOME Investment Partnership (HOME) Program, and Emergency Solutions Grant (ESG) Program regulations.

City of South Bend, IN:
Pete Buttigieg, Mayor
Date
City of Mishawaka, IN:
David Wood, Mayor
Date







VII. Appendix

The following items are in the appendix:

- Appendix A Agency/Organization Meetings & Additional Consultations
- Appendix B Resident Surveys and Agency Surveys
- Appendix C Public Comments
- Appendix D HMDA Data









A. Appendix A – Agency/Organization Meetings

Attached are summaries of the following meetings:

- Advocacy Organizations
- Area Planning Commission
- Bankers & Lenders
- City Council Members
- Continuum of Care
- Code Enforcement, Sustainability, and Planning
- Diversity & Human Rights
- Notre Dame Economic Justice Clinic
- Faith-Based Organizations
- Health Services
- Housing Authority of South Bend
- Housing Authority of the City of Mishawaka
- Housing Providers
- Social Services
- Public Transportation

ADVOCACY GROUPS

April 23, 2019 3:30-4:30 p.m. SJC Public Library-Main Branch 2020-2024 Housing & Community Development Plan and Analysis of Impediments to Fair Housing Choice St. Joseph County Housing Consortium

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Organization		LOGOTA	La Casa de Amistral	South Bend Common Guncil	(Poss Community		
N C	Wilner Gusse	HAMY Tobolski	Juan Constantino	Keama Williams-Preston	Michael fitten		

City of South Bend, Indiana FY 2020-2024 Five Year Consolidated Plan and Analysis of Impediments

Interview with Advocacy Organizations Tuesday, April 23, 2019 at 3:30pm

In attendance: Wilmea Cusic, IN*Source; Hally Tubulski, Logan; Juan Constantino, La Casa de Amistad; Regina Williams-Preston, South Bend Common Council; James Florek, Catholic Workers; Michael Patton, Cross Community; Walter Haglund, Urban Design Ventures, LLC; Brandon Wilson, Urban Design Ventures, LLC

The following was discussed at the meeting:

- Wilma Cusic IN*SOURCE, advocates for children and young adults with disabilities.
 - People with disabilities don't have decent places to live. They are a parent-training center for children with disabilities.
 - o They also deal with developmental disabilities.
 - Some parents passed their disabilities on hereditarily, so In*Source could provide some education for these parents too.
 - They work with the Bureau of Developmental Disabilities. Affordable housing for people
 with disabilities is important, and it is part of the reason for supportive housing because
 it is less expensive.
- Cheryl Ashe Community Advocate, works with Ex-Offenders and re-entry
- There is a push among landlords and the Housing Authority to pay for utilities entirely on the part of the tenant, even when the wiring is incorrect and the electric bills are too high
- Insulation in public housing is extremely poor and the temperature must be increased or the population is using space heaters
- On the East Side, rents are being charged on a per bedroom basis so landlords can rent to Notre Dame students to get more money
- There is a lot of purchasing of small houses, tearing the house down, and then building a much larger house in the Eastern area
- Sex offenders who come out of prison have ten years on the register or lifetime on the register. They cannot live within 1,000 square feet (between 2 1/2 and 3 blocks) of the property line of a park, school, youth-oriented center, or daycare facility
 - This makes it very difficult for these people to find housing, and it also makes it impossible for sex offenders to stay in certain homeless shelters
 - o There are people who will become homeless because they are a sex offender
 - There have been cities that have addressed this issue
- The recovery house that is coming in to the area is grouping recovering addicts together, however they may not be receiving treatment.
 - The problem may be that the Oxford Houses are too large for these zoning types.
- Mishawaka had three housing co-ops built in the 60s. South Bend has two co-ops built.
 - Co-op housing is cheaper than single family housing, especially in regards to paying for repairs.
- It would benefit micro-enterprises to have low-rent places to sell their products

- There is not really housing choice for Moderate-income people, and their choice is only a single-family home.
- The people at the library would frequently get questions from people on land contracts. They would go to the library to look through the legal books.
- Jim Floreck Catholic Workers House/Community Forum for Economic Justice
 - They own houses that are owned by an LLC. They have two residences for men and women with volunteer staff. They house about a dozen men and women for varying lengths of time.
 - They provide both transitional and permanent housing.
 - They have a house for people to eat breakfast and take showers. It serves anybody but it's targeted to the chronically homeless.
 - o They do not rely on public funds. They are located on the same block as Dismas House, and the women's transitional housing is also on this block.
- Regina Williams Found that neighborhoods that saw more of the development and funding came from neighborhoods with CDCs
 - o Paid CDCs got more work done and volunteer ones were not able to get the same accomplishments. Though they got 501(c)(3) status, it made it more difficult
 - Odom Community Developers was just founded for the farther west side, long-term plan is to build 28 houses and repair 60
 - There are food deserts in the area and there may be some way to address them with CDBG money.
 - o There is also a need for nutrition education in the City.
- Logan Center provides housing for people with disabilities.
 - o Logan tries to group together people with disabilities that can all live together. But they have had issues finding landlords that will accommodate these whole groups.
 - As more people get off the waiting list for disability housing, more people are looking for housing and there are less ADA accessible and other accessible houses on the market.
 - o It is a challenge to find much of the appropriate accommodations.
 - o If they rent the facility, it is harder to put in the accommodations. They are much more likely to put in accommodations and modifications in the houses they own.
 - They have 7-8 Logan-owned group homes. All are in South Bend. There are staff at these homes.
 - o There are also supportive living sites that are unstaffed with smaller amounts of roommates (3-4) that are not fully staffed in Mishawaka.
 - Logan tries to find affordable 3 bedroom houses and group employed or employable people together that can also access public transportation with that location.
 - There was pushback from neighbors for accommodations in Mishawaka, but this may have been HOA more so than zoning.
- As a senior, it is much easier to get funding to modify housing than it is for others. Real Services provides funding.
- Juan Constantino La Casa de Amistad is a community center for children and youth.

- They see lots of redlining on the west side where they force people onto the west side to get a cheap \$20,000 house. The person they were paying to purchase the home is on a land contract and they no longer own the home and are kicked out.
- They partnered with Tusly Harper Noca to do free consultations for the people who have been kicked out of their houses due to landlords with land contracts.
- New immigrants that come into the area are taken advantage of. They have up to 8-12 people in the house. La Casa de Amistad is trying to find new housing for them.
- They are also trying to work with Hurry Home to get people to purchase properties. They will also recommend people to Judith Fox.
- Rudy Montarosa is on their board and he is a law and immigration attorney. He is not so much a housing lawyer.
- They are looking to start a program to fund a larger legal clinic with more legal resources to help offset legal costs for the attorneys that have been helping the Latinx community.
 They will also provide interpreters. They have five fulltime bilingual staff.
- The Latinx population in the City of South Bend is mostly Mexican. They are seeing an
 increase in immigrants from Guatemala and Honduras. The number of Venezuelans are
 also increasing.

MORNING Social Service Providers

2020-2024 Housing & Community Development Plan and St. Joseph County Housing Consortium

SIC Public Library Main Branch NNN Community Analysis of Impediments to Fair Housing Choice 5:30 7:00 pm. April 39, 2019

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City of South Bend, Indiana FY 2020-2024 Five Year Consolidated Plan and Analysis of Impediments

Interview with Area Planning Commission Wednesday, April 24, 2019 at 10:00am

In attendance: Angela Rosenbrock, Oaklawn; Debbie Larkin, HOPE Ministries; Dennis Kaplan, Youth Service Bureau; Angela Blake, St. Margaret's House; John Horsley, Oaklawn; Steve Matteson, HOPE Ministries; Steve Camilleri, Center for the Homeless; Jennifer Pickering, Youth Services Bureau; Trish Coleman, St. Joseph County Public Library; Dan Welch, Boys & Girls Club of St. Joseph's County; Kathy Schneider, St. Margaret's House; Elisabeth Jackson, Youth Services Bureau; LeRoy King, Goodwill Bridges Out of Poverty; Julie Heiman, AIDS Assist; Linda Jung-Zimmerman, Upper Room Recovery; Maria Stancati, Dismas House; Walter Haglund, Urban Design Ventures, LLC; Brandon Wilson, Urban Design Ventures, LLC

The following was discussed at the meeting:

- There is a need for expanded choices for housing for homeless young people. They require more supportive housing.
- Children need stabilized housing. There are too many families that are constantly moving and constantly moving school systems. They need to find another support system.
- Most Permanent Supportive Housing focuses on single adults and there is a need for PSH that supports families.
- The group homes in the area provide housing for people who should be on the BDDS waiver.
 There are not good services for those people. They need long-term group homes which do not exist.
- People who could not move into independent living need housing. Oaklawn has been unable to put people into a BDDS home.
- Group homes do not want anything to do with anyone showing a sign of violence.
- There is a group of people with mental illnesses but they are not diagnosed so these are people that must fend for themselves and struggle to find housing.
- All group homes for those with mental disabilities are temporary and not permanent.
- There are issues with certain neighborhoods that are not allowing sober living facilities to be constructed in their areas.
- People with HIV/AIDS require more permanent housing. There is some transitionary
- Availability is a problem for victims of domestic violence. They have difficulty even finding a bed
 or a place to stay, and the facility is a day center so it gives them problems finding a place to
 sleep.
- A YWCA takes children and has ESG funding and does transitional housing and it is limited in the number of people they can take and they are full and may have scaled back.
- HOPE always has a waitlist for women.
- Dismas House receives ESG grants.
- On the Coordinated Entry list for this county, there are approximately 100 people listed. There are no current openings for Oaklawn for PSH of their 100 units and they are constructing 60 more.

- Dismas House has a hard time finding permanent residencies for their residents because they are felons. Felons must go to slumlords and people who take advantage of them because they cannot get to any housing.
- There is generally a need for permanent housing. People with felonies cannot get into public housing at all.
- Drug felonies prevent people from getting housing even if they are 15-20 years ago.
- There is not enough permanent affordable housing in the area. The area is building a lot of luxury condos but none of the people served will live there.
- The lack of housing stock is allowing landlords to pick and choose and not rent to people with criminal histories. They can be very selective and they are.
- There is nobody who will take sex offenders.
- For the unsheltered in the area, there is a lack of permanent supportive housing. Because this is lacking, there is nowhere to address anyone with other interventions.
- The HMIS System is in place here and many of the organizations are participating. HMIS still has flaws--there is housing that will pass inspection that should not pass inspection.
- There is the potential for somebody to lose out on their deposit for fighting the violation. Fair housing at Notre Dame has provided assistance.
- A \$400-500 deposit for somebody who has been homeless for a year is a difficult thing to come by.
- Landlords do not want to rent to Section 8. The capped rent can cause it to be difficult to recruit landlords.
- There is less supply and the landlords can be picky.
- Notre Dame legal clinic is a good resource, but it is a limited resource that cannot fight for all homeless people.
- The City just passed a law for landlord inspections.
- Youth Services (?) also receives ESG funding.
- There is a need to stabilize families so that children are not bouncing from school to school. One of the schools had a 77% mobility rate with students bouncing between schools. This contributes to the academic gaps in the City.
- Indiana Legal Counsel has an office that did a pilot project in Marion County to give legal representation to people being evicted and negotiate the process. This leads to some housing stability.
- The people getting evicted were once about the bottom 12% of people on the socioeconomic ladder, but now it is moving up the ladder.
- People at eviction hearings typically do not know how to handle the court hearing and are often stressed out.
- Bridges to Poverty works with employers to retain workers, and even for workers the #1 issue was housing and it impacted their ability to keep their job.
- The LGBTQ Community in the area also needs housing and many people in this community are also homeless. The main provider of services to the LGBTQ Community is HR Jung
- NIMBYism is a problem. It leads to volatile and hostile meetings that leads to the end of the Gateway Center.

- There is no site for the Gateway Center and nobody wants it in any of the sites. There is no space to put it and businesses and residents continue to fight it.
- The bulk of Emergency Services in South Bend. The people who are needy in Mishawaka come to South Bend.
- There may be a perception of South Bend residents that there are a series of homeless service providers and they do not want another one there instead of Mishawaka.
- There is always a weather amnesty season with different stops along the way that can protect people, and the day the weather amnesty ends, people are put out on the street.
- There is a big push back against sober or transitional living at all. Where people are trying to deal with their substance abuse disorder, City Council denies zoning.
- The City Council and the local media will continue to propagate stigma on recovering addict communities.
- There is also an attitude that if something is built for homelessness or recovering addicts, people will come from elsewhere to utilize the services.
- The Mayor has put together a task force on social services.
- The seven pods were donated for free, at first to the Center for the Homeless, and relatively low City funds were dedicated to using this.
- The pods have now been sitting on main street for a year. This is the permanent supportive housing that has not been built. The NIMBYism may have caused this to take a step back.
- The homeless service providers have been trying to plan for next winter's weather amnesty, and the financial constraints are too high so it is difficult for people to run the system.
- In the previous year, when the City dropped below freezing, there were no warming centers. The City needed to open up warming centers.
- There is a need for an Emergency Management program if the City does not open the Gateway Center.
- Weather Amnesty is perceived as the emergency solution, but the organizations that run
 weather amnesty cannot use it as an answer. The organizations are worried that their clients
 may suffer because the City will not act.
- The City experienced the growing homeless population for an extended amount of time but the issue only broke through locally when there were 35 people living in tents under the bridge.
- The Gateway Center is necessary not just for shelter but also for trauma-informed care. The plans were for about 50 beds.
- Permanent Supportive Housing (Oliver Apartments) opened up recently.
- Without an intake center, open units cannot be found even if they are open. Even based on the VI-SPDAT
- Life Treatment Center offers beds for Homeless Veterans and so does the Homeless Center. They are just for men. There are 24 beds with only 16 beds full. Over the last few years, the numbers of people using beds went down. There is about a 75-76% success rate, and the VASH vouchers contributed.
- There are veterans with intersectional identities that will not be welcomed in the same way. Additionally, female veterans do not have the resources of male veterans.
- In many parts of the City, there are more renters than homeowners. There is a wealth gap and subsequent homeownership gap.

BANKS & CREDIT UNIONS

11:90 a.m.-12:00 p.m. 100 N. Michigan (1st Source Bank) 2020-2024 Housing & Community Development Plan and Analysis of Impediments to Fair Housing Choice St. Joseph County Housing Consortium April 26, 2019

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City of South Bend, Indiana FY 2020-2024 Five Year Consolidated Plan and Analysis of Impediments

Interview with Banks & Credit Unions Friday, April 26, 2019 at 11:30am

In attendance: James R. Seitz, 1st Source Bank; Debra A. Bass, 1st Source Bank; Andrew Burggraf, Communitywide FCU; Kathy May, Teachers Credit Union; Michele Banes, Mutual Bank; Mark Dollinger, Community Homebuyers; Charles Leone, Halpin Slough, PC, Attorneys; David Morgane, Notre Dame, FCU; Ralph Villalov, Lake City Bank; Pam Meyer, City of South Bend/CHC; Kandee Block-Tingel, City of South Bend/CHC; Walter Haglund, Urban Design Ventures, LLC; Brandon Wilson, Urban Design Ventures, LLC

The following was discussed at the meeting:

- CHC is a loan pool made up banks & credit unions & savings banks that began in 1992.
- It works on the understanding that housing is important in the area, and this is one of the few counties with a loan pool like this.
- Their biggest issue is that they historically do not use all of the loan funds available, largely because of the lack of housing and lack of affordable housing.
- The median income of St. Joseph County is low. Only 41% of people in the County can afford the average loan.
- The Community Homebuyers Corporation is to fill a void that exists in the marketplace, and they have low delinquency rates and loss ratios.
- Their default rate is low. It depends on the time period but historically it is less than 1%. 5.3% delinquency rates and FHA rates are double that.
- There is an education component of this that the City partakes in, preparing the City for homeownership.
- There has been work with the Federal Home Loan Bank by the partners, and they are actually competing against the FHLB with the CHC program. They do not leverage the programs with the FHLB
- Lake City Bank and 1st Source are FHLB members.
- The only place that uses the FHLB locally is Habitat for Humanity.
- They have considered adding rehabilitation to the program. They are considering expanding to a separate loan pool for improvements.
- The CHC has no minimum mortgage amount.
- There is no larger institution in this community that will assist someone in buying a house that is \$50,000 or less.
- These are legacy statements and this used to be the situation 20 years ago. This has led to the conversations about CDFIs and Hurry Home.
- They would like to put more emphasis on serving the Hispanic Community and overcoming the language barriers associated with this.
- There are issues with the education system, and the bankers are doing much more financial literacy than in the past.
- The CHC has applications in Spanish.

- There is a Regional Development Initiative set up by the state for \$42 million and it has been leveraged well. It is regional money, other grant money, municipal participation, and private equity.
- 1st Source is active as an SBA lender and is the number one SBA lender in Northern Indiana and number 2 in the state behind a bank that operates in Indianapolis, which 1st Source does not.
- Many of these bankers have participated in LIHTC developments as well.
- There have been some projects with Historic Tax Credits but not recently.
- Conversations about the CDFI have largely been with Notre Dame or reflected being a CDFI-friendly community.
- New Market Tax Credits have also been used.
- There is a lot more crossover between County lines based on employment than there was. Many people will travel to Elkhart from South Bend for jobs.



SOUTH BEND CITY DEPARTMENTS (A)

St. Joseph County Housing Consortium
2020-2024 Housing & Community Development Plan and
Analysis of Impediments to Fair Housing Choice
April 22, 2019 2:00 3:00 p.m. County-City Building

Email	No show on file	No show on file	On file	On file	On file				
Department	Powere - 1st Listrict	Comeio - 5th District							
Name	Tim Scott	Take Teschka							

City of South Bend, Indiana FY 2020-2024 Five Year Consolidated Plan and Analysis of Impediments

Interview with Jake Teshka, South Bend City Council Friday, April 26, 2019 at 8:00am

In attendance: Jake Teshka, South Bend City Council; Walter Haglund, Urban Design Ventures, LLC; Brandon Wilson, Urban Design Ventures, LLC

The following was discussed at the meeting:

- The Landlord registry program will be a huge benefit.
- There is a need for quality affordable housing. Two different houses can be at the same rate but one landlord is good and the other is a slumlord.
- They want to be able to enforce the Landlord registry.
- Teshka is the representative for the Southeast of town.
- Miami Hills Apartments have always been a problem apartment. They have exposed wires, mold issues, and broken windows. They receive Section 8 residents.
- A woman received an eviction for calling the code office on these apartments. She is currently working with Judy Fox (Notre Dame legal aid).
- They are making a lot of progress toward fair and affordable housing.
- There are more luxury downtown units coming in Downtown. The City needs a mix of housing.
- He would like to have more Habitat for Humanity activity in the City. There could potentially be
 a site at an old dilapidated pool building that could lead to a 12 home development and other
 programming.
- The planners have ideas and have spoken about some South Side development. Traditionally, this is the part of town with old historical homes that Studebaker had set up for engineers.
- There are a few old schools in the South Side and it is likely the school district will shift people from one school to another. That could potentially lead to a site for development.
- Jake offered to take the Gateway Center in the 5th district but it is in the far South Side and too far from the services.
- There is a problem with NIMBYism for the Gateway Center. There is a need to calm the fears of the people that refuse to have the area.
- Permanent Supportive Housing has been placed in the 6th district and there was a slight uptick in certain types of crime that led people to respond with NIMBYism.
- Both districts that have seen the homeless services placed in them fought against it.
- The administration has been against having the Gateway Center downtown because it might stifle future development.
- There is a need for more mixed housing. BY concentrating poverty, it creates a stigma and may drive people to feel hopeless and not work to make things better.
- In the past, zoning has involved quick fixes. There is now going to be a complete overhaul. The ordinances and resources that go with it include graphics which make it easier for homeowners and developers to understand.
- This will lower the barrier to investing in the City and revitalizing a home as well.

- Fair housing complaints for retaliation are common in Jake's district. They know who the bad actors are and they know where they are, but they cannot specifically target those people. They are trying to use the Landlord Registry.
- This is an older City, so there are buildings that are not accessible to people with disabilities. This has not been a huge issue in the area, but it comes up.
- Central High School Apartments required some accommodations and retrofitting.
- He doesn't hear about the racial barriers from his constituents because they are predominantly white but he hears about them secondhand from other council people.
- The City hasn't annexed any new land in 30 years. They were annexing a lot of land in the 60s. This was when Studebaker closed its doors.
- Annexation is always voluntary. The most recent annexations were farmland in the Southwest side of town and the Northwest side of town. These are areas that are open field or forest. This is primarily for development purposes.
- The old Studebaker plant has tech startups, a coding school, a church. The building has new glass put in and will become a mixed used development, largely for its location close to the baseball stadium.
- There is talk of shifting the South Shore Line which connects South Bend to Chicago via rail. They are deciding whether to change the tracks toward the airport for goods, or to Downtown for people.
- There are upscale apartments right next to the Cubs Stadium.
- The South Shore train still runs passengers to Chicago, but it leaves from the airport.

City of South Bend, Indiana FY 2020-2024 Five Year Consolidated Plan and Analysis of Impediments

Interview with Continuum of Care Thursday, April 25, 2019 at 2:00pm

In attendance: Brendan Devitt, CoC; Walter Haglund, Urban Design Ventures, LLC; Brandon Wilson, Urban Design Ventures, LLC

The following was discussed at the meeting:

- They have been floating between 120 and 150 people on the Coordinated Entry list.
- The State of Indiana has people who are automatically discharged if the list is not updated every 90 days.
- These people are scoring above an 8 which is the threshold for PSH. Anyone who scores above an 8 on a VI-SPDAT should go to PSH.
- The VI-SPADT is out of 17 points and give points for age, number of days spent homeless, amount of time homeless in last 3 days, medical & mental health (self-reported), etc.
- Veterans and individuals fleeing domestic violence are prioritized if both have the same score.
- With the housing stock, it is difficult for them find housing for people between 8-14. There is a high chance of an individual dying on the street without intervention.
- On the case load, there are 15 individuals at 15 or above, 51 individuals that scored a 14 and above, 60 that scored 13 and above.
- Anecdotally, anyone hitting a 10 or above cannot be self-sufficient
- For people scoring 8-10, RRH can be appropriate, but following that, the only way these people can be housed is with subsidized housing.
 - o This still does not encompass everyone as people will drop out.
- They have been doing CE since last January. They filled all the units they had pretty quickly, and they are one-in one-out.
- 18 units funded through CDBG that the City funded. Should be online soon but were held up by staffing.
- There was also an existing CoC grant and the CDBG funds were for the staffing. They reallocated
 case management funds to housing so the housing is paid for through CoC and CDBG allowed for
 staffing.
- Coordinated Entry is successful in that when something becomes available, they can immediately give the name of the person and move quickly and get in contact with the individual
- In two weeks, they will be assigning the first case (early May)
- For a long time, there was the sense that homelessness was a South Bend problem and not a Mishawaka problem
- Homeless individuals won't concentrate in Mishawaka at the rate of South Bend
- They used to use ZIP code of last permanent address. 80% of the people in shelters of South Bend were from St. Joseph County, and of that, 80% were from South Bend so still mostly from there.

- South Bend is where the social services are, so people were coming to that as well. Once people were homeless in Mishawaka, it was hard to stay.
- The best approach is for cities to treat it as a Countywide problem with more resources put toward it.
- The pushback toward the Gateway Center is understandable. There needs to be a narrative about how, in addition to the Gateway Center, there will be PSH.
- The goal for the Gateway Center is that it houses people for a couple of years and constantly decline the number of beds because PSH will be opened. Possible use seasonally.
- The biggest need is continued PSH. Another 100 units in the next five years are needed in addition to the oncoming 20.
- There are new higher end apartments opening up in South Bend. There needs to be a greater focus on mixed income housing and engaging landlords.
- Landlords need to commit to a certain percentage of housing inventory to homeless populations. The wraparound services would also be included.
- There seems to be a disconnect between face-to-face conversations with people about homelessness and the way they feel about housing these people at a broader level.
- An educational initiative to share facts and numbers and positive results
- FUES (Frequent Users of Emergency Services) is working with frequent fliers at the Memorial ER to house these people. There could be cost savings to the ER and to EMS.
- It would be great if there was leadership in the City or County for landlord relations or incentivizing landlords that work with homeless individuals.
- There are often landlords who are willing but then have 1 or 2 bad clients and the pool of landlords shrinks. If they were repaid for the risk, they may not lose this pool anymore.
- There is a need to incentivize new buildings and have inclusionary zoning or set-asides for Section 8.
- There are many ways that the City and County could be involved in increasing the affordable housing stock other than just increasing construction.
- 20-30% of the homeless individuals encountered have either SSI or SSDI. This is anywhere from \$750-\$1,200 per month. This is money that could be used to pay a portion of the rent, but that means units would need to include utilities.
 - This may require an effort to target people with SSI or SSDI to get them housed more quickly.
- They are not seeing people come straight from eviction to Coordinated Entry. People will typically couchsurf for a while and then show up.
- Eviction prevention resources are a better focus than Rapid Rehousing. There is a need for more eviction prevention services.
- Prevention is extremely important because it becomes difficult to house them even if there is one on the record. They can qualify for RRH but they won't be rehoused because of the barrier.
- The last round of Rapid Rehousing filled included families. The CoC would like to focus on candidates that they believe truly can maintain housing in 6 months-2 years later.
- The previous attempts at Rapid Rehousing did not work because as soon as the funding was gone, the people in it were back on the street.
- RRH is a valuable tool, but in this community, eviction prevention is better.

- The CoC is not encountering people at the eviction prevention stage. Brendan would like to speak with landlord mediation organizations if they exist.
- Oftentimes, the worst part of an eviction is the long-term ramifications. There may be creative solutions.
- In terms of the Gateway Center, the place that makes sense is the Southeast area near the Center for the Homeless.
 - Any other location could be ok as long as it is on a bus line or somebody is willing to run
 a bus to it. The closer to services and the target neighborhood, the better. Outside of
 that, the transportation options need to be there.
- The plans are no longer to have kitchens or food services at the Gateway Center.
- The main bus station is on Michigan Street, north of the Center for the Homeless.
- Initially, the business community had been very resistant to weather amnesty. After the first
 year and continued education and outreach, the business community was much more
 welcoming.
- As far as the CoC goes, they can react to a location and move on the location once the City has found it
- They have done exploratory discussions of modular homes and small homes to increase the housing stock
- In the last two years, they began using CDBG beyond ESG
- St. Joseph's County used to have its own HMIS and then they joined in with the balance of state in the last two years. It was unique that they were an independent CoC as long as they were.
- The Federal level is requiring more organization and formalization, which caused the best option to be joining together.
- They also interact with 2-1-1 (United Way) who is providing people with numbers to call, but is working on creating referrals within the system that can go straight to people. This is the Information Referral Service (IRS)
- Homeless Prevention in general should be a goal. Eviction prevention and general homeless
 prevention will be important. There were a few places in the community that would house
 people with sex offenses that closed and now they have highly affected the CoC.
 - o If the CoC had been contacted, it would not have hit the shelters as hard.
 - Utility assistance would also be an important resource.
- Concentration of resources on the prevention side similar to Coordinated Entry would be extremely useful.

CODE ENFORCEMENT / SUSTAINABILITY / PLANNING

St. Joseph County Housing Consortium 2020-2024 Housing & Community Development Plan and Analysis of Impediments to Fair Housing Choice April 23, 2019 10:00-10:45 a.m. County-City Building

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FY 2020-2024 Five Year Consolidated Plan and Analysis of Impediments

Interview with Code Enforcement, the Office of Sustainability, and Planning Thursday, April 25, 2019 at 2:00pm

In attendance: Tracy Skivens, Code Enforcement; Tim Corcoran, Planning; Chris Dressel, Planning; Michael DeVita, Planning, Amber Warner, Office of Sustainability; Liz Merdick, Planning; Walter Haglund, Urban Design Ventures, LLC; Brandon Wilson, Urban Design Ventures, LLC

- The last comprehensive zoning update was in 2004. The planning department is currently in the
 process of the most recent comprehensive update. Over the last 2 years, planning has been
 fixing elements.
- Where ordinance rules were being granted variances 90% of the time, the rule was fixed. The
 comprehensive rewrite is changing more of those rules but also being redesigned for usability
 and readability.
- The biggest variance requests were for setbacks, parking, and landscaping in ways that didn't make sense.
- In the past, larger homes were converted to apartments. This has not been happening as much recently.
- In most of the zones, there are distinct divides between single family zones and multi-family zones. Duplexes often go by exception. The current ordinance does not speak to anything in between.
- There may be the introduction of a new zone that permits as-of-right 1-4 family dwelling units.
- There has been pushback about changing the definition of family to include more people because of student housing in the City.
- There is no requirement against renting by bedroom as opposed to renting by apartment size. This practice is common for student housing. The enforcement piece of this would be difficult.
- The rental registration program has just begun. The landlord registration is still on the books but is not being pursued.
- It is difficult for code enforcement to determine how many people are actually living in a house. The City must verify allegations rather than take the complainant's word for it.
- There are periodic code enforcement inspections for rental properties. The inspectors also do driving inspections and are assigned to specific sections of town.
- Housing inspectors are also broken up into different sections of town. There are 10 total code inspectors.
- There are code enforcement hearings every Tuesday and Thursday. The judge is an independent third party attorney that the City contracts with.
- Code enforcement fines are up to \$5,000 which depends on the number of times that somebody has appeared in court.
- The Comprehensive Plan dates back to 2006 with a twenty year horizon. A timeline for revision has not begun.

- There have been neighborhood planning efforts that have been addressing parts of the comprehensive plan, including the Near Northwest Neighborhood and Southeast Neighborhood Master Plan in the last year. These are two large sections that are up-to-date.
- The City's zoning ordinance is administered by the County and the Area Planning Commission. There was the beginnings of a St. Joseph County Unigov, and there are remnants of this.
- The City is in the process of starting its own Planning Commission which will take effect January
- There is NIMBYism that causes issues with people in recovery, who are a protected class while in recovery but not once they have completed recovery.
- Costs for housing are so low that banks are unwilling to give a mortgage.
- A new startup called Hurry Home is looking to provide something similar to a mortgage for a \$50,000-\$60,000 house that a bank will not underwrite. This prevents the cash buying landlord from coming in and acting as a slumlord leading to decline.
- There have been some conversations with a large Modular home builder. This company may be doing some construction of modular homes in one of the nearby factories.

DIVERSITY / HUMAN RIGHTS

St. Joseph County Housing Consortium 2020-2024 Housing & Community Development Plan and Analysis of Impediments to Fair Housing Choice April 23, 2019 9:00-9:45 a.m. County-City Building

Email	On file	On file	On file	On file		
Department / Office	Moreita & Inclusion.	Human Migate				
Name	Uherr Peak Lois Gonzala	Christina Brooks				

FY 2020-2024 Five Year Consolidated Plan and Analysis of Impediments

Interview with Diversity and Human Rights Tuesday, April 23, 2019 at 9:00am

In attendance: Cherri Peate, Mayor's Office; Luis Gonzalez, Diversity & Inclusion; Crystal McCain, Human Rights; Chrstina Brooks, Office of Diversity & Inclusion; Walter Haglund, Urban Design Ventures, LLC; Brandon Wilson, Urban Design Ventures, LLC

- Crystal McCain Takes charges of discrimination where housing is one of the areas that they deal with
 - There are calls to her office all over the County and beyond regarding housing discrimination
 - o They are a City office but since 2017 they have had jurisdiction over the County.
 - o The biggest area of discrimination in their office is employment.
 - There is a human relations commission board that decides whether a complaint is an instance of discrimination. There are mayoral and council appointees.
 - There will be a big housing committee event on Thursday. A rep from HUD will come in to train people in the morning and there will be a code enforcement panel in the afternoon. The project is to help grassroots people know their rights.
 - o The board holds study circles and has a women's committee.
 - People do not necessarily know where to turn for fair housing violations until they
 experience one, but the office will gain exposure through referrals.
- The local reconstituted NAACP has a housing committee. The City is in the process of working with the NAACP to support each other.
- The City does not have an Urban League, although they used to.
- Sheri Petes Director of Community Outreach for the Mayor's office. Also advises the Mayor on appointees for the 30+ boards.
 - o The office has been very intentional in making sure the boards represent the neighborhoods that they make decisions on behalf of.
- The offices are beginning to track the diversity of the boards and commissions so they can report on the growth of diversity in this area in the future.
- Some of the appointees must also have different political affiliations of the mayor so they must cross the aisle. The tracking has occurred in the last 6 months.
- There is an ongoing roundtable with community leaders, and this includes the Hispanic/Latino community. There are quarterly meetings. At the most recent meeting, there were conversations about the living conditions of migrant farmworkers which resulted in the Rental Registry (?)
- The amount of migrant workers depends on the season. Some of the migrant workers live within the City limits and others outside.
- Luis Gonzalez Diversity and Inclusion fellow
 - The Hispanic community is well-connected because of newspapers and radio stations on the West Side.

- Christina Brooks Diversity and Inclusion Officer
 - Position created out of an Executive Order in 2016 where there was a focus on diversity and inclusion in the internal and external workforce, community, purchasing/contracting, and the MWVBE/Section 3 requirements.
 - The City has a diversity and inclusion plan where they have identified 3-5 specific goals in each area. As of last year, 85% of those goals were achieved. Now, it may be closer to 90% with the completion of the disparity study.
 - There has been an MWBE ordinance on the books since 1983, but this is the first disparity study to create some accountability.
 - o They have been working to create race and gender neutral measures, and they have been working to fund the West Side Small Business Resource Center at Project Impact which is the only small business center on the west side. They support businesses at all levels from aspiration to scaling. The City has partnered with them for a year and worked to ensure they are sustainable and stable nonprofit.
 - There are some key anchor organizations that hold the Hispanic community together. La
 Casa de Amistad is very instrumental in bringing different Latino groups together for
 common causes. There are a number of legal resources Rudy Montarosa's law firm
 provides legal advice.
 - Mexico and Central America are the two areas of the Hispanic world most represented in the area. La Casa offers a citizenship program that is global and works with people from all over the world.
 - There are an increasing number of Venezuelans coming in due to the Political Crisis.
- Recent population growth in the region is from immigrants.
- Aladeen DeRose (sp?) ADA compliance officer and HRC attorney.
- Community members have expressed concern about the new residential development around the university that is very expensive. That has driven a lot of people who were LMI homeowners out of that area. There were three homes on the corner of Tweakingham and 23 that were LMI rental properties and they were demolished. In place, townhomes went up at an average cost of almost \$1 million.
 - The amount of new homes that have been spreading from the southern border of the University into former LMI neighborhoods has created a juxtaposition between Section 8 housing and luxury housing. This has caused a lot of tension in neighborhoods around the university.
 - The university doesn't own these properties and they are in the City of South Bend. This housing has been developed by private developers.
- Short-term rentals are common throughout football season. They were previously residential rental properties that were affordable to people. They were converted for game day because landlords are making more.
- Renting by bedroom happens, largely around the universities.
- There were one-for-one replacements on the Eddy Street Phase I development. There was a challenge in making sure the developer kept to these agreements. The property values skyrocketed and forced out the Low-Income people in the neighborhood, so the market also caused some of these issues.

• There is an ongoing conversation between the Housing Authority, the City, and Notre Dame are having conversations about ensuring there is an income mix in the areas near the university.



FY 2020-2024 Five Year Consolidated Plan and Analysis of Impediments

Phone Call with Judith Fox of the Notre Dame Fair Justice Clinic Tuesday, April 23, 2019 at 1:15pm

In attendance: Judith Fox, Notre Dame Economic Justice Clinic; Walter Haglund, Urban Design Ventures, LLC; Brandon Wilson, Urban Design Ventures, LLC

- The biggest barrier is the inflated rental rates. The rental rates do not make sense in terms of the conditions of the properties so it's cheaper to buy than rent.
- There is a lack of affordable housing across the board, but the condition is the problem here.
- In terms of racial fair housing issues, there is still a lot of regional segregation that is hard to document.
- Whether it's by choice or perception, there are very concentrated neighborhoods of color and other neighborhoods where they will not try to live.
- This is residual, but it was exacerbated by the financial crisis because African American neighborhoods were really hurt by this.
- Handicap accessibility is big. Landlords will evict people or not accept people because of service dogs. There is likely not an awareness that this is required.
- Owners of apartments will refuse to make reasonable accommodations. This is more with apartment complexes. It is also common with mentally ill clients.
- Judith thinks that it is harder to show, and it is hard to find places that are big enough for children, but families may be an issue.
- There are a lot of grandmothers in senior housing who get in trouble for having their grandchildren there.
- Conditions problems are the biggest problems here: lead, mold
- The region had a 500 year and 1,000 year flood back-to-back. A lot of people did not realize that they needed to do things in relation to this, so there are lots of mold problems.
- Affordability is the biggest challenge.
- There is a concern about the zoning definition of a family.
- Many of the zoning ordinances in the area were meant to prevent student rentals. But the
 consequences have been far-reaching and more people than students have been adversely
 affected.
- There is no provision in state law that allows a land bank. They have been working on this issue
 for a long time. Land banking is only allowed in Marion County, and the person in charge of it
 was charged with embezzlement so the program stopped.
- It may be possible to do something similar with a CDFI.
- There is a recent statute now: 36-7-38-9, enacted in 2018
- They are looking for some kind of metric that will determine a house in the neighborhood that will reasonably expected to sell for, and the amount that it will cost to fix it up versus tearing it down, broken down by neighborhood

- Because there is a lot of housing stock, some worth rehabbing and some not, they need to find some way to determine which properties that were acquired were worth fixing
- There were metrics created for the 1000 days 1000 properties for vacant property recovery, but now there is nobody really doing this
- The only tool that the City has is code enforcement, so demolition as a result is also the only tool the City has
- As a result of the financial crisis, the City had a lot of zombie mortgages. The City could not
 acquire them, the County was not cooperating at the time of the financial crisis.
- Some homeowners wanted to donate underwater housing to Habitat but the County would not allow them to do so.
- Because the sale process takes so long, housing worth salvaging reaches a point where it must be torn down by the time the City or a housing provider can acquire it.
- There is no awareness locally of where to file fair housing complaints. Some people will go to
 the South Bend Civil Rights Commission, but that is only a mediation and those with fair housing
 complaints will often be unsatisfied.
- The most active fair housing advocate in the area is Chicago's John Marshall Law School.
 Neighborhood Legal Services does not do advocacy work here.
- Michael Seng is the John Marshall professor that does a lot of work in the Northwestern Indiana area.
- Rudy Montarosa is one of the few Spanish-speaking attorneys in the area. Judith thought he was mostly criminal.
- The foreclosure rates have gone down--the foreclosures were peaking from 1999-2005 or 6, where South Bend had one of the highest foreclosure rates in the country.
 - South Bend's went up in the crisis, but so did all of the others, so it made them relatively better.
- This City has some of the highest eviction rates and there are some of the worst landlord-tenant laws in the Country. With the evictions, there are lots of fair housing complaints.
 - o In the evictions, Judith will see many of the fair housing problems with accommodations and retributions, as well as the types of discrimination that is very hard to tell.
- When there is a shortage of housing, it is very hard to prove that the landlord is discriminating because of the amount of applicants they will receive, and that they can choose.
- The main familial status discrimination comes from "mom and boyfriend and children" households. The bigger problem is that there are not enough properties big enough for families.
- The Fair Housing Center of Central Indiana does cases across the state, mostly across Southern Indiana. In Southern Indiana, they were advertising against "no children"
- Judith has not heard of LGBTQ discrimination as an issue for many people. It is not a common issue.
- They do not go above the Federal protected classes in Indiana.
- Nobody is really lending in the area at all. Some people have claimed Dodd-Frank has prevented people from making loans.
- Based on an Urban Institute study, mortgages had stopped for housing underneath \$100,000, which is the majority of the City's housing stock.

- There is a lot of predatory lending in the area. There are predatory land contracts that are popping up.
- The land contracts are appearing everywhere that the housing crisis affected.
- Hurry Home is really trying to give affordable housing without being predatory. Their interest rates are a little higher than they would like, but their limited funding is the issue. They are trying an unproven model so this is test case.
 - The theory: The owner buys equity in the LLC that owns the property. When they sell, they will cash out.
- One of the mistakes in the run-up to the previous financial crisis was that everyone should own a home. There need to be more creative models such as co-ops.
- Three bedroom rentals are the rentals that are the most in-need.
- The ability of out-of-state investors to title a property in a land trust causes problems. They do not have to record the land trust anywhere and simply title the property fictionally.
- Indiana's statute forbids people who owe property taxes or code enforcement fines from bidding on property auctions, so buyers use straw buyers. This has recently been made illegal in Wisconsin and Judith would like to see that carry to Indiana.
- There's no enforcement for many of the landlord-tenant disputes. Rent cannot be withheld.
 There is really no protection and the money cannot be put in escrow. There is no incentive for the landlord to fix up the house and the tenants do not have any rights.
- Emergency Possessory orders are done to turn the water on, but it makes it look like the tenant got evicted and prevents them from finding housing in the future.
- The landlord-tenant statutes look a lot better than they actually are.
- There have been leases that make it a violation of the lease if code enforcement is called.
- They are attempting to create the rental registry to give some warnings of the landlords that may or may not be better.
- There is no occupancy inspection before somebody can move in to a property in the City.
- There is a sense that realtors steer people, but it's not proven. The realtors have not been disclosing lead.
- There has been a lot more awareness of lead in the last year, pushed by the lead affinity group. Since awareness was raised, this is the first time Judith has had a disclosure of lead in 20 years.

HEALTH SERVICES PROVIDERS

St. Joseph County Housing Consortium
2020-2024 Housing & Community Development Plan and
Analysis of Impediments to Fair Housing Choice
April 24, 2019 2:00-3:00 p.m. 1013 Portage Ave. (NNN)

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Organization	St. Joseph Conty Dent of Halth	& fresh Deo & Health		COSB SBOC				
Name	icsay White	Siamah M'Call	Mark Fox	J. M. Broden				

FY 2020-2024 Five Year Consolidated Plan and Analysis of Impediments

Health Services

Wednesday, April 24, 2019 at 2:00pm

In attendance: Cassy White, St. Joseph County Department of Health; Briannah McCall, St. Joseph County Department of Health; Mark Fox, St. Joseph County Department of Health; Jo M. Broden, South Bend City Council; Walter Haglund, Urban Design Ventures, LLC; Brandon Wilson, Urban Design Ventures, LLC

- Eviction rates are very high.
- Services are needed for the chronic homeless including wraparound services.
- There are issues with addiction in the community.
- The variety of housing and the gaps in affordability that exist make it harder for older people to age in place and to rehabilitate their homes
- Transportation is a leading issue according to Real Services (Area Agency on Aging)
- The City lacks transit-oriented development. Transit and housing are not being connected within planning here like they are in larger cities.
- There are maintenance issues with utilities and weatherization. This can lead to high heating costs.
- There is a need for technical assistance to make sure smaller developers are connected and can address some of the utilities.
- Cassie and Briahnna do lead inspections. Lead is their primary issue but they see some other things.
- There are many neighborhoods that are mostly poverty stricken and they are spread out and they are food deserts.
- There is a need to provide fresh food to people in the West Side.
- There are often severe housing problems and landlords that will not fix the house but the landlord will still accept the rent.
- Rent cannot be withheld or held in escrow so the tenant has no leverage over the landlord.
- There is a massive lobby in the state of Indiana that makes it very unsupportive of tenants.
- There are many absentee landlords in the City.
- There is no requirement to disclose absentee landlordism at the state level. There is at the local level but it cannot be enforced without the state help.
- The lead problems are primarily paint. Soil samples and water samples are taken, but this is much less common here. There is definitely lead in the soil but not at toxic levels.
- A rental safety verification program was just passed. IT requires landlords to assume the paint is lead when it is deteriorated. When landlords are asked to fix it, they will not fix the whole area but the spot that is deteriorated.
- Many of the repairs on the houses are "band-aid" fixes, where the landlord does the easiest, cheapest thing and the problem returns.
- There are tenants who will fix things themselves because landlords are not responsive even though this is not allowed.

- There is a lack of certified lead abatement workers. There are only two in Indiana, although the City has a relationship with Michigan where they can receive certified lead abatement people from there.
- If a child tests above a certain blood-lead level, a lead inspection is required. If it is between that and a lower level, a lead test can be requested.
- In the owner-occupied houses, it is very unlikely that they will communicate with the lead inspectors. They often were not informed of whether their house had lead paint or not. In the disclosure, it can often be a small line.
- If there were verification that a child in the house had gotten tested high on lead previously, it should be able to show that the house has lead paint.
- Deteriorated paint is not as consistent of a positive lead test as windows are. A frequent quick fix here is often that the landlords will paint over windows or nail them shut.
- There is the potential to educate the tenants about lead. Overall, there are gaps in knowledge on the parts of tenants on simple, basic repairs.
- After the flood in February, which had affected 400 homes, there were many fundamental things that people who were flooded out did not know.
- The chronically homeless need permanent supportive housing. There is a large portion of people who are not candidates for this because of addiction and mental illness.
- Transportation is a need. There are a couple of routes that are more effective than others. This leads to a lot of congestion.
- There are not alternatives to lead-exposed apartments for people that would like to leave that are still affordable. There are not short-term relocation options.
- The City is partnering with a non-profit that will do emergency repairs.
- Part of the recommendations for the City are constructing the Gateway Center. There is too
 much neighborhood pushback to put it somewhere.
- Some relaxation in the timing or actual standards for the setup of weather amnesty locations.
- Modifications and accommodations for seniors and impaired persons are needed. There is a knowledge gap here for families, landlords, and homeowners.
- There are a lot of big, basic structural hazards that would make it harder for people to get around. There are also a lot of stairs too.
- Many of the developers in the area do not come in with universal design concepts and are not prepared for accessibility.
- Lead inspectors must do a health homes assessment. Many times, a renter's or homeowner's
 understanding of their own house is that something is not a hazard even if it may appear to be
 one.
- Homeworks owns and manages a lot of homes, and they track their lead risk assessments and it assists in marketing houses to families based on lead amounts.
- About 14% of the kids in the county get tested for lead. There are areas where an excess of 20% of kids have elevated BLPs and in one Census Tract, as high as 30% of kids had elevated BLP.
- There tend to not be good places to relocate families that face high blood lead levels.
- There are not a lot of best practices in the field of reaching out to families to ensure that they get their kids tested for blood lead levels.

- Most coalitions on social issues are on a volunteer basis. Mental health, homelessness, aging, and lead are all led and directed by volunteers. If there were paid staff, the capacity building for these coalitions could be stronger.
- Lead risk does not exist in isolation, as it is tied with other health-related social needs. If there
 were a robust infrastructure for data sharing, it would facilitate that and ultimately be cost
 effective.
- There is a large migrant community that comes to South Bend that works on the fields between the City and Michigan. They seek affordable rental housing and fill housing beyond the occupancy levels.
- There is a need for short-term single room occupancy opportunities.
- Western St. Joseph County and Elkhart have larger Hispanic and migrant populations. These lead to education and childcare problems.
- Access to reproductive health and STD testing is an issue in this area.
- There are two large health systems. The health department provides immunizations, lead testing, and travel immunizations but not primary care.
- There are no resources for the medically fragile homeless. There are no respite services for individuals with TB or in need of therapy. There is risk of exposure to potentially hundreds of other people.
- Climate change related issues are a need. Some areas of the City have experienced severe rainfall events. The impact of climate change is going to be more severely felt by people who are under-resourced, at lower socioeconomic levels.
- Access to programs providing recovery from natural disasters were only available to homeowners and not to renters.
- The County's Emergency Management Plan is not robust and is not at the level that it needs to be. The County was not prepared for the flooding.
- There is a need for resiliency plans at the neighborhood level. If a phone goes out, you cannot notify neighbors of the disaster.
- There are vacant schools that could potentially be used as other assisted living housing.
- There are violence and safety issues. There is both a perception of violence in the City and there is actual violence that fuels this.
- The Group Violence Initiative (GVI) attempts to take repeat criminals and provide them with wraparound services.
- Trauma is an underlying issue because of the violence in the community, and it affects education and everything down the line.
- Transit-oriented development, bike shares, and car shares can assist in making housing more affordable. They drive housing decisions.

HOUSING AUTHORITY OF SOUTH BEND

April 22, 2019 4:00-5:00 p.m. Housing Authority of South Bend 2020-2024 Housing & Community Development Plan and Analysis of Impediments to Fair Housing Choice St. Joseph County Housing Consortium

Email					
Organization Housing Authority of South Bend	Housing Authority of South Bend Housing Authority of South Bend	Housing Authority of South Bend	Housing Authority of South Bend Housing Authority of South Bend		
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FY 2020-2024 Five Year Consolidated Plan and Analysis of Impediments

Housing Authority

Monday, April 22, 2019 at 4:00pm

In attendance: Tonya Robinson, Director, Housing Authority of the City of South Bend; Steve Peters, Housing Authority of the City of South Bend; Walter Haglund, Urban Design Ventures, LLC; Brandon Wilson, Urban Design Ventures, LLC

- There are 814 units. There are 658 on the 1-bedroom waiting list. The 2-bedroom waiting list is 527 people. 176 for 3 bedroom. 77 for 4 bedroom. 17 for 5 bedroom.
- The public housing waiting list is open.
- The Section 8 waiting list is closed. There are 881 applicants on the list.
- 62 units are designated disabled. No units are designated elderly and all units are open to them.
- There are 4 AMPS
- 2021 Section 8 Housing Choice vouchers, 1937 occupied. There are openings and 300 people were just pulled off the waiting list.
- There are 104 VASH units and a VA Hospital was just constructed in Mishawaka.
- There is a Veterans Annex, Millers Vets Center, at the Center for the Homeless with 24 beds for the homeless.
- There are no resident councils. They have tried multiple times for 4 years but they were not self-sustaining.
- The board is very active. There are usually seven people on the board but there are five currently.
- The resident on the board was the resident that just left. The Mayor's office is in the process of finding their replacement.
- There are no port-in/port-out issues with the Housing Choice Voucher. Many people want to port out because the inventory ion the City is small. Their solution is to give extensions. (45 days)
- The HA meets with landlords quarterly. The landlords that show up are often the ones that do not have issues.
- There is no separate Housing Corporation.
- There was a HOPE IV project that was demolished in 2004.
- Housing units are in good condition.
- The current public housing occupancy rate is 95% and Section 8 is 95%.
- The public housing has been losing residents to Section 8 because many of the Section 8 people come from public housing.
- There are two homebuyer programs for Public Housing and Section 8. The same for FSS. Both have people with escrow(?) accounts.
- This is the first year that the Housing Authority has come out of "troubled."

- They received one complaint in March 2019. The woman who made the complain wanted a larger unit with a basement. They forwarded it immediately to their attorney and insurance company. It was related to reasonable modifications/accommodations and it is still open.
- There is not enough housing inventory and not enough funding.
- Any money that the Housing Choice Voucher program could get would be beneficial.
- There are many evictions that the Housing Authority must do because they do not have wraparound support services for mental health.
- The Housing Authority hires City police officers for its communities. There is a lot of drug activity. There used to be a "stop and knock" police officer but his funding was cut.
- The public housing units have a no smoking policy.
- There are problems with unregistered live-in fathers for single-mother households.
- There have been issues where senior citizens have been intimidated into having their housing taken over by younger residents.
- If somebody is going to live at a unit, they must be added to the lease. They are given 14 days to do this by giving the HA their ID, and if they cannot produce it they are put on the trespassers list. This stops most of the abuse problems.
- The communities with the most crime issues have cameras for enforcement.
- Job training and mental health services could be better. The job training service is good, but people just do not go to it.
- Daycare services are needed.
- The main public transit issue for public housing residents is that buses stop running at 9pm. This prevents third shift workers from getting to or from their job. There is no service on Sunday.
- Residents that can afford to take Uber will do so, but those that cannot have limited employment opportunities.
- There is an Access bus for disabled residents to get to their healthcare appointments.
- The homeless tents are a highly visible issue in the area. When public housing has attempted to house these people, they will often bring their friends to live with them. They will communally decide to not occupy the public housing.
- Coordinated Entry list has about 119 names on it. South Bend has merged with the Balance of State CoC.
- As long as unrelated individuals qualify for a same apartment, they are allowed to live together. They must all be approved as long as it is within 14 days.
- The Housing Authority's Senior Service provider will walk homeless people through phone calls to get housing.
- Better housing inventory is needed for HCV holders. The house that they are living in is often low quality because of credit score, etc.
- Absentee landlords that buy properties sight-unseen and rent it out before code complaints rack up are a common problem in the area.
- The City allows rental by bedroom. This is common near Notre Dame. Many Housing Authority residents can't afford housing in this area because of the bedroom rentals.
- The City attempted to do a landlord registration, but they were not allowed to charge a fee for it at the state level. The City still requires registration.



CITY OF MISHAWAKA- DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

Public Hearing

2020-2024 Five Year Consolidated Plan

April 25, 2019

Sign in sheet

NAME	ORGANIZATION/ DEPARTMENT	E-MAIL ADDRESS	PHONE NUMBER
KEY PRINCE	CITY OF MISHMUMEA, PUNHHIME + COMMUNITY DEVELOPMENT	KAZIHCE @MISHTOWNCGIN, GOU	(574) 258-1625
Dave Wood	City of Mishawaka, Mayor	dwood@ mishawaka, in. gov	(574) 258-1601
BRIAN THOMAS	CITY OF MISHAUAKA FIRE & Ems	13 THO MIAS @ MISHAWAKA. 126	2574-251-0621
JIM SCHRADDE	MISHAUNKAUTILITIES	ISCHMADLE MEHAWAKA.INKOW	574-258 1635
finny Fras	Mishaylaka Z/h/.fies	Vfras @ Mishawaka. Irt. Gov	574-258-1645
may kn Mendagger	House as Auxbroka	MALANMO MUHHA.OR	574 - 258 -1658
Breadan Devitt	Center for the Homeless	pdelittach, net	574-282-8700
Christa Nill	City of Mishawaka - Planning	Chill 2@ mishawaka.in.goi	574-258-1625
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City of Mishawaka, Indiana

FY 2020-2024 Five Year Consolidated Plan and Analysis of Impediments

Interview with Mishawaka Housing Authority Thursday, April 25, 2019 at 1:00pm

In attendance: Mary Ann McNamara, Mishawaka Housing Authority; Walter Haglund, Urban Design Ventures, LLC; Brandon Wilson, Urban Design Ventures, LLC

- The Housing Authority is considered a high performer by HUD
- South Bend will port vouchers in to the Mishawaka Housing Authority
- There are Section 8 Voucher recipients that cannot find housing that is eligible
- Fair market rent is ~\$353 for one bedroom. It's \$700 in the private market.
- Fair market rents are very undervalued in the area.
- Landlords have refused to take a payment because they are going to evict tenants. The landlord would not be able to do this.
- Rent cannot be withheld in the area.
- They have 3 public housing properties, one affordable, and one tax credit. IT's rare that there is a vacancy in the two latter.
- Barbie Creek has a lot of evictions. That is their family housing. They have 2-3 per quarter. It is almost always nonpayment, and they use resources to try to help people make payments.
- One public housing, Riverview, is 41 units for Assisted Living, Level I and Level II with the Medicaid waiver. Sometimes they cannot get prorated rent and security deposit.
 - o The assisted living has had these fees waived.
- Their affordable housing is also 55+, Mary Phillips.
- Federal Home Loan Bank's audit of Mary Phillips showed that there were problems and five of the tenants were to be paid back \$20,000.
- The Medicaid checks go to the Medicaid Waiver for the assisted living facility. Once the public housing rent has been paid on the waiver, there is a board charge for laundry, food, etc. and they are left with at least \$52 in the bank account.
- They have a resident commissioner on their board. They had resident councils in two communities.
- The Housing Authority has 7 board members. They are appointed by the Mayor with the consent of council.
- There are currently no plans for tax credit projects. Prior to Mary Ann, there were conversations about Veterans Housing.
- Two of the housing communities are old schools.
- There are currently no VASH units.
- As of the 31st, they had 269 Section 8 Vouchers. They are eligible for 345.
- There are 299 public housing units. They are at 97% occupancy.
- There were two fair housing complaints. They went to civil rights. One, Mary Ann is not familiar with.

- The Housing Authority has tenant get a doctors note and for accommodations, and upon receipt of the note, accommodates.
- All of the assisted units are accessible 41 units out of 113 in Riverview (assisted living) units are accessible.
- Most of the reasonable accommodations are ramps, walk-in tubs, parking places up front, grab bar. Because there are only so many up-front parking places, they are first-come, first-serve.
- The units are secured but visitable.
- There are notifications of long-term visitors but nobody can stay more than 14 days.
- There are arrests and evictions out of the Barbie Creek property. It is a lease violation if there are drugs on the property.
- They have no homeownership initiatives nor FSS programs.
- Mary Ann will send Fair Housing Policy.
- Mishawaka needs to attract more people for activity at night and recreation.
- The City will be buying back some of the property from the Assisted Living facility.
- There is the need for more recreation along the rivers.
- The Affordable Housing is struggling to make money. It is owned by the City and it was either bought for \$1 or leased for 100 years. There is maintenance that needs to happen on the building but the buildings cannot be refinanced.
- People in the Affordable Housing are paying, but it is not enough to maintain the housing. It was previously a Community Development project with the City.
- The Housing Authority needs more Section 8 participants. The ones that they have do not have problems. They are inspected on move-in and move-out.

HOUSING DEVELOPERS / PROVIDERS

April 23, 2019 11:00 a.m.-12:00 p.m. SJC Public Library-Main Branch 2020-2024 Housing & Community Development Plan and Analysis of Impediments to Fair Housing Choice St. Joseph County Housing Consortium

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Organization

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City of South Bend, Indiana FY 2020-2024 Five Year Consolidated Plan and Analysis of Impediments

Housing Providers Monday, April 23, 2019 at 11:00am

In attendance: Sy Barker, 466 Works; Anne Mannix, Neighborhood Development; Andy Place, Sr., Place Builders, Inc.; Kathy Schuth, Near Northwest Neighborhood, Inc.; Jim Williams, Habitat for Humanity; John Gibbons, Hurry Home; Michele Brown, South Bend Heritage Fund; Marco Mariana, South Bend Heritage Fund; Tina Patton, Cross Community CDC; Walter Haglund, Urban Design Ventures, LLC; Brandon Wilson, Urban Design Ventures, LLC

- South Bend Heritage has 400 units of affordable housing that they own, manage, operate, and it's across the full spectrum of re-entry, elderly, homeless, etc.
 - They manage LIHTC, use federal funding for contracting, acquisition/rehab, foreclosure prevention and counseling, down payment assistance programs, large-scale projects and new construction, beginning a new phase for PSH
 - They manage Rebuilding Together, which is for senior elderly disabled, manage
 Northeast Neighborhood Revitalization Organization which has done the development around Notre Dame
- Anne Mannix Housing Consultant, has done several tax credit developments with South Bend Heritage and Historic Tax Credits as well
 - o 466Works has also done work with construction
- Sai Barker 466Works CDC. Their strategic focus is quality affordable housing. The organization
 is three years old. They have been contracted to build new houses based on the CDBG Grant
 received from the City.
 - There are currently plans to build five new single family Owner-Occupied houses. They
 are concentrated in the Southeast.
- Tina Patton Board of Cross Community CDC They are also a new organization in the Near Northwest Side community. they are focused on a 4-5 block area. They will be building single family homes. They will be building 5-7 homes.
- Andy Place Place Builders are Local builder and developer who has worked with many of these organizations. On the board of the State Housing and Community Development Authority.
 - Mainly works on single-family houses. He builds 40-60 units per year with approximately
 10 in the City and approximately 15 in Mishawaka.
- Kathy Shuth Executive Director of Near Northwest, 40 year old neighborhood-based CDC and the most effective resources for them have been CDBG and HOME dollars. They do either acquisition-rehab or homeownership, and they have 7 units and complete 5-7 units a year.
 - They also engage with community members in the area. Near Northwest has some of the strongest successes in the City, but also some of the greatest need.
- Jim Williams Habitat for Humanity. They have been working here since 1987 and have built 220 single family homes since then. 85% of families still live in their Habitat House. 10% of the houses have come back for foreclosure.

- They partner with Rebuilding Together and South Bend Heritage for rehabs and have built net-zero. They require sweat equity and provide a 0% mortgage. They provide an aging in place program so seniors can live in their home longer.
- o They also do a lot of work with Mishawaka.
- o They get AHP funding.
- Jon Gibbons Founder of Hurry Home. Focus on renters becoming homeowners with the housing that costs \$70,000 or less where banks would not do mortgages.
 - It is hard to find specific evidence of the banks avoiding \$50,000 homes at the micro level, but this is a national trend.
 - o The City has given some money to act as default insurance for investors, but that is all.
- Many of the houses for less than \$70,000 are often one-bedroom and have no garages. But there are many more 2 or 3 bedrooms in various states of disrepair that are available.
- Houses cost \$180,000 to build, but appraise for \$115,000 so it creates a gap in the mortgage and it stops people from purchasing.
- The HUD Income Restrictions will also create a very small range of incomes where somebody can qualify for a mortgage or some other financial product.
- There do not seem to be high vacancy rates on the West Side.
- First Source frequently participates in affordable housing and applying for AHP Grants or Down payment Assistance.
- PNC is also willing to do affordable housing work in the City, and they are also a member of the FHB and willing to give grants to 466Works. They may be involved in the CDFI.
- The Mutual Homes housing Co-op has a 90-person waiting list.
- There are many neighborhoods that have original homes that are about 120 years old and have many maintenance needs. Existing homeowners have repairs that they cannot afford, and investors cannot afford to make the repairs either.
- Rentals are primarily single-family rental houses and the quality of the single family rentals can be very poor. The amount of money it costs to renovate a property like that far outweigh the return on investment. Many of the families that live in these places do not have the capital to repair them.
- There is no supportive service for people that have mental health issues, which can lead to disruption.
- There is a scattered site model in the city for PSH. This can become a problem for somebody who may need more services.
- It is difficult for the Housing Authority to get landlords to participate in Section 8.
- There are investors buying up property in large amounts from outside.
- South Bend Heritage tries to work with its residents to make arrangements and buy some time for people in bad situations where they may be evicted.
- There was some talk about creating land banks to disrupt the tax sale process in the State of Indiana. This failed. Locally, the County makes a lot of short term money off the tax sale and wants to continue having tax sales.
- There is state legislation for land banks. It is Indianapolis-focused, but it may have been expanded for the whole state.
- There are provisions to convey properties from the tax sale to local nonprofits.

- For a number of years, nonprofits could approach the County with a list of properties that they
 were interested in. The County no longer allows this and nonprofits go through the full, legal
 public process.
- Legislatively, there was a shift in tax credits that led it to more affluent communities. This can lead to a "Moving to Opportunity" situation, but that leaves South Bend out of the loop.
- Workforce housing is contentious because of the cost.
- In South Bend, sewer tap-ins were expensive because the streets needed to be milled and paved and a plumber had to be on-site with the excavator. This rose the cost from \$1,500 to \$6,000.
- Habitat finds it very difficult and expensive to build in South Bend due to the sewer tap in prices and other regulations.
- Habitat has been building net-zero houses.
- South Bend gives tax abatements and TIF money, but does not often waive fees.
- Barriers to affordable housing include the lead cost, which must be figured into acquisition and rehab
- Habitat has recently gotten all of its people trained on the lead abatement.
- Nonprofits face other barriers and issues that other private companies do not face.
- Locally, money gets allocated based on putting the full amount into the property, rather than leveraging and layered funding. The City does not incentivize leveraging.
- Appraisals are another issue. The appraisers must look at the comparables and they require some education to notice the return that is needed on the Habitat zero energy homes or something comparable to that.
- The City's policy has shifted toward incentivizing rental housing.
- The neighborhoods with the highest need for housing are also the neighborhoods with the most expensive rehabs, so the money put into these neighborhoods will not go as far.
- Minneapolis Habitat is doing some very progressive things and providing mortgages to non-Habitat families.
- Permanently affordable rental housing is also needed.

PUBLIC TRANSIT

St. Joseph County Housing Consortium
2020-2024 Housing & Community Development Plan and
Analysis of Impediments to Fair Housing Choice
April 24, 2019 1:00-2:00 p.m. 1013 Portage Ave. (NNN)

Chill esb+paspo-com		
Organization Thansob		
Name Amy Hill		

City of South Bend, Indiana FY 2020-2024 Five Year Consolidated Plan and Analysis of Impediments

Interview with Public Transit
Wednesday, April 24, 2019 at 1:00pm

In attendance: Amy Hill, Transpo; Walter Haglund, Urban Design Ventures, LLC; Brandon Wilson, Urban Design Ventures, LLC

- Sunday Service is a priority for Transpo but the funding is just not there.
- They would like to start a Pilot Program for Sundays but they do not have the funding.
- They do the fixed route and paratransit rides for the Cities of South Bend & Mishawaka.
- 1.7 million for fixed route, 800,000 for paratransit.
- Estimate 80% of fixed route riders have no other form of transportation. Ridership is trending downward.
- Paratransit ridership is up about 13% and already trending up 10% this year.
- 47 Fixed route buses and 20 paratransit vehicles.
- Started the process in 2014 of converting fixed route buses to compressed natural gas. Useful life of a bus is 12 years and they are operating 14-15 year old buses.
- Received \$4.9 million for replacement of transit vehicles from Federal Government.
- Operate out of the first LEED Platinum transportation center in the Country and operates a compressed natural gas station w/ the City of South Bend.
- Local dollars come from County Option income tax, property taxes, and excise taxes. Nothing from the City.
- The 2020 Circuit Breaker will take place next year. There is a break on property taxes from the State of Indiana next year. Estimating losing \$300,000-500,000
- There is a public mass transportation fund that funds all in the state. IT's been stagnant for 10 years. They will bump it from \$44 million to \$45 million, should significantly be \$60 million
- Indianapolis is the only City in the state with designated transit funding and will take up a bigger piece of pie hurting the rest of the state
- Fare box revenue only makes up 14% of their budget
- Many drivers have been with them for a long time. Maybe 40% of the work force will retire in the next 5 years. The pension is in good shape. They are at 88% funded now.
- Their drivers are the highest paid in the State of Indiana. Top wage is \$26.42/hr with benefits. They have a great health insurance program and benefits package.
- There are a total of 124 employees. 80-85 of these are union employee operators and then the rest are maintenance staff.
- Drivers and maintenance are union.
- They are ready to kick off a strategic planning phase. They will analyze operations for the first time since 2011. They cut services after that but the ridership went up.
- They will likely do a joint COA with Elkhart/Goshen's transit agency.
- There has been some individual analysis and route adjustments over the last 2-3 years but they better served the community. The service map overall has not much changed since the 1960s.

- They contract for service with the colleges and universities and operate a connector route between the three services. The universities pay for this service. IT's open to the public.
- There is also a late-night service for Notre Dame on Friday and Saturday nights. Students ride free.
- Companies always think about transit after-the-fact when they move into the City.
- sbtranspo.com to look at routes.
- Big accessibility problems in Mishawaka. There are many places without sidewalks and it makes it hard for their customers to access.
- The State of Indiana is doing an accessibility analysis and would likely describe many of the bus stops in Mishawaka as inaccessible.
- There are no plans to make the two main streets in Mishawaka pedestrian friendly.
- All buses have bike racks and they promote busing and biking.
- All buses have wheelchair ramps. Every vehicle is handicapped accessible.
- There is a Federal grant to install bus stop shelters and the City is going to use local match to help them install them. This was for \$1.8 million
- Transpo is always applying for Federal dollars for 533-39 bus facilities infrastructure investment program. Funding is for maintenance, replacement of buses, and conversion to compressed natural gas. They got this for \$4.9 million last year. This is to replace buses.
- Their biggest program at the moment is bus replacement. Once they complete this replacement there is not much available.
- If they do not receive adequate funding they will be looking at cutting service.
- The focus is on trying to maintain existing service without cutting service. Funding is the big issue.



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B. Appendix B – Resident Surveys and Agency Surveys

Attached are copies and summaries of the following surveys:

- Residential Survey
- Agency Survey
- Survey Results



ST. JOSEPH COUNTY HOUSING CONSORTIUM HOME PROGRAM COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM AND EMERGENCY SOLUTIONS GRANT PROGRAM NEEDS

The St. Joseph County Housing Consortium is preparing its Housing & Community Development Five Year Consolidated Plan and Annual Action Plan. As part of the planning process, the Consortium is conducting a survey to identify residents' needs, and based on those needs, how funds could be used to address those needs under the HOME, CDBG, and ESG Programs. Questions are also asked on Fair Housing, such as acts of discrimination or barriers that might limit the housing choices of families and individuals. Please take a few minutes and complete this confidential questionnaire to the best of your ability. If you are unsure of an answer, or the question does not apply to you, please feel free to skip that question. Thank you for your assistance in helping us to identify residents' needs and Fair Housing issues in the County. Please return the completed survey to the City of South Bend Department of Community Investment, 227 West Jefferson Boulevard, Suite 1400 S, South Bend, IN 46601, OR COMPLETE ONLINE at southbendin.gov. The City would appreciate your response by Friday, May 31, 2019.

What is the postal ZIP Code and municipality where you live?	45	
☐ City of South Bend ☐ City of Mishawaka ☐ Other Municipality in St. Jose	eph County	
Gender: Male		
Race/Ethnicity (choose all that apply):		
₩hite ☐ Black or African-American ☐ American Indian or Alaskan Native ☐	Asian	
☐ Native Hawaiian/ Pacific Islander ☐ Hispanic or Latino ☐ Some Other Race	☐ Two or M	lore Races
Age: ☐ 17 or younger ☐ 18-20 ☐ 21-29 ☐ 30-39 ☐ 40-49 ☐] 50-59	☑ 60 or older
Number of persons living in your household? One Y Two Three	☐ Four ☐ 1	Five Six +
What is the approx. total family income per year based on the number of person	ns in your h	ousehold?
1 person household \square over $35,500$ 4 person household \square under $35,500$	over unde	} \$50,650
2 person household over 5 person household under \$40,550	over under	} \$54,750
3 person household over state over under \$45,600 6 person household	over unde	} \$58,800
Are you a homeowner? Yes No or Are you a rente	er? 🗌 Yes	No No
Are there any housing issues in the City or County that you are aware of	? If so, plea	ase list:
Is there a need for affordable housing in your neighborhood?	☐ Yes	No
Is there a need for handicap accessible housing in your neighborhood?	💢 Yes	☐ No
Is there a need for single family housing in your neighborhood?	☐ Yes	🔀 No
Is there a need for rental housing in your neighborhood?	☐ Yes	∑ No
Are any improvements to the recreational and community facilities in the needed? Please list:	he City or (County
	City of South Bend City of Mishawaka Other Municipality in St. Jose Gender: Male Female Race/Ethnicity (choose all that apply): White Black or African-American American Indian or Alaskan Native Native Hawaiian/ Pacific Islander Hispanic or Latino Some Other Race Age: 17 or younger 18-20 21-29 30-39 40-49 Number of persons living in your household? One Two Three What is the approx. total family income per year based on the number of person 1 person household Over 4 person household 2 person household Over 5 person household 3 person household Over 6 person household 4 person household 5 person household Are you a homeowner? Yes No or Are you a renter Are there any housing issues in the City or County that you are aware of Is there a need for affordable housing in your neighborhood? Is there a need for single family housing in your neighborhood? Is there a need for rental housing in your neighborhood? Is there a need for rental housing in your neighborhood? Are any improvements to the recreational and community facilities in the city or community facilities in the capture of the properties of the recreational and community facilities in the capture of the properties of the properties of the recreational and community facilities in the capture of the properties of the prop	City of South Bend City of Mishawaka Other Municipality in St. Joseph County Gender: Male Female Race/Ethnicity (choose all that apply): White Black or African-American American Indian or Alaskan Native Asian Native Hawaiian/ Pacific Islander Hispanic or Latino Some Other Race Two or Mage: 17 or younger 18-20 21-29 30-39 40-49 50-59 Number of persons living in your household? One Two Three Four 10 What is the approx. total family income per year based on the number of persons in your household over 4 person household over 355,500 under 2 person household over 440,550 under 3 person household over 440,550 under 4 person household over 440,550 under 5 person household over 440,550 under 4 person household over 440,550 under 5 person household over 440,550 under 7 served a person household over 440,550 under 8 served a pe

☐ Tra	olic Safety
.5.	What, if any, medical or health care is missing or lacking in St. Joseph County? Please list:
16.	Do you use any of the social service programs available in St. Joseph County? Yes No If yes, what programs do you use?
17.	Are there programs or services that are needed in the City or St. Joseph County? Please list:
_	Are there any employment issues in the City or St. Joseph County? Please list:
18.	THORTAGE OF SKILLED LABER
19.	THORTAGE OF SKILLED LABOR
_	Are there unmet housing and service needs for the homeless in the City or County? Please list
19.	Are there unmet housing and service needs for the homeless in the City or County? Please list TES SHORTAGE + SOCIAL SORTES Housing concerns/impediments include any act of discrimination or barrier that might limit the social
19.	Are there unmet housing and service needs for the homeless in the City or County? Please list The start Are to Social Services Housing concerns/impediments include any act of discrimination or barrier that might limit the sing choices of families and individuals. Impediments to fair housing choice are defined as an emission or decisions that restrict, or have the effect of restricting, the availability of the start

Please evaluate if the following conditions result in further discrimination and/or barriers to fair housing in the City and County.

	Strongly Agree	Agree	Neutral/ Unsure	Disagree	Strongly Disagree
Concentration of subsidized housing in certain communities		X			
Lack of affordable housing in certain areas of the City and County		X			
Lack of accessible housing for persons with disabilities		K			
Lack of accessibility in the community (i.e. curb cuts)		X			
Lack of fair housing education		K			
Lack of fair housing organizations in the City and County			X		
State or Local laws and policies that limit housing choice			X		
Lack of knowledge among residents regarding fair housing			X		
Lack of knowledge among landlords and property managers regarding fair housing			X		
Lack of knowledge among real estate agents regarding fair housing				X	
Lack of knowledge among bankers/lenders regarding fair housing					
Landlords unwilling to make reasonable accommodations			X		
23. Are there any additional comments or concerns th	at you wi	sh to sha	re?		

ST. JOSEPH COUNTY HOUSING CONSORTIUM AGENCIES/ORGANIZATIONS NEEDS SURVEY

Address: 1007 Portage Ava	Vear Northwest Neighborhood Inc. E, South Bend, IN 46616
Contact: Kathy Schutt	Title: Executive Director
Phone: 514 232 9/82 Fax:	E-Mail: Anndirector & near northwy
Brief description of programs you	r agency provides: (Attach any brochures)
Neighborhood based ()	Attach any brochures)
· Affordable hous	Sing Program including:
· Az Rohab	of SF homes for resale to low/mod
· New con	struct. of St for sale to low/mad
· Ports	struct. of St for Sale to low/mad of low/mod rental, plan to increase slip over next 5 years exclopment beam: Lead Education effort
Engagement & De	S YEARS
· Commercia Metro	velophed
Cuare Cuare	hen ream: bead Education effort
Does your organization provide any	services or programs for the following?
Social/Human Services:	programs for the following?
Housing: Yes	
Planning: In particular	
Community Development: 1/25	
conomic Development: In Partice	rship
usiness Loans: No	
ob Training: No	
ther: Community Organ	niting & Engagement
	5

Please respond to the following questions if they apply to your agency or

The clientele your program(s) serve? I.e. Low income, elderly, disabled, etc.

low-Mame (80% ani) with housing programs. Neighbors within the New Morthwest Nazhborhood.

Are there any unmet community and economic development needs in the

Yes; high need for reduction of lead poisoning of he homes needs (mold; asthma triggers; lead)

Small Eyisiness training for contractors

Spaces available for small business / 5/on fronts at porisoning of hear Growth/Stabization of CUC Business Development Center

Are there any unmet housing needs in the County?

need for homeowner repair programs; a for existing aging housing stock; a need for high quality afformable housing; a need for housing those previously incarcerated Both rental of ownership needs

Are there any unmet social service needs in the County?

Perhaps available in some ways, many formities in a in substandard housing really need on advocate, to find a understand resources.	risis on Kelp
Are there any Fair Housing issues in the County? Limited accessible housing choices	
Other Comments/Suggestions (if any):	

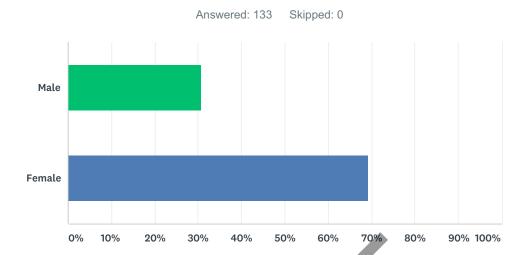
Q1 What is the postal ZIP Code and municipality where you live?

Answered: 133 Skipped: 0

ANSWER CHOICES	RESPONSES	
ZIP Code:	100.00%	133
Municipality: (South Bend/Mishawaka/Other)	96.99%	129



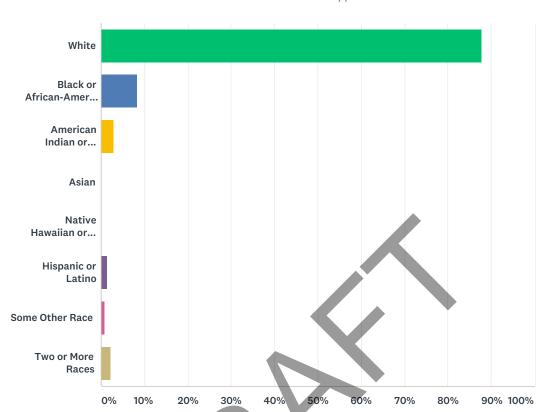
Q2 Gender



ANSWER CHOICES	RESPONSES	
Male	30.83%	41
Female	69.17%	92
TOTAL		133

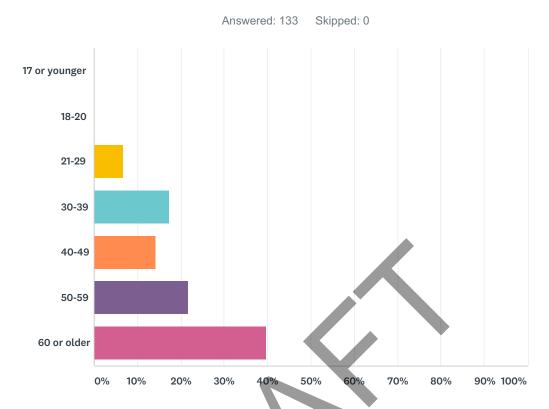
Q3 Race/Ethnicity (choose all that apply)





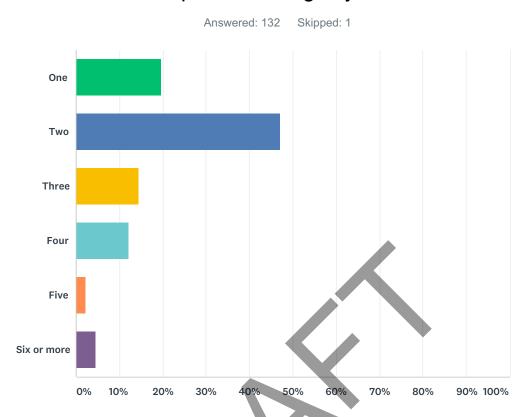
ANSWER CHOICES	RESPONSES	
White	87.88%	116
Black or African-American	8.33%	11
American Indian or Alaskan Native	3.03%	4
Asian	0.00%	0
Native Hawaiian or other Pacific Islander	0.00%	0
Hispanic or Latino	1.52%	2
Some Other Race	0.76%	1
Two or More Races	2.27%	3
Total Respondents: 132		

Q4 Age



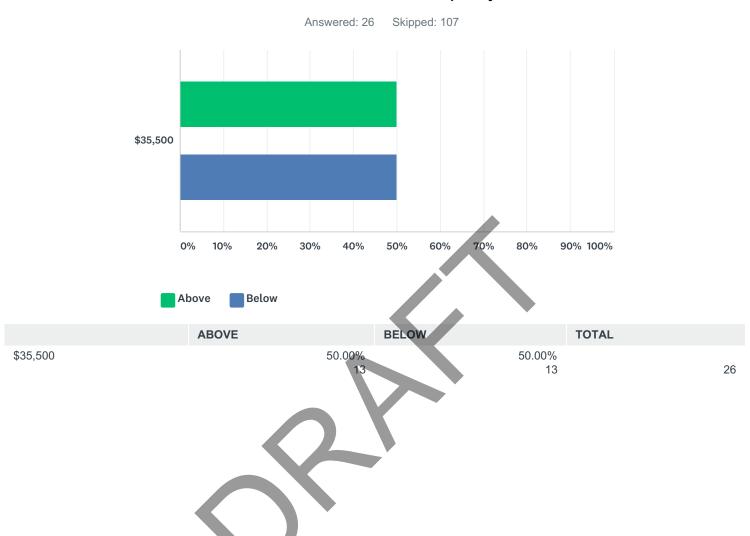
ANSWER CHOICES		RESPONSES	
17 or younger		0.00%	0
18-20		0.00%	0
21-29		6.77%	9
30-39		17.29%	23
40-49		14.29%	19
50-59		21.80%	29
60 or older	*	39.85%	53
TOTAL			133

Q5 Number of persons living in your household?

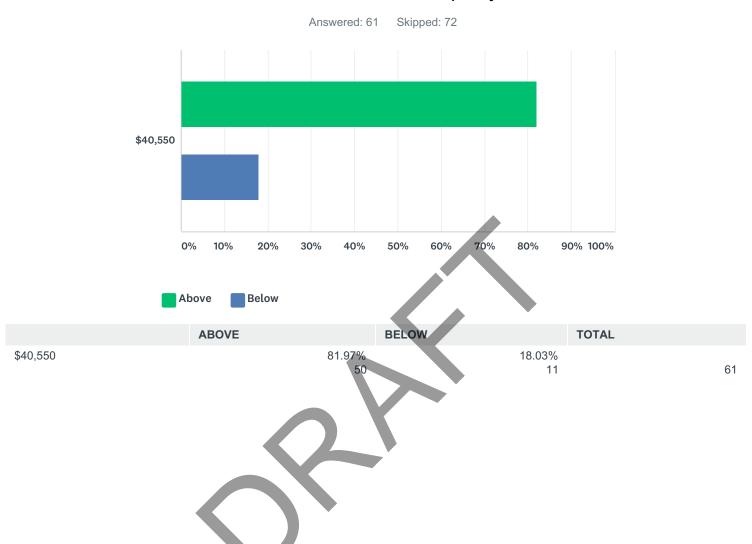


ANSWER CHOICES	RESPONSES	
One	19.70%	26
Two	46.97%	62
Three	14.39%	19
Four	12.12%	16
Five	2.27%	3
Six or more	4.55%	6
TOTAL		132

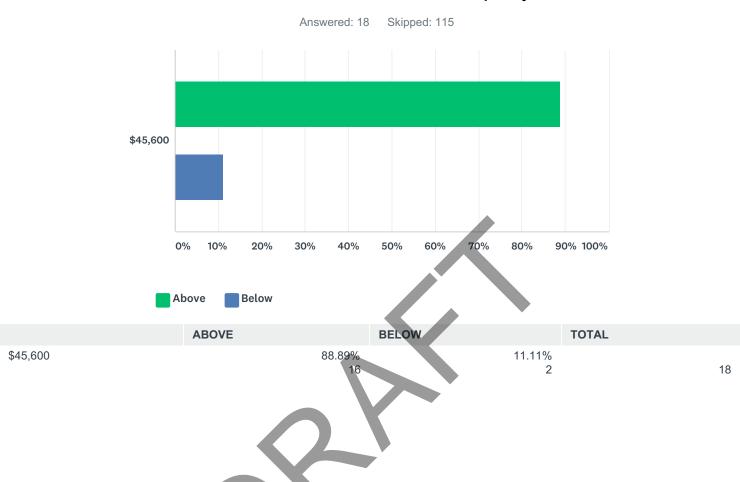
Q6 If you are a one (1) person household, is your total household income above or below \$35,500 per year?



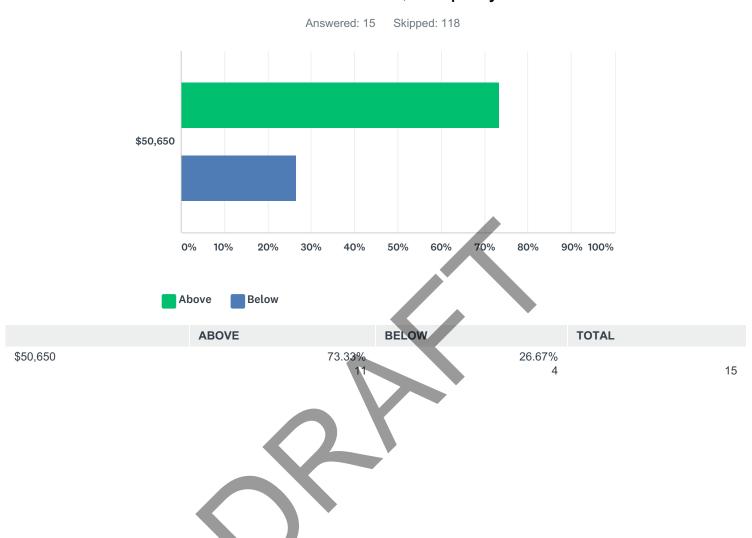
Q7 If you are a two (2) person household, is your total household income above or below \$40,550 per year?



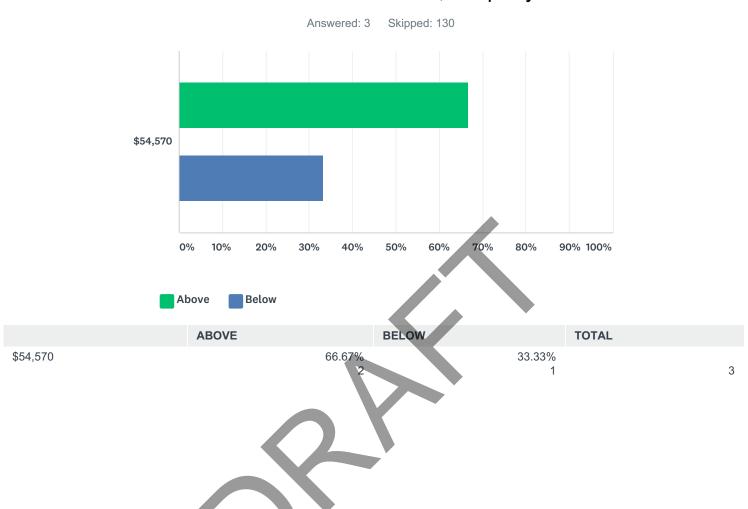
Q8 If you are a three (3) person household, is your total household income above or below \$45,600 per year?



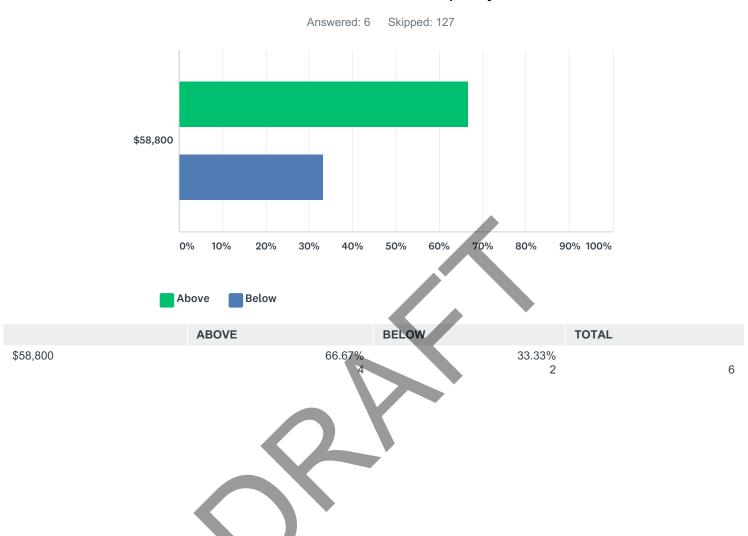
Q9 If you are a four (4) person household, is your total household income above or below \$50,650 per year?



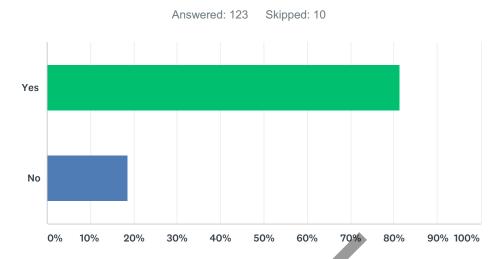
Q10 If you are a five (5) person household, is your total household income above or below \$54,750 per year?



Q11 If you are a six (6) person household, is your total household income above or below \$58,800 per year?

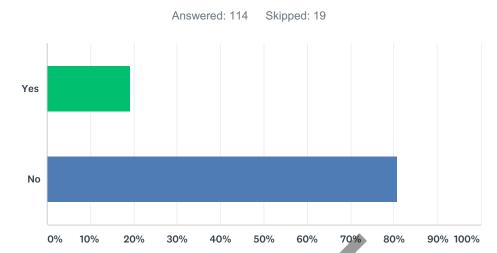


Q12 Are you a homeowner?



ANSWER CHOICES	RESPONSES	
Yes	81.30%	100
No	18.70%	23
TOTAL		123

Q13 Are you a renter?



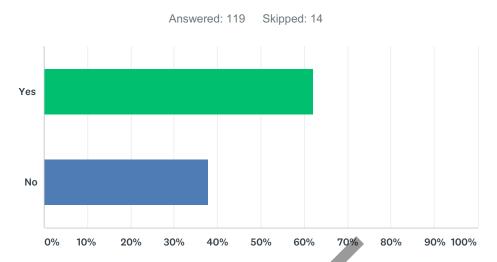
ANSWER CHOICES	RESPONSES	
Yes	19.30%	22
No	80.70%	92
TOTAL		114

Q14 Are there any housing issues in the City or County that you are aware of? If so, please list:

Answered: 84 Skipped: 49

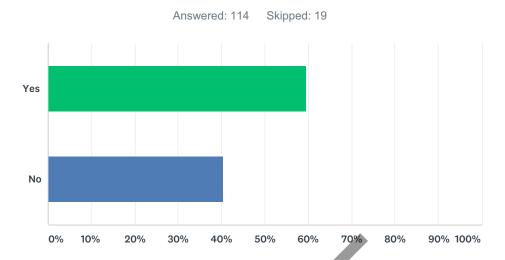


Q15 Is there a need for affordable housing your neighborhood?



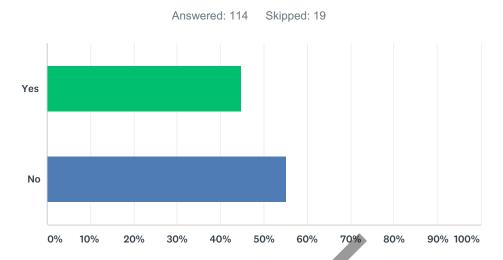
ANSWER CHOICES	RESPONSES	
Yes	62.18%	74
No	37.82%	45
TOTAL		119

Q16 Is there a need for accessible housing your neighborhood?



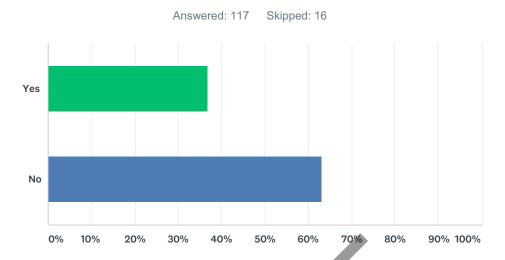
ANSWER CHOICES	RESPONSES	
Yes	59.65%	68
No	40.35%	46
TOTAL		114

Q17 Is there a need for single family housing your neighborhood?



ANSWER CHOICES	RESPONSES	
Yes	44.74%	51
No	55.26%	63
TOTAL		114

Q18 Is there a need for rental housing your neighborhood?



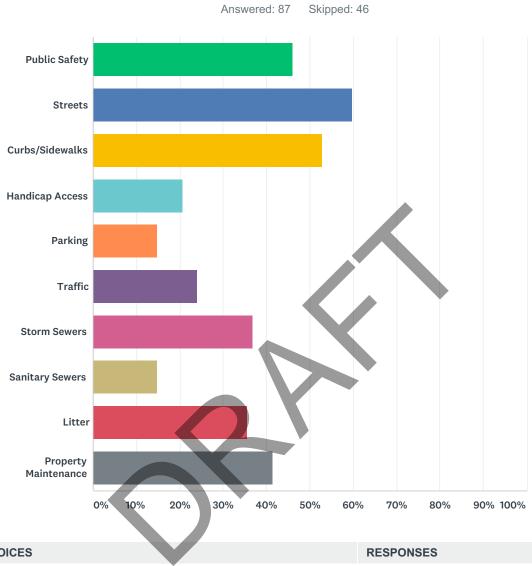
ANSWER CHOICES	RESPONSES	
Yes	36.75%	43
No	63.25%	74
TOTAL		117

Q19 Are any improvements to the recreational and community facilities in the City or County needed? Please list:

Answered: 56 Skipped: 77



Q20 Are there any problems in your neighborhood with the following (choose all that apply):



ANSWER CHOICES	RESPONSES	
Public Safety	45.98%	40
Streets	59.77%	52
Curbs/Sidewalks	52.87%	46
Handicap Access	20.69%	18
Parking	14.94%	13
Traffic	24.14%	21
Storm Sewers	36.78%	32
Sanitary Sewers	14.94%	13
Litter	35.63%	31
Property Maintenance	41.38%	36

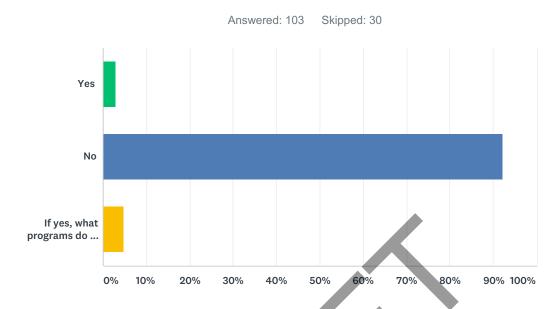


Q21 What, if any, medical or health care is missing or lacking in St. Joseph County? Please list:

Answered: 49 Skipped: 84



Q22 Do you use any of the social service programs available in St. Joseph County?



ANSWER CHOICES	RESPONSES	
Yes	2.91%	3
No	92.23%	95
If yes, what programs do you use?	4.85%	5
TOTAL		103

Q23 Are there programs or services that are needed in the City or St. Joseph County? Please list:

Answered: 54 Skipped: 79



Q24 Are there any employment issues in the City or St. Joseph County? Please list:

Answered: 47 Skipped: 86

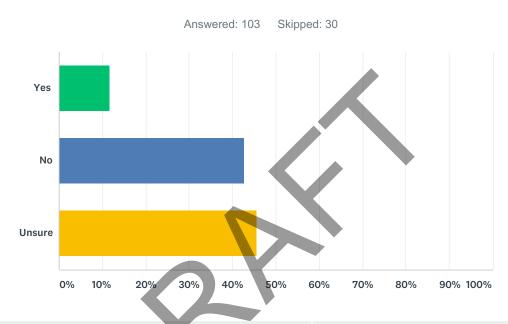


Q25 Are there any unmet housing and service needs for the homeless in the City or County? Please list:

Answered: 64 Skipped: 69



Q26 Fair Housing Impediments include any act of discrimination or barrier that might limit the housing choices of families and individuals. Impediments to fair housing choice are defined as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices based on race, color, religion, sex, disability, familial status, or national origin. In your opinion, are residents of the City or County aware of how to report fair housing violations or concerns?



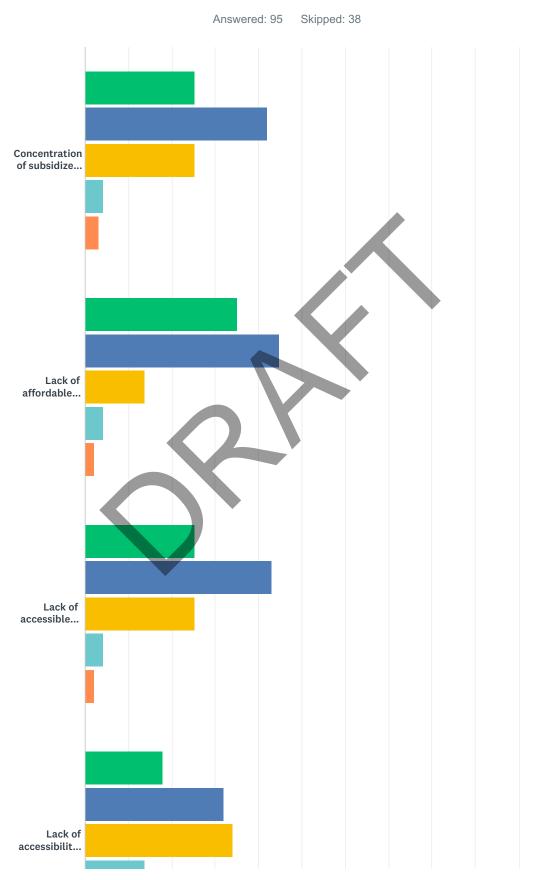
ANSWER CHOICES	RESPONSES	
Yes	11.65%	12
No	42.72%	44
Unsure	45.63%	47
TOTAL		103

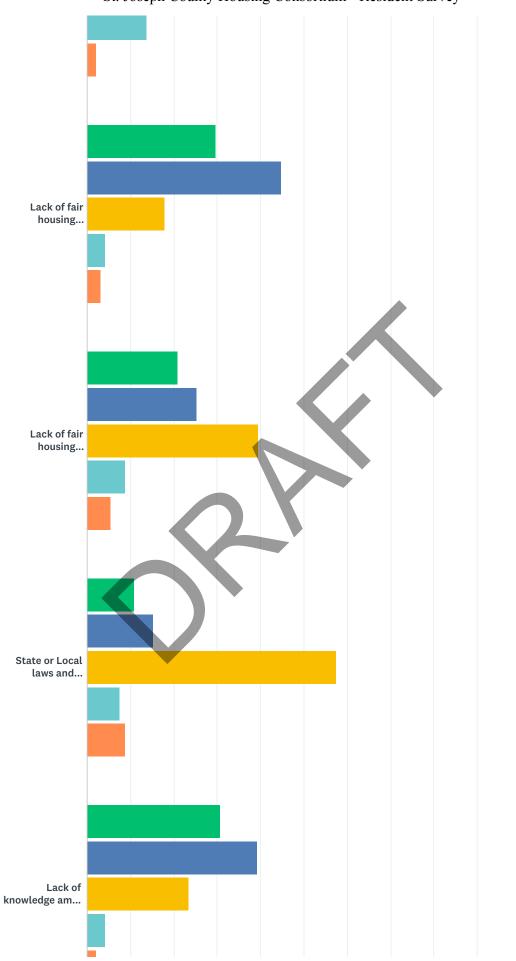
Q27 What do you think are the primary reasons why fair housing complaints are not reported?

Answered: 79 Skipped: 54



Q28 Please evaluate whether the following situations result in further discriminations and/or barriers to fair housing in the City or County.





St. Joseph County Housing Consortium - Resident Survey 0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100% Neutral/Unsure Strongly Agree Disagree Agree Strongly Disagree

	STRONGLY AGREE	AGREE	NEUTRAL/UNSURE	DISAGREE	STRONGLY DISAGREE	TOTAL
Concentration of subsidized housing in certain	25.26%	42.11%	25.26%	4.21%	3.16%	
neighborhoods	24	40	24	4	3	95
Lack of affordable housing in certain areas	35.11%	44.68%	13.83%	4.26%	2.13%	
	33	42	13	4	2	94
Lack of accessible housing for persons with	25.26%	43.16%	25.26%	4.21%	2.11%	
disabilities	24	41	24	4	2	95
Lack of accessibility in neighborhoods (i.e.	18.09%	31.91%	34.04%	13.83%	2.13%	
curb cuts)	17	30	32	13	2	94
Lack of fair housing education	29.79%	44.68%	18.09%	4.26%	3.19%	
	28	42	17	4	3	94
Lack of fair housing organizations in the City	20.88%	25.27%	39.56%	8.79%	5.49%	
	19	23	36	8	5	91
State or Local laws and policies that limit	10.87%	15.22%	57.61%	7.61%	8.70%	
housing choice	10	14	53	7	8	92
Lack of knowledge among residents regarding	30.85%	39.36%	23.40%	4.26%	2.13%	
fair housing	29	37	22	4	2	94
Lack of knowledge among landlords and	20.21%	36.17%	23.40%	14.89%	5.32%	
property managers regarding fair housing	19	34	22	14	5	94
Lack of knowledge among real estate agents	12.77%	18.09%	36.17%	21.28%	11.70%	
regarding fair housing	12	17	34	20	11	94
Lack of knowledge among bankers/lenders	13.98%	18.28%	37.63%	18.28%	11.83%	
regarding fair housing	13	17	35	17	11	93
Other barriers	23.73%	13.56%	59.32%	1.69%	1.69%	
	14	8	35	1	1	59

Q29 Are there any additional comments or concerns that you wish to share?

Answered: 23 Skipped: 110





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C. Appendix C – Public Comments

Attached are summaries of the following meetings:

Public Hearing



Today's weather report is sponsored by:

CASS OUTDOOR POWER EQUIPMENT

WSBT 22 FIRST ALERT

METEOROLOGISTS BOB WERNER, ABBY WEPPLER, MATT RUDKIN, CARI PEUGEOT AND ED RUSSO



TODAY'S FORECAST

METEOROLOGIST ED RUSSO Chilly, breezy, rain/snow



38

Today is looking very soggy, breezy, and chilly. A few snowflakes may mix in with the rain from time to time, especially late in the day. Highs will be in the upper 30s. Tonight, the rain could shringly change over to a little snow with minor

MONDAY

HIGH LOW

46 40

Cool, becoming

mostly sunny





HIGH LOW 68 | 56

Partly cloudy, very mild

WEDNESDAY



Cloudy, chance

THURSDAY



Mostly cloudy, rain likely, t-storms possible

68 44

FRIDAY



HIGH LOW 48 | 38

Cloudy, cooler, chance of showers

ANCHORAGE, Alaska - The Yupik Eskimo village of Kotlik on Alaska's northwest coast relies on a cold, hard blanket of sea ice to protect homes from vicious winter Bering Sea storms.

Frigid north winds blow down from the Arctic Ocean, freeze saltwater and push sea ice south. The ice normally prevents waves from forming and locks onto beaches, walling off villages. But not this year.

In February, southwest winds brought warm air and turned thin sea ice into "snow cone ice" that melted or blew off. When a storm pounded Norton Sound, water on Feb. 12 surged up the Yukon River and into Kotlik, flooding low-lying homes. Lifelong resident Philomena Keyes, 37, awoke to knee-deep water outside her house.

"This is the first I experienced in my life, a flood that happened in the winter, in February," Keyes said in a phone interview.

Winter storm surge flooding is the latest indication that something's off-kilter around ilar to what we saw last year, water at the bottom of the wide, stock is declining, is suffering system as a whole is going to the Bering Strait, the gateway but not for another 40 or 50 shallow continental shelf. The because of the warming tem-



AP Photo/ANCHORAGE DAILY NEWS, MARC LESTER

Jessie Royer passes icebergs in open water on Norton Sound March 13 as she approaches Nome, Alaska, in the Iditarod trail sled dog race. The Bering Sea last winter saw record-low sea ice.

from the Pacific Ocean to the years," Danielson said. Arctic Ocean. Rapid, profound changes tied to high atmospheric temperatures, a direct Villagers use sea ice to hunt result of climate change, may them. Sea ice is the primary be reordering the region's physical makeup. Ocean researchers are asking themselves if ice blooms in spring, dies and they're witnessing the transfor- sinks, sending an infusion of mation of an ecosystem.

record-low sea ice. Climate mod-els predicted less ice, but not this soon, said Seth Danielson, Sea ice also affects commera physical oceanographer at the cially valuable fish. Sea ice his-University of Alaska Fairbanks.

we would've hit situations sim-

Walruses and seals use sea ice to rest and give birth. habitat of polar bears. Algae that clings to the bottom of sea The Bering Sea last winter saw worms on the ocean floor-

torically has created a Bering 'The projections were saying Sea "cold pool," an east-west would've hit situations simbarrier of extremely cold, salty

and Atmospheric Administration. "It kind of comes down shape ... through the center of the southeast Bering Sea."

However, when Britt and oth- ice, she said. er NOAA researchers last year conducted annual fish and ocean condition surveys, they got a big surprise: For the first time in 37 years, they found no cold pool.

Researchers found high con-centrations of Pacific cod and walleye pollock in the northern Bering Sea. But the species that was supposed to be there, Arctic cod, was hardly found.

More than half the fish landed in U.S. waters come from the North Pacific, and most are food to clams, snails and sea caught in the Bering Sea. Chad See, executive director of the Freezer Longline Coalition, a trade association of vessels that target Pacific cod using challenge than projecting the baited lines, said members biological ramifications. caught their quota last year but had to travel farther north.

ogist for the National Oceanic oceanographer Phyllis Stabeno, who has studied the Bering Sea for more than 30 years. almost like a little hockey stick The southern Bering Sea since 2000 has undergone multi-year stanzas of low and extensive

> When sea ice in November began forming as usual, she expected a bounce-back this winter. Instead, warm winds in February mostly cleared the northern Bering Sea of sea ice through the Bering Strait into the Chukchi Sea.

We're in winter," she said. This is all supposed to be

Formation of the cold pool is again in doubt. It could return in the future, but temperatures are trending upward with the rate of greenhouse gases entering the atmosphere.

Scientists say figuring out the ocean physics is far less of a

'We sort of opened up this whole Pandora's box of not "Does that mean that the really knowing how the ecosystem as a whole is going to

NOTICE OF PUBLIC HEARING 2020-2024 FIVE YEAR HOUSING AND COMMUNITY DEVELOPMENT PLAN AND

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING FOR ST. JOSEPH COUNTY HOUSING CONSORTIUM

AND 2020 ANNUAL PLANS FOR THE CITIES OF SOUTH BEND AND MISHAWAKA

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HEARING TIMES AND LOCATIONS Hearings will be on two dates and in two locations: Tuesday, April 23, 2019 at 5:30 pm in the St. Joseph County Public Library, Dickinson Room, 304 S. Main Street, South Bend, IN, and Wednesday, April 24, 2019 at 5:30 pm in the City Council Chambers, 1st floor, Mishawaka City Hall, 600 E. Third Street, Mishawaka, IN. Both locations are accessible to persons with physical disabilities If special arrangements need to be made to accommodate any resident in order for them to participate in the public hearings, including translation services, please contact the Department of Community Investment at (574) 235-9371.

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72 hours prior to the hearing. EQUAL OPPORTUNITY We are pledged to the letter and spirit of U.S. policy for the achievement of equal opportunity throughout the Nation. We encourage and support an affirmative advertising and marketing program in which there are no barriers to obtaining housing and business opportunities because of race, color, religion, sex, handicap, familial status or national origin.

Pete Buttigieg Mayor, City of South Bend

Dave Wood Mayor, City of Mishawaka

Laura O'Sullivan Chair, St. Joseph County Housing Consortium



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Tribunal de Francia acusa a Monsanto por causar la enfermedad de un agricultor

que Monsanto es culpable de la enfermedad de un granjero que inhaló uno de sus herbicidas, en un nuevo revés legal para la firma propiedad de Bayer por reclamos relacionados con la salud.

En la última etapa de un pulso legal que se extiende ya por una década, la corte de apelaciones de Lyon falló el jueves pasado a favor del agricultor Paul Francois, que aseguraba que el herbicida Lasso de Monsanto le hizo enfermar y que el etiquetado del producto era inadecuado.

Francois, de 55 años, afirma que sufrió problemas neurológicos, incluida pérdida de la memoria, desmayos y cefaleas, tras inhalar por accidente Lasso en 2004 mientras trabajaba en su granja.

"El señor Francois concluye de forma justificada que el producto, debido a su etiquetado inadecuado que no respetaba las regulaciones aplicables, no ofrecía el nivel de seguridad que podría esperar legítimamente", indicó la Corte en su dictamen.

No obstante, el último veredicto

Un tribunal francés dictaminó no determinó una compensación para el agricultor, algo que será considerado ahora por otro tribunal en Lyon. Francois busca el pago de cerca de 1 millón de euros (1,1 millones de dólares) en daños.

> Bayer, que compró Monsanto en un acuerdo por 63,000 millones de dólares el año pasado, afirmó que está evaluando sus opciones legales, incluida una apelación ante el más alto tribunal francés

> Lasso fue prohibido Francia en 2007, después de que fuera retirado del mercado en otros países. El producto contenía una sustancia activa distinta al glifosato, el químico incluido en el herbicida superventas de Monsanto, Roundup, que está siendo objeto de demandas en Estados Unidos por su supuesta relación con el cáncer.

La compañía fue hallada culpable en dos juicios en California presentados por pacientes de cáncer que fueron compensados decenas de millones de dólares. Los problemas legales por el glifosato han contribuido a que Bayer haya perdido unos 30,000 millones de euros en valor de mercado desde agosto.

UNA NOCHE CON LAS Viene de la página 8 información de IUSB.

Para obtener más información sobre los eventos de DAMAS/

Daughter and Mothers Achieving Success, favor de contactar a Mario Rosa, coordinador de recursos familiares de LPCSC al 219-362-2080 o mrosa@lpcsc.k12.in.us.

ARGENTINA RENUNCIA Viene de la página 10

En paralelo, estas mismas naciones fundaron a fines de marzo el Prosur --Foro para el Progreso de América del Sur-- un proyecto que se autoproclamó desprovisto de "ideología" pero comprometido con la integración regional.

"Al comunicar su decisión a la Presidencia Pro Tempore (de Unasur), la Argentina ratificó su vocación y voluntad integracionista así como su disposición a explorar alternativas de integración regional más eficientes y con resultados tangibles para nuestras sociedades", concluyó la cancillería argentina.

ESCUELAS DE ELKHART Viene de la página 9

los niños se fueran a casa los fines de semana y no tuvieran nada que comer". Este tipo de ayuda solidaria

está haciendo una gran diferencia en la vida de los alumnos que reciben los alimentos. El sistema escolar de Elkhart quiere expandir el programa de alimentos a otras escuelas.

NOTIFICACION DE AUDIENCIA PUBLICA PLAN DE VIVIENDA Y DESARROLLO COMUNITARIO 2020-2024 Y ANALISIS DE IMPEDIMENTOS PARA VIVIENDA EQUITATIVA PARA EL CONSORCIO DE VIVIENDA DEL CONDADO ST. JOSEPH Y PLANES ANUALES PARA LAS **CIUDADES DE SOUTH BEND Y MISHAWAKA 2020**

Por el presente aviso se notifica que se llevarán a cabo dos (2) audiencias para solicitar comentarios y reunir información de individuos y organizaciones respecto de las necesidades de vivienda, desarrollo económico/comunitario y vivienda equitativa en el condado de St. Joseph, la ciudad de South Bend, y la ciudad de Mishawaka, Indiana. Se anima a asisitir a todas las personas interesadas y presentar comentarios verbales y/o escritos de las necesidades y basados en esas necesidades, del uso de fondos para esas necesidades de la Subvención en Bloque de Desarrollo Comunitario y y el Programa HOME y la Subvención de Soluciones de Emergencial (ESG).

TIEMPOS Y LUGARES DE AUDIENCIA

Las audiencias para iniciar el proceso de aplicación para el desarrollo del Plan de Acción del 2019 se llevarán a cabo en dos lugares el martes 23 de abril, 2019 a las 5:30 pm en la Biblioteca Pública del condado de St. Joseph, 304 S. Main Street, South Bend, IN y el miércoles, 24 de abril, 2019 a las 5:30 pm, en la Cámara del Consejo de la ciudad, 1er piso, Mishawaka, IN. Ambos lugares de las reuniones son accesibles para las personas con discapacidad. Las personas que deseen comentar pero necesiten adaptaciones adicionales, incluyendo servicios de traducción deben contactar el Departamento de Inversión Comunitaria de la ciudad de South Bend, en el (574) 235-9371.

Los comentarios escritos para el Consorcio de vivienda del condado de St. Joseph y la Ciudad de South Bend pueden ser dirigidos al Director, Desarrollo de Vecindarios, 227 W. Jefferson Blvd. Suite 1400S South Bend, IN 46601 y para la Ciudad de Mishawaka al Administrador de Subvención, Departamento de Desarrollo Comunitario, ciudad de Mishawaka, 600 E. 3rd Street, Mishawaka, IN 46544.

NOTIFICACION PARA PERSONAS CON DISCAPACIDAD AUDITIVA Y DE VISION

Servicio auxiliar y otros servicios estarán disponibles sin costo alguno al ser solicitados. De ser posible con una solicitud previa razonable. Las personas con impedimentos auditivos pueden obtener información en la audiencia pública, contactando el Terminal TDD al (574) 235-5567. Además si requiere asistencia especial en la audiencia pública, por favor contacte al Departamento de Inversión Comunitaria en el (574) 235-9371, por lo menos 72 horas antes de la audiencia.

IGUALDAD DE OPORTUNIDADES

Estamos comprometidos a cumplir con la letra y el espíritu de la política de los EE.UU. de lograr oportunidades equitativas de vivienda en toda la nación. Animamos y apoyamos una publicidad y programa de mercadeo afirmativos en el cual no hay barreras para obtener oportunidades de vivienda y negocios basados en raza, color, religión, género, discapacidad, estado familiar u origen nacional.

Pete Buttigleg Alcalde, Ciudad de South Bend

PUBLIC MEETING

5:30-7:00 p.m. SJC Public Library-Main Branch 2020-2024 Housing & Community Development Plan and Analysis of Impediments to Fair Housing Choice St. Joseph County Housing Consortium April 23, 2019

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Zip Code	46637	Helo 7	46001	46638		
Name	Hally Chusen	Long Timmer	Lachal Towns Margun	Thelma Williams		

PUBLIC MEETING

Analysis of Impediments to Fair Housing Choice April 23, 2019 5:30-7:00 p.m. SJC Public Library-Main Branch 2020-2024 Housing & Community Development Plan and St. Joseph County Housing Consortium

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Name	Of Wender	Jame Morgan	tam Mayer	Lyon Collect	Lehoy King				

City of South Bend, Indiana FY 2020-2024 Five Year Consolidated Plan and Analysis of Impediments

First Public Hearing Tuesday, April 23, 2019 at 5:30pm

In attendance: Megan Mays, St. Joseph County Resident; Carl Hetler, St. Joseph County Resident; Sonja Karnovsky, St. Joseph County Resident; Lonnie Hosea, St. Joseph County Resident; D.E. Blair, St. Joseph County Resident; Bilijah Williams, St. Joseph County Resident; Ameenah Starks, St. Joseph County Resident; Sally Clausen, St. Joseph County Resident; Linda Wolfson, St. Joseph County Resident; Rachel Tomas Morgan, St. Joseph County Resident; Thelma Williams, St. Joseph County Resident; Allen Grace, St. Joseph County Resident; Jamie Morgan, St. Joseph County Resident; Lynn Collier, St. Joseph County Resident; LeRoy King, St. Joseph County Resident; Megan Smedley, WNDV; Lory Timmer, South Bend Department of Community Investment; Walter Haglund, Urban Design Ventures, LLC; Brandon Wilson, Urban Design Ventures, LLC

5:33 PM - Pam started the meeting and introduced everyone. She explained the Five Year Consolidated Plan and its three jurisdictions. She also described the AI.

The following was discussed at the meeting:

- Walt described the reason for the Five Year Consolidated Plan, and the reasons that we need both resident input and input from people who are anticipating applying for funding.
- Walt described the reason that the Analysis of Impediments is done.
- Carl Hetler said that there were 50-60 people who were at Winter Amnesty that are now on the street. They are dealing with mental health issues, outstanding payments with landlords, and criminal histories. There will be more need for wraparound services.
- The president of the Parks Board of Roseland attended to gain information.
- Megan Mays is attending.
- LeRoy is a part of Bridges out of Poverty and they merged with Goodwill. The under resourced community once used housing as a means to wealth development but this is no longer the case because they are mostly renting. They are going to work for homeownership.
- Linda Wolfson is a member of Community Forum for Economic Justice. They have been interested in safe and affordable housing. Their interests showed up at previous meetings. She wanted to second Carl's emphasis on year-round housing for the homeless. She is aware that a lot of these people
 - Have problems like mental illness and drug addiction but she has also met people who
 say that the problem was a divorce or that nobody had enough money or they cannot
 find another house to rent because landlords will not rent to people with an eviction on
 their record.
 - O We can't wait again for Weather Amnesty because the situation is really bad. South Bend has an enormously high eviction rate and there is a growing awareness of that. Are there other programs that could receive support that other localities have tried? The new City Ordinance for a
 - o Proactive inspection of rental property will help because it will eliminate the necessity that a renter needs to make a code enforcement complaint. She has spoken with

- women who do not trust using the cooking facilities and take their kids to McDonalds instead, but probably would not have
- The resources to get a new rental unit. There is legal help but it's a bigger problem than that. The last thing is that the organization that she works with has to deal with capacity for building but there are people with human capacity rather than financial and they would like people to
- Organize the program. Other cities are having really exciting programs and she would like to organize and have people power.
- Sonja Karnovsky is here to listen to people and mention the issue of the gap in the cost to build
 new units versus what those units can be sold or rented for. The City is thinking through some
 innovative finance methods to close that gap.
- Jamie Morgan works on Health & Human Services Policy for the City.
- Lynn Collier is a lifelong resident.
- Alan Grace is a realtor and is here to understand the problem a little better and make sure it is stated correctly so that everyone is working on the same issue.
- Reverend Lonnie Hosea is here to understand more of what is going on. His biggest concern is
 that people work on the outside of the house but not the insides. There are many abandoned
 houses but the main streets seems to always be beautified. He lives on the Northwest side of
 the City and there
 - o Is a street that changed from one-way to two-way and people are speeding down the street. The sidewalks need improvements around the school. The sidewalks are just as bad on the street that was changed from the one-way to a two-way.
- Thelma Williams is concerned about the senior citizen building in her area and also veterans. In her area, there is a need for senior housing because they do not always need a large house that they had originally lived in. Sidewalks in her area are being repaired more but they used to be left out.
 - o She generally thinks that her part of the City needs more help.
- P.E. Blaine is a project manager and construction manager. He works on aging in place projects.
 He sees people aging and staying in their homes for 30-40 years and lose their house due to a
 couple catastrophes. Then they are reliant upon the state. He would prefer going in to do the
 modifications
 - Instead of them needing a residential care facility. He wants to see more funds directed to allowing people to stay in their own home, rather than in a residential care facility.
 This will anchor the facility. A lot of the neighborhoods have empty lots because houses have been demolished. There
 - Are initiatives to implement this new housing and it has been taking over a decade and the properties are public-private partnerships. He would like to put some incremental development for aging in place while also downsizing in these vacant lots. These would be stable housing. He also wants housing
 - To use net zero design and also anchor the neighborhood with aging in place and allowing the elderly to stay within the City.
- Elijah Williams has been living in South Bend for 7 years and is a realtor. She has heard some of the things that are going on concerning neighborhood development. She is concerned that even

though affordable housing is being developed, it may not create a sustainable community. She would like to see

- That the neighborhoods that are being invested in will also see community center development which can sustain the community. They should be able to create a spot where there are activities for people including the elderly and youth. There should also be programs to assist children in having
- Something to do. There is also no public transit to necessarily help the people in these communities with new affordable development reach their community centers.
- Pam described the funding: South Bend receives about \$2.5 million in CDBG, HOME is \$700-900 thousand that can be spent in South Bend, Mishawaka, or unincorporated areas of the County, and \$220,000 for ESG that can be spent in shelters. She described entitlement communities and that South Bend is an entitlement community.
 - The timing of the receipt of the funds makes things challenging. They just received a notice that told them the dollar amounts for 2019, which makes things late.
- Walt described the things learned through other stakeholder meetings re: lots of land available, low housing costs relative to the rest of the Country, there is a workforce but a need for job creation, there is a need for small business, there is brain drain from the higher education facilities, the City is unequal and the programs come in to help people that need help
 - The City will develop priority lists to address all of the needs that will be presented to the City. The City is in the process of rewriting its zoning ordinance. There are populations that have Special Needs and they will be addressed in the plan.
- Linda Wolfson wanted to bring attention to the large number of working people who can only
 afford low-quality housing. If one emergency happened to these people, they would lose their
 housing.
- Phil wanted to point out the wages are stagnant. Many of the large employers are not taxed which makes it works. The aging in place population requires a lot of funding and they should be able to pay things back incrementally because they cannot afford to do these projects all at once. The City has held
 - Properties for years and would like to get ahold of some of the vacant properties to build aging in place housing. The vacant properties should be opened up for purchase for everyone. Many of the older partnerships are aging out and the commercial development has replaced it which prices
 - Out other development and engagement. Phil has reached out to the City but has not submitted a proposal.
- Elijah sold a couple of homes recently that were part of an affordable housing program. She was
 not able to sell these houses to some working poor people because they made too much. She
 would like to know what percentage of evictions are belonging to the household of working
 poor. She would also like to know what other cities have done about evictions.
- Walt said that there are communities that have set up private funds along with public funds to help people who are slightly over income. There are also Federal Home Loan Bank programs that can assist people above LMI. Banks can provide a pool of money and the City can guarantee the loans with some of its money. There is also the possibility of doing an NRSA.
- Lynn found that there was a problem with transparency, especially for realtors. The
 neighborhoods with the empty lots that were in the potential to be developed. She would like to

see the revitalization of the lots but they have not been developed quickly enough. She says on Angelo one side of the street

- Has been split, where one side is affluent and the other is LMI. The affluent side is thriving. She would like to know how to get something started with the vacant lots.
- Walt responded that neighborhoods with CDCs were much quicker at getting money. These are the neighborhoods more effective in expressing their needs. 3-1-1 has been a success story, though not everyone agrees.
- LeRoy says there is lots of opportunity but grassroots organizing is necessary to make these
 changes. There cannot just be the hope that this happens, but it must be intentional with
 organizing. One of the number one services his organization provides is housing. Once
 somebody is evicted, it is almost impossible for them to get new housing.
 - The local school corporation has lots of students who come from vulnerable housing situations. Their mobility rate was 77%, so insecure housing affected the academics. He would like to stabilize young families and make sure the students never have to worry about being evicted.
- Lonnie thought the closure of the LaSalle High School harmed his part of the City. There were only pockets of improvements. He would like to use the TIF money to revitalize that neighborhood instead of the downtown area. There is a lot of inequality on the Gateway of the City. He would also like to see landlords invest in the community and work with tenants.
- Phil has one of the longest standing neighborhood organizations, and he saw a TIF district drawn into the neighborhood immediately after his CDC had its leadership voted out. He says that carcinogens in houses are not being addressed. The nonprofit and public entities are not taking the same measures that he is. The homes that were torn down in the neighborhoods
 - Were all full of asbestos and lead paint, and this was environmentally damaging to the street. He also took issue with not being awarded a residential construction contract.
- Pam disagreed with Phil's assessment of the asbestos and lead paint. She pointed out that the
 contract he was disputing was in regards to a specific program that he did not meet the
 requirements for years ago.
- Walt discussed the Analysis of Impediments and specifically asked realtors to comment on Fair Housing.
- Allen stated there is a class as part of a continuing education program and is one of the principal items presented to realtors on an annual basis. He does not know if there is housing discrimination that is going on. If it is, it is because the realtor does not know that it is going on and it is the way most realtors treat it.
- Allen stated lead based paint is a Federal issue that realtors must communicate. Unfortunately,
 the law is written that a seller is only required to disclose the knowledge that they physically
 have, so they say they do not know if they have a problem and meet the legal guidelines, which
 is still an issue but it is not addressed in that manner. There are no lead assessment people in St.
 Joseph's County.
 - There are no inspectors to go in-depth on lead-based paint and there are no people to do the lead work. There are only a few people licensed to do lead assessment and abatement and because there are so few, it is very expensive.
- Pam said that the City has two lead assessors in the St. Joseph's County Health Department.

- The County Health Department has committed to doing assessments for children under 6. But Allen said that these inspections are delayed for months due to a lack of resources. HE has asked if there are funding issues in the Health Department.
- Pam said that there are agreements with the Health Department to do lead assessment risks.
- Linda has been attending affordable housing conferences on lead-based paint in the area. She
 has a different evaluation now and thought it was a very serious problem. There was a lack of
 resources, but now there has been a major change in the Health Department and the County
 budget has changed.
 - There have been monthly meetings in the Near Northwest Neighborhood and they have been successful in getting the news out on lead. She would like to see this among other issues like fair housing and eviction.
- Lonnie has pointed out that the eviction problem is related to unemployment, the low quality jobs here, and the lack of industry. Many people move in from other places to South Bend but do not have jobs. Additionally, everyone is building further out in the suburbs, but this does not fix the problems of South Bend.
- Thelma would like education for people outside of high school. She would like them to learn more about getting an apartment or house.
- Walt mentioned that the City has housing counselors.
- The VP of the Parks Board at Roseland wanted to comment that all communities across the country has these issues and she appreciates the community for working together. She would like to get involved.

Pam ended the meeting at 6:52PM

NOTICE OF PUBLIC HEARING 2020-2024 FIVE YEAR HOUSING AND COMMUNITY DEVELOPMENT PLAN AND ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING FOR ST. JOSEPH COUNTY HOUSING CONSORTIUM AND 2020 ANNUAL PLANS FOR THE CITIES OF SOUTH BEND AND MISHAWAKA

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EQUAL OPPORTUNITY

We are pledged to the letter and spirit of U.S. policy for the achievement of equal opportunity throughout the Nation. We encourage and support an affirmative advertising and marketing program in which there are no barriers to obtaining housing and business opportunities because of race, color, religion, sex, handicap, familial status or national origin.

Pete Buttigieg Mayor, City of South Bend

Dave Wood Mayor, City of Mishawaka

Laura O'Sullivan Chair, St. Joseph County Housing Consortium

SB-655615-1

☐ PROOF O.K. BY:	□ O.K. WITH CORRECTIONS BY:
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NEXT RUN DATE: 04/21/19 PROOF DUE: 04/19/19 12:59 NOTICE OF PUBLIC HEARING
2020-2024 FIVE YEAR HOUSING
AND COMMUNITY
DEVELOPMENT PLAN
AND
ANALYSIS OF IMPEDIMENTS
TO FAIR HOUSING
FOR
ST. JOSEPH COUNTY HOUSING
CONSORTIUM
AND
2020 ANNUAL PLANS FOR THE
CITIES OF SOUTH BEND AND
MISHAWAKA
Notice is hereby given that two (2)
public hearings will be held to solicit
views and comments and gather

views and comments and gather information from individuals and organizations concerning the housing, community/economic development, and fair housing needs in St. Joseph County, the City of South Bend and the City of Mishawaka, Indiana. All interested persons are encouraged to attend and present oral and/or written comment concerning needs, and based on those needs, the use of Community needs, the use of Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME) and Emergency Solutions Grant (ESG) funding to address those

needs.

HEARING TIMES AND
LOCATIONS

Hearings will be on two dates and in two locations: Tuesday, April 23, 2019
at 5:30 pm in the St. Joseph County
Public Library, Dickinson Room, 304
S. Main Street, South Bend, IN, and
Wednesday, April 24, 2019 at 5:30 pm
in the City Council Chambers, 1st floor,
Mishawaka City Hall, 600 E. Third
Street, Mishawaka, IN. Both locations
are accessible to persons with physical are accessible to persons with physical disabilities. If special arrangements need to be made to accommodate any resident in order for them to participate in the public hearings, including translation services, please contact the Department of Community Investment at (574) 235-9371.

Written comments for the St. Joseph Written comments for the St. Joseph County Housing Consortium and the City of South Bend can be submitted to: Director, Neighborhood Development, 227 W. Jefferson Blvd. Suite 1400S South Bend, IN 46601, and for the City of Mishawaka to Grant Manager, Department of Community Development, City of Mishawaka, 600 E. 3rd Street Mishawaka, IN 46544. NOTICE FOR HEARING AND SIGHT IMPAIRED PERSONS Auxiliary aid or other services are available upon request at no charge.

available upon request at no charge. Please give reasonable advance request

when possible. If special assistance is needed at the public hearing please contact the Department of Community Investment at (574) 235-9371 at least 72 hours prior to the hearing.

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Pete Buttigieg
Mayor, City of South Bend
Dave Wood Mayor, City of Mishawaka Laura O'Sullivan Chair, St. Joseph County Housing Consortium State of Indiana St. Joseph County

Personally Appeared Before Me The Undersigned:

Nancy Nich

Legal Clerk of the MISHAWAKA ENTERPRISE, a public newspaper of general circulation, published in the city of Mishawaka in the County aforesaid, who being duly sworn, upon her oath saith, that the notice of which she attached is the true copy, was duly published in the Mishawaka Enterprise for:

XX_One	_ TWO	THREE
	times successively	to-wit:
On the 18th	_day of <u>April</u>	, 2019, and
On the	_day of	, 2019, and
On the	day of	, 2019
Subscribed & S This 11th	worn to Before Me day of April, 201	9) jch

Jennifer Nich

Notary Public - Seal Elkhart County - State Of Indiana Commission Number NP0714975 y Commission Expires July 23, 2026

CHARGES: \$ 45.80



CITY OF MISHAWAKA- DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

Public Hearing

2020-2024 Five Year Consolidated Plan

April 24, 2019 @ 5:30

Sign in sheet

NAME 0	ORGANIZATION/ DEPARTMENT	E-MAIL ADDRESS	PHONE NUMBER
	Resident, Many Phillips	alilor youthnet	574-255-1325
JOHN SHAFER	Michiana Five	MICHIANAFIVE & GMAIL.COM	
Brandon Wil Son	Vibandesign Ventures, CLC	provion Our kandes Tonyer will com	412-461-6916
Long Timmer	City of SB	It immer @ soxthbendin.gov	
Laura Viramon #5	City of Mishawaka	Wire nontes@ Mishawake. 12	
Walt Hagland	Urban Design Venturos	walted urban Desyn Untu	
Fam Meyer	City of Sb. Housing Codos	e prayer asouth bendingov	574-235-5845
Marelyn Nelums - Vones	City of Mishawika	in held magnad. com	275 11 11
	0 0	@ MIShausika, M.go	V 574-258-1609
	1		

City of Mishawaka, Indiana

FY 2020-2024 Five Year Consolidated Plan and Analysis of Impediments

Public Hearing

Wednesday, April 24, 2019 at 5:30pm

In attendance: Alice Slatton Campbell, Public Housing Resident; John Shafer, Michiana Five; Lory Timmer, South Bend Department of Community Investment; Pam Meyer, South Bend Department of Community Investment; Laura Viramontes, Mishawaka Department of Community Development; Marilyn Neulm-Jones, Mishawaka Department of Community Development; Walter Haglund, Urban Design Ventures, LLC; Brandon Wilson, Urban Design Ventures, LLC

Pam opened the meeting at 5:35PM and discussed the purpose of the Five Year Plan.

The following was discussed at the meeting:

- Walt introduced the goals of the CDBG and HOME programs and the Five Year Plan, and the Analysis of Impediments to Fair Housing Choice.
- The big concern is about the homeless situation. Alice does not know about the homeless situation or what the City of Mishawaka is going to do with this population.
 - o Walt explained that City's do not develop homeless shelters but other organizations do.
- John asked if the City could assist an organization that is looking to build a homeless shelter.
 - Walt responded that yes, they may do so.
- Alice asked why there was so much controversy around the homeless population in South Bend.
 - Walt described the support services that are provided for the homeless at the Mishawaka food pantry.
- John asked if the City is at no time willing or obligated to operate the homeless shelter.
 - Walt responded that City's are not allowed to operate shelters. They can operate
 recreation, but not shelters. Counties used to operate homes for the elderly but no
 longer.
- Alice lives in the Mary Phillips apartments since the beginning in 2006. She had a specific rent
 allocated for her two-bedroom apartment. This complex is owned by the Mishawaka Housing
 Authority. HOME funds had gone into this property.
 - o Lory described the Housing Authority's umbrella development corporation.
- Alice had to go through a questionnaire and then found out that she had to list her income again.
 - Walt said that the residents, by law, must recertify income eligibility based on median income.
- Alice asked why this has changed and she needs to fill this out.
 - Walt said this is because NYC had scandals and were not checking income but still giving out development money.
- Alice said that many large people got large rebates on their rent because they were being overcharged. She did not get this.
 - Walt described the 30% income limit.
- Alice had lots of back trouble after falling. She is concerned that her income dropping would give her trouble.

- Walt said that the lower income will help her continue to qualify.
- Alice was concerned she would be moved from a two bedroom to one bedroom apartment.
 - Walt said it will be based on the building's policy.
 - Laura said that the Housing Authority itself is under new management and they will get back to her on this.
- John spoke with somebody who had gotten assistance through the South Bend Housing Authority. She should be paying 30% LMI on her Section 8 Voucher Program. She said her landlord was raising the rent and her portion to pay was going up \$30 a month. Jim wanted to know how this worked.
 - Walt described Fair Market Rents.
- John said this particular lady is elderly and she is staying in another apartment community that
 forced her out, so she was forced to transfer her voucher to another place that accepted Section
 8. He wanted to know how this previous apartment could kick her out, as she had been there for
 9 years.
 - Walt asked if it was a year lease or month to month.
- John responded that they would not give her a copy, but it should have been a year. She was never late with her rent and he thought she was switched to month-to-month.
 - Walt described the landlord tenant law in the State of Indiana, and its imbalance in favor of the landlord.
- John said that a lot of senior citizens are being victimized, especially by slumlords. They are raising senior citizens' rent and leading them to homelessness. He works with the homeless.
- Alice asked that if an individual homeowner rented the top floor of their house, were they not subject to any regulations?
 - o Pam responded that it may depend on the homeowner's mortgage and its terms.
- John asked if the funding can include a capacity to help existing shelters expand the number of beds for homeless people.
 - Pam described how the money from the ESG program is spent in the City of South Bend.
 The lack of funding prevents the shelters in the area from expanding the beds.
- John is worried that these things will get worse as costs go up and incomes remain stagnant.
- Alice asked if there was a need for all of the condo development.
 - o Laura said that the City Planners will ultimately decide if the condos will be built or not.
- John suggested that the housing is built with the idea of encouraging people to move in.
- John asked how much funding the City of Mishawaka and the City of South Bend gets.
 - Pam gave the approximate numbers.

Walt closed out the meeting at 6:14PM.



Table of Contents





D. Appendix D - HMDA Data

Attached are the HMDA Data Tables.



Table 1: Disposition of loan applications, by location of property and type of loan, 2017

MSA/MD: 43780 - South Bend-Mishawaka, IN-MI

CENSUS TR Loans on 1- to 4-Family and Manufactured Home Dwellings

	Home Purchas FHA, FSA/RHS	se Loans			Refinancings	н	lome Improve	ment I (I (nans on Dwelli	ings Foi Noi	noccupant l	oans Er Lo:	ans On Man	ıfacture % M	lin Pon Me	dian Income As PCT	of MSA/MD Media
	Α	E	3		C	D)	Е		F		G		aracture /0 iv	iiii rop ivie	ulali lilcollie AS FCT	of MisAyMid Media
	Number \$ County/0010.0		Number \$	1	Number \$	N	lumber \$	N	umber \$	Nur	mber \$	Nu	mber \$		5	113	
Loans origi		1901	61	16716	47	7380	17	1261	0	0	22	5639	8	626	3	113	
Apps appro		105	1	205	5	614	0	0	0	0	0	0	2	245			
Apps denie Apps withd		192 527	6 3	1069 533	24 9	3773 1767	1 2	3 74	0 0	0 0	2 3	409 1342	4 2	357 116			
Files closed		0	0	0	9	1973	1	160	0	0	0	0	3	374			
	County/0011.0		20	F077	25	2526	4	242	0	0	-	600	6	477	3	87	
Loans origi Apps appro		1990 274	30 2	5977 393	25 1	3526 292	4 0	212 0	0 0	0 0	5 0	600 0	6 1	477 83			
Apps denie		798	3	406	11	1253	2	564	0	0	1	155	1	128			
Apps withd		166	3	506	11	1552	2	175	0	0	2	244	1	53			
Files closed	1 County/0012.0	111 00	0	0	4	507	1	140	0	0	0	0	0	0	7	95	
Loans origi	•	1888	56	12512	36	6844	3	55	0	0	11	2287	1	61	,	33	
Apps appro		0	4	784	2	718	0	0	0	0	1	216	0	0			
Apps denie Apps withd		297 433	5 5	966 939	12 12	2654 2621	0 0	0 0	0	0 0	2 1	358 248	2 1	74 123			
Files closed		0	2	1099	1	237	2	199	0	0	1	375	0	0			
	County/0015.0														7	88	
Loans origi		1326 181	36 1	5108 42	32 1	3717 72	14 0	1090 0	0 0	0 0	8 0	1672 0	1 1	51 42			
Apps appro Apps denie		346	2	249	21	2444	6	345	0	0	3	353	2	143			
Apps withd	3	417	5	583	9	902	2	253	0	0	1	188	0	0			
Files closed		0	1	46	5	1030	0	0	0	0	0	0	1	46	10	106	
IN-MI/Cass Loans origi	County/0016.0	00 927	47	13674	38	7076	10	767	0	0	35	10375	5	389	19	106	
Apps appro		87	3	812	3	796	0	0	0	0	2	705	1	109			
Apps denie	1	74	5	540	19	5048	3	124	0	0	1	54	6	598			
Apps withd Files closed		384 0	4 0	712 0	12 4	2529 931	1 0	75 0	0 0	0	4	1399 0	0	0			
	County/0017.0		J	U	4	231	U	U	U	J		U	Ů.		5	97	
Loans origi	11	1465	46	6863	44	6345	14	804	0	0	20	3249	7	745			
Apps appro		123 292	2 5	540 995	3	251 2859	2	56 347	0	0	0	626	0 4	0			
Apps denie Apps withd		461	5 4	385	21 10	2859 1482	11 0	0	0 0	0	0	626 0	2	259 124			
Files closed		0	1	236	7	1009	0	0	0	0	0	0	0	0			
	County/0018.0		70	47000	7.4	10000	24	1700						670	7	109	
Loans origi Apps appro		4264 66	72 3	17220 505	71 9	10839 1504	21 1	1789 115	0	0	0	773 0	9 1	678 32			
Apps denie		347	4	523	24	6343	8	1004	0	0	0	0	8	698			
Apps withd		625	8	1599	21	3226	4	436	0	0	4	233	4	372			
Files closed	2 County/0019.0	312 no	1	262	15	2755	2	188	0	0	0	0	1	152	10	113	
Loans origi	• •	1555	55	10541	44	7897	9	956	0	0	42	9572	5	478	10	113	
Apps appro		123	5	914	10	1228	1	69	0	0	4	882	2	190			
Apps denie Apps withd		799 172	10 4	1462 351	19 13	2807 1791	2 3	114 269	0	0 0	11 5	2167 778	5 1	312 70			
Files closed		0	1	30	4	555	0	0	0	0	2	225	0	0			
	County/0020.0														21	81	
Loans origi		3116	19	2529	36	4493	6	434	0	0	15	2681	5	391			
Apps appro Apps denie		158 236	0 3	0 198	14	830 1093	2 5	261 39	0 0	0 0	0 3	0 127	0 1	0 8			
Apps withd		260	1	160	10	911	1	91	0	0	2	152	1	90			
Files closed		0	0	0	1	150	0	0	0	0	0	0	0	0	20	00	
Loans origi	County/0021.0 26	3076	38	6100	41	5430	13	525	0	0	17	4279	10	751	30	90	
Apps appro		457	2	230	8	1221	0	0	0	0	1	90	0	0			
Apps denie		155	5	353	16	1986	10	1057	0	0	7	1580	3	166			
Apps withd Files closed		802 0	4 1	487 244	11 8	1756 1217	2 0	50 0	0 0	0 0	3 1	216 92	3 0	342 0			
	County/0022.0		1	244	O	121/	U	U	U	U	1	JL	U	U	22	97	
Loans origi	19	2636	29	4426	42	5591	8	454	0	0	5	494	10	644			
Apps appro Apps denie		0 828	2 4	168 203	10 19	1116 1998	1 7	62 311	0 0	0	0 1	0 34	2 5	171 272			
Apps denie Apps withd		828 530	1	203 196	19 16	1998	2	139	0	0	3	34 173	0	0			
Files closed	1	74	2	169	3	181	0	0	0	0	0	0	0	0			
	oseph County/0		^	C00	•	463	-	20	•	•	4	O.F.	0	•	58	64	
Loans origi Apps appro		761 0	9 0	600 0	8 0	462 0	7 0	39 0	0 0	0 0	1 0	85 0	0 0	0 0			
Apps denie	1	61	2	135	6	399	0	0	0	0	0	0	0	0			
Apps withd		250	0	0	4	238	0	0	0	0	1	56	0	0			
Files closed	0 Oseph County/0	0 2002 00	1	68	2	117	0	0	0	0	0	0	0	0	65	54	
Loans origi		524	4	262	7	595	1	5	0	0	1	23	0	0	UJ	J .,	
Apps appro	. 0	0	2	33	4	196	0	0	0	0	1	49	0	0			
Apps denie Apps withd		78 34	0 1	0 135	10	754 228	6 0	111 0	0	0 0	0 0	0 0	0 0	0 0			
Apps withd Files closed		34 28	0	135	2 1	228 85	0	0 0	0 0	0	0	0	0	0			
IN-MI/St. Jo	oseph County/0						•		-	-	-		-	-	32	75	
Loans origi		1258	25	2035	13	887	4	260	0	0	4	323	0	0			
Apps appro Apps denie		138 303	1 3	78 126	1 8	36 456	0 2	0 84	0	0 0	1 1	36 31	0 0	0			
Apps denie Apps withd		0	3	191	9	549	1	84 71	0	0	0	0	0	0			
Files closed	0	0	1	72	1	51	0	0	0	0	0	0	0	0			
	oseph County/0		•	0.40	A	252	4	2	0	0	4	20	0	0	58	54	
Loans origi Apps appro		638 0	9 0	948 0	4 1	253 114	1 1	2 20	0 0	0 0	1 0	29 0	0 0	0 0			
, ibbs apple	-		-					-									
Apps denie Apps withd		0 171	2	262 128	3	273 304	1	30 0	0	0	1	30	0	0			

Files closed	0	0	0	0	1	140	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph	County/00														76	43
Loans origi	1	27	2	106	3	94	4	56	0	0	2	76	0	0		
Apps appro	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Apps denie	1	34	0	0	2	87	4	66	0	0	1	24	0	0		
Apps withd	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Files closed	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph	n County/00														81	69
Loans origi	2	111	1	35	1	49	1	3	0	0	2	52	0	0		
Apps apprc	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Apps denie	0	0	0	0	3	131	6	92	0	0	2	35	0	0		
Apps withd	0	0	1	60	1	35	1	46	0	0	0	0	0	0		
Files closed	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph	-														70	43
Loans origi	1	59	7	498	1	90	4	86	0	0	1	90	0	0		
Apps apprc	0	0	2	115	1	54	0	0	0	0	0	0	0	0		
Apps denie	0	0	0	0	4	251	8	147	0	0	3	104	0	0		
Apps withd	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Files closed	0	0	0	0	1	68	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph	-										_		_		31	124
Loans origi	3	284	18	2130	1	99	1	8	0	0	2	117	0	0		
Apps appro	0	0	3	375	0	0	0	0	0	0	0	0	0	0		
Apps denie	1	205	1	135	3	314	1	25	0	0	0	0	0	0		
Apps withd	0	0	1	138	1	67	0	0	0	0	0	0	0	0		
Files closed	0	0	0	0	0	0	0	0	0	0	0	0	0	0	40	400
IN-MI/St. Joseph	-		47	4746	40	2040	0	200		•		44.4	0		13	139
Loans origi	0	0	17	1716	19	2049	8	390	0	0	6	414	0	0		
Apps appro	0	0	1	180	1	102	0	0	0	0	0	0	0	0		
Apps denie	2	132	2	218 472	9 7	843 580	0	0 216	0	0	2	185 186	0	0		
Apps withd Files closed	0	0	3	472 126		589 385	1	216	0	0	2	186	0	0		
	0 County/00	0	1	126	2	385	0	0	0	0	1	126	0	0	25	00
IN-MI/St. Joseph			12	2255	e	E12	0	0	0	0	c	604	0	0	25	80
Loans origi	0	0	12 0	2355 0	6 0	513 0	0 0	0 0	0 0	0 0	6	694	0	0 0		
Apps appro	0 1	240				0 600	1	0 17			2					
Apps denie Apps withd	1 0	240	3 0	10553 0	5 1	600 34	1 0	17 0	0 0	0 0	3	10197 34	0	0		
Files closed	0	0	0	0	1	233	0	0	0	0		233	0	0		
IN-MI/St. Joseph			U	U	1	233	U	U	U	U	1	233	U	U	49	61
Loans origi	5	482	39	15130	9	1390	3	283	1	1183	13	7123	0	0	49	01
_	0	0	1	424	5	275	0	0	1 0	0	2	7123	0	0		
Apps appro Apps denie	1	54	2	363	9	522	5	19	0	0	3	277	0	0		
Apps withd	0	0	1	64	1	74	0	0	0	0	0	0	0	0		
Files closed	0	0	0	0	3	238	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph			O	U	3	230	O	U		O		O	O	U	35	90
Loans origi	20	1859	44	4489	24	2711	11	981	0	0	12	1185	0	0	33	30
Apps appro	2	189	2	130	3	343	2	164	0	0	0	0	0	0		
Apps denie	2	358	3	327	10	850	7	58	0	0	2	155	0	0		
Apps withd	2	204	0	0	15	1348	1	125	0	0	1	57	0	0		
Files closed	0	0	0	0	2	133	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph			O	Ü	2	133					O	O	O	· ·	12	126
Loans origi	8	1048	46	6502	21	2971	5	241	0	0	10	1025	0	0	12	120
Apps appro	0	0	2	369	0	0	2	21	0	0	0	0	0	0		
Apps denie	0	0	2	364	2	158	2	29	0	0	0	0	0	0		
Apps withd	4	928	1	112	3	237	2	38	0	0	0	0	0	0		
Files closed	0	0	1	484	1	128	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph	_		_		_										32	82
Loans origi	5	529	10	1109	10	830	1	10	0	0	0	0	0	0		
Apps appro	0	0	2	186	1	128	0	0	0	0	0	0	0	0		
Apps denie	1	136	1	144	4	414	2	77	0	0	0	0	0	0		
Apps withd	0	0	1	146	4	380	0	0	0	0	0	0	0	0		
Files closed	0	0	0	0	1	125	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph	County/00	014.00													29	64
Loans origi	26	1862	31	2727	13	716	3	27	0	0	11	737	0	0		
Apps apprc	2	147	3	201	6	360	1	6	0	0	1	56	0	0		
Apps denie	8	485	4	160	6	483	1	35	0	0	0	0	0	0		
Apps withd	1	96	3	229	7	405	0	0	0	0	2	127	0	0		
Files closed	0	0	0	0	2	120	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph	•														33	50
Loans origi	17	1166	18	1098	15	1078	3	17	2	931	10	1506	0	0		
Apps appro	1	92	0	0	2	145	0	0	0	0	0	0	0	0		
Apps denie	1	90	2	101	8	570	1	35	0	0	0	0	0	0		
Apps withd	1	59	2	163	5	458	1	40	0	0	1	63	0	0		
Files closed	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph								_							12	179
Loans origi	7	858	46	6837	19	2352	5	261	0	0	2	194	0	0		
Apps apprc	1	66	4	725	1	112	1	10	0	0	1	162	0	0		
Apps denie	1	92	0	0	8	824	2	30	1	888	1	888	0	0		
	-	12/	4	862 0	5	562	1	15	0	0	0	0	0	0		
Apps withd	1	124	_	Λ	3	253	0	0	0	0	0	0	0	0		
Apps withd Files closed	0	0	0	U				-	^	^	^	^	^	^	50	37
Apps withd Files closed IN-MI/St. Joseph	0 n County/00	0 017.00			_	4.45	_	5	0	0 0	0	0	0	0		
Apps withd Files closed IN-MI/St. Joseph Loans origi	0 n County/00 0	0 017.00 0	3	256	2	145	1	^	~	(1)		_	^			
Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc	0 n County/00 0 0	0 017.00 0 0	3 0	256 0	0	0	0	0	0		0	120	0	0		
Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie	0 n County/00 0 0 0	0 017.00 0 0	3 0 1	256 0 84	0 1	0 81	0 4	178	1	680	2	139	0	0		
Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie Apps withd	0 n County/00 0 0 0 0	0 017.00 0 0 0	3 0 1 2	256 0 84 114	0 1 0	0 81 0	0 4 0	178 0	1 0	680 0	2 1	139 48	0 0	0		
Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie Apps withd Files closed	0 n County/00 0 0 0 0	0 017.00 0 0 0 0	3 0 1	256 0 84	0 1	0 81	0 4	178	1	680	2	139	0	0	77	20
Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie Apps withd Files closed IN-MI/St. Joseph	0 n County/00 0 0 0 0 0 n County/00	0 017.00 0 0 0 0 0	3 0 1 2 0	256 0 84 114 0	0 1 0	0 81 0 0	0 4 0 0	178 0 0	1 0 0	680 0 0	2 1 0	139 48 0	0 0 0	0 0 0	77	38
Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi	0 0 0 0 0 0 0 0 0 County/00	0 017.00 0 0 0 0 0 0 0 019.00	3 0 1 2 0	256 0 84 114 0	0 1 0 0	0 81 0 0	0 4 0 0	178 0 0	1 0 0	680 0 0	2 1 0	139 48 0 179	0 0 0	0 0 0	77	38
Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc	0 0 0 0 0 0 0 0 1 County/00	0 017.00 0 0 0 0 0 019.00 78 108	3 0 1 2 0	256 0 84 114 0 568	0 1 0 0	0 81 0 0	0 4 0 0	178 0 0 40 0	1 0 0	680 0 0	2 1 0 2 0	139 48 0 179 0	0 0 0	0 0 0	77	38
Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie Apps denie	0 0 0 0 0 0 0 0 1 County/00 1 1	0 017.00 0 0 0 0 0 0 019.00 78 108	3 0 1 2 0 7 0	256 0 84 114 0 568 0 110	0 1 0 0 4 0 3	0 81 0 0 328 0 233	0 4 0 0 1 0	178 0 0 40 0	1 0 0 0	680 0 0 0 0 401	2 1 0 2 0 0	139 48 0 179 0	0 0 0 0	0 0 0 0	77	38
Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie Apps denie Apps denie Apps withd	0 0 0 0 0 0 0 1 County/00 1 1 0	0 017.00 0 0 0 0 0 019.00 78 108 0	3 0 1 2 0 7 0 1 1	256 0 84 114 0 568 0 110 120	0 1 0 0 4 0 3 1	0 81 0 0 328 0 233 86	0 4 0 0 1 0 0	178 0 0 40 0 0	1 0 0 0 0 1 0	680 0 0 0 0 401 0	2 1 0 2 0 0 1	139 48 0 179 0 0 86	0 0 0 0 0 0	0 0 0 0 0 0	77	38
Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie Apps withd Files closed	0 0 0 0 0 0 0 0 County/00 1 1 0 0	0 017.00 0 0 0 0 0 019.00 78 108 0 0	3 0 1 2 0 7 0	256 0 84 114 0 568 0 110	0 1 0 0 4 0 3	0 81 0 0 328 0 233	0 4 0 0 1 0	178 0 0 40 0	1 0 0 0	680 0 0 0 0 401	2 1 0 2 0 0	139 48 0 179 0	0 0 0 0	0 0 0 0		
Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie Apps withd Files closed IN-MI/St. Joseph	0 0 0 0 0 0 0 0 County/00 1 1 0 0	0 017.00 0 0 0 0 0 019.00 78 108 0 0 128	3 0 1 2 0 7 0 1 1 0	256 0 84 114 0 568 0 110 120 0	0 1 0 0 4 0 3 1	0 81 0 0 328 0 233 86 0	0 4 0 0 1 0 0	178 0 0 40 0 0 0	1 0 0 0 0 1 0	680 0 0 0 0 401 0	2 1 0 2 0 0 1	139 48 0 179 0 0 86	0 0 0 0 0 0	0 0 0 0 0 0	77 78	38 28
Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi	0 0 0 0 0 0 0 1 1 0 0 1 1 County/00	0 017.00 0 0 0 0 0 019.00 78 108 0 0	3 0 1 2 0 7 0 1 1	256 0 84 114 0 568 0 110 120 0	0 1 0 0 4 0 3 1 0	0 81 0 0 328 0 233 86 0	0 4 0 0 1 0 0 0	178 0 0 40 0 0	1 0 0 0 1 0 0	680 0 0 0 401 0	2 1 0 2 0 0 1 0	139 48 0 179 0 0 86 0	0 0 0 0 0 0	0 0 0 0 0 0		
Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc	0 0 0 0 0 0 0 0 1 1 0 0 1 1 1 County/00 0	0 017.00 0 0 0 0 0 019.00 78 108 0 0 128 020.00	3 0 1 2 0 7 0 1 1 0	256 0 84 114 0 568 0 110 120 0	0 1 0 0 4 0 3 1	0 81 0 0 328 0 233 86 0	0 4 0 0 1 0 0 0	178 0 0 40 0 0 0	1 0 0 0 0 1 0 0	680 0 0 0 0 401 0 0	2 1 0 2 0 0 1 0	139 48 0 179 0 0 86 0	0 0 0 0 0 0	0 0 0 0 0 0 0		
Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi	0 1 County/00 0 0 0 0 1 1 0 0 1 1 1 0 0 0 1 1 1 1	0 017.00 0 0 0 0 0 019.00 78 108 0 0 128 020.00 0	3 0 1 2 0 7 0 1 1 0	256 0 84 114 0 568 0 110 120 0	0 1 0 0 4 0 3 1 0	0 81 0 0 328 0 233 86 0	0 4 0 0 1 0 0 0 0	178 0 0 40 0 0 0 0	1 0 0 0 1 0 0	680 0 0 0 401 0 0	2 1 0 2 0 0 1 0	139 48 0 179 0 0 86 0	0 0 0 0 0 0 0	0 0 0 0 0 0 0		

Files closed	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph	h County/00	21.00													84	22
Loans origi	1	47	0	0	0	0	2	30	0	0	0	0	0	0		
Apps appro	0	0	1	24	1	40	0	0	0	0	1	24	0	0		
Apps denie	1	61	0	0	2	82	3	117	0	0	0	0	0	0		
Apps withd	0	0	0	0	1	47	0	0	0	0	0	0	0	0		
Files closed	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph	h County/00	22.00													75	63
Loans origi	0	0	0	0	2	96	0	0	0	0	0	0	0	0		
Apps appro	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Apps denie	1	27	1	38	4	142	6	99	0	0	0	0	0	0		
Apps withd	0	0	0	0	5	208	0	0	0	0	0	0	0	0		
Files closed	0	0			2	82		0	0	0	0	0	0			
			0	0	2	82	0	U	U	U	U	U	U	0	00	42
IN-MI/St. Joseph									_	_					88	43
Loans origi	1	63	0	0	1	57	3	16	0	0	0	0	0	0		
Apps appro	0	0	0	0	1	46	0	0	0	0	0	0	0	0		
Apps denie	0	0	1	47	3	154	5	29	0	0	3	59	0	0		
Apps withd	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Files closed	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph	h County/00	24.00													84	44
Loans origi	0	0	3	142	0	0	2	25	0	0	1	45	0	0		
Apps appro	0	0	0	0	1	52	0	0	0	0	0	0	0	0		
Apps denie	0	0	0	0	6	234	0	0	0	0	2	87	0	0		
Apps withd	0	0	2	44	2	66	0	0	0	0	3	76	0	0		
Files closed	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph	h County/00														70	67
Loans origi	11	881	4	231	7	440	1	33	0	0	1	28	0	0	, 0	0,
Apps appro	0	0	1	39	0	0	0	0	0	0	0	0	0	0		
Apps appic Apps denie	0	0	1	68	3	150	5	103	0	0	2	55	• 0	0		
Apps defile Apps withd	1	106	1	93	1	75	0	0	0	0	1	55 75	0	0		
Apps withd Files closed			_						•	•	-			0		
	0	0	0	0	0	0	0	0	0	0	0	0	0	U	F.C	0.1
IN-MI/St. Joseph	-				<u></u>		_		-	_	-		_	_	56	84
Loans origi	13	881	10	602	13	695	5	108	0	0	3	132	0	0		
Apps appro	2	92	1	97	0	0	1	4	0	0	0	0	0	0		
Apps denie	3	172	1	3	12	824	4	20	0	0	3	91	0	0		
Apps withd	1	85	0	0	4	222	0	0	0	0	0	0	0	0		
Files closed	0	0	0	0	2	194	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph	h County/00	27.00													64	58
Loans origi	0	0	0	0	1	27	0	0	0	0	0	0	0	0		
Apps appro	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Apps denie	0	0	0	0	1	35	2	27	0	0	0	0	0	0		
Apps withd	0	0	0	0	1	37	0	0	0	0	0	0	0	0		
Files closed	0	0	0	0	1	37	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph			O	U	-	37	U	O		O		O	O	U	63	56
•	-	206	4	235	4	203	1	_	0	0		58	0	0	03	30
Loans origi	3				4		1	5	0	0	1		0			
Apps appro	0	0	1	48	1	44	0	0	0	0	0	0	0	0		
Apps denie	0	0	0	0	1	52	3	151	0	0	0	0	0	0		
Apps withd	1	39	0	0	0	0	0	0	0	0	0	0	0	0		
Files closed	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph	n County/00	29.00													81	57
Loans origi	2	161	4	363	3	221	3	57	0	0	2	87	0	0		
Apps appro	0	0	1	129	0	0	0	0	0	0	0	0	0	0		
Apps denie	1	137	0	0	2	69	3	73	0	0	2	84	0	0		
Apps withd	0	0	0	0	1	53	0	0	0	0	0	0	0	0		
Files closed	0	0	0	0	3	282	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph	h County/00	30.00				`									62	54
Loans origi	3	187	2	116	3	136	2	59	0	0	0	0	0	0		
Apps appro	0	0	0	0	1	55	0	0	0	0	0	0	0	0		
Apps denie	2	163	2	127	1	40	3	34	0	0	2	30	0	0		
Apps withd	0	0	0	0	2	105	0	0	0	0	0	0	0	0		
Files closed	0	0	0	0	2	184	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph			U	o o		104	U	U	U	U	U	U	U	U	33	61
•	•		12	688		422	2	6.4	0	0	2	116	0	0	33	01
Loans origi	11	744	12		9	432	3	64	0	0	3	116	0	0		
Apps appro	1	88	1	51	0	0	0	0	0	0	0	0	0	0		
Apps denie	3	161	5	300	9	530	4	109	0	0	2	64	0	0		
Apps withd	2	105	0	0	6	380	0	0	0	0	1	75 62	0	0		
Files closed	0 (22)	0	0	0	2	118	0	0	0	0	1	62	0	0		
IN-MI/St. Joseph	•		_		_						_		_	_	18	111
Loans origi	39	4248	68	9848	24	2685	10	1205	1	1400	4	2713	0	0		
Apps appro	3	353	5	631	2	278	1	5	0	0	0	0	0	0		
Apps denie	4	512	4	940	17	1799	10	346	0	0	4	459	0	0		
Apps withd	4	696	8	2040	14	1685	0	0	0	0	0	0	0	0		
Files closed	0	0	1	142	9	987	1	21	0	0	0	0	0	0		
		22.00													34	86
IN-MI/St. Joseph	h County/00	33.00		1928	12	702	0	0	0	0	6	377	0	0		
IN-MI/St. Joseph Loans origi	h County/00 15	1081	25			48	0	0	0	0	1	45	0	0		
			25 4	252	1	40	U	U	U		-	43	U			
Loans origi	15	1081			1 14	902	6	219	0	0	0	0	0	0		
Loans origi Apps apprc Apps denie	15 1 3	1081 85 237	4 1	252 50	14	902		219	0	0	0	0	0			
Loans origi Apps apprc Apps denie Apps withd	15 1	1081 85	4	252 50 210	14 9	902 671	6 1	219 25	0 0	0 0	0 0	0 0	0 0	0		
Loans origi Apps appro Apps denie Apps withd Files closed	15 1 3 0 0	1081 85 237 0 0	4 1 3	252 50	14	902	6	219	0	0	0	0	0		67	56
Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph	15 1 3 0 0 0 h County/00	1081 85 237 0 0 34.00	4 1 3 0	252 50 210 0	14 9 1	902 671 61	6 1 0	219 25 0	0 0 0	0 0 0	0 0 0	0 0 0	0 0 0	0	67	56
Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi	15 1 3 0 0 0 h County/00	1081 85 237 0 0 34.00 250	4 1 3 0	252 50 210 0 596	14 9 1 5	902 671 61 497	6 1 0	219 25 0	0 0 0	0 0 0	0 0 0	0 0 0	0 0 0	0 0 79	67	56
Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps appro	15 1 3 0 0 h County/00 4 1	1081 85 237 0 0 34.00 250 108	4 1 3 0 7 0	252 50 210 0 596	14 9 1 5 2	902 671 61 497 54	6 1 0	219 25 0 35 0	0 0 0	0 0 0	0 0 0	0 0 0 266 34	0 0 0	0 0 79 0	67	56
Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps appro Apps denie	15 1 3 0 0 h County/00 4 1 0	1081 85 237 0 0 34.00 250 108	4 1 3 0 7 0 4	252 50 210 0 596 0 246	14 9 1 5 2 8	902 671 61 497 54 668	6 1 0 2 0 9	219 25 0 35 0 63	0 0 0 0 0	0 0 0 0 0	0 0 0 3 1 4	0 0 0 266 34 61	0 0 0 1 0	0 0 79 0	67	56
Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps appro Apps denie Apps withd	15 1 3 0 0 h County/00 4 1 0	1081 85 237 0 0 34.00 250 108 0	4 1 3 0 7 0 4 0	252 50 210 0 596 0 246 0	14 9 1 5 2 8 3	902 671 61 497 54 668 203	6 1 0 2 0 9	219 25 0 35 0 63 0	0 0 0 0 0 0	0 0 0 0 0 0	0 0 0 3 1 4	0 0 0 266 34 61 0	0 0 0 1 0 0	0 0 79 0 0	67	56
Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps appro Apps denie Apps withd Files closed	15 1 3 0 0 0 h County/00 4 1 0 0	1081 85 237 0 0 34.00 250 108 0 0	4 1 3 0 7 0 4	252 50 210 0 596 0 246	14 9 1 5 2 8	902 671 61 497 54 668	6 1 0 2 0 9	219 25 0 35 0 63	0 0 0 0	0 0 0 0 0	0 0 0 3 1 4	0 0 0 266 34 61	0 0 0 1 0	0 0 79 0		
Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph	15 1 3 0 0 h County/00 4 1 0 0 0	1081 85 237 0 0 34.00 250 108 0 0 0 35.00	4 1 3 0 7 0 4 0 0	252 50 210 0 596 0 246 0	14 9 1 5 2 8 3 0	902 671 61 497 54 668 203 0	6 1 0 2 0 9 0 1	219 25 0 35 0 63 0 82	0 0 0 0 0 0	0 0 0 0 0 0	0 0 0 3 1 4 0	0 0 0 266 34 61 0	0 0 0 1 0 0 0	0 0 79 0 0 0	67 32	56 49
Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi	15 1 3 0 0 h County/00 4 1 0 0 0 h County/00 13	1081 85 237 0 0 34.00 250 108 0 0 0 35.00	4 1 3 0 7 0 4 0 0	252 50 210 0 596 0 246 0 0	14 9 1 5 2 8 3 0	902 671 61 497 54 668 203 0	6 1 0 2 0 9 0 1	219 25 0 35 0 63 0 82	0 0 0 0 0 0 0	0 0 0 0 0 0	0 0 0 3 1 4 0 0	0 0 0 266 34 61 0	0 0 0 1 0 0 0	0 0 79 0 0 0		
Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps appro	15 1 3 0 0 1 1 0 0 0 0 1 1 1 0 1 1 0 1 1 0 1 1 0 1 1 0 0 1 1 1 1 1 1 1 1 1 1 1 1 1	1081 85 237 0 0 34.00 250 108 0 0 0 35.00 926 0	4 1 3 0 7 0 4 0 0	252 50 210 0 596 0 246 0 0	14 9 1 5 2 8 3 0	902 671 61 497 54 668 203 0	6 1 0 2 0 9 0 1	219 25 0 35 0 63 0 82 139 0	0 0 0 0 0 0 0	0 0 0 0 0 0	0 0 0 3 1 4 0 0	0 0 0 266 34 61 0 0	0 0 0 1 0 0 0 0	0 0 79 0 0 0 0		
Loans origi Apps apprc Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie	15 1 3 0 0 h County/00 4 1 0 0 0 h County/00 13 0 2	1081 85 237 0 0 34.00 250 108 0 0 35.00 926 0 153	4 1 3 0 7 0 4 0 0	252 50 210 0 596 0 246 0 0	14 9 1 5 2 8 3 0	902 671 61 497 54 668 203 0 360 0 278	6 1 0 2 0 9 0 1	219 25 0 35 0 63 0 82 139 0 88	0 0 0 0 0 0 0	0 0 0 0 0 0	0 0 0 3 1 4 0 0	0 0 0 266 34 61 0 0	0 0 0 1 0 0 0 0	0 0 79 0 0 0		
Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps appro Apps withd Files closed IN-MI/St. Joseph Loans origi Apps appro Apps denie Apps denie Apps withd	15 1 3 0 0 0 h County/00 4 1 0 0 0 0 h County/00 13 0 2 1	1081 85 237 0 0 34.00 250 108 0 0 0 35.00 926 0 153 69	4 1 3 0 7 0 4 0 0 0	252 50 210 0 596 0 246 0 0 1192 40 0	14 9 1 5 2 8 3 0 7 0 4 3	902 671 61 497 54 668 203 0 360 0 278 217	6 1 0 2 0 9 0 1 4 0 5 0	219 25 0 35 0 63 0 82 139 0 88 0	0 0 0 0 0 0 0		0 0 0 3 1 4 0 0	0 0 0 266 34 61 0 0	0 0 0 1 0 0 0 0	0 0 79 0 0 0 0		
Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps withd Files closed Apps appro Apps appro Apps appro Apps appro Apps appro Apps denie Apps withd Files closed	15 1 3 0 0 h County/00 4 1 0 0 0 h County/00 13 0 2 1	1081 85 237 0 0 34.00 250 108 0 0 35.00 926 0 153 69 0	4 1 3 0 7 0 4 0 0	252 50 210 0 596 0 246 0 0	14 9 1 5 2 8 3 0	902 671 61 497 54 668 203 0 360 0 278	6 1 0 2 0 9 0 1 4 0 5	219 25 0 35 0 63 0 82 139 0 88	0 0 0 0 0 0 0	0 0 0 0 0 0 0	0 0 0 3 1 4 0 0	0 0 0 266 34 61 0 0	0 0 0 1 0 0 0 0	0 0 79 0 0 0 0		49
Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps appro Apps withd Files closed IN-MI/St. Joseph Loans origi Apps appro Apps denie Apps denie Apps withd	15 1 3 0 0 h County/00 4 1 0 0 0 h County/00 13 0 2 1	1081 85 237 0 0 34.00 250 108 0 0 35.00 926 0 153 69 0	4 1 3 0 7 0 4 0 0 0	252 50 210 0 596 0 246 0 0 1192 40 0	14 9 1 5 2 8 3 0 7 0 4 3	902 671 61 497 54 668 203 0 360 0 278 217	6 1 0 2 0 9 0 1 4 0 5 0	219 25 0 35 0 63 0 82 139 0 88 0	0 0 0 0 0 0 0		0 0 0 3 1 4 0 0	0 0 0 266 34 61 0 0	0 0 0 1 0 0 0 0	0 0 79 0 0 0 0		
Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps withd Files closed Apps appro Apps appro Apps appro Apps appro Apps appro Apps denie Apps withd Files closed	15 1 3 0 0 h County/00 4 1 0 0 0 h County/00 13 0 2 1	1081 85 237 0 0 34.00 250 108 0 0 35.00 926 0 153 69 0	4 1 3 0 7 0 4 0 0 0	252 50 210 0 596 0 246 0 0 1192 40 0	14 9 1 5 2 8 3 0 7 0 4 3	902 671 61 497 54 668 203 0 360 0 278 217	6 1 0 2 0 9 0 1 4 0 5 0	219 25 0 35 0 63 0 82 139 0 88 0	0 0 0 0 0 0 0		0 0 0 3 1 4 0 0	0 0 0 266 34 61 0 0	0 0 0 1 0 0 0 0	0 0 79 0 0 0 0	32	49
Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps appro Apps denie Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph	15 1 3 0 0 0 h County/00 13 0 2 1 0 h County/00	1081 85 237 0 0 34.00 250 108 0 0 35.00 926 0 153 69 0	4 1 3 0 7 0 4 0 0 0	252 50 210 0 596 0 246 0 0 1192 40 0 102 0	14 9 1 5 2 8 3 0 7 0 4 3 3	902 671 61 497 54 668 203 0 360 0 278 217 176	6 1 0 2 0 9 0 1 4 0 5 0	219 25 0 35 0 63 0 82 139 0 88 0	0 0 0 0 0 0 0		0 0 0 3 1 4 0 0	0 0 0 266 34 61 0 0	0 0 0 1 0 0 0 0 0	0 0 79 0 0 0 0 0	32	49
Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi	15 1 3 0 0 h County/00 4 1 0 0 0 h County/00 13 0 2 1 0 h County/00 13	1081 85 237 0 0 34.00 250 108 0 0 35.00 926 0 153 69 0 01.00	4 1 3 0 7 0 4 0 0 0 1 0 1 0	252 50 210 0 596 0 246 0 0 1192 40 0 102 0	14 9 1 5 2 8 3 0 7 0 4 3 3	902 671 61 497 54 668 203 0 360 0 278 217 176	6 1 0 2 0 9 0 1 4 0 5 0 0	219 25 0 35 0 63 0 82 139 0 88 0 0			0 0 0 3 1 4 0 0	0 0 0 266 34 61 0 0	0 0 0 1 0 0 0 0 0 0	0 0 79 0 0 0 0 0	32	49
Loans origi Apps apprc Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps denie Apps apprc Apps denie Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc Apps withd Files closed IN-MI/St. Joseph Loans origi Apps apprc	15 1 3 0 0 h County/00 4 1 0 0 0 h County/00 13 0 2 1 0 h County/00 18 1	1081 85 237 0 0 34.00 250 108 0 0 35.00 926 0 153 69 0 01.00 1377 85	4 1 3 0 7 0 4 0 0 0 1 0 1 0	252 50 210 0 596 0 246 0 0 1192 40 0 102 0	14 9 1 5 2 8 3 0 7 0 4 3 3	902 671 61 497 54 668 203 0 360 0 278 217 176	6 1 0 2 0 9 0 1 4 0 5 0 0	219 25 0 35 0 63 0 82 139 0 88 0 0			0 0 0 3 1 4 0 0 0 0 0	0 0 0 266 34 61 0 0 0 23 30	0 0 0 1 0 0 0 0 0 0	0 0 79 0 0 0 0 0 0	32	49

Files closed																
	0	0	0	0	4	329	0	0	0	0	1	107	0	0		
IN-MI/St. Joseph (12	81
Loans origi	25	2071	56	4798	21	1433	4	130	0	0	5	403	0	0		
Apps appro	0	0	2	141	1	83	3	77	0	0	0	0	0	0		
Apps denie	2	161	3	390	15	1107	3	110	0	0	3	210	0	0		
Apps withd	4	284	4	293	5	445	1	13	0	0	2	214	0	0		
Files closed	0	0	2	100	9	566	1	15	0	0	2	99	0	0		
IN-MI/St. Joseph (County/0	103.00													15	95
Loans origi	31	3575	49	5293	38	3241	12	369	0	0	6	466	0	0		
Apps appro	1	124	3	237	3	237	3	147	0	0	0	0	0	0		
Apps denie	3	263	7	738	23	2391	3	50	0	0	0	0	0	0		
Apps withd	4	361	4	358	11	934	1	124	0	0	0	0	0	0		
Files closed	0	0	2	244	3	271	0	0	0	0	1	101	0	0		
IN-MI/St. Joseph (County/0														11	81
Loans origi	32	2936	43	3683	25	2185	6	329	1	1766	10	2298	0	0		
Apps appro	2	320	4	396	0	0	0	0	0	0	1	100	0	0		
Apps denie	6	481	2	193	10	797	6	73	0	0	3	225	0	0		
Apps withd	2	130	3	279	9	951	0	0	0	0	0	0	0	0		
Files closed	1	74	1	46	4	255	1	112	0	0	1	46	0	0		
IN-MI/St. Joseph (_		-	40	7	233	-	112	Ū	Ü	-	40	Ü	Ü	11	93
Loans origi	16	2065	35	4610	37	4228	8	336	0	0	1	80	0	0		33
Apps appro	0	0	1	201	2	259	0	0	0	0	0	0	0	0		
Apps denie	0	0	3	583	8	881	3	22	0	0	0	0	0	0		
Apps withd	1	111	3	395	10	1375	1	51	0	0	0	0	1	45		
Files closed	0	0	1	180	5	699	1	12	0	0	0	0	2	166		
IN-MI/St. Joseph (1	100	3	099	1	12	U	O	U	U	۷	100	19	85
Loans origi	22	2108	38	3213	17	1428	3	111	0	0	6	391	0	0	19	63
•	2	229	3	287	2	242	0	0	0	0	1	30	0	0		
Apps apprc Apps denie	6	579	4	247	11	734	5	70	0	0	1	60	. 1	48		
	6	544	3	328	8	560	0	0	0	0	0					
Apps withd			•				•		•	•		0	0	0		
Files closed	0	0	0	0	3	187	0	0	0	0	0	0	0	0	42	07
IN-MI/St. Joseph (-			0.1.0			_				_	444			13	87
Loans origi	22	2107	33	3156	21	2497	8	162	1	371	5	1135	0	0		
Apps appro	2	180	1	73	1	115	2	150	0	0	0	0	0	0		
Apps denie	1	79	2	170	7	591	4	115	0	0	0	0	0	0		
Apps withd	1	116	0	0	6	334	0	0	0	0	1	50	0	0		
Files closed	0	0	0	0	3	162	0	0	0	0	1	44	0	0		
IN-MI/St. Joseph (County/0	108.00											`		4	127
Loans origi	26	3933	36	5638	35	4581	18	1721	0	0	4	403	1	160		
Apps appro	1	164	3	738	8	1360	1	65	0	0	0	0	1	176		
Apps denie	3	364	2	214	13	1465	6	203	0	0	2	105	3	151		
Apps withd	3	446	2	514	18	2855	0	0	0	0	1	163	1	79		
Files closed	1	131	1	174	4	549	0	0	0	0	1	54	1	54		
IN-MI/St. Joseph (County/0	109.00													12	121
Loans origi	43	7389	92	14466	59	8522	19	863	0	0	3	428	1	85		
Apps appro	3	455	4	362	3	508	1	10	0	0	0	0	1	68		
Apps denie	6	1026	5	523	34	5250	7	117	O	0	1	54	0	0		
Apps withd	3	403	6	901	19	2048	1	104	0	0	0	0	2	139		
Files closed	1	106	5	685	13	2051	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph (County/0	110.00													18	119
Loans origi	32	5039	94	15553	61	7274	14	919	0	0	5	491	0	0		
Apps appro	0	0	7	1293	5	732	1	355	0	0	0	0	0	0		
Apps denie	4	543	2	285	20	2060	0	0	0	0	1	92	0	0		
Apps withd	3	480	5	802	27	3734	2	498	0	0	3	254	0	0		
Files closed	0	0	1	153	4	406	1	55	0	0	0	0	0	0		
IN-MI/St. Joseph (-		-	100	•						· ·		· ·		31	72
Loans origi	18	1833	19	7746	17	1393	11	408	0	0	2	6258	4	6288	31	72
Apps appro	1	64	2	227	4	447	0	0	0	0	0	0	0	0		
Apps denie	4	416	3	174	15	1126	8	215	0	0	1	10	8	422		
Apps withd	2	208	2	148	13	1254	1	35	0	0	0	0	0	0		
Files closed	0	0	0	0	5	420	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph (U	U	3	420	U	U	U	U	U	U	U	U	30	67
•	3	230	8	1420		169	0	0	0	0	_	1015	0	0	30	67
Loans origi	_				1	88	0	0 0			5			0		
Apps appro	0	0	0	0	1				0	0	0	0	0	0		
Apps denie	1	72	0	0	0	0	0	0	0	0	0	0	0	0		
Apps withd	0	0	1	50	0	0	1	21	0	0	0	0	0	0		
Files closed	0 County/0	112.02	0	0	1	77	0	0	0	0	0	0	0	0	20	4.44
IN-MI/St. Joseph (county/0	112.UZ												_	20	141
Loans origi	^	^	-	465	~		4	42	^	^	2	167	^			
•	0	0	5	465	3	237	1	12	0	0	2	167	0	0		
Apps appro	0	0	0	0	0	0	1	13	0	0	0	0	0	0		
Apps appro Apps denie	0 0	0 0	0 0	0 0	0 1	0 59	1 0	13 0	0 0	0 0	0	0 0	0 0	0 0		
Apps appro Apps denie Apps withd	0 0 0	0 0 0	0 0 0	0 0 0	0 1 1	0 59 64	1 0 0	13 0 0	0 0 0	0 0 0	0 0 0	0 0 0	0 0 0	0 0 0		
Apps appro Apps denie Apps withd Files closed	0 0 0 0	0 0 0	0 0	0 0	0 1	0 59	1 0	13 0	0 0	0 0	0	0 0	0 0	0 0		
Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph (0 0 0 0 County/0	0 0 0 0 113.01	0 0 0 0	0 0 0 0	0 1 1 0	0 59 64 0	1 0 0 0	13 0 0 0	0 0 0 0	0 0 0	0 0 0	0 0 0 0	0 0 0	0 0 0	19	87
Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph (Loans origi	0 0 0 0 County/0 15	0 0 0 0 113.01 1466	0 0 0 0	0 0 0 0	0 1 1 0	0 59 64 0	1 0 0 0	13 0 0 0	0 0 0 0	0 0 0 0 17549	0 0 0 0	0 0 0 0	0 0 0 0	0 0 0 0	19	
Apps approduced Apps denie Apps withd Files closed IN-MI/St. Joseph Cloans origi Apps approduced	0 0 0 0 County/0 15 2	0 0 0 0 113.01 1466 435	0 0 0 0 50 3	0 0 0 0 6793 1047	0 1 1 0	0 59 64 0 3065 184	1 0 0 0 9 1	13 0 0 0 9 20	0 0 0 0	0 0 0 0 17549	0 0 0 0	0 0 0 0 2015	0 0 0 0	0 0 0 0	19	
Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph (Loans origi Apps appro Apps denie	0 0 0 0 County/0 15 2 3	0 0 0 0 113.01 1466 435 510	0 0 0 0 50 3 4	0 0 0 0 6793 1047 409	0 1 1 0 32 2 10	0 59 64 0 3065 184 820	1 0 0 0	13 0 0 0 0 99 20 133	0 0 0 0	0 0 0 0 17549 0	0 0 0 0 13 0	0 0 0 0 2015 0	0 0 0 0	0 0 0 0	19	
Apps approduced Apps denie Apps withd Files closed IN-MI/St. Joseph of Loans origi Apps approduced Apps denie Apps withd	0 0 0 0 County/0 15 2 3 0	0 0 0 0 113.01 1466 435 510	0 0 0 0 50 3 4 5	0 0 0 0 6793 1047 409 415	0 1 1 0 32 2 10 8	0 59 64 0 3065 184 820 752	1 0 0 0 9 1 3 1	13 0 0 0 99 20 133 70	0 0 0 0 2 0 0	0 0 0 0 17549 0 0	0 0 0 0 13 0 0 5	0 0 0 0 2015 0 0 578	0 0 0 0	0 0 0 0	19	
Apps approduced Apps denie Apps withd Files closed IN-MI/St. Joseph Cloans origi Apps approduced Apps denie Apps withd Files closed	0 0 0 0 County/0 15 2 3 0	0 0 0 0 113.01 1466 435 510 0	0 0 0 0 50 3 4	0 0 0 0 6793 1047 409	0 1 1 0 32 2 10	0 59 64 0 3065 184 820	1 0 0 0 9 1 3	13 0 0 0 0 99 20 133	0 0 0 0	0 0 0 0 17549 0	0 0 0 0 13 0	0 0 0 0 2015 0	0 0 0 0	0 0 0 0		87
Apps approduced Apps denie Apps withd Files closed IN-MI/St. Joseph Of Loans origi Apps approduced Apps denie Apps withd Files closed IN-MI/St. Joseph Of IN-MI/St. Jo	0 0 0 County/0 15 2 3 0 2	0 0 0 113.01 1466 435 510 0 130	0 0 0 0 50 3 4 5	0 0 0 0 6793 1047 409 415 0	0 1 1 0 32 2 10 8 4	0 59 64 0 3065 184 820 752 387	1 0 0 0 9 1 3 1	13 0 0 0 99 20 133 70 0	0 0 0 0 2 0 0 0	0 0 0 0 17549 0 0 0	0 0 0 0 13 0 0 5	0 0 0 0 2015 0 0 578 0	0 0 0 0 0 0	0 0 0 0 0 0	19 17	
Apps approduced Apps denie Apps withd Files closed IN-MI/St. Joseph O Loans origi Apps approduced Apps denie Apps withd Files closed IN-MI/St. Joseph O Loans origi	0 0 0 0 County/0 15 2 3 0 2 County/0	0 0 0 113.01 1466 435 510 0 130 113.02 2331	0 0 0 0 50 3 4 5	0 0 0 0 6793 1047 409 415 0	0 1 1 0 32 2 10 8	0 59 64 0 3065 184 820 752 387	1 0 0 0 9 1 3 1 0	13 0 0 0 99 20 133 70 0	0 0 0 0 2 0 0	0 0 0 0 17549 0 0	0 0 0 0 13 0 0 5 0	0 0 0 0 2015 0 0 578 0	0 0 0 0 0 0 0	0 0 0 0		87
Apps approduced Apps denie Apps withd Files closed IN-MI/St. Joseph (Loans origi Apps approduced Apps denie Apps withd Files closed IN-MI/St. Joseph (Loans origi Apps approduced Apps withd Apps approduced Apps withd Files closed IN-MI/St. Joseph (Loans origi Apps approduced Apps app	0 0 0 County/0 15 2 3 0 2	0 0 0 113.01 1466 435 510 0 130 113.02 2331	0 0 0 0 50 3 4 5	0 0 0 0 6793 1047 409 415 0	0 1 1 0 32 2 10 8 4	0 59 64 0 3065 184 820 752 387 7191 502	1 0 0 0 9 1 3 1	13 0 0 0 99 20 133 70 0	0 0 0 0 2 0 0 0	0 0 0 0 17549 0 0 0	0 0 0 0 13 0 0 5	0 0 0 0 2015 0 0 578 0	0 0 0 0 0 0 0	0 0 0 0 0 0 0		87
Apps approduced Apps denie Apps withd Files closed IN-MI/St. Joseph of Loans origi Apps approduced Apps denie Apps withd Files closed IN-MI/St. Joseph of Loans origi Apps approduced Apps approduced Apps denie Apps denie	0 0 0 0 County/0 15 2 3 0 2 County/0	0 0 0 113.01 1466 435 510 0 130 113.02 2331	0 0 0 0 50 3 4 5 0	0 0 0 0 6793 1047 409 415 0	0 1 1 0 32 2 10 8 4	0 59 64 0 3065 184 820 752 387	1 0 0 0 9 1 3 1 0	13 0 0 0 99 20 133 70 0	0 0 0 0 2 0 0 0	0 0 0 0 17549 0 0 0	0 0 0 0 13 0 0 5 0	0 0 0 0 2015 0 0 578 0	0 0 0 0 0 0 0	0 0 0 0 0 0 0		87
Apps approduced Apps denie Apps withd Files closed IN-MI/St. Joseph (Loans origi Apps approduced Apps denie Apps withd Files closed IN-MI/St. Joseph (Loans origi Apps approduced Apps withd Apps approduced Apps withd Files closed IN-MI/St. Joseph (Loans origi Apps approduced Apps app	0 0 0 County/0 15 2 3 0 2 County/0 15 0	0 0 0 113.01 1466 435 510 0 130 113.02 2331	0 0 0 0 50 3 4 5 0	0 0 0 0 6793 1047 409 415 0	0 1 1 0 32 2 10 8 4	0 59 64 0 3065 184 820 752 387 7191 502	1 0 0 0 9 1 3 1 0	13 0 0 0 99 20 133 70 0	0 0 0 0 2 0 0 0 0	0 0 0 0 17549 0 0 0	0 0 0 0 13 0 0 5 0	0 0 0 0 2015 0 578 0	0 0 0 0 0 0 0	0 0 0 0 0 0 0		87
Apps approduced Apps denie Apps withd Files closed IN-MI/St. Joseph of Loans origi Apps approduced Apps denie Apps withd Files closed IN-MI/St. Joseph of Loans origi Apps approduced Apps approduced Apps denie Apps denie	0 0 0 County/0 15 2 3 0 2 County/0 15 0 3	0 0 0 113.01 1466 435 510 0 130 113.02 2331 0 309	0 0 0 50 3 4 5 0	0 0 0 0 6793 1047 409 415 0 14575 1640 557	0 1 1 0 32 2 10 8 4 50 4	0 59 64 0 3065 184 820 752 387 7191 502 1009	1 0 0 0 9 1 3 1 0	13 0 0 0 99 20 133 70 0 889 0 63	0 0 0 0 2 0 0 0 0	0 0 0 0 17549 0 0 0 0	0 0 0 0 13 0 0 5 0	0 0 0 0 2015 0 0 578 0 1356 0 78	0 0 0 0 0 0 0 0	0 0 0 0 0 0 0 0 0		87
Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph (Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph (Loans origi Apps appro Apps denie Apps denie Apps denie Apps appro Apps denie Apps denie Apps withd	0 0 0 County/0 15 2 3 0 2 County/0 15 0 3 3	0 0 0 113.01 1466 435 510 0 130 113.02 2331 0 309 465 214	0 0 0 50 3 4 5 0	0 0 0 0 6793 1047 409 415 0 14575 1640 557 605	0 1 1 0 32 2 10 8 4 50 4 9	0 59 64 0 3065 184 820 752 387 7191 502 1009 2103	1 0 0 0 9 1 3 1 0	13 0 0 0 99 20 133 70 0 889 0 63 0	0 0 0 0 2 0 0 0 0	0 0 0 0 17549 0 0 0 0	0 0 0 0 13 0 0 5 0 7 0 1 1	0 0 0 0 2015 0 578 0 1356 0 78 220	0 0 0 0 0 0 0 0 0	0 0 0 0 0 0 0 0 0		87
Apps approduced Apps denie Apps withd Files closed IN-MI/St. Joseph of Loans origi Apps approduced Apps denie Apps withd Files closed IN-MI/St. Joseph of Loans origi Apps approduced Apps denie Apps denie Apps denie Apps withd Files closed	0 0 0 County/0 15 2 3 0 2 County/0 15 0 3 3	0 0 0 113.01 1466 435 510 0 130 113.02 2331 0 309 465 214	0 0 0 50 3 4 5 0	0 0 0 0 6793 1047 409 415 0 14575 1640 557 605	0 1 1 0 32 2 10 8 4 50 4 9	0 59 64 0 3065 184 820 752 387 7191 502 1009 2103	1 0 0 0 9 1 3 1 0	13 0 0 0 99 20 133 70 0 889 0 63 0	0 0 0 0 2 0 0 0 0	0 0 0 0 17549 0 0 0 0	0 0 0 0 13 0 0 5 0 7 0 1 1	0 0 0 0 2015 0 578 0 1356 0 78 220	0 0 0 0 0 0 0 0 0	0 0 0 0 0 0 0 0 0	17	87 116
Apps approduced Apps denie Apps withd Files closed IN-MI/St. Joseph Cloans origi Apps approduced Apps withd Files closed IN-MI/St. Joseph Cloans origi Apps approduced Apps denie Apps approduced Apps denie Apps withd Files closed IN-MI/St. Joseph Cloans origi Apps approduced Apps denie Apps denie Apps withd Files closed IN-MI/St. Joseph Closed	0 0 0 0 County/0 15 2 3 0 2 County/0 15 0 3 3 1	0 0 0 113.01 1466 435 510 0 130 113.02 2331 0 309 465 214 113.03	0 0 0 0 50 3 4 5 0	0 0 0 0 6793 1047 409 415 0 14575 1640 557 605 0	0 1 1 0 32 2 10 8 4 50 4 9 14 9	0 59 64 0 3065 184 820 752 387 7191 502 1009 2103 942	1 0 0 0 9 1 3 1 0	13 0 0 0 99 20 133 70 0 889 0 63 0 0	0 0 0 0 2 0 0 0 0 0	0 0 0 0 17549 0 0 0 0	0 0 0 0 13 0 0 5 0 7 0 1 1	0 0 0 0 2015 0 578 0 1356 0 78 220 0	0 0 0 0 0 0 0 0 0 0 0	0 0 0 0 0 0 0 0 0 0 119 0	17	87 116
Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph (Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph (Loans origi Apps appro Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph (IN-MI/St. I)	0 0 0 County/0 15 2 3 0 2 County/0 15 0 3 3 1 County/0	0 0 0 113.01 1466 435 510 0 130 113.02 2331 0 309 465 214 113.03 3882	0 0 0 50 3 4 5 0 73 5 4 4 0	0 0 0 0 6793 1047 409 415 0 14575 1640 557 605 0	0 1 1 0 32 2 10 8 4 50 4 9 14 9	0 59 64 0 3065 184 820 752 387 7191 502 1009 2103 942	1 0 0 0 9 1 3 1 0 5 0 0	13 0 0 0 99 20 133 70 0 889 0 63 0 0	0 0 0 0 2 0 0 0 0 0 0	0 0 0 0 17549 0 0 0 0 0	0 0 0 0 13 0 0 5 0 7 0 1 1 0	0 0 0 0 2015 0 578 0 1356 0 78 220 0	0 0 0 0 0 0 0 0 0 0 2 0 0	0 0 0 0 0 0 0 0 0 119 0	17	87 116
Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph of Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph of Loans origi Apps appro Apps denie Apps denie Apps withd Files closed IN-MI/St. Joseph of Loans origi Apps appro Apps denie Apps withd Files closed IN-MI/St. Joseph of Loans origi Apps appro	0 0 0 County/0 15 2 3 0 2 County/0 15 0 3 3 1 County/0 34	0 0 0 113.01 1466 435 510 0 130 113.02 2331 0 309 465 214 113.03 3882 244	0 0 0 50 3 4 5 0 73 5 4 4 0	0 0 0 0 6793 1047 409 415 0 14575 1640 557 605 0	0 1 1 0 32 2 10 8 4 50 4 9 14 9	0 59 64 0 3065 184 820 752 387 7191 502 1009 2103 942 3795 559	1 0 0 0 9 1 3 1 0 5 0 0	13 0 0 0 99 20 133 70 0 889 0 63 0 0 541 78	0 0 0 0 2 0 0 0 0 0 0	0 0 0 0 17549 0 0 0 0 0 0	0 0 0 0 13 0 0 5 0 7 0 1 1 1 0	0 0 0 0 2015 0 578 0 1356 0 78 220 0	0 0 0 0 0 0 0 0 0 0 0 0	0 0 0 0 0 0 0 0 0 0 119 0	17	87 116
Apps approduced Apps denie Apps withd Files closed IN-MI/St. Joseph Cloans origi Apps approduced Apps withd Files closed IN-MI/St. Joseph Cloans origi Apps approduced Apps denie Apps denie Apps denie Apps withd Files closed IN-MI/St. Joseph Cloans origi Apps approduced Apps withd Files closed IN-MI/St. Joseph Cloans origi Apps approduced Apps denie Apps denie	0 0 0 County/0 15 2 3 0 2 County/0 15 0 3 3 1 County/0 34 3	0 0 0 113.01 1466 435 510 0 130 113.02 2331 0 309 465 214 113.03 3882 244 566	0 0 0 50 3 4 5 0 73 5 4 4 0 5 7 6	0 0 0 0 0 6793 1047 409 415 0 14575 1640 557 605 0 5839 693 629	0 1 1 0 32 2 10 8 4 50 4 9 14 9	0 59 64 0 3065 184 820 752 387 7191 502 1009 2103 942 3795 559 2057	1 0 0 0 9 1 3 1 0 5 0 0	13 0 0 0 99 20 133 70 0 889 0 63 0 0 541 78 394	0 0 0 0 0 0 0 0 0 0 0	0 0 0 0 17549 0 0 0 0 0 0	0 0 0 0 13 0 0 5 0 7 0 1 1 0 3 2 1	0 0 0 0 2015 0 578 0 1356 0 78 220 0	0 0 0 0 0 0 0 0 0 0 0 1	0 0 0 0 0 0 0 0 0 0 119 0 0	17	87 116
Apps approduced Apps withd Files closed IN-MI/St. Joseph Capps denie Apps withd Files closed IN-MI/St. Joseph Capps denie Apps approduced Apps withd Files closed IN-MI/St. Joseph Capps denie Apps withd Files closed	0 0 0 0 County/0 15 2 County/0 15 0 3 3 1 County/0 34 3 4 3	0 0 0 113.01 1466 435 510 0 130 113.02 2331 0 309 465 214 113.03 3882 244 566 445 0	0 0 0 50 3 4 5 0 73 5 4 4 0 5 7 6 4	0 0 0 0 0 6793 1047 409 415 0 14575 1640 557 605 0 5839 693 629 493	0 1 1 0 32 2 10 8 4 50 4 9 14 9	0 59 64 0 3065 184 820 752 387 7191 502 1009 2103 942 3795 559 2057 870	1 0 0 0 9 1 3 1 0 5 0 5 0 0	13 0 0 0 99 20 133 70 0 889 0 63 0 0 541 78 394 100	0 0 0 0 0 0 0 0 0 0 0	0 0 0 0 17549 0 0 0 0 0 0 0	0 0 0 0 13 0 0 5 0 7 0 1 1 0 3 2 1 0	0 0 0 0 2015 0 578 0 1356 0 78 220 0 204 166 92 0	0 0 0 0 0 0 0 0 0 0 0 0 1 0 1	0 0 0 0 0 0 0 0 0 0 119 0 0	17	87 116
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Files closed 0															
INLANI/CL Land L.C. of 1044	0	0	0	1	232	1	20	0	0	0	0	0	0		
IN-MI/St. Joseph County/012	.3.05													16	168
Loans origi 23	3611	48	7896	28	3510	10	903	0	0	4	528	0	0		
Apps appre 2	372	2	478	4	478	1	424	0	0	0	0	0	0		
Apps denie 1	183	1	254	11	1138	6	469	0	0	1	5	0	0		
Apps withd 1	123	3	420	12	1246	1	124	0	0	0	0	0	0		
Files closed 0	0	0	0	4	474	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph County/012	3.06													13	171
	1714	38	8933	27	5226	4	139	0	0	4	482	0	0		
Apps appre 1	113	3	479	2	164	0	0	0	0	0	0	0	0		
	204				3083										
Apps denie 1		0	0	14		1	80	0	0	1	202	0	0		
Apps withd 0	0	2	422	3	578	0	0	0	0	1	378	0	0		
Files closed 0	0	0	0	2	910	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph County/012	.4.03													14	191
Loans origi 9	2174	79	21620	61	12247	7	1232	0	0	7	1572	0	0		
Apps apprc 0	0	9	1954	1	165	0	0	0	0	0	0	0	0		
Apps denie 1	211	6	1984	20	3708	5	175	0	0	0	0	0	0		
Apps withd 1	147	6	1462	14	3307	1	92	0	0	2	213	0	0		
Files closed 0	0	3	702	4	709	0	0	0	0	1	295	0	0		
IN-MI/St. Joseph County/013		3	702	7	703	Ü	Ū	Ü	Ü	-	233	Ü	Ü	18	192
	3212	102	29635	67	14979	12	1365	0	0	4	649	0	0	10	132
•															
Apps apprc 2	504	2	1107	0	0	0	0	0	0	0	0	0	0		
Apps denie 1	211	8	2562	12	2359	3	271	0	0	2	199	0	0		
Apps withd 1	177	8	2321	16	3909	1	25	0	0	3	369	0	0		
Files closed 0	0	0	0	6	1292	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph County/012	.4.05													6	175
Loans origi 15	3189	58	13995	35	5650	9	804	0	0	4	560	0	0		
Apps appro 0	0	4	1105	4	820	1	16	0	0	1	96	0	0		
Apps denie 3	453	1	70	11	1906	3	53	0	0	0	0	0	0		
Apps withd 2	478	4	1332	9	1484	0	0	0	0	1	120	0	0		
Files closed 0	0	2	217	6	1118	0	0	0	0	1	66	0	0		
IN-MI/St. Joseph County/013		۷	21/	U	1110	J	U	U	U	1	JU	U	U	c	149
•		72	12040		0054	4.4	050	^	•	4	157	^	^	6	149
· ·	4293	72	13649	55	8654	11	950	0	0	1	157	0	0		
Apps apprc 1	112	6	1248	4	632	3	255	0	0	0	0	0	0		
Apps denie 3	492	3	2695	28	4247	8	742	0	0	2	375	0	0		
Apps withd 2	377	10	4118	16	2381	2	180	0	0	2	322	0	0		
Files closed 0	0	1	310	3	571	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph County/013	.5.01													53	40
Loans origi 3	324	3	197	1	15	1	101	0	0	0	_ 0	1	55		
Apps apprc 0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Apps denie 0	0	1	32	0	0	0	0	0	0	0	0	1	32		
Apps withd 0	0	1	42	2	182	0	0	0	0	1	42	0	0		
						•			_						
Files closed 0	0	1	60	0	0	0	0	0	0	0	0	0	0	_	
IN-MI/St. Joseph County/012														7	90
Loans origi 7	785	23	3570	24	2582	5	106	0	0	3	218	1	40		
Apps appro 1	96	0	0	0	0	0	0	0	0	0	0	0	0		
Apps denie 3	369	0	0	10	892	1	100	O	0	1	53	1	100		
Apps withd 3	377	0	0	5	796	2	88	0	0	0	0	0	0		
Files closed 0	0	1	40	5	728	0	0	0	0	1	40	0	0		
IN-MI/St. Joseph County/012	5.04													14	112
	1406	16	2812	20	2849	1	153	0	0	1	228	0	0		
-	0	0	0	1	138	0	0	0	0	0	0	0	0		
							1	,							
Apps denie 0	0	3	603	7	910	1	1	0	0	0	0	0	0		
Apps withd 1	143	0	0	2	167	0	0	0	0	0	0	0	0		
Files closed 0	0	0	0	5	737	0	0	0	0	0	0	0	0		
IN-MI/St. Joseph County/012	.5.05													25	115
Loans origi 8	1642	17	3606	18	3111	4	149	0	0	1	130	0	0		
Apps appro 0	0	1	170	1	160	1	5	0	0	0	0	0	0		
Apps denie 3	637	0	0	12	1898	2	18	0	0	0	0	0	0		
Apps withd 1	186				473	0						0	0		
Files closed 0	0	1	162	3	4/3		0	0	0		0	U			
IN-MI/St. Joseph County/013	U	_	162 156	3 4				-		0	-	•	•		
in-wii/ot. Joseph County/or.	5.06	1	162 156	3 4	743	0	0	0	0		0 106	0	0	10	82
Loons origi		1	156	4	743	0	0	0	0	0 1	106	0	0	19	82
Loans origi 9	736	1	156 4015	19	743 1841	0 2	0	0	0 6955	0 1 3	106 191	0	0	19	82
Apps apprc 0	736 0	1 31 4	156 4015 855	4 19 1	743 1841 80	0 2 0	0 23 0	0 1 0	0 6955 0	0 1 3 0	106 191 0	0 0	0 0	19	82
Apps apprc 0 Apps denie 0	736 0 0	1 31 4 5	156 4015 855 842	4 19 1 7	743 1841 80 487	0 2 0 5	0 23 0 134	0 1 0 0	0 6955 0	0 1 3 0	106 191 0 0	0 0 0	0 0 0	19	82
Apps apprc 0 Apps denie 0 Apps withd 1	736 0 0 87	31 4 5 0	156 4015 855 842 0	4 19 1 7 3	743 1841 80 487 208	0 2 0 5 0	0 23 0 134 0	0 1 0 0	6955 0 0	0 1 3 0 0	106 191 0 0	0 0 0 0	0 0 0 0 0	19	82
Apps apprc 0 Apps denie 0 Apps withd 1 Files closed 0	736 0 0 87 0	1 31 4 5	156 4015 855 842	4 19 1 7	743 1841 80 487	0 2 0 5	0 23 0 134	0 1 0 0	0 6955 0	0 1 3 0	106 191 0 0	0 0 0	0 0 0		
Apps appre 0 Apps denie 0 Apps withd 1 Files closed 0 IN-MI/St. Joseph County/012	736 0 0 87 0	31 4 5 0	156 4015 855 842 0	4 19 1 7 3 1	743 1841 80 487 208 83	0 2 0 5 0 0	0 23 0 134 0	0 1 0 0 0	0 6955 0 0 0	0 1 3 0 0 0	106 191 0 0 0	0 0 0 0 0	0 0 0 0 0 0	19	82 141
Apps appre 0 Apps denie 0 Apps withd 1 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 52	736 0 0 87 0 .6.01 8459	1 31 4 5 0 0	156 4015 855 842 0 0	4 19 1 7 3 1	743 1841 80 487 208 83 11581	0 2 0 5 0 0	0 23 0 134 0 0	0 1 0 0 0 0	0 6955 0 0 0	0 1 3 0 0 0 0	106 191 0 0 0 384	0 0 0 0 0 0	0 0 0 0 0 0 0		
Apps apprc 0 Apps denie 0 Apps withd 1 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 52 Apps apprc 3	736 0 0 87 0 .6.01 8459	31 4 5 0	156 4015 855 842 0 0	4 19 1 7 3 1 88 10	743 1841 80 487 208 83 11581 1604	0 2 0 5 0 0	0 23 0 134 0 0	0 1 0 0 0	0 6955 0 0 0	0 1 3 0 0 0	106 191 0 0 0	0 0 0 0 0	0 0 0 0 0 0 0		
Apps appre 0 Apps denie 0 Apps withd 1 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 52	736 0 0 87 0 .6.01 8459	1 31 4 5 0 0	156 4015 855 842 0 0	4 19 1 7 3 1	743 1841 80 487 208 83 11581	0 2 0 5 0 0	0 23 0 134 0 0	0 1 0 0 0 0	0 6955 0 0 0	0 1 3 0 0 0 0	106 191 0 0 0 384	0 0 0 0 0 0	0 0 0 0 0 0 0		
Apps appre 0 Apps denie 0 Apps withd 1 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 52 Apps appre 3 Apps denie 1	736 0 0 87 0 .6.01 8459	31 4 5 0 0	156 4015 855 842 0 0	4 19 1 7 3 1 88 10	743 1841 80 487 208 83 11581 1604	0 2 0 5 0 0	0 23 0 134 0 0	0 1 0 0 0 0	0 6955 0 0 0 0	0 1 3 0 0 0 0	106 191 0 0 0 384 130	0 0 0 0 0 0	0 0 0 0 0 0 0		
Apps apprc 0 Apps denie 0 Apps withd 1 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 52 Apps apprc 3 Apps denie 1	736 0 0 87 0 .6.01 8459 490	1 31 4 5 0 0 90 3 5	156 4015 855 842 0 0 15243 462 798	4 19 1 7 3 1 88 10 29	743 1841 80 487 208 83 11581 1604 3782	0 2 0 5 0 0 25 0 9	23 0 134 0 0 1885 0 377	0 1 0 0 0 0 0	0 6955 0 0 0 0	0 1 3 0 0 0 0 0	106 191 0 0 0 0 384 130 3	0 0 0 0 0 0 0	0 0 0 0 0 0 0		
Apps appre 0 Apps denie 0 Apps withd 1 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 52 Apps appre 3 Apps denie 1 Apps withd 10 Files closed 0	736 0 0 87 0 .6.01 8459 490 140 1737 0	31 4 5 0 0 90 3 5 9	156 4015 855 842 0 0 15243 462 798 1392	4 19 1 7 3 1 88 10 29 14	743 1841 80 487 208 83 11581 1604 3782 1704	0 2 0 5 0 0 25 0 9 4	23 0 134 0 0 1885 0 377 213	0 1 0 0 0 0 0	0 6955 0 0 0 0	0 1 3 0 0 0 0 0 3 1 1	106 191 0 0 0 384 130 3 0	0 0 0 0 0 0 1 0 2	0 0 0 0 0 0 0 77 0 108		
Apps apprc 0 Apps denie 0 Apps withd 1 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 52 Apps apprc 3 Apps denie 1 Apps withd 10 Files closed 0 IN-MI/St. Joseph County/012	736 0 0 87 0 .6.01 8459 490 140 1737 0	1 31 4 5 0 0 90 3 5 9 2	156 4015 855 842 0 0 15243 462 798 1392 776	4 19 1 7 3 1 88 10 29 14 13	743 1841 80 487 208 83 11581 1604 3782 1704 1340	0 2 0 5 0 0 25 0 9 4 1	23 0 134 0 0 1885 0 377 213 10	0 1 0 0 0 0 0 0	0 6955 0 0 0 0 0	0 1 3 0 0 0 0 0 3 1 1 0 0	106 191 0 0 0 0 384 130 3 0	0 0 0 0 0 0 0 1 0 2 0 0	0 0 0 0 0 0 0 77 0 108 0	4	141
Apps apprc 0 Apps denie 0 Apps withd 1 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 52 Apps apprc 3 Apps denie 1 Apps withd 10 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 33	736 0 0 87 0 .6.01 8459 490 140 1737 0	1 31 4 5 0 0 90 3 5 9 2	156 4015 855 842 0 0 0 15243 462 798 1392 776	4 19 1 7 3 1 88 10 29 14 13	743 1841 80 487 208 83 11581 1604 3782 1704 1340 9399	0 2 0 5 0 0 25 0 9 4 1	23 0 134 0 0 0 1885 0 377 213 10	0 1 0 0 0 0 0 0 0	0 6955 0 0 0 0 0 0	0 1 3 0 0 0 0 3 1 1 0 0	106 191 0 0 0 0 384 130 3 0 0	0 0 0 0 0 0 0 1 0 2 0 0	0 0 0 0 0 0 0 0 108 0 0	4	141
Apps apprc 0 Apps denie 0 Apps withd 1 Files closed 0 IN-MI/St. Joseph County/013 Loans origi 52 Apps apprc 3 Apps denie 1 Apps withd 10 Files closed 0 IN-MI/St. Joseph County/013 Loans origi 33 Apps apprc 4	736 0 0 87 0 .6.01 8459 490 140 1737 0 .6.02 5191	1 31 4 5 0 0 90 3 5 9 2	156 4015 855 842 0 0 15243 462 798 1392 776 12640 541	4 19 1 7 3 1 88 10 29 14 13	743 1841 80 487 208 83 11581 1604 3782 1704 1340 9399 895	0 2 0 5 0 0 25 0 9 4 1	23 0 134 0 0 0 1885 0 377 213 10	0 1 0 0 0 0 0 0 0	0 6955 0 0 0 0 0 0	0 1 3 0 0 0 0 3 1 1 0 0	106 191 0 0 0 384 130 3 0 0	0 0 0 0 0 0 0 1 0 2 0 0	0 0 0 0 0 0 0 0 108 0 0	4	141
Apps apprc 0 Apps denie 0 Apps withd 1 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 52 Apps apprc 3 Apps denie 1 Apps withd 10 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 33 Apps apprc 4 Apps denie 10	736 0 0 87 0 .6.01 8459 490 140 1737 0 .6.02 5191 420 1304	31 4 5 0 0 90 3 5 9 2 82 4 11	156 4015 855 842 0 0 15243 462 798 1392 776 12640 541 1124	4 19 1 7 3 1 88 10 29 14 13 70 8 31	743 1841 80 487 208 83 11581 1604 3782 1704 1340 9399 895 3829	0 2 0 5 0 0 25 0 9 4 1 1 14 0 6	23 0 134 0 0 0 1885 0 377 213 10 701 0 512	0 1 0 0 0 0 0 0 0	0 6955 0 0 0 0 0 0 0	0 1 3 0 0 0 0 3 1 1 0 0	106 191 0 0 0 384 130 3 0 0 637 0 0	0 0 0 0 0 0 0 1 0 0 0 0	0 0 0 0 0 0 0 108 0 0 0	4	141
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Apps apprc 0 Apps denie 0 Apps withd 1 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 52 Apps apprc 3 Apps denie 1 Apps withd 10 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 33 Apps apprc 4 Apps denie 10 Apps withd 2 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 34 Apps apprc 4 Apps apprc 0 IN-MI/St. Joseph County/012 Loans origi 34 Apps apprc 0 Apps denie 5 Apps withd 3 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 23 Apps apprc 0 Apps denie 2 Apps withd 0 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 23 Apps apprc 0 Apps denie 2 Apps withd 0 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 1	736 0 87 0 6.01 8459 490 140 1737 0 6.02 5191 420 1304 454 0 7.01 5595 0 662 486 0 7.02 3878 0 387 0 0 8.01 226	1 31 4 5 0 0 90 3 5 9 2 82 4 11 7 2 69 3 22 6 13 70 10 8 4	156 4015 855 842 0 0 15243 462 798 1392 776 12640 541 1124 1250 262 7774 183 1146 795 372 13073 1991 2545 711 400	4 19 1 7 3 1 88 10 29 14 13 70 8 31 19 11 41 1 11 13 5 36 5 14 10 7	743 1841 80 487 208 83 11581 1604 3782 1704 1340 9399 895 3829 2497 1188 4338 108 1091 1375 511 6568 1267 2174 1422 1245 437	0 2 0 5 0 0 25 0 9 4 1 1 14 0 6 1 1 1 5 0 7 0 1 1 1 1 0 0 1 1	0 23 0 134 0 0 1885 0 377 213 10 701 0 512 20 30 91 0 247 0 116 1020 0 300 0 371		6955 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 1 3 0 0 0 0 3 1 1 0 0 0 5 0 0 0 1 5 1 0 0 0 0 0 0 0 0	106 191 0 0 0 384 130 3 0 0 637 0 0 62 193 38 0 0 0 1631 360 0 0 0	0 0 0 0 0 0 0 1 0 0 0 0 0 0 0 1 5 2 1 6 1 1 3 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0 0 0 0 0 0 108 0 0 0 0 157 0 0 448 87 358 19 372	4 7 11 20	141 122 86
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Apps apprc 0 Apps denie 0 Apps withd 1 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 52 Apps apprc 3 Apps denie 1 Apps withd 10 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 33 Apps apprc 4 Apps denie 10 Apps withd 2 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 34 Apps apprc 4 Apps denie 5 Apps withd 3 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 34 Apps apprc 0 Apps denie 5 Apps withd 3 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 23 Apps apprc 0 Apps denie 2 Apps withd 0 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 1 Apps apprc 1 Apps apprc 1 Apps denie 1	736 0 0 87 0 .6.01 8459 490 140 1737 0 .6.02 5191 420 1304 454 0 .7.01 5595 0 662 486 0 .7.02 3878 0 387 0 0 .8.01 226 136 136 136 136 136 137 138 138 138 138 138 138 138 138	1 31 4 5 0 0 90 3 5 9 2 82 4 11 7 2 69 3 22 6 13 70 10 8 4 2	156 4015 855 842 0 0 15243 462 798 1392 776 12640 541 1124 1250 262 7774 183 1146 795 372 13073 1991 2545 711 400 1911 152 418	4 19 1 7 3 1 88 10 29 14 13 70 8 31 19 11 41 1 11 13 5 36 5 14 10 7	743 1841 80 487 208 83 11581 1604 3782 1704 1340 9399 895 3829 2497 1188 4338 108 1091 1375 511 6568 1267 2174 1422 1245 437 193 246	0 2 0 5 0 0 25 0 9 4 1 14 0 6 1 1 5 0 7 0 1 1 1 0 0 2 0 0	0 23 0 134 0 0 0 1885 0 377 213 10 701 0 512 20 30 91 0 247 0 116 1020 0 300 0		6955 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 1 3 0 0 0 0 3 1 1 0 0 0 5 0 0 0 1 5 1 0 0 0 0 0 0 0 0	106 191 0 0 0 384 130 3 0 0 637 0 0 62 193 38 0 0 0 1631 360 0 0 0 0 0 3	0 0 0 0 0 0 0 1 0 0 0 0 0 0 0 1 5 2 16 1 13 0 0 0 0 0 0 0	0 0 0 0 0 0 0 108 0 0 0 157 0 0 448 87 358 19 372 0 0 0	4 7 11 20	141 122 86
Apps apprc 0 Apps denie 0 Apps withd 1 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 52 Apps apprc 3 Apps denie 1 Apps withd 10 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 33 Apps apprc 4 Apps denie 10 Apps withd 2 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 34 Apps apprc 4 Apps denie 5 Apps withd 3 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 34 Apps apprc 0 Apps denie 5 Apps withd 3 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 23 Apps apprc 0 Apps denie 2 Apps withd 0 Files closed 0 IN-MI/St. Joseph County/012 Loans origi 1 Apps apprc 1	736 0 0 87 0 .6.01 8459 490 140 1737 0 .6.02 5191 420 1304 454 0 .7.01 5595 0 662 486 0 .7.02 3878 0 0 .8.03 387 0 0 0 0 0 0 0 0 0 0 0 0 0	1 31 4 5 0 0 90 3 5 9 2 82 4 11 7 2 69 3 22 6 13 70 10 8 4 2 11 11 12 13 14 15 16 16 16 17 18 18 18 18 18 18 18 18 18 18	156 4015 855 842 0 0 15243 462 798 1392 776 12640 541 1124 1250 262 7774 183 1146 795 372 13073 1991 2545 711 400 1911 152	4 19 1 7 3 1 88 10 29 14 13 70 8 31 19 11 41 1 11 13 5 36 5 14 10 7	743 1841 80 487 208 83 11581 1604 3782 1704 1340 9399 895 3829 2497 1188 4338 108 1091 1375 511 6568 1267 2174 1422 1245 437 193	0 2 0 5 0 0 25 0 9 4 1 1 4 0 6 1 1 5 0 7 0 1 1 1 0 0 2 0 0 1	0 23 0 134 0 0 0 1885 0 377 213 10 701 0 512 20 30 91 0 247 0 116 1020 0 0 300 0		6955 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 1 3 0 0 0 0 3 1 1 0 0 0 0 1 5 1 0 0 0 0 0 0 0 0 0 0 0	106 191 0 0 0 384 130 3 0 0 637 0 0 62 193 38 0 0 0 1631 360 0 0 0 0 0	0 0 0 0 0 0 0 1 0 0 0 0 0 0 0 0 1 5 2 1 6 1 1 1 3 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0 0 0 0 0 0 0 108 0 0 0 0 157 0 0 448 87 358 19 372	4 7 11 20	141 122 86

Files closed	0	0	0	0	1	125	0	0	0	0	0	0	0	0		
IN-MI/St. Josep	h County/														14	119
Loans origi	40	5270	90	10908	58	6133	12	619	0	0	3	463	0	0		
Apps appro	1	110	6	655	7	808	2	18	0	0	1	134	0	0		
Apps denie	5	557	9	1191	10	1294	6	317	0	0	1	5	0	0		
Apps withd	3	384	12	1826	20	2237	3	261	0	0	3	683	0	0		
Files closed	0	0	2	167	5	524	0	0	0	0	0	0	0	0		
IN-MI/St. Josep	h County/	0119.00													14	118
Loans origi	19	2787	49	7010	29	4156	10	577	0	0	0	0	9	294		
Apps appro	3	336	16	884	2	181	1	10	0	0	0	0	13	189		
Apps denie	1	142	37	1488	16	2091	7	193	0	0	0	0	34	377		
Apps withd	2	342	1	94	9	1556	1	80	0	0	0	0	0	0		
Files closed	1	174	5	147	6	1307	0	0	0	0	0	0	5	147		
IN-MI/St. Josep	h County/	0120.00													7	126
Loans origi	11	1500	48	9084	36	4985	10	550	0	0	3	459	0	0		
Apps appro	0	0	0	0	2	220	0	0	0	0	0	0	0	0		
Apps denie	2	160	8	1160	11	1576	7	686	0	0	3	159	0	0		
Apps withd	1	184	5	586	6	825	1	117	0	0	2	256	0	0		
Files closed	4	496	0	0	1	125	0	0	0	0	0	0	0	0		
IN-MI/St. Josep	h County/	0121.00													2	98
Loans origi	8	1058	35	5673	31	3647	8	240	1	218	6	581	0	0		
Apps appro	0	0	1	52	1	40	0	0	0	0	0	0	0	0		
Apps denie	0	0	2	175	11	1200	3	12	0	0	0	0	0	0		
Apps withd	1	101	4	770	7	812	0	0	0	0	2	101	0	0		
Files closed	0	0	0	0	3	353	0	0	0	0	0	0	0	0		
IN-MI/St. Josep	h County/	0122.00													5	109
Loans origi	23	2720	16	1856	15	1316	8	317	0	0	2	111	2	375		
Apps appro	0	0	2	308	3	450	0	0	0	0	0	0	0	0		
Apps denie	2	193	5	894	15	1170	4	158	0	0	3	343	0	0		
Apps withd	1	85	3	369	4	351	1	24	0	0	1	135	0	0		
Files closed	0	0	1	210	3	247	0	0	0	0	0	0	1	77		
IN-MI/St. Josep	h County/	0123.00													3	94
Loans origi	12	1814	33	6582	23	2632	15	1033	0	0	1	560	3	228		
Apps appro	2	272	4	523	2	348	1	10	0	0	0	0	0	0		
Apps denie	3	502	3	331	10	1412	6	113	0	0	1	4	0	0		
Apps withd	0	0	5	1010	8	1477	2	36	0	0	0	0	0	0		
Files closed	0	0	0	0	7	1154	0	0	0	0	2	206	0	0		
IN-MI/St. Josep	h County/	0124.00													1	129
Loans origi	5	687	12	2507	8	2842	1	6	0	0	0	0	0	0		
Apps appro	1	86	0	0	0	0	0	0	0	0	0	0	0	0		
Apps denie	1	86	0	0	4	447	2	186	0	0	0	0	0	0		
Apps withd	0	0	0	0	2	273	0	0	0	0	0	0	0	0		
Files closed	0	0	0	0	1	354	0	0	0	0	0	0	0	0		

Table 4-2: Disposition of applications for conventional home-purchase loans 1- to 4- family and manufactured home dwellings, by race, ethnicity, gender and income of applicant, 2017 MSA/MD: 43780 - South Bend-Mishawaka, IN-MI

RACE, ETHI Ap Nu ace	-	\$000's	Number	\$000's	Number	proved But N \$000's	Number	\$000's	Number	\$000's	Number	ed for Incomple \$000's
ace American Indi	an/∆lack	a Native										
Male	aii/Aiask 6	.a wative 555	5 5	552		0 0) 1	3	C) 0) (0 0
emale	7	607										
						_						
oint (Male	3	304				0 0						0 0
otal	16	1466	12	1346	1	0 0	9	64	1	. 56) (0 0
sian												
1ale	29	6194				0 0						0
emale	19	3580	12	2308	}	1 222	3	299	1	. 442	!	2 309
oint (Male	26	7014	. 17	4416		5 1712		0	3	576	5	1 310
otal	74	16788	55	12287	,	6 1934	. 4	506	6	1442	!	3 619
lack or Africa	n Ameri	can										
1ale	60	9547	42	7277	,	5 943	7	597	4	639)	2 91
emale	48	5495				2 200						2 208
oint (Male	17	3437				2 200 1 311						0 0
•												
otal	125	18479		14212		8 1454	. 17	1414	9	1100) 4	4 299
ative Hawaii	an or Ot											
Iale	2	203	0	0		0 0	2	203	C	0) (0 0
emale	2	252	. 1	132		0 0	(0	1	. 120) (0 0
oint (Male	3	710	2	539)	0 0	1	171	C	0) (0 0
otal	7					0 0						0
/hite	•		3	0,1		_		3, 1	-		`	_
Tale	1104	160247	064	128458	5 5	6 5820	99	12178	60	12410) 16	5 1381
emale	681	77588										
int (Male	1278	249420										
otal	3073	488455	2459	401504	. 16	7 23545	218	27300	183	30414	46	5692
or more min	ority rac	es							7			
ale	, 1	304	. 0	0)	1 304	. (0		0) (0 0
emale	1	98		98		0 0						0 0
int (Male	0	0				0 0				•		0 0
-												
otal	2		. 1	98	•	1 304	. (0	C	0) (0 0
int (White/N	∕linority	-										
lale	1	60	0	0		0 0	0	0	1	. 60) (0 0
emale	1	230	0	0		0 0		0	0	0) :	1 230
int (Male	28	5632	21	4016		1 530	3	182	2	420) :	1 484
otal	32	6460	23	4554		1 530	3	182	3	480) :	2 714
ace Not Avai	lable											
lale	35	5989	24	4311		2 325	e	886	C) 0	. :	3 467
emale	20	1685				0 0						
oint (Male	32	6081			`	0 0						1 130
otal	181	33152	118	21555		6 1283	35	7127	14	2042		8 1145
thnicity												
ispanic or La	tino											
lale	75	8665	49	6156		6 425	14	1629	5	428	3	1 27
emale	29	2885				1 73						0 0
int (Male	28	3573				1 100						0 0
otal	132	15123				8 598						0 1 27
		13123	94	11312		238		22/8	/	/08	, .	. 2/
ot Hispanic o		4.50-	- -	40.55			_		_		-	
ale	1121	168741										
emale	712	83942										
int (Male	1287	256854	1060	213771	. 7	1 15157	61	11084	75	13016	20	3826
otal	3131	511066	2507	418785	17	0 26389	216	27249	189	31270	49	9 7373
int (Hispanio												
ale	0	•		-)	0 0		0	C	0) (0 0
emale												
	0	6707		•					-			0 0
int (Male	38	6797				3 496						0 0
otal	38	6797	26	4478	;	3 496	3	410	6	1413	; (0
hnicity Not A	Available											
lale	42	5693	26	3735		2 255		762	2	714		4 227
emale	38	2708	24	2050		0 0	8	322	3			3 136
int (Male	37	5569				2 354						2 158
tal	212	33576				8 1567						
inority st <i>i</i>		333/0	, 133	21013		. 130/	43	7004	13	. 2203	, 13	5 1005
hite Non-Hi	•											
lale	1021	151042	812	122106	5	0 5465	82	10529	64	11643	13	3 1299
emale	636	73811	501	60094	. 4	0 4098	49	3592	36	4644	10	1383
int (Male	1243	245162							71	. 12553		
otal	2910	471511										
			. 2555	303033	1.0	. 23313	107	27410	1/2	. 203/1	. 4.	_
thers, Includ			, .			0 ^		_	_	, -	,	2
lale	1	78				0 0						0 0
	0	0	0	0)	0 0	(0	C	0) (0 0
emale oint (Male	0			0		0 0		0	C	0		0 0

Total income	1	78	1	78	0	0	0	0	0	0	0	0
Less than 5	272	0.077427	181	0.06558	17	0.089947	61	0.214789	9	0.041475	4	0.063492
50-79% of I	786	0.22374	597	0.216304	51	0.269841	76	0.267606	37	0.170507	25	0.396825
80-99% of I	418	0.118987	334	0.121014	15	0.079365	20	0.070423	44	0.202765	5	0.079365
100-119% (383	0.109024	304	0.110145	25	0.132275	30	0.105634	18	0.082949	6	0.095238
120% or m	1654	0.470823	1344	0.486957	81	0.428571	97	0.341549	109	0.502304	23	0.365079
Income No	0	0	0	0	0	0	0	0	0	0	0	0
	3513	1	2760	0.785653	189	0.0538	284	0.080843	217	0.061771	63	0.017933



Table 5-2: Disposition of Applications for Conventional Home-Purchase Loans, 1-to-4 Family and Manufactured Home Dwellings, by Income, Race, and Ethnicity of Applicant, 2017 MSA/MD: 43780 - South Bend-Mishawaka, IN-MI

MSA/MD: 437	780 - Sout	h Bend-Mi	shawaka, IN	-MI		,	,				, ,	,	,
INCOME, R Ap			•		Apps. Appr	oved But N	Application	s Denied	Application	s Withdraw	Files Closed	l for Incom	oleteness
Nu	ımber	\$000's	Number	\$000's				\$000's	Number	\$000's	Number	\$000's	
Less than 50%	of MSA/	MD media	n										
Race													
American I	5	242	2	125	0	0	2	61	1	56	0	0	
Asian	9	994	4	342	0	0	4	506	1	146	0	0	
Black or Afı	13	767	6	399	0	0	7	368	0	0	0	0	
Native Haw	0	0	0	0	0	0	0	0	0	0	0	0	
White	235	15579	165	12117	17	844	43	1820	6	601	4	197	
2 or more r	0	0	0	0	0	0	0	0	0	0	0	0	
Joint (Whit	1	89	1	89	0	0	0	0	0	0	0	0	
Race Not A	8	483	3	223	0	0	4	203	1	57	0	0	
Hispanic or	18	1103	12	830	1	73	5	200	0	0	0	0	
Not Hispan	239	16147	164	12159	16	771	47	2217	8	803	4	197	
Joint (Hispa	1	34	0	0	0	0	1	34	0	0	0	0	
Ethnicity no	14	904	5	306	0	0	8	541	1	57	0	0	
Total	272	18188	181	13295	17	844	61	2992	9	860	4	197	
White Non	212	0.824903	152	0.716981	16	0.075472	34	0.160377	6	0.028302	4	0.018868	
Others, Inc	0	0	0	0	0	0	0	0	0	0	0	0	
Minority St	45	0.175097	24	0.533333	1	0.022222	18	0.4	2	0.044444	0	0	
White+Min	257	1	176		17	0.066148	52	0.202335	8	0.031128	4	0.015564	
American I	3	206	2	203	0	0	1	3	0	0	0	0	
Asian	11	1355	10	1199	0	0	0	0	0	0	1	156	
Black or Afi	40	3947	27	2664	5	539	2	263	3	250	3	231	
Native Haw	3	409	0	0	0	0	2	289	1	120	0	0	
White	685	62823	534	51254	44	3538	59	4222	30	2736	18	1073	
2 or more r	1	98	1	98	0	0	0	0	0	0	0	0	
Joint (Whit	2	158	0	0	0	0	2	158	0	0	0	0	
Race Not A	40	3793	22	2062	2	213	10	873	3	369	3	276	
50-79% of MS	A/MD me	edian											
Hispanic or	51	4910	31	2985	5	362	9	1032	5	504	1	27	
Not Hispan	673	63091	531	51545	42	3662	54	4002	29	2602	17	1280	
Joint (Hispa	6	555	5	481	1	74	0	0	0	0	0	0	
Ethnicity no	56	4254	30	2490	3	192	13	774	3	369	7	429	
Total	786	72810	597	57501	51	4290	76	5808	37	3475	25	1736	
White Non	614	0.849239	491	0.799674	37	0.060261	47	0.076547	25	0.040717	14	0.022801	
Others, Inc	0	0	0	0	0	0	0	0	0	0	0	0	
Minority St	109	0.150761	71	0.651376	10	0.091743	14	0.12844	9	0.082569	5	0.045872	
White+Min	723	1	562	0.777317	47	0.065007	61	0.084371	34	0.047026	19	0.026279	
American I	2	216	2	216	0	0	0	0	0	0	0	0	
Asian	8	1207	6	835	1	222	0	0	1	150	0	0	
Black or Afı	18	2152	16	1956	0	0	0	0	1	128	1	68	
Native Haw	1	132	1	132	0	0	0	0	0	0	0	0	
White	371	44319	296	35258	14	1443	18	2157	39	5090	4	371	
2 or more r	0	0	0	0	0	0	0	0	0	0	0	0	
Joint (Whit	3	310	2	250	Ò	0	0	0	1	60	0	0	
Race Not A	14	1538	10	1043	0	0	2	275	2	220	0	0	
80-99% of MS	A/MD me	edian											
Hispanic or	19	2391	16	2120	1	63	2	208	0	0	0	0	
Not Hispan	373	44854	301	35857	14	1602	14	1821	40	5173	4	401	
Joint (Hispa	3	319	1	88	0	0	1	96	1	135	0	0	
Ethnicity no	23	2450	16	1765	0	0	3	307	3	340	1	38	
Total	418	50014	334	39830	15	1665	20	2432	44	5648	5	439	
White Non	348	0.878788	279	0.801724	13	0.037356	15	0.043103	38	0.109195	3	0.008621	
Others, Inc	1	0	1	0	0	0	0	0	0	0	0	0	
Minority St	48	0.121212	41	0.854167	2	0.041667	2	0.041667	2	0.041667	1	0.020833	
White+Min	396	1	320	0.808081	15	0.037879	17	0.042929	40	0.10101	4	0.010101	
American I	0	0	0	0	0	0	0	0	0	0	0	0	
Asian	8	1438	7	1285	0	0	0	0	0	0	1	153	
Black or Afı	13	1630	9	1172	0	0	4	458	0	0	0	0	
Native Haw	0	0	0	0		0	0	0	0	0	0	0	
White	336	45830		37262		3681	21	2565	16	2102	4	220	
2 or more r	0	0		0		0	0	0	0	0	0	0	
Joint (Whit	6	623		599		0	1	24	0	0	0	0	
Race Not A	20	2271	13	1465		0	4	533	2	143	1	130	
100-119% of I													
Hispanic or	9	1197	6	813	0	0	3	384	0	0	0	0	
Not Hispan	345	47049		38291		3681	23	2663	16	2069	4	345	
Joint (Hispa	7	1085		1085		0	0	0	0	0	0	0	
Ethnicity no	22	2461		1594		0	4	533	2	176	2	158	
Total	383	51792		41783		3681	30	3580	18	2245	6	503	
White Non-	326	0.91573		0.809816		0.076687	19	0.058282	15	0.046012	3	0.009202	
Others, Inc	0	0		0		0	0	0	0	0	0	0	
•	-	-	-	_		-	-	_	-		-	-	

Minority St	30	0.08427	22	0.733333	0	0	7	0.233333	0	0	1	0.033333
White+Min	356	1	286	0.803371	25	0.070225	26	0.073034	15	0.042135	4	0.011236
American I	6	802	6	802	0	0	0	0	0	0	0	0
Asian	38	11794	28	8626	5	1712	0	0	4	1146	1	310
Black or Af	41	9983	29	8021	3	915	4	325	5	722	0	0
Native Haw	3	624	2	539	0	0	1	85	0	0	0	0
White	1446	319904	1194	265613	67	14039	77	16536	92	19885	16	3831
2 or more r	1	304	0	0	1	304	0	0	0	0	0	0
Joint (Whit	20	5280	15	3616	1	530	0	0	2	420	2	714
Race Not A	99	25067	70	16762	4	1070	15	5243	6	1253	4	739
120% or more of MSA/MD median												
Hispanic or	35	5522	29	4764	1	100	3	454	2	204	0	0
Not Hispan	1501	339925	1234	280933	73	16673	78	16546	96	20623	20	5150
Joint (Hispa	21	4804	13	2824	2	422	1	280	5	1278	0	0
Ethnicity no	97	23507	68	15458	5	1375	15	4909	6	1321	3	444
Total	1654	373758	1344	303979	81	18570	97	22189	109	23426	23	5594
White Non	1410	0.919166	1167	0.82766	66	0.046809	72	0.051064	88	0.062411	17	0.012057
Others, Inc	0	0	0	0	0	0	0	0	0	0	0	0
Minority St	124	0.080834	94	0.758065	10	0.080645	8	0.064516	11	0.08871	1	0.008065
White+Min	1534	1	1261	0.822034	76	0.049544	80	0.052151	99	0.064537	18	0.011734
	3513		2760		189		284		217		63	



Table 8-2: Reasons for denial of applications for conventional home-purchase loans, 1- to 4-family and manufactured home dwellings, by race, ethnicity, gender and income of applicant, 2017

MSA/MD: 43780 - South Bend-Mishawaka, IN-MI

APPLICANT Debt-to-Income Ratio Employment History Credit History			Collateral Insufficient Cash			Unv	Unverifiable Informatic Credit App. Incomplete Mortgage Insurance De Other								tal							
Nui	mber %	Nur	mber %	Nυ	ımber %	Nu	mber %	Nu	ımber %	Nur	mber %	Nur	mber %	Nun	nber %	Nur	mber %	Nι	ımber %			
race																						
American Iı	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	(
Asian	4	100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4	100	4	100
Black or Afı	5	35	0	0	2	14	2	14	0	0	2	14	1	7	0	0	2	14	14	100	14	100
Native Haw	1	33	0	0	0	0	2	66	0	0	0	0	0	0	0	0	0	0	3	100	3	100
White	30	21	1	0	30	21	39	28	5	3	5	3	14	10	1	0	13	9	138	100	138	100
2 or more r	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	C
Joint (White	0	0	0	0	1	50	0	0	0	0	0	0	1	50	0	0	0	0	2	100	2	100
Race Not A	4	16	0	0	4	16	7	28	3	12	2	8	3	12	0	0	2	8	25	100	25	100
ethnicity																						
Hispanic or	10	52	0	0	3	15	2	10	1	5	1	5	1	5	0	0	1	5	19	100	19	100
Not Hispan	29	20	1	0	31	22	41	29	4	2	6	4	13	9	1	0	14	10	140	100	140	100
Joint (Hispa	0	0	0	0	0	0	0	0	0	0	0	0	2	100	0	0	0	0	2	100	2	100
Ethnicity No	5	20	0	0	3	12	7	28	3	12	2	8	3	12	0	0	2	8	25	100	25	100
MINORITY STA	TUS																					
White Non-	19	16	1	0	27	23	37	31	4	3	4	3	12	10	1	0	12	10	117	100	117	100
Others, Incl	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	C
gender																						
Male	17	21	1	1	19	24	20	25	2	2	5	6	6	7	1	1	7	8	78	100	78	100
Female	15	37	0	0	6	15	11	27	1	2	1	2	4	10	0	0	2	5	40	100	40	100
Joint (Male	11	21	0	0	9	17	13	25	2	3	2	3	8	15	0	0	6	11	51	100	51	100
Gender Not	1	5	0	0	3	17	6	35	3	17	1	5	1	5	0	0	2	11	17	100	17	100
income																						
Less than 5	16 0.	551724	0	0	6 0.2	06897	4 0.	137931	1 0.0	34483	0	0	0	0	0	0	2 0.0	068966	29 0.	155914	29	1
50-79% of I	13 0.	295455	0	0	8 0.1	81818	13 0.	295455	3 0.0	68182	3 0.	068182	1 0.0	022727	1 0.0	22727	2 0.0)45455	44 0.	236559	44	1
80-99% of I	3	0.25	0	0	2 0.1	66667	5 0.	416667	0	0	0	0	2 0.:	166667	0	0	0	0	12 0.	064516	12	1
100-119% (5 0.	217391	0	0	3 0.1	30435	5 0.	217391	2 0.0	86957	3 0.	130435	3 0.:	130435	0	0	2 0.0	86957	23 0.	123656	23	1
120% or m	7 0.	.093333	1 0.0	13333	17 0.2	26667	23 0.	306667	1 0.0	13333	3	0.04	12	0.16	0	0	11 0.1	46667	75 O.	403226	75	
Income Not	0	0	0	0	1 0.3	33333	0	0	1 0.3	33333	0	0	1 0.3	333333	0	0	0	0	3 0.	016129	3	_
	44 0.	236559	1 0.0	05376	37 0.1	98925	50 0.	268817	8 0.0	43011	9 0.	048387	19 0.:	102151	1 0.0	05376	17 0.0	91398	186	1	186	1

