

Review Submission

Review the content of your AFH before completing the certification and submission to HUD.

Presubmission Review

Please note that this software does not determine if the answers provided are substantially incomplete or inconsistent with fair housing or civil rights requirements.

The assessment may be submitted for HUD review.

Cover

Assessment Id 10
Assessment Title City of Hammond Indiana Assessment of Fair Housing

Sole or Lead Submitter
Contact Information

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City Hammond
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Program Participants

Participant Id	Name	Lead?	Submission Due Date
356001054	Hammond, Indiana	Yes	10/04/2016

Executive Summary

II.1. Summarize the fair housing issues, significant contributing factors, and goals. Also include an overview of the process and analysis used to reach the goals.

Introduction

The City of Hammond is committed to fair housing for all of its residents. The City's Human Relations Commission is a testament to the City's commitment to fair housing. By investing in the Human Relations Commission, the City of Hammond is one of only fifty-one local governments in the nation to achieve a substantial equivalence certification from HUD, meaning the City enforces a law that provides substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the federal Fair Housing Act. The City of Hammond is also committed to providing the greatest level of opportunity to all of its residents. In April 2015, the City passed ordinance 9293 which prohibits discrimination based upon sexual orientation and gender identity in employment, housing, services and accommodations.

The goal of this document, the Assessment of Fair Housing (AFH) for the City of Hammond, Indiana, is to identify fair housing issues within the City's jurisdiction, identify potential contributing factors to fair housing choice, and recommend actions that the City and its partners can take to eliminate or remedy the identified issues and contributing factors.

At the heart of the AFH is an analysis and evaluation of housing patterns for the City and the region. This includes an assessment of demographic patterns, the degrees of segregation and integration of members of each protected class, the overlap between concentrations of poverty in predominantly minority neighborhoods, and disparities in opportunities based on limited housing choice. The AFH also evaluates the current capacity of government and fair housing advocates to uphold fair housing rights through outreach and enforcement efforts.

This analysis and evaluation will serve as the basis for fair housing planning within the City of Hammond and provides essential information to policy makers, administrative staff, housing providers, lenders, and advocates to affirmatively further fair housing choice.

How was this document developed?

As a recipient of federal affordable housing and community development grants, the City is required to follow the fair housing planning regulations mandated by the U.S. Department of Housing and Urban Development (HUD). More information on HUD's guidelines can be found at: <https://www.hudexchange.info/programs/affh/> (<https://www.hudexchange.info/programs/affh/>).

Under these guidelines, the City must use the HUD-provided format and data, which includes data for the jurisdiction and region, to complete the AFH. However, certain HUD-provided data may have limitations. For this reason, program participants must supplement the HUD-provided data with local data and local knowledge.

Local data refers to metrics, statistics, and other quantified information, subject to a determination of statistical validity by HUD, that are relevant to program participants' geographic areas of analyses, can be found through a reasonable amount of searching, are readily available at little or no cost, and are necessary for the completion of the AFH using the Assessment Tool.

Local knowledge means information to be provided by program participants that relates to program participants' geographic areas of analyses and that is relevant to program participants' AFH, is known or becomes known to program participants, and is necessary for the completion of the AFH using the Assessment Tool.

The City must consider information relevant to the jurisdiction or region submitted during the community participation process, including recommendations of other data sources to assess, but need not expend extensive resources in doing so. It is the discretion of the City to choose the supplemental information that is most relevant to its analysis. HUD does not expect program participants to hire statisticians or other consultants to locate and analyze all possible sources of local data. Program participants are not generally expected to conduct primary data gathering or analysis, or a quantitative impact evaluation requiring empirical research to objectively determine causation.

How can I participate in the planning process?

A draft of the full document will be made available for public review and comment beginning September 1st, 2016. The City will consider all written comments received before October 1st, 2016. The complete document will be available on the City's website at www.gohammond.com (<http://www.gohammond.com/>) and at the Department of Planning and Development at City Hall, 5925 Calumet Avenue.

The City will hold a public hearing at 1:00 PM on September 1st at the Hammond Public Library located at 564 State St. The City will consider all comments received at the public hearing. The City may hold additional meetings to gather input throughout September. Please check www.gohammond.com (<http://www.gohammond.com/>) for the most up to date schedule.

Public Comment Period

The City will hold a public comment period commencing September 1st and ending September 30th. All comments received by the City will be summarized in an attachment to the draft plan. Written comments received during the formal comment period and those received orally at public hearings will receive a written response and will be included in the documents submitted to HUD. The City will accept comments throughout the year outside of the public comment periods, but the City cannot guarantee that these comments will be included in the submitted versions to HUD.

Comments may be emailed to millero@gohammond.com or submitted in writing to:

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What is Fair Housing?

Fair Housing is the law of the land. There are laws at the federal, state, and local levels to ensure fair housing is a right of every citizen. At the federal level, the Civil Rights Act of 1968 protects the right to fair housing for all people and prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status and disability. The State of Indiana and the City of Hammond have passed laws that mirror federal law and have achieved "substantial equivalence" which entitles the State and City access to resources for addressing fair housing complaints.

Despite these laws, discrimination in the housing market still exists. In recent years, the U.S. Department of Housing and Urban Development (HUD) has reported a record number of housing discrimination complaints for the nation. There are both positive and negative aspects to the increase in complaints. A higher level of complaints indicates more people are aware of the right to fair housing choice and are willing to take action to protect that right. Conversely, the record number of complaints serves as a reminder that housing discrimination remains prevalent.

What is Affirmatively Furthering Fair Housing?

As a recipient of federal affordable housing and community development funds, the City of Hammond has a duty to affirmatively further fair housing. Affirmatively furthering fair housing is two-fold. In addition to combating discrimination, the City must take meaningful actions that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.

Specifically, the City's fair housing actions should include:

- Actions to address significant disparities in housing needs and in access to opportunity,
- Actions to replace segregated living patterns with truly integrated and balanced living patterns,
- Actions to transform racially and ethnically concentrated areas of poverty into areas of opportunity, and
- Actions to foster and maintain compliance with civil rights and fair housing laws.

What Fair Housing Issues Exist Today?

HUD has published guidance on fair housing planning that includes a list of forty one contributing factors that may play a role in fair housing issues. In the course of developing its plan, the City has identified the following contributing factors.

Private Discrimination

In reviewing data for the City's down-payment assistance program, Homebound, there was a lack of African American homebuyers purchasing homes in the northern portion of the City, including the North Hammond and Robertsdale neighborhoods. While the City has not been able to determine specific instances of discrimination, African Americans born and raised in the City did not find this statistic surprising. Further investigation is needed.

Access to Financial Services / Lending Discrimination

Based on an assessment of HMDA data, African Americans and Hispanics are less likely to originate home purchase loans. The data cannot determine if the cause of this disparate outcome is discrimination. Other possible contributing factors would include a lack of access to financial services, credit counseling, and economic opportunities.

Deteriorated and Abandoned Properties / Land use and zoning laws

Hammond has an older housing stock that is not being replaced in large number through rehabilitation or redevelopment. A large number of housing units fall into disrepair and in some cases are abandoned. The most appropriate solution to remove the negative effects of these blighted properties is to demolish them. Many of these older homes were built on small lots, in some cases only 25 feet wide. The zoning requirements call for a minimum lot width of 40 feet to redevelop. In order to build a new unit, a builder would need to combine two lots together or seek a variance.

The impediments to redeveloping these blighted properties have a disparate impact on their surrounding areas, which are increasingly populated with Hispanic and African American residents. The latest Census shows that Hammond's two largest minority populations, Hispanics and African Americans, now account for 56% of the City population. Since 1990, the City has gained 17,643 Hispanic residents and 9,442 African American residents while the White Non-Hispanic population decreased by 33,534. Put into a regional context, these demographic trends lead to an increasingly segregated living pattern.

Lack of Private Investment in Specific Neighborhoods

New housing development in Lake County continues to be concentrated in the communities on the outskirts of the metropolitan region. Over the last six years, new housing development and investment within Lake County is primarily located in its southern communities. Crown Point, St. John, Merrillville, Cedar Lake, and Winfield account for 75% of the new housing units authorized by permits reported from 2010-2015. Communities in the northern portion of Lake County, including Hammond, East Chicago, Whiting, and Gary, accounted for only 5% of the permit activity.

This lack of private investment within the City creates regional disparities in access to opportunity and results in deteriorating quality of housing stock, poor school performance, and fewer employment opportunities. From a regional context, these disparities have a disparate impact on the populations of Hammond, East Chicago, and Gary which have relatively larger minority populations. These are large, complex issues that will require coordinated and comprehensive strategies at the regional level to address.

Siting selection policies / decisions for publicly supported housing

A RECAP is a neighborhood with a high poverty rate and a non-white population of 50 percent or more. The City of Hammond has one area identified as a Racially/Ethnically Concentrated Area of Poverty (RECAP). This area's qualification as a RECAP is largely a result of the clustering of affordable housing developments into one area. Most of the housing units within the RECAP identified within Hammond are subsidized.

According to the South Suburban Housing Center, of the eleven affordable housing developments in Hammond, including public housing, low-income housing tax credit or privately assisted housing, nine of the eleven are located in two clusters. Four developments are located within the RECAP and five additional developments are located in Columbia Center. These multi-family developments contain 973 units (83.6%) of Hammond's total subsidized developments. The RECAP is a majority low-income African American area. The Columbia Center area has a population that is 64.5% low to moderate income African American and Hispanic.

The site selection for large affordable housing developments can become a fair housing issue if members of a protected class, such as racial minorities, are disproportionately represented among low-income populations who would benefit from low-cost housing and the housing developments are segregated or located in areas that offer a relative lack of opportunity. In the case of Columbia Center, the Hammond Housing Authority has attracted huge amounts of investment to increase the overall standard of housing and serves as an asset to the surrounding neighborhood. The City will continue to explore potential issues and solutions within the RECAP.

Availability, type, frequency, and reliability of public transportation

The City administered a public bus service until 2010, when the administration of the bus service was transferred to the Regional Bus Authority due to fiscal pressures. The Regional Bus Authority was never able to secure an adequate funding source and ended operations in June 2012. Portions of the City currently receive limited service from PACE Bus Lines and the Gary Public Transportation Corporation (GPTC).

The lack of public transportation is one of the most frequently cited issues facing low income persons in the City of Hammond. A lack of public transportation can become a fair housing issue when members of a protected class, such as persons with disabilities and racial minorities, are disproportionately represented among transit users and are limited in their housing choice.

Northwest Indiana Regional Planning Commission (NIRPC) is the planning agency that coordinates public transit for the region, including fixed route, complementary paratransit, and demand response services. In 2006, Everybody Counts, Inc., a local advocacy organization for persons with disabilities, obtained a federal court consent decree ordering NIRPC and several local public transit agencies to comply with the Americans with Disabilities Act. While the federal litigation was ended in June 2014 through a conciliation agreement, the adequacy of transportation for persons with disabilities remains an issue in the City and Lake County as a whole.

What Are the Proposed Actions To Address The Issues?

For each fair housing issue and contributing factor described above, the City proposes the following goals and strategies to address the issue and its contributing factors. When finalized, each proposed goal will identify parties who will be responsible for carrying out the strategies and actions to meet the goal as well as metrics, milestones, and timeframes to gauge performance.

It is important to note that the following actions are proposed and are subject to change based on approval of City elected officials and feedback received during the public comment period.

Overall, the City's Department of Planning and Development will oversee and report on the progress of the following proposed actions. Progress and performance will be included in the annual Consolidated Annual Performance and Evaluation Report (CAPER) submitted to HUD each June.

Combat Private Discrimination

There is a need to better coordinate the efforts of all fair housing agencies within the region to ensure that the limited resources available to each are used to their maximum efficiency. The City will continue to support the Hammond Human Relations Commission to investigate instances of private discrimination. When necessary, the Human Relations Commission will coordinate with other fair housing agencies, including South Suburban Housing Center and Northwest Indiana Reinvestment Alliance, to conduct investigations and enforcement efforts.

The specific issue cited above, namely the lack of African American Homebound participants purchasing homes in North Hammond and Robertsdale, will be further assessed in the first year of this plan and develop specific recommendations to ensure any identified issues are addressed.

In addition, the South Suburban Housing Center has the capacity to conduct a substantial testing monitoring project to analyze systemic rental, sales, mortgage lending, disability accessibility and REO property testing with funds made available from HUD for this purpose, or to jointly apply with SSHC to obtain funding for the project.

Potential Actions:

- Ten (10) Fair Housing Complaint investigations each year
- Recommendation on Impediments to African American buyers in North Hammond and Robertsdale
- Systemic testing of mortgage lending and/or steering

Responsible Party: Hammond Human Relations Commission and partnering outside agencies

Provide Greater Access to Financial Services / Examine Lending Discrimination

The City currently requires homebuyer counseling for all of its federally-funded homebuyer programs, including the Homebound down payment assistance program and the development of homebuyer housing through partner agencies like United Neighborhoods, Inc. In addition, agencies such as the Northwest Indiana Reinvestment Alliance, a HUD-approved housing counseling agency, and local lenders

sponsor homebuyer counseling workshops and clinics. These workshops are well attended and have helped a number of homebuyers from protected classes. However, the final metric of loan origination for minority buyers remains disproportionately low. An underlying issue may be poor credit for potential buyers.

Potential Actions:

- Systemic testing of mortgage lending
- Creation of credit repair program / Individual Development Accounts (IDA) - *proposed*

Responsible Party: Hammond Department of Planning and Development and partnering outside agencies

Encourage Redevelopment and Private Investment

The City needs to strategically link the redevelopment of new housing units to parcels that are now vacant due to demolition of vacant structures.

Potential actions:

- Examine potential changes to minimum lot widths outlined in the zoning ordinance
- Funding subsidies for the development of new in-fill housing.

Responsible Parties: City Department of Planning and Development; City of Hammond Zoning Division; Hammond City Council

Siting selection policies / decisions for publicly supported housing

In the course of the planning process, South Suburban Housing Center recommended the following actions in regard to site selection policies of publicly supported housing.

Potential Actions:

- All new or redeveloped multi-family affordable housing be scattered in small developments throughout the city in opportunity areas outside of the RECAP and Columbia Center locations.
- As units in older developments in the RECAP are removed from the housing stock, they are replaced with an equal number of affordable units outside of this area.

Responsible Parties: City Department of Planning and Development; Hammond Human Relations Commission; Hammond Housing Authority; City of Hammond Zoning Division

Increase the reliability of public transportation

The City Department of Planning and Development needs to work with existing transit providers, including NIRPC, PACE, GPTC, and North Township, to improve access to reliable transportation to person with disabilities.

Potential Actions:

- Modify existing bus routes to better serve neighborhoods with concentrations of assisted housing and the RECAP
- Explore the possibility of using federal grant dollars to supplement public transportation to increase access to employment centers, especially for neighborhoods with concentrations of assisted housing and the RECAP.

Responsible Party: City Department of Planning and Development.

Promote Mobility

In the course of the planning process, South Suburban Housing Center recommended the following proposed actions in order to promote greater mobility.

Proposed Actions:

- Development of a voluntary mobility counseling program for Housing Choice Voucher holders to assist them in locating units and allowing movement to opportunity areas in Hammond and other communities in the region.
- Introduction of "source of income" protections in fair housing ordinances, on a county-wide basis, to create access to a larger supply of housing units in opportunity areas for voucher holding families.

Responsible Parties: Hammond Housing Authority (mobility counseling); Hammond City Council and other local governments (fair housing ordinance)

Address disparities in access to opportunities in RECAP

Proposed Actions:

- The City will focus more of its self-sufficiency programs and provide incentives to community service providers to better service residents living the RECAP and other areas with relatively high concentrations of minorities and poverty. These programs include services directed at youth development, such as Parents as Teachers, Youthbuild, and Big Brothers/Big Sisters.

- Support the formation of a Community Based Development Organization that can lead a coordinated response to the priority needs of RECAP residents.

Responsible Party: City Department of Planning and Development; Hammond Housing Authority.

Community Participation Process

III.1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board.

The City has adopted a Citizen Participation Plan (CPP) that outlines the City's policies and procedures for obtaining public input in the planning and decision-making processes associated with the HUD grants and the Fair Housing Assessment. To view a copy of the City's adopted Citizen Participation Plan, please visit:

http://www.gohammond.com/wp-content/uploads/Departments/Community_Development/pdf/Proposed_Hammond_Citizens_Participation_Plan-English.pdf
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Publication of Data

The City's main method for the dissemination of information is publication to its website at:

<http://www.gohammond.com/departments/planning-and-development/community-development/affirmatively-furthering-fair-housing-data-information/>
(<http://www.gohammond.com/departments/planning-and-development/community-development/affirmatively-furthering-fair-housing-data-information/>)

Publication to the City website allows for quick and efficient distribution of large amounts of information to the broadest possible audience. In May 2016, the City posted a number of resources to its fair housing site, including its last fair housing study, the 2012-2016 Analysis of Impediments to Fair Housing Choice (AI), data and maps provided by HUD for the current study, and a presentation used in public meetings. The web site included a form for interested parties to submit comments to the City in relation to the data presented.

Interested Parties Mailing List

In addition to publishing notice on the City website, the City maintains an Interested Parties List. To be included on the Interested Parties List, please call the City's Community Development Department at 219-853-6358. Persons on the Interested Parties List will be contacted regarding all public participation opportunities related to the covered grant programs and fair housing planning.

Focus Group Consultations with Community Groups

The City held two small group sessions to facilitate input from community organizations and fair housing advocates involved in affordable housing and community development programs in the area. The first focus group was held at City Hall in May, 2016 and the second focus group was held in July, 2016 at Greater Hammond Community Services. Participants included fair housing agencies, including Hammond Human Relations and South Suburban Housing Center, assisted housing providers, social service providers, and an area lender. A summary of all comments received at the public hearings are included as an Appendix to this plan

Public Hearings

The City held three public hearings to facilitate input from residents in the community. Locations were selected for their accessibility and their proximity to the City's identified Racially/Ethnically Concentrated Area of Poverty (RECAP). The first hearing was held at 6 PM on August 23rd at City Council chambers, located at 5925 Calumet Ave. The second meeting was held during the day at 1 PM, September 1st in the community room of the Hammond Public Library, located at 564 State Street. The third meeting was held at 6 PM on September 15th at City Hall. Each hearing was well attended and generated a number of comments from residents, including advocates for persons with disabilities.

Public Comment Period

The City will hold a public comment period commencing September 1st and ending September 30th. All comments received by the City will be summarized in an attachment to the draft plan. Written comments received during the formal comment period and those received orally at public hearings will receive a written response and will be included in the documents submitted to HUD. The City will accept comments throughout the year outside of the public comment periods, but the City cannot guarantee that these comments will be included in the submitted versions to HUD.

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Outreach to Persons of Limited English Proficiency (LEP)

In regard to non-English speaking persons, the City has conducted a Four-Factor Analysis to identify Limited English Speaking Persons (LEP). According to the 2013 5 Year ACS Estimates prepared by the U.S. Census, Spanish speakers account for 89% of LEP persons in the City and were the only group of LEP persons of significant size. Based on this analysis, the City will ensure that outreach materials are available in Spanish and that translators are made available during public meeting and hearings.

Outreach to Persons with Disabilities

The City will work with the Hammond Disabilities Commission and other local agencies to outreach directly to persons with disabilities within the community.

III.2. Provide a list of organizations consulted during the community participation process.

- City Departments and Commissions
 - Hammond Human Relations Commission
 - Hammond Board of Zoning Appeals
 - Hammond Redevelopment Commission
 - Hammond Planning Commission
 - Hammond Disabilities Commission
 - Hammond Building Division

- Other Local Public/Quasi-public Agencies
 - School City of Hammond
 - Work One Northwest Indiana Workforce Board- *planned*
 - North Township Trustee
 - Lake County, Indiana- *planned*
 - East Chicago, Indiana- *planned*
 - City of Gary, Indiana- *planned*
 - Eviction Court- *planned*

- LocalService Providers
 - Member of Homeless Continuum of Care
 - Northwest Indiana Community Action Corporation- *planned*
 - NAACP- *planned*
 - We Care From the Heart
 - Parents as Teachers
 - CR Works

- Affordable Housing Providers
 - Public Housing Authority of Hammond
 - United Neighborhoods, Inc.

- Hammond Elderly Apartments (Section 8) - *planned*
- Renaissance Towers (Section 8) - *planned*
- Mount Zion Pleasant View Manor (Section 8) - *planned*
- Local Fair Housing Agencies / Advocacy Groups
 - South Suburban Housing Center
 - Northwest Indiana Reinvestment Alliance
 - State of Indiana Civil Rights Commission
 - Hammond Human Relations Commission
 - Everybody Counts, Inc. (Disability Advocacy)
- Others
 - Hammond Hispanic Community Committee
 - Greater Northwest Indiana Association of Realtors
 - Chamber of Commerce
 - Local Banks
 - NWI Bankers Community Council - *planned*
 - Lake County Housing Taskforce- *planned*

III.3. How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.

The City received meaningful participation from community organizations and fair housing advocates at the focus group meetings. The City also received a number of constructive comments from residents at all three public hearings.

III.4. Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.

The City has accepted all comments and views received to date through the planning process. The comments below have been summarized into three broad categories of "Issues", "Recommendations", and "Other Comments/Remarks". In addition, the City received a written statement from the South Suburban Housing Center which will be included as an attachment to the plan.

Issues – Housing General

- Children who grow up in Hammond and go to college do not return
- Housing stock is not attractive; too many vacant buildings
- Greater Hammond sees large amounts of overcrowding – 3 or 4 families sharing one unit
- High rates of predatory lending
- How is foreclosures affecting renters?
- There are concerns about administration of Code Enforcement. Many of those cited cannot afford to make repairs, cannot afford fines. Is there a connection between code enforcement and rehabilitation programs offered?
- Feels that non-residents (Illinois residents) are benefitting from city services

Issues – Fair Housing

- South Suburban feels that all forms of discrimination are under-reported. Possible solution is to promote fair housing resources.
- HHC should work with SHHC. Substantial testing recommended for REOs and rentals. South Suburban has a DPA model they are willing to share
- Greater Hammond feels there is a high level of NIMBYism to new affordable housing unless its senior housing
- Northwest Indiana Reinvestment Alliance has a list of properties to do fair housing outreach but encounters a lot of resistance from management companies.
- Renaissance residents call Hammond Human Relations Commission with anonymous tips. Afraid of retribution
- Recommends analyzing mortgage lending and HMDA data, especially for African Americans
- Recommends promoting Hammond's diversity. This should be viewed as an asset.

- People in bad circumstances are being discriminated against
- City is discriminating against landlords renting to Section 8 voucher holders

Issues – Persons with Disabilities / Seniors

- Persons with disabilities experience disparate treatment in housing search/application process. Need emergency housing for persons with disabilities. Persons with disabilities (especially those coming out of shelter system) have extremely hard time finding housing
- Lack of accessible housing exists. Forces people into nursing homes. Existing ADA plan to does not adequately speak of needs in community (access to housing and community facilities)
- City should be given credit for improvements to infrastructure, but there are issues with access to commercial properties (stores)

Issues – Public / Assisted Housing

- Issue with Section 8 voucher holders finding housing within Hammond. Hammond rent standards are based on Gary rents instead of Chicago. Voucher holders have issues finding available housing in both City and County programs.
- Voucher program should not be permanent for persons who are able to work. Would prefer if it was a self-sufficiency program
- Public housing is shutting down two developments (continued redevelopment of Columbia Center). Is concerned about the relocation of these residents
- There is a concentration of publicly assisted housing. Recommends de-concentration, mobility vouchers, and "source of income" protections

Issues – Access to Transportation

- Bussing is needed.
- When public transit funding decisions were made (transfer of bus service to regional provider)? How was impact on protected classes analyzed when transit funding decisions were made? What steps has the City made to recoup assets invested in the bus service? How will people access the South Shore extension?
- Need to support aging in place for seniors. Older housing stock is not accessible to persons with disabilities. Seniors complain about lack of loans and grants. Seniors have to leave their homes when they cannot afford repairs. Need to publicize the availability of any programs and funding available to help seniors age in place
- There is a lack of public transit, especially to employment centers like the hospital and casino. Should conduct a transit study. Cited that it takes a long, circuitous route on bussing to get from Columbia Center to the hospital

Issues – Access to Education

- Education index provided by HUD is a concern. Families will not want to move to Hammond if these statistics are correct. Can HUD provide funding for education / improvements to educational system? Feels there is a need to supplement data
- Need to address the school system. Is Private Schools or more charter schools the answer? What needs to happen to fix?
- School has open boundaries, meaning kids from outside of the City can attend. About 350 kids from outside the City take advantage of this. School feels this leads to new residents.
- School has made large gains in terms of graduation rate in the last few years. Up to 81%; up 20 points from few years back
- Feels a stronger positive relationship/partnership between school and city would be beneficial. Create a forum to promote positive things happening in school
- Safety is a concern. Partnership would help ensure safety of kids

Recommendations

- What makes people want to invest in Hammond? Sees a difference in how properties are cared for in Hammond vs other communities, specifically cited NIPSCO. Everyone needs to pull together to solve problems of this magnitude
- Need to work with local banks to ensure access to credit
- Talk to eviction court
- for education and marketing: use social media; use outside parties
- More data/discussion regarding employment centers would help. More data/discussion regarding housing needs in terms of tenure
- Look into Miller Trust programs
- South Suburban would like to see similar indexes for subsidized housing
- South Suburban recommends looking at race & income index and exposure index
- NWIRA thinks study should focus on Lake County

- Look at trends in Robertsdale
- South Suburban feels there is a lack of counseling availability
- In regard to poor school rankings, Maywood school had effective program that was discontinued.
- Woodmar should be redeveloped into housing
- Would like to see more hotels.
- Would like to see housing on 40 foot lots
- Would like to see more multifamily housing
- Would like to see more middle range/higher end housing

Other Comments / Remarks

- How does one adopt a lot or start a community garden?
- Need more living wages in the City
- Availability of rent to own programs in Hammond
- We Care has prevented a lot of preventions in E Chicago.
- South Suburban feels that there should be more RECAPs in Hammond. Columbia Center?
- Hessville has changed to a "Hispanic" neighborhood
- Hammond is a destination for Hispanic immigrants because of family who have moved to Hammond
- Poor folks are immobilized; HUD stands for Helping You Die
- Concerns over the data quality of ACS data/high margins of error

Assessment of Past Goals, Actions and Strategies

IV.1. Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:

IV.1.a. Discuss what progress has been made toward their achievement.

The City's last fair housing planning document, the Analysis of Impediments to Fair Housing Choice, or AI, was created and adopted in 2012. A copy of the full document can be downloaded from the City's website at:

http://www.gohammond.com/wp-content/uploads/Departments/Community_Development/affh_2016/analysis_of_impediments_to_fair_housing.pdf
(http://www.gohammond.com/wp-content/uploads/Departments/Community_Development/affh_2016/analysis_of_impediments_to_fair_housing.pdf)

In the Analysis of Impediments, the study identified a correlation between protected classes, such as racial minorities and persons with disabilities, and low income. The study concluded that the best way to remove impediments to fair housing choice was making strategic investments in low income neighborhoods:

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

In keeping with this theme, the recommendations of the AI were mostly focused around the theme of revitalizing struggling neighborhoods in order provide their residents better access to opportunity. Below is a summary of the five impediments identified in the AI and an evaluation of the City's efforts to address them.

1. Vacant and abandoned property

Hammond's declining population for the past forty years has had a measurable impact on the number of vacant and abandoned property. Vacant land and building impact housing values, insurance rates, and may create safety concerns. Private investment and neighborhood partnerships that focus on clean up and reinvestment activities should be pursued by City agencies and incorporated into short-term strategies. As such, the AI recommends the following actions to address this impediment:

- Develop vacant property strategies that will identify vacant property, identify the owner, develop a treatment for the property on a case by case basis, place on police watch list (as determined by case), make repairs in case of vandalism or board up as necessary.
- Assess the merits of a Vacant Property Registration Ordinance.
- Institute an aesthetic improvement and maintenance installation regiment for all vacant land and building sites as part of the City's Curb Appeal Program. These treatments can include community gardens, rain gardens, use of native plants, and window board up art.
- Expand the Adopt a Lot Program.

Assessment of Performance

In the last two years, the City adopted three ordinances to specifically address the issue of vacant and abandoned property. These include the Vacant Property Registration Ordinance (#9312 passed in September 2015), Cut and Clean Ordinance (#9249 passed in April 2014), and the Blight Elimination Program (#9275 passed in November 2014).

The City has demolished about 500 structures since 2008, primarily with \$500,000 a year from casino revenues. The City also received funds through the Indiana Hardest Hit Fund Blight Elimination Program (BEP). The Blight Elimination Program, which is administered by United Neighborhoods, Inc. on behalf of the City, is subject to more requirements and has identified a total of twelve blighted residential properties to date. The program is successful in removing the blighted condition from the neighborhood.

Planning and Community Development staff continuously reach out to local organizations through Mayor's Night Out, the Ministerial Alliance, crime watch meetings, annual events, and the HCC, a Hispanic-based community group. A main topic in these outreach efforts is often the re-use of vacant property.

The success of the Adopt-a-Lot Program was limited. The City was able to put seven vacant properties back into use. Two properties were donated to neighborhood churches for use as parking lots. One property was donated to a private homeowner as a side lot. The Curb Appeal Program was considered for Community Development Block Grant (CDBG) funded but was ruled ineligible based on the requirements of the federal program.

Overall, the City has made tremendous strides in removing abandoned properties that have a blighting influence on neighborhoods. However, that success is somewhat tempered by the difficulty experienced in redeveloping these now vacant lots. Many of the lots are too small to redevelop without receiving a variance on minimum lot width.

2. Foreclosed Property

Foreclosures in Hammond have consistently been above 500 for the last three years. The impact of foreclosures can result in significant costs and hardships for those most directly affected. As such, the AI recommended the following actions to address this impediment:

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

Assessment of Performance

The City remained in the midst of the national foreclosure crisis during the development of the last fair housing plan. Foreclosures, while still an issue, do not loom as large of a threat as they did five years ago. The City's main strategy to address foreclosures is the continuation of the NSP program. The City has been able to continue the NSP program beyond its initial allocation by generating nearly \$2.5 million of program income through the resale of rehabilitated properties.

In addition to the NSP Program, the City provides funding for its Homebound program that provides down payment assistance to income eligible homebuyers purchasing a unit in the City. From the inception of the Homebound Program, the City assisted 657 homebuyers in the purchase of a home. These incentives to re-invest in the City have helped counter act the effects of foreclosures within the City.

3. Quality Housing

Census data records the number of homes built before 1980 at over 31,000. The combination of the age of the housing stock, size of older homes and amenities impacts the ability to attract homebuyers that are interested in updated homes. As such, the AI recommended the following actions:

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

Assessment of Performance

The City rehabilitated 38 homes during the 2014 program year. Of those, 12 were fully brought up to code. While the need for rehabilitation remains high, the costs associated with each rehabilitation needs to be weighed against the benefits received when funding new development. For example, if the City can build a new housing unit with a net development subsidy of \$30,000 to \$50,000 (the average price of recent comprehensive rehabilitations), the City should consider pursuing infill development in addition to rehabilitation.

The City has not yet pursued acquisition strategies due to the lack of funds and to its existing inventory of properties. In 2014, the Code Enforcement Department exhausted its funding for housing demolitions.

The Planning and Development Department is working more closely with the other departments to address vacant properties. Code enforcement officers offer property owners information such as brochures for the City's housing rehabilitation programs and a list of contractors in order to bring their property up to code. For vacant properties, the City will cite properties and take necessary actions to secure the property. Whatever costs are incurred are secured with a lien against the property.

4. Homeownership and Financial Literacy

The review of practices in the real estate, insurance, appraisals, and lending institutions identified a few issues involving mortgage lending in relationship to homeownership opportunity for African Americans. The disparity of approval for conventional home loan purchases extended to high income African-Americans at a higher rate than other racial groups. To address this impediment, the AI recommended the following actions:

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

Assessment of Performance

For each of the City's programs related to home buying, including NSP, Homebound, and CHDO properties, buyers are required to complete homebuyer and financial literacy courses. The City partners with Hammond Housing Authority, Consumer Credit Counseling, and Northwest Indiana Reinvestment Alliance to provide education regarding home buying, foreclosures, and basic financial literacy. The City is also working with several financial institutions, including Chase, Sagamore Mortgage, Centier, to provide homebuyer and foreclosing classes and education.

As mentioned above, the City's Homebound Program has assisted 657 new homebuyers since 2008. Of those 307 were Hispanic and 109 were African American. These successes clearly addressed the impediments faced by African American buyers identified in the last plan. However, in evaluating the geographic distribution of African American participants in the Homebuyer program, there were very few buyers who purchased a home in the North Hammond and Robertsdale neighborhoods.

5. Visitability

While not listed as an impediment, the AI recommended that the City develop a written Visitability Policy to make all or a significant percentage of units visitable. Visitability allows mobility impaired residents to have the option of visiting families, friends, or places of interest without the assistance of others. The term Visitability includes at least one entrance at grade level that is approached by an accessible route such as a sidewalk, and doorways on the first floor that provide at least 32 inches of clearance.

Assessment of Performance

During the course of the term of the AI, the City did not adopt a formal Visitability policy. The State of Indiana has formalized Visitability Standards for One and Two Family Dwellings and Townhouses (Article 27 of Title 675 of the Indiana Administrative Code). However, the standards that are specified are not mandatory unless a person contracts with a designer or builder for construction of a visitability feature. Given the existence of this standard at the State level, the City can choose to incorporate these standards for specific developments without adopting its own standard.

The City has supported visitability and accessibility of single family housing through its Disabled Ramp Program.

IV.1.b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences); and

Overall, the City has succeeded in addressing the goals described in its previous fair housing plan. However, the limited amount of resources available to the City is not sufficient to address all of the needs of the community.

1. Vacant and abandoned property

The City has succeeded in eliminating vacant and abandoned property. As stated above, the City demolished about 500 structures since 2008. However, the City has faced challenges in finding redevelopment opportunities for the vacant land. A program designed specifically to address this issue, the Adopt-a-Lot Program, had only limited success in disposing of vacant property. Its still too early to gauge the success of the three new ordinances that address the issue of vacant and abandoned property.

2. Foreclosed Property

Foreclosures, while still an issue, do not loom as large of a threat as they did five years ago. The City's main strategy to address foreclosures is the continuation of the NSP program. The City has been able to continue the NSP program beyond its initial allocation by generating nearly \$2.5 million of program income through the resale of rehabilitated properties.

3. Quality Housing

The City rehabilitated 38 homes during the 2014 program year. Of those, 12 were fully brought up to code. The City has not yet pursued acquisition strategies due to the lack of funds and to its existing inventory of properties.

4. Homeownership and Financial Literacy

The City partners with Hammond Housing Authority, Consumer Credit Counseling, and Northwest Indiana Reinvestment Alliance to provide education regarding home buying, foreclosures, and basic financial literacy. The City provided CDBG funds to Consumer Credit Counseling and the Housing Authority to expand their offerings but the funds were not needed. Several financial institutions, including Chase, Sagamore Mortgage, Centier, also provide homebuyer and foreclosing classes and education. As mentioned above, the City's Homebound Program has assisted 657 new homebuyers since 2008. Of those 307 were Hispanic and 109 were African American. These successes clearly addressed the impediments faced by African American buyers identified in the last plan.

5. Visitability

During the course of the term of the AI, the City did not adopt a formal Visitability policy. The City has supported visitability and accessibility of single family housing through its Disabled Ramp Program.

IV.1.c. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.

As stated above, the can better stabilize minority neighborhoods if it emphasizes the redevelopment of vacant lots. While the vacant lot has less of an adverse impact on the neighborhood than a dilapidated structure, a new housing unit on the vacant lot would truly be an asset. The issue at hand is that redevelopment efforts in these neighborhoods will require a development subsidy, meaning the market price of the new unit is less than the cost necessary to construct the unit. Going forward, both rehabilitation and redevelopment must be used to provide quality housing in the City. In addition, the City may need to re-evaluate the condemnation process to see if there are cases where rehabilitation would be more cost effective than demolition.

The City needs to continue and expand its successful Homebound program. The Homebound program has helped hundreds of low-income, minority families purchase their own home. This gives assisted families a chance to build wealth through equity and provides a secondary benefit to the stability of the neighborhood. Potential actions to expand Homebound include leveraging additional grant funding, closely aligning Homebound with existing financial literacy and counseling programs, and adding components to help more families prepare and save for homeownership such as independent development accounts (IDAs).

IV.1.d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

Based on an evaluation of past performance, the City's proposed goals in this current plan place a bigger emphasis on redevelopment or vacant lots and will try to expand the success of its homebuyer programs that provide homeownership opportunities to low-income minority families. The plan also calls for closer coordination between fair housing providers to make the most efficient use of limited resources.

Fair Housing Analysis

Fair Housing Analysis > Demographic Summary

V.A.1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).

Regional Trends and Patterns

For the purposes of this study, HUD considers the City of Hammond to be part of the Chicago-Naperville-Elgin metropolitan region. This large metro region spans three states and includes the following fourteen counties:

- | | | |
|--------------------|--------------------|--------------------|
| Cook County, IL | Lake County, IL | Lake County, IN |
| DuPage County, IL | Grundy County, IL | Porter County, IN |
| Will County, IL | McHenry County, IL | Jasper County, IN |
| Kendall County, IL | Kane County, IL | Newton County, IN |
| Dekalb County, IL | | Kenosha County, WI |

The following trends and patterns emerge when analyzing the Chicago metro region data in Table 1:

- The region is predominantly White, Non-Hispanic. This segment accounts for 55 percent of the overall population. The region has grown more diverse in terms of race and ethnicity.
- Hispanic residents account 20.7% of the population and comprise the second largest segment.
- Black, Non-Hispanic residents account for 17 percent of the population and comprise the third largest segment.
- Asian/Pacific Islander Non-Hispanic residents account for 5.6 percent of the population and comprise the fourth largest segment.

The data for the Chicago metro region in Table 2 shows the following:

- Overall, the regional population has grown 16% from 1990 to 2010. Over that period of time, the region has grown more diverse in terms of race and ethnicity. White Non-Hispanic residents accounted for 67% of the population in 1990. This percentage dropped to 55 percent by 2010. The number of White Non-Hispanics decreased by 282,162 during this period and represents the only segment of the population that experienced a decrease.
- The Hispanic population more than doubled, growing from 895,156 in 1990 to 1,957,080 in 2010. This represents an increase of 1,061,924 residents.
- The Asian/Pacific Islander Non-Hispanic population also doubled, growing from 247,669 to 528,832. This represents an increase of 281,163 residents.
- The Black, Non-Hispanic population also increased but not as quickly. This segment grew by 84,916, increasing from 1,528,728 to 1,613,644. This represents an increase of six percent over the 1990 population.

Hammond in a Regional Context

Hammond is one of a number of older communities in the Chicago metro area that has experienced a long, slow decline as upper income households have moved further from the central core. Since the 1970's, the heavy manufacturing industry in the area has reduced its workforce by half. The City's population declines have mirrored the declines in manufacturing. In 1970, the City population stood at 107,983. According to the 2010 census, the population was 80,830.

Population losses have been offset by the increase of lower-income families. With the exception of Chicago, new housing development continues to be concentrated in the communities on the outskirts of the metropolitan region. Older communities closer to Chicago, especially those in southern Cook County and northern Lake County, including Hammond, are not experiencing large levels of redevelopment of housing.

This lack of private investment within the City's neighborhoods has resulted in a disparity of opportunities. Hammond is one of a number of older suburban communities of Chicago metropolitan area that has experienced a long, slow economic decline.

City Level Trends and Patterns

HUD Table 1 presents data from the 2010 U.S. Census. Based on this data, the City's population is a plurality of racial and ethnic groups, meaning that a no single racial or ethnic group comprises more than half of the population.

- White, Non-Hispanic population was the largest group, accounting for 41.5 percent of the City population.
- Hispanics accounted for the second largest segment, representing 34 percent of the population.
- Black, Non-Hispanic residents accounted for the third largest segment, representing 22 percent of the population.
- Multi-racial, Asian, Pacific Islanders, Native Americans, and Other Non-Hispanic groups accounted for the remaining 2.5 percent.

HUD Table 2 contains U.S. Census data from 1990, 2000, and 2010. The City's population has changed significantly from 1990 to 2010:

- Overall, the population decreased by four percent from 1990 to 2010, decreasing from 84,236 to 80,830. This continued a downward trend since 1970, when the City population stood at 107,983.
- White Non-Hispanic population decreased by almost half, decreasing from 66,029 to 33,534. In 1990, this segment accounted for 78 percent of the overall population. As of 2010, this was still the largest segment of the population. However, it only accounted for 41.5 percent.
- The Hispanic population grew by 17,643, increasing from 9,920 to 27,563. The 2010 population represents an increase of 178% over the 1990 population.
- The Black Non-Hispanic grew by 9,442, increasing from 7,626 to 17,568. The 2010 population represents an increase of 130% over the 1990 population.

County Level Trends and Patterns

When viewing data for Northwest Indiana, which for the purposes of this study includes Lake County and Porter County, the following trends emerge:

- Overall, the population of Northwest Indiana has grown from 604,526 in 1990 to 660,348 in 2010. This represents an increase of 9 percent.
- The majority of population growth (63%) occurred in Porter County, while Lake County accounted for 37% of the growth.

- The three cities located in the northern portion of Lake County, including Hammond, East Chicago, and Gary, all experienced population loss. Taken together, these three communities form the "Central" portion of the Gary-Hammond PMSA. Gary lost 31 % of its population while East Chicago lost 12%. Taken together, these three cities lost 43,952 residents. By comparison, the areas outside these three cities added 99,774 residents, an increase of 27%, over the same period of time.

Over the last six years, new housing development and investment is primarily located in the southern portion of Lake County. Crown Point, St. John, Merrillville, Cedar Lake, and Winfield account for 75% of the new housing units authorized by permits reported from 2010-2015. Conversely, Hammond, East Chicago, Whiting, and Gary accounted for only 5% of the permit activity.

NAME	1 unit	2 unit	3-4 unit	5+ unit	Total
Lake Station	6	-	-	-	6
New Chicago	11	-	-	-	11
Gary	20	-	-	-	20
Highland	21	-	-	6	27
Griffith	41	6	-	-	47
Whiting	24	-	-	24	48
East Chicago	22	2	3	57	84
Dyer	91	-	-	-	91
Hammond	14	24	64	-	102
Hobart	103	-	-	-	103
Munster	111	-	-	-	111
Lowell	250	-	-	-	250
Schererville	216	12	32	30	290
Winfield	310	10	125	-	445
Cedar Lake	487	-	-	-	487
Merrillville	122	74	-	485	681
St. John	897	-	6	-	903
Crown Point	1,034	4	43	42	1,123
TOTAL	3,780	132	273	644	4,829

V.A.2. Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.

The City reviewed household tenure data by race and ethnicity provided in the 2014 ACS. Overall, the homeownership rate within the City is 60%. This rate ranges from a low of 9% in the City's one RECAP (Census Tract 206) to 80% (Census Tract 219). There is a large discrepancy between the homeownership rates between White Non-Hispanics and African Americans. The homeownership rate for White Non-Hispanics is 76% while the homeownership rate for African Americans is only 23%. The rate of 64% for Hispanics is slightly higher than the average rate.

There is a correlation between high homeownership rate and a high proportion of White Non-Hispanic households. Five census tracts have a homeownership rate at or over 75%. Each of these five tracts are majority White Non-Hispanic.

The two tracts with the lowest homeownership rates are Census Tract 206 (9%) and 207 (38%). Census Tract 206 is the City's only Racially/Ethnically Concentrated Area of Poverty (RECAP). Both of these tracts have high Black Non-Hispanic populations (50 and 51%, respectively). The Hispanic populations for the two tracts are 17 and 25%, respectively.

Fair Housing Analysis > General Issues

V. Fair Housing Analysis > B. General Issues > Segregation/Integration

V. Fair Housing Analysis > B. General Issues > Segregation/Integration > Analysis

V.B.i.1. Analysis

V.B.i.1.a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

For the purposes of this study, HUD has selected the dissimilarity index as a statistical tool used to measure the degree of community-level segregation. The dissimilarity index (or the index of dissimilarity) represents the extent to which the distribution of any two groups differs across census tracts or block-groups.

The values of the dissimilarity index range from 0 to 100, with a value of zero representing complete integration between the racial groups in question, and a value of 100 representing complete segregation between the racial groups. HUD interprets an index below 40 as "low" segregation, a score between 40 and 54 as "moderate" segregation, and a score above 54 as "high" segregation.

Table 3 above presents dissimilarity indices for both the City and the Chicago metropolitan region for the last three Census data sets: 1990, 2000, and 2010. For each data set, a dissimilarity index is provided for Non-White to White, Black to White, Hispanic to White, and Asian/Pacific Islander to White. A discussion for the region and the City analyzes the data presented in Table 3.

Regional Housing Patterns vs. City Housing Patterns

Based on the information in Table 3, the City is less segregated than the region as a whole by each measure in 2010, with the exception of Asian/White. With an index of 52.2, segregation of Asian and White residents in Hammond would be considered moderate. For the most current year of data, the overall Non-White/White and Hispanic/White indices for the City are less than half of the region. The Black/White index for the City is also significantly lower than the region, 44.4 and 77.8, respectively.

High Levels of Segregation

Based on the information in Table 3, the highest levels of segregation are for Black/White at the regional level (77.8), followed by Hispanic/White at the regional level (58.1), and Non-White/White at the regional level (57.5). Based on HUD's interpretation of these indices, all three of these qualify as "high" segregation. Within the City, the segregation of Asian and White has the highest index at 52.2 which is considered moderate. Black and White residents have the second highest index at 44.4 which is considered moderate.

V.B.i.1.b. Explain how these segregation levels have changed over time (since 1990).

In 1980, Chicago was one of the most segregated metropolitan statistical areas in the nation, ranked as highly segregated on all five measures of racial segregation. [1]

Segregation within the region remained in the "high" segregation category through 2010 for Non-White to White, Black to White, and Hispanic to White, but the indices are clearly trending downward. The Black to White remains the highest index in all years, almost 20 points higher than the next closest index.

Hammond has become more diverse and integrated over the last twenty years. Based on the data in HUD Table 2, Hammond is becoming a predominantly Hispanic community. The one exception is the Asian / White measure, which jumped dramatically from 15.7 in 2000 to 52.2 in 2010. Based on a review of 2010 Census data, the City feels this measure increased due to a large Asian student population at Purdue-Calumet (discussed in more detail below).

[1] Wilhelmina A. Leigh, "Trends in the Housing Status of Black Americans Across Selected Metropolitan Areas".

V.B.i.1.c. Identify areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

Segregation becomes more apparent at the regional level when racial categories are depicted on a map at the census tract and block group levels. In addition to analyzing the HUD-provided Maps 01 and 02 that presents the information in a dot-density format, the City mapped race and ethnic population data from the 2010 Census in a pie-chart format for both the region and the City (ATTACHMENTS 1 and 2). The block groups on the map are also shaded based on its percentage of minority residents. Block groups with a minority population greater than 51% are shaded grey.

When looking at data on the regional level, clear racial and ethnic patterns emerge. Black, Non-Hispanic populations are clustered to the south side of Chicago, Hispanics are clustered to the west side of Chicago, and White Non-Hispanics populate the suburbs further from the city center. Beyond the overall pattern, it should be noted that there are very few pie charts that are evenly divided among races. For most block groups, one race clearly outnumbers the others. Some of the few exceptions to this pattern are the central areas of Chicago and the areas surrounding Hammond.

There are clear patterns in the areas immediately adjacent to Hammond, including southern Cook County to the west, Gary and East

Chicago to east, and Munster, Highland, and Griffith to the south.

To the west, portions of Chicago immediately adjacent to Hammond are an even mix of White Non-Hispanic and Hispanic. Burnham and Calumet City and Lansing have a mix of Black Non-Hispanic, White Non-Hispanic, and Hispanic. However, as one travels further west into Illinois, the next group of communities, including South Holland, Riverdale, Dolton, and Harvey, are overwhelmingly Black Non-Hispanic and very few White, Non-Hispanic.

To the east, East Chicago is overwhelmingly Hispanic and Black Non-Hispanic. Whiting is situated between the northern portion of Hammond and East Chicago. In contrast to East Chicago, Whiting has a very small Black Non-Hispanic population. With the exception of its southeastern corner, Gary is predominately Black Non-Hispanic.

To the south of Hammond lies Munster and Highland. Both Munster and Highland have a significant lack of African American populations and, relative to Hammond, a small Hispanic population. A major interstate, I-94, runs along the southern portion of Hammond and serves as a fairly accurate demarcation between the more diverse neighborhoods to the north and the less diverse neighborhoods to the south.

Hammond itself is relatively well integrated. HUD has not defined or set a standard for what constitutes an integrated neighborhood. For the purpose of this analysis, the City will define "integrated" as any census tract where one race or ethnicity does not account for more than 60 percent of the occupied housing units, based on 2014 ACS 5 Year estimates. This standard was selected to reflect the percentage of minority households within Lake County which is approximately 40% of the overall households. Using this standard, only 26 of the 117 census tracts (22%) within Lake County are integrated. Of these, 14 are located within Hammond. East Chicago, Merrillville, Gary and Griffith also had at least one tract that met this standard. Conversely, there are 33 census tracts within the County where one race or ethnicity account for 90% or more of the households. Only five of the census tracts in Hammond did not meet this standard. In Census Tract 208, African Americans account for seventy-one percent of households. The other four tracts (201, 202, 210, and 215) have White Non-Hispanic percentages ranging from 61% to 69%.

The one outlier is the Asian/White segregation. In reviewing the 2010 Census data, the City determined that 46% of the Asian population was aged 18 to 24. This is distinct from all races, where 18 to 24 year olds only accounted for 10% of the population. The City also determined that two census block groups, 209-001 and 209-003, had the only large concentrations of Asians. Purdue Calumet University is located near both block groups, so it may be surmised based on the location and the age of the Asian population that high measure of segregation is at least partly due to Asian college students attending Purdue Calumet.

V.B.i.1.d. Consider and describe the location of owner and renter occupied housing in determining whether such housing is located in segregated or integrated areas.

Using the standard of integration discussed above, there are 14 integrated census tracts within the City. The homeownership rates vary widely among these 14 tracts, from 9% (Census Tract 206) to 80% (Census Tract 219).

There is a correlation between high homeownership rate and a high proportion of White Non-Hispanic households. Five census tracts have a homeownership rate at or over 75%. Each of these five tracts are majority White Non-Hispanic.

The two tracts with the lowest homeownership rates are Census Tract 206 (9%) and 207 (38%). Census Tract 206 is the City's only Racially/Ethnically Concentrated Area of Poverty (RECAP). Both of these tracts have high Black Non-Hispanic populations (50 and 51%, respectively). The Hispanic populations for the two tracts are 17 and 25%, respectively.

V.B.i.1.e. Discuss how patterns of segregation have changed over time (since 1990).

In reviewing the raw data provided by HUD, the City identified a pattern of white flight between the 1990 and 2000. In each of the 17 census tracts in Lake County where the African American population increased by more than 10%, the White population decreased. Of these 17 tracts, five are within Hammond (206, 208, 209, 2011, and 218). In each of the 10 census tracts in Lake County where the Hispanic population increased by more than 10%, the White population decreased. Of these 10 tracts, seven are within Hammond (201, 203, 204, 207, 214, and 216).

V.B.i.1.f. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future.

While Hammond is statistically well integrated at the present time, the City will become more segregated if current demographic trends continue. According to HUD Table 2, the City's White Non-Hispanic population was reduced by nearly half (32,495 residents) from 1990 to 2010. Over that same period, Hispanics added 17,643 residents and Black Non-Hispanics added 9,942 residents.

V. Fair Housing Analysis > B. General Issues > Segregation/Integration > Additional Information

V.B.i.2. Additional Information

V.B.i.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.

As part of the analysis of segregation and integration, the City also mapped the race and ethnicities of elementary school children attending the School City of Hammond school district for the 2014-2015 academic year provided by the State of Indiana Department of Education. Based on this information, the schools at the elementary schools are more segregated than the population as a whole. Maywood and Lafayette have two of the three highest concentrations of African American children (73% and 53%, respectively) and the lowest concentration of White children (2% and 3%, respectively). Conversely, Franklin has the lowest percentage of African American children (5%) and the highest percentage of White children (29%).

V.B.i.2.b. The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and mobility options for protected class groups.

The City also examined participation by race and ethnicity in its Homebound down payment assistance program. The City mapped the locations of homes purchased by each participant based on their race and ethnicity. Of the African American buyers participating in the program, only 2 purchased homes in North Hammond and no buyers found a home in Robertsdale (see ATTACHMENT #3). The City is working to outreach to participants in the program to see if they feel any steering, discrimination or disparate treatment was experienced.

V. Fair Housing Analysis > B. General Issues > Segregation/Integration > Contributing Factors of Segregation

V.B.i.3. Contributing Factors of Segregation

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

- Lack of private investments in specific neighborhoods
- Private discrimination

V.B.i.3. Contributing Factors of Segregation - Other

Based on the data examined, patterns of housing segregation exist at both the regional and City level. Statistically, the City is more integrated than the region at the moment. If demographic trends continue, Hammond will become less integrated as the White Non-Hispanic population continues to decrease and the two largest minority populations, Hispanic and Black Non-Hispanic, continue to increase.

In addition to the lack of private housing investment within the City and potential private discrimination, the legacy of past housing patterns continues to slow the integration of specific neighborhoods. When discussing the lack of African American homebuyers buying homes in Robertsdale, several long time African American City residents stated that they were not surprised by the numbers.

V. Fair Housing Analysis > B. General Issues > R/ECAPs

V. Fair Housing Analysis > B. General Issues > R/ECAPs > Analysis

V.B.ii.1. Analysis

V.B.ii.1.a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction.

HUD defines **Racially or Ethnically Concentrated Areas of Poverty (R/ECAP)** as neighborhoods that meet two conditions:

- a poverty rate that exceeds 40% or is three times the average tract poverty rate for the metro/micro area; and
- a non-white population of 50 percent or more.

Per HUD provided data, the City of Hammond has one census tract (206) that qualifies as a Racially/Ethnically Concentrated Area of Poverty (R/ECAP). The area is mainly composed of the downtown business district with some housing along the fringes. The area is bounded by Stateline Avenue (West), Calumet Avenue (East), the Grand Calumet River (North) and Ogden Street /Douglas Street/Kane Street (South). See Attachment #04 for a map of the tract with land uses.

The area has limited housing. The only housing within the census tract are three large subsidized housing developments clustered on the north side and some single family housing along the fringes of the tract. The three subsidized housing developments are Turner Park/Hubert Humphrey (PHA), Renaissance Towers (Project Based Section 8) and Hammond Elderly Apartments.

The Hammond RECAP does have some promising assets. As stated above, the census tract contains the downtown commercial area which is an employment center and the location of a large grocery. The area is also home to Franciscan St. Margaret Health Hospital and the First Baptist Church have a large, beneficial presence in the area. The two large subsidized housing developments are located within a mile of Hammond South Shore Train Station at 4531 Hohman Avenue which provides service to employment opportunities within downtown Chicago.

In one sense, the opportunities for the RECAP are closely tied to the fate of the downtown commercial area. In recent years, the City has made significant investments in the area and private companies are following suit.

When looking at the data on a regional level, most of the RECAPs are clustered in and around the southern and western portions of Chicago. RECAPs are located to the east of Hammond as well, including Gary and East Chicago. According to HUD Table 4, the racial composition of the regional RECAPs is heavily Black, Non-Hispanic. Almost 3 of every 4 residents within the regional RECAPs are Black, Non-Hispanic. Hispanic residents also have a significant presence, comprising almost 19%. White Non-Hispanics, who account for 55% of the region's overall population, account for only 5% of the RECAP population.

V.B.ii.1.b. Which protected classes disproportionately reside in R/ECAPs compared to the jurisdiction and region?

In terms of demographics, the area's population is predominantly Black Non-Hispanic (52%), followed by White Non-Hispanic (28%), and Hispanic (18%). Of the 1,118 households, 367 are families (33%), 65% are householders living alone.

V.B.ii.1.c. Describe how R/ECAPs have changed over time (since 1990).

When reviewing the demographics for the RECAP from the 1990 to 2010 U.S. Census, a number of trends emerge. First off, the poverty rate has remained consistently high. In 2010, this area had the highest poverty rate in the City at 67%. Overall, the area's population decreased by 992, a drop of 31%, and the areas' number of single family units decreased by 336 (46%), primarily from the demolition of blighted homes that had fallen into disrepair. In 2010, 154 of the total units (13%) were reported as vacant. The population decline, however, was not consistent among racial and ethnic categories. White Non-Hispanic population decreased by 1,183 (65%) while the Black Non-Hispanic actually increased by 383 (48%). These trends fit within the "white flight" narrative.

Census Tract 206	1990	2000	2010
Population	3,247	2,290	2,255
White Non-Hispanic	1,817	837	634
Black Non-Hispanic	791	1,064	1,174
Hispanic	584	336	411
Asian		10	6
Other/Multiracial	10	41	25
% Minority	44%	63%	72%
Families	729	426	440
Households	1464	1031	1,043
Poverty Rate	59%	51%	67%
Median Family Income (%)	17%	32%	13%
Single Family Units	726	380	390
Housing Units	1,515	1,147	1,197
Vacant Units	126	50	154

V.B.ii.2. Additional Information

V.B.ii.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.

In a November 2013 report entitled "Fair Housing and Equity Assessment: Metropolitan Chicago", the Chicago Metropolitan Agency for Planning (CMAP) summarized the root causes of the region's RECAPs and the effects on the residents in terms of access to opportunity.

While the look and feel of RECAPs varies to some degree across the region, they tend to be clearly identifiable, often avoided, areas of severe isolation which are largely void of the community resources enjoyed by the rest of society: "the physical landscape of such neighborhoods often consists of abandoned buildings, poor quality housing stock, unclean streets, and low quality municipal services—particularly schools and recreational facilities. A lack of access to mainstream financial services is also a consistent characteristic of concentrated impoverished communities." Those who can avoid these areas entirely do so, and are therefore not confronted with the inequities faced by those who live there. This natural proclivity is damaging in that it often leads to complete disinvestment from RCAPs and entrenched isolation of RCAP residents.[i]

[i] "Fair Housing and Equity Assessment: Metropolitan Chicago"; Chicago Metropolitan Agency for Planning (CMAP); November 2013; page 34.

V.B.ii.2.b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.

The City did not use additional information apart from the information and data presented above.

V. Fair Housing Analysis > B. General Issues > R/ECAPs > Contributing Factors of R/ECAPs

V.B.ii.3. Contributing Factors of R/ECAPs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

V.B.ii.3. Contributing Factors of R/ECAPs - Other

The segregation patterns in Chicago metropolitan area have a long history. The roots of the current housing patterns have been well documented and challenged. Fifty years ago, Martin Luther King, Jr. led the Chicago Freedom Movement in an effort to push for open housing and an end to the slum conditions in Chicago. Of his experience in the Chicago area, King stated "I've been in many demonstrations all across the south, but I can say that I have never seen, even in Mississippi and Alabama, mobs as hostile and as hate-filled as I'm seeing in Chicago."

Much has happened in the past fifty years, but many of the housing patterns in place then are still in place now. And many of the causes are similar in nature. In a 2008 testimony given to the National Commission on Fair Housing and Equal Opportunity, the South Suburban Housing Center found that the causes of the segregation patterns in the southern suburbs of Cook County were similar to the white flight experienced by Chicago south side neighborhoods. While the earlier episodes of white flight from the Chicago neighborhoods were driven by more blatant forms of discrimination, such as steering and blockbusting, the more current forms of white flights are more subtle and harder to detect.

The 2013 CMAP report cited earlier found that economics could not account for the racial segregation patterns in the region. Instead, one of the primary driving factors for the housing patterns in Chicago region was the willingness, or lack thereof, of White Non-Hispanics to move into areas with significant minority populations. In addition, the report found that Hispanics and Asians have similar attitudes to African American neighborhoods. When faced with such a weak demand in a market, the prices of those areas will fall and create economic burdens on a neighborhood and its residents. The end result are neighborhoods with higher minority concentrations and fewer economic opportunities.

Hammond's RECAP fits within this same pattern. The RECAP has a large Black, Non-Hispanic population coupled with high levels of poverty. The RECAP is also the location of a cluster of publicly assisted housing developments. It is clear that the site selection policies of the past have contributed to the formation of the RECAP.

The lack of private investment also contributed to the concentrations of poverty within the RECAP. As the area's population declined, up to a third of the single family housing fell into disrepair, became blighted, and was removed from the housing stock. Redevelopment of many of the vacant single family properties is complicated by the small lot sizes that do not conform to the minimum lot widths called for in the zoning ordinance.

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Analysis

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Analysis > Educational Opportunities

V.B.iii.1. Analysis

V.B.iii.1.a. Educational Opportunities

V.B.iii.1.a.i. Describe any disparities in access to proficient schools based on race/ethnicity, national origin, and family status.

The Proficient Schools Index in HUD Table 12 is based on 2012 data sources including Great Schools, Common Core of Data, and the School Attendance Boundary Information System (SABINS). The information is based on 4th grade state test scores at the elementary school level. Higher scores indicate a higher school quality. Based on this data, Whites (62) and Asians (60) at the regional level had the highest access to school quality. All races in Hammond (9 to 14) had the lowest amount of access to school quality.

In the course of community meetings, several people, including representatives from the School City of Hammond questioned this data and provided supplemental data to speak to the quality of the local schools. In the second public hearing and in a follow up consultation, representatives from the schools presented data showing that Hammond school students were performing on average or slightly better than average on standardized testing:

- The majority of students meet or exceed the NWEA national norms for Mathematics & Reading in grades 3-10.
- Graduating seniors exceed the State College and Career Readiness indicator by 4.2%.
- The graduation rate has increased to 81%.
- Schools achieved an 81% pass rate for IRead.
-

The school district also highlighted several successful programs and initiatives, including:

- Early College Program (earn both a high school diploma and Associate's Degree)
- JROTC Program
- Hammond Academy for the Performing Arts
- Advanced Placement and Dual Credits
- SOAR Program for High Ability students
- Nationally recognized robotics team

V.B.iii.1.a.ii. Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.

Attendance and standardized test data for elementary schools in the School City of Hammond district was examined (source: 2015-2016 Indiana Department of Education data). While the school data displayed residency patterns, most between White and African American populations, there was no corresponding pattern among the test scores. 2014/2015 Spring ISTEP scores ranged from 33.8 to 54.8.

School	Hispanic	Black	White	Multi	Other	Total	Pct Hisp	Pct White	Pct Black
Maywood	88	322	11	23	0	444	20%	2%	73%
Kenwood	91	169	33	15	0	308	30%	11%	55%
Lafayette	209	285	15	28	2	539	39%	3%	53%

Obannon	180	267	105	26	3	581	31%	18%	46%
Wallace	212	205	21	18	0	456	46%	5%	45%
Hess	245	214	143	21	3	626	39%	23%	34%
Jefferson	183	117	117	25	0	442	41%	26%	26%
Edison	353	188	122	45	4	712	50%	17%	26%
Morton	257	129	121	36	2	545	47%	22%	24%
Harding	316	163	174	37	2	692	46%	25%	24%
Columbia	167	58	24	19	0	268	62%	9%	22%
Irving	494	65	38	19	2	618	80%	6%	11%
Lincoln	470	52	82	40	1	645	73%	13%	8%
Franklin	208	16	93	6	1	324	64%	29%	5%

School	Free	Reduced Paid	English	Non English	2014/15 Spring ISTEP	
Maywood	361	19	64	21	423	33.8
Kenwood	192	7	109	29	279	35.6
Lafayette	490	14	35	70	469	44.1
Obannon	467	41	73	32	549	41.4
Wallace	362	20	74	89	367	40
Hess	421	48	157	45	581	36.2
Jefferson	232	37	173	33	409	44.7
Edison	537	60	115	99	613	45.7
Morton	342	36	167	68	477	46.9
Harding	467	44	181	84	608	39.9
Columbia	232	13	23	65	203	54.8
Irving	498	14	106	182	436	42.6
Lincoln	451	36	158	154	491	51.8
Franklin	212	20	92	45	279	39.9

V.B.iii.1.a.iii. Describe how school-related policies, such as school enrollment policies, affect a student's ability to attend a proficient school Which protected class groups are least successful in accessing proficient schools?

School attendance is based on boundaries for each elementary school, middle school, and high school. It is the district policy that every student shall attend the elementary school, middle school, or high school assigned to his/her residential district. There are five exceptions that allow transfers, including for students with special needs. However, as noted above, there is not a clear geographic pattern of school proficiency within the City.

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Analysis > Employment Opportunities

V.B.iii.1.b. Employment Opportunities

V.B.iii.1.b.i. Describe any disparities in access to jobs and labor markets by protected class groups.

The Labor Market Index, provided on HUD Table 12, is based on 2006-2010 American Community Survey (ACS), which analyzed employment, labor force participation, and educational attainment at the census tract level. This information is also presented in a graphic in Attachment #6. A higher score (the further to the right on the graphic) indicates a higher labor force participation rate. Whites (68) and Asians (72) at the regional level scored highest. All races in Hammond (21 to 26) except Asian (37) were on the lower side of the spectrum. At the regional level, Black Non-Hispanic (27) and Hispanic (42) in region also were on the lower side of the spectrum.

At the community meetings, it was stated multiple times that the lack of public transportation severely affected those without a car or other means of transportation. The lack of public transit options has an adverse effect on persons with disabilities who rely on public transit. It also has a disparate impact on low income minority households who rely on public transit.

V.B.iii.1.b.ii. How does a person's place of residence affect their ability to obtain a job?

The Jobs Proximity Index, provided on HUD Table 12, measures distance to job locations at the neighborhood level by Census block group. The information is also presented in a graphic in Attachment #7. A higher score (further to the right on the graphic) indicates better access to employment opportunities. On this index, all but 2 races and ethnicities at both the local and regional level are clustered in the range of 46-54. Asians (69) and Native Americans (59) in Hammond have significantly higher scores, but too much statistical meaning cannot be placed on these outliers given the small populations of Asians and Native Americans within Hammond.

Overall, Hammond is well situated to many large employment centers within the region. Most notably, the City has a commuter train station that provides convenient access for City residents with the downtown business district of Chicago. Plans are currently underway to extend the train line south and also provide residents better access to employment opportunities.

V.B.iii.1.b.iii. Which racial/ethnic, national origin, or family status groups are least successful in accessing employment?

When comparing the HUD indices between the City and the region, the City scores lower on the Labor Market Index regardless of race or ethnicity. In this regard, the issue of accessing employment opportunities is more geographic in nature rather than disparate access based on protected classes.

In terms of family status (families with children), it should be noted that single parent families are more likely to be in poverty, which is an indicator the household is not successful in accessing sufficient employment. The presence of children and the number of parents within are strong determinants on the poverty status of a family. Single-parent households with children under 18 years are much more likely to be in poverty than married-couple families with children or families with children under 18. According to the 2014 ACS, single parent households with children accounted for 59% of the families in poverty in Hammond. Among African American households in poverty, 86% are single parent households with children under 18. Based on this information, any type of self sufficiency and anti-poverty programs should be designed to support and assist single parent families with children.

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Analysis > Transportation Opportunities

V.B.iii.1.c. Transportation Opportunities

V.B.iii.1.c.i. Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.

The Transportation Cost Index, provided on HUD Table 12, is based on the 2008-2012 Location Affordability Index (LAI). The information is also included in a graphic in Attachment #8. This index is very specific in that it is focused on a specific type of household as opposed to the population as a whole. This index only includes data for 3-person single parent households at 50% of median income for renters. A higher score (further to the right on the graphic) indicates a lower cost of transportation. Transportation costs may be low for a range of reasons, including greater access to public transit, the density of housing, and the availability of jobs close to home.

All races in Hammond scored in the 50s, indicating a slightly lower than average transportation cost (79-80) to the nation as a whole. Race and ethnicities at the regional level are much higher, indicating lower transportation costs. This data corresponds with the lack of public transportation within Hammond compared to the remainder of the region. At the regional level, Whites are at the lower end of this index which would reflect the higher concentration of Whites at the fringes of the metropolitan area where there are fewer public transit options.

The Transit Index, provided on HUD Table 12, is based on data the 2008-2012 Location Affordability Index (LAI). The information is also included in Attachment #9. This index is very specific in that it is focused on a specific type of household as opposed to the population as a whole. This index only includes data for 3-person single parent households at 50% of median income for renters. A higher score (further to the right on the graphic) indicates this type of household is more likely to use public transit. All races in Hammond (79-80) except Asian (72) are clustered around 80. Race and ethnicities at the regional level are also clustered around 80 but have greater variances between each group. Whites are at the lower end of this index which would reflect the higher concentration of Whites at the fringes of the metropolitan area where there are fewer public transit options.

V.B.iii.1.c.ii. Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?

A lack of public transportation can become a fair housing issue when members of a protected class, such as persons with disabilities and racial minorities, are disproportionately represented among transit users and are limited in their housing choice. Based on a review of 2014 ACS household income data, presented below and in Attachment #12, African American households are more likely to be disproportionately affected by the lack of public transportation. Thirty four percent of African American households earn less than \$20,000 compared to 21% of White Non-Hispanic and Hispanic households.

	African American	White-Non Hispanic	Hispanic
Less than \$20,000	2,215	2,925	1,621
\$20,000 to \$50,000	2,408	4,873	3,187
\$50,000 to \$100,000	1,327	4,561	2,426
\$100,000 or more	477	1,608	588

Source: Household Income 2014 ACS 5 Year Estimates

V.B.iii.1.c.iii. Describe how the jurisdiction's and region's policies, such as public transportation routes or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.

The City administered a public bus service until 2010, when the administration of the bus service was transferred to the Regional Bus Authority due to fiscal pressures. The Regional Bus Authority was never able to secure an adequate funding source and ended operations in June 2012. Currently, portions of the City currently receive limited service from PACE Bus Lines and the Gary Public Transportation Corporation (GPTC). The lack of public transportation is one of the most frequently cited issues facing low income persons in the City of Hammond. A lack of public transportation can become a fair housing issue when members of a protected class, such as persons with disabilities and racial minorities, are disproportionately represented among transit users and are limited in their housing choice.

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Analysis > Low Poverty Exposure Opportunities

V.B.iii.1.d. Low Poverty Exposure Opportunities

V.B.iii.1.d.i. Describe any disparities in exposure to poverty by protected class groups.

The Low Poverty Index, presented in HUD Table 12 and in Attachment #10, is based on poverty rate data at the neighborhood (census tract) level from the 2006-2010 American Community Survey (ACS). A higher score (further to the right on the graphic), indicates a lower exposure to poverty. Whites (70) and Asians (65) at the regional level were significantly higher than all other races. All races in Hammond, except for Asian (52), were clustered from 24-34. At the regional level, African Americans (30) were significantly lower than all other races, indicating a higher level of exposure to poverty.

V.B.iii.1.d.ii. What role does a person's place of residence play in their exposure to poverty?

At a regional level, Map 14 clearly depicts a geographic pattern related to exposure to poverty. The southern portions of Chicago and the southern suburbs have a high concentration of households with a high exposure to poverty. Within Hammond, the patterns are not as pronounced, the City does fit within the regional pattern where the portions of the City further from the metro center have lower exposure to poverty. The map also shows a correlation between race and exposure to poverty. At the regional level, White Non-Hispanics clustered away from the metro center have lower exposure to poverty while African American Non-Hispanics are clustered in areas with high exposure to poverty. Hammond fits within this overall pattern to an extent, but the City is more integrated than its neighbors and has less variance in the exposure to poverty at the census tract level than the region.

V.B.iii.1.d.iii. Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?

Based on the information presented in Table 12 and Map 14, African Americans at the regional level are the most effected by exposure to poverty. This pattern holds to some extent within the City, but the relative difference between races and ethnicities at the City level is much smaller.

V.B.iii.1.d.iv. Describe how the jurisdiction's and region's policies affect the ability of protected class groups to access low poverty areas

The geographic patterns of exposure to poverty presented in the HUD data correspond with patterns of "white flight" where White Non-Hispanic households have moved further from the metro center. A lack of effective regional growth policies allow jurisdictions at the fringe to continue to expand while providing little incentive to redevelop and reinvest in areas that continue to experience population declines.

Programs such as the Housing Choice Voucher program administered by the Hammond Housing Authority offers a way for low-income families to access low poverty areas. However, the program rules, such as rent ceilings and the requirement to stay within the City for the first year, have a limiting effect on a household's ability to access low poverty areas throughout the region.

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Analysis > Environmentally Healthy Neighborhood Opportunities and Patterns in Disparities in Access to Opportunity

V.B.iii.1.e. Environmentally Healthy Neighborhood Opportunities

V.B.iii.1.e.i. Describe any disparities in access to environmentally healthy neighborhoods by protected class groups.

The Environmental Index, provided on HUD Table 12 and Attachment #11, is based on 2005 National Air Toxics Assessment (NATA). This index measures potential exposure to harmful toxins at the neighborhood (census tract) level. A higher index (further to the right) indicates less exposure to toxins and better air quality. The index for Whites (45) at the regional level significantly higher than all other races. African Americans at the regional level fell in line with those indices of all races for Hammond.

In reviewing this data during the community planning meetings, there was concern that this 11 year old data set does not properly reflect improvements made in the last few years. Most notably, the closure of the State Line Generating Plant in 2012, one of the oldest electrical generating station in the country, is not reflected in the 2005 data.

V.B.iii.1.e.ii. Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?

Within the City, there is not a significant discrepancy between race, ethnicity or other protected classes in terms of access to environmentally healthy neighborhoods. Map 15 shows that all areas within Hammond have similar scores in regard to environmental health.

V.B.iii.1.f. Patterns in Disparities in Access to Opportunity

V.B.iii.1.f.i. Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.

Overall, there is a higher correlation with geography and patterns to access to opportunity that between protected classes and access to opportunity. By HUD's data, Hammond fits within a large regional pattern where there is less access to opportunity relative to the outlying areas of the metro area. Much of the discussion at the community meetings focused on the disparities presented in the opportunity indices. The community meetings also focused on the inadequacy of public transportation, especially for persons with disabilities. The lack of public transportation has been an often cited issue since the termination of City-funded bus service in 2010 due to fiscal considerations

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Additional Information

V.B.iii.2. Additional Information

V.B.iii.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.

No additional information other than that presented is included.

V.B.iii.2.b. The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).

No additional information other than that presented is included.

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Contributing Factors of Disparities in Access to Opportunity

V.B.iii.3. Contributing Factors of Disparities in Access to Opportunity

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

The availability, type, frequency, and reliability of public transportation

Lack of private investments in specific neighborhoods

Lack of regional cooperation

V.B.iii.3. Contributing Factors of Disparities in Access to Opportunity - Other

V. Fair Housing Analysis > B. General Issues > Disproportionate Housing Needs

V. Fair Housing Analysis > B. General Issues > Disproportionate Housing Needs > Analysis

V.B.iv.1. Analysis

V.B.iv.1.a. Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?

The City used HUD Tables 9 and 10 to analyze disproportionate housing needs. The top of Table 9 shows the percentage of race/ethnicity groups and families with children experiencing housing need, including housing cost burden (defined as paying more than 30% of income for monthly housing costs including utilities), overcrowding (defined as a household with more than one person per room), lacking a complete kitchen, or lacking plumbing. The bottom section of Table 9 provides information on "severe housing problems", including severe housing cost burden (defined as paying more than half of one's income for monthly housing costs including utilities), overcrowding, and lacking a complete kitchen, or lacking plumbing. Table 10 provides similar data, except it focuses on severe housing cost burden and excludes overcrowding, lack of kitchen, and lack of plumbing.

Analysis

- The total percent of households in Hammond with a housing problem (38.8%) was slightly lower than the region as a whole (40.88%). The percentage of housing problems for each race/ethnicity and household size within Hammond is lower than the percentage for each category at the regional level, with the exception of the Native American, Non-Hispanic and Other, Non-Hispanic, and Large Family categories. Given the small population sizes of the Native American and Other categories within Hammond, it is difficult to infer much meaning from the percentages. The higher incidence of problems for large families may be

attributed to the lack of larger units within Hammond. As the underlying cause for the vast majority of housing problems is cost burden, the lower incidence of housing problems within Hammond can be attributed in part to the lower cost of housing within the City.

- When comparing the percentage of housing problems between each race and ethnicity, it is clear that Black, Non-Hispanics (49%) and Hispanics (47%) within Hammond as a whole have a significantly higher incidence of housing problems than White, Non-Hispanics (30%) and the population as a whole (39%). The margin of difference between race and ethnicities is similar at the regional level. At the regional level, Black, Non-Hispanics (52%) and Hispanics (56%) have significantly higher instances of housing problems than White, Non-Hispanics (34%) and the total (41%). Asian/Pacific Islanders (40%) and Other Race, Non-Hispanics (45%) are close to the average.
- Severe housing problems include households that spend more than half of their income on housing costs. This population is vulnerable to loss of housing when a portion of their income is interrupted through sickness or loss of work or due to an unforeseen expense such as a car repair. The same patterns seen earlier are apparent for severe housing problems. Black, Non-Hispanics (28%) and Hispanics (28%) within Hammond have a higher incidence of housing problems than White, Non-Hispanics (15%) and the population as a whole (22%). The margin of difference between race and ethnicities is similar at the regional level. At the regional level, Black Non-Hispanics (30%) and Hispanics (33%) have significantly higher instances of housing problems than White Non-Hispanics (16%) and the total (21%). Asian/Pacific Islanders (22%), Native Americans (27%) and Other Race, Non-Hispanics (25%) are closer to the average.
- When comparing the percentage of housing problems among family sizes, large families in Hammond (59%) clearly have a higher incidence of housing problems. This can be attributed to a large family's need for larger units and the higher likelihood that these families will experience overcrowding. As mentioned earlier, this can be partially attributed to the low number of larger units within Hammond.

V.B.iv.1.b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

Maps 7 and 8 present housing burden data overlaid with race, ethnicity, and national origin data. Within the City, there is not a clear geographic pattern to the housing burden data. The percent of households with housing problems, which includes cost burden, ranges from 57% (Census Tract 205) to 30% (Census Tract 219). The area with highest number of housing problems is Census Tract 203, which identified 1,085 households with housing problems. Census Tract 216 had the fewest number of housing problems with 320. The areas of North Hammond and western portion of the City may have a slightly higher cost burden. The patterns at the regional level for this map are similar to those described earlier where there are correlations between neighborhoods with high minority concentrations and greater housing burdens.

V.B.iv.1.c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing.

Large families are those with five or more members and are more likely to experience housing problems because they have to pay more for a larger unit or they accept a smaller unit but experience overcrowding. The definition of "housing problem" includes not only the number of households with a cost burden but also the number of households living in overcrowded conditions. According to Table 9, the total number of large families in Hammond with a housing problem is 2,175. This accounts for 59% of all large families within the City.

According to Table 11, there are only a total of 137 public housing development units with two or more bedrooms. There are 443 units in the HCV program with two or more bedrooms. There are three times as many households with children participating in the HCV program (396) than living in public housing developments (120). When comparing these numbers to the number of public housing units available with 2 or more bedrooms to the number of large families with a housing problem, it becomes apparent that there is a clear shortage of affordable units, both in the public and private markets, that can accommodate larger families.

V.B.iv.1.d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

The City reviewed household tenure data by race and ethnicity provided in the 2014 ACS. Overall, the homeownership rate within the City is 60%. This rate ranges from a low of 9% in the City's one RECAP (Census Tract 206) to 80% (Census Tract 219). There is a large discrepancy between the homeownership rates between White Non-Hispanics and African Americans. The homeownership rate for White Non-Hispanics is 76% while the homeownership rate for African Americans is only 23%. The rate of 64% for Hispanics is slightly higher than the average rate.

V. Fair Housing Analysis > B. General Issues > Disproportionate Housing Needs > Additional Information

V.B.iv.2. Additional Information

V.B.iv.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.

Housing problems, in large measure, are caused by cost burdens where the household pays more than 30% of its income on housing costs. Given this, it is important to consider household income in any analysis of cost burden. The table and graph below depict 2014 household income for the three largest race and ethnic categories in Hammond: African American, White Non-Hispanic, and Hispanic.

An affordable housing cost (30% of income) for a household earning \$20,000 is \$500. There are few housing options available in the City at this price range, meaning that most households earning less than \$20,000 will face a cost burden. In Hammond, African American households in Hammond are disproportionately represented in this income range. Thirty-four percent of Black Non-Hispanic households earn less than \$20,000, compared to 21% for White Non-Hispanics and Hispanics. Based on this data, one way to address disparities in cost burden is to address the underlying issues that cause disparities in household income.

	Black Non-Hispanic	White Non-Hispanic	Hispanic
Less than \$20,000	2,215	2,925	1,621
\$20,000 to \$50,000	2,408	4,873	3,187
\$50,000 to \$100,000	1,327	4,561	2,426
\$100,000 or more	477	1,608	588

Source: Household Income 2014 ACS 5 Year Estimates

In addition to reviewing household income, it is helpful to review household types and its effect on income, especially on poverty level families. The presence of children and the number of parents within are strong determinants on the poverty status of a family. Single-parent households with children under 18 years are much more likely to be in poverty than married-couple families with children or families with children under 18. According to the 2014 ACS, single parent households with children accounted for 59% of the families in poverty in Hammond. African American households are disproportionately represented in this category as well. Of the African American households in poverty, 86% are single parent households with children under 18.

V.B.iv.2.b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.

In reviewing the HUD-provided data, there is clear levels of disproportionate housing needs for African Americans and Hispanic households in both the City and the region. The primary contributing factor for the variation in housing problems, which are mostly caused through cost burdens as opposed to overcrowding or lack of kitchen and plumbing facilities, are the variances in household income for African Americans and Hispanics within the City.

To address disproportionate needs in housing cost burdens, it is necessary to address the underlying issues and contributing factors to the differences in household income. A strong contributing factor to family poverty is the type of household (single parent vs. married couple) and the presence of children.

V. Fair Housing Analysis > B. General Issues > Disproportionate Housing Needs > Contributing Factors of Disproportionate Housing Needs

V.B.iv.3. Contributing Factors of Disproportionate Housing Needs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

Lending Discrimination

V.B.iv.3. Contributing Factors of Disproportionate Housing Needs - Other

In reviewing the HUD-provided data, there is clear levels of disproportionate housing needs for African Americans and Hispanic households in both the City and the region. The primary contributing factor for the variation in housing problems, which are mostly caused through cost burdens as opposed to overcrowding or lack of kitchen and plumbing facilities, are the variances in household income for African Americans and Hispanics within the City.

To address disproportionate needs in housing cost burdens, it is necessary to address the underlying issues and contributing factors to the differences in household income. A strong contributing factor to family poverty is the type of household (single parent vs. married couple) and the presence of children.

Fair Housing Analysis > Publicly Supported Housing Analysis

Fair Housing Analysis > Publicly Supported Housing Analysis > Analysis

Fair Housing Analysis > Publicly Supported Housing Analysis > Analysis > Publicly Supported Housing Demographics

V.C.1. Analysis

V.C.1.a. Publicly Supported Housing Demographics

V.C.1.a.i. Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV))?

The HUD provided data related to publicly supported housing is included in HUD Tables 5, 6, 7, 8, 11, and 15. The HUD-provided data on publicly supported housing is grouped into five program categories:

- public housing developments;
- project-based Section 8;
- Section 8 tenant-based Housing Choice Vouchers (HCV);
- Other HUD Multifamily housing, including Section 202 Supportive Housing for the Elderly and Section 811 Supportive Housing for Persons with Disabilities; and
- Low-Income Housing Tax Credit (LIHTC) housing.

Where a housing development includes more than one category of publicly supported housing, this development is reported in data for each housing category (e.g., project-based Section 8 combined with LIHTC). Note that other publicly supported housing programs, for instance those funded through state and local programs or by other federal agencies, such as USDA's Rural Housing Service and the Veteran's Administration, or other HUD programs that are not covered in the HUD-provided data may be relevant to the analysis.

HUD Table 5 provides a total count of publicly supported housing by program category and references the number to the total number of units in the jurisdiction. In Hammond, the majority of publicly supported housing units are provided through the Housing Choice Voucher program. Of the 1,258 supported housing units, 783 are Housing Choice Vouchers, representing 62% of the total. From a fair housing perspective, this percentage should be viewed as a positive since vouchers provide the assisted household greater choice in where to live. The remainder of the units are 325 units in public housing developments (26%) and 150 Project-based Section 8 units (12%). It should be noted that these numbers may not accurately reflect the number of public housing units due to current efforts to redevelop Columbia Center. In the consultation with the Hammond Housing Authority (HHA), the total number of units in public housing developments, including Turner Park and American Heartland Homes 1 and 2, was reported at 240.

V.C.1.a.ii. Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population in general, and

persons who meet the income eligibility requirements for the relevant category of publicly supported housing. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

HUD Table 6 provides race and ethnicity data for each category of publicly supported housing, as well as a breakdown of each race and ethnicity at different income levels that are eligible for housing assistance. In comparing the race and ethnicity of publicly supported housing clients and those of the eligible populations within the jurisdiction, some variations appear.

- For Whites, the composition of public housing (30%) is lower and housing choice vouchers (7%) is drastically lower than the eligible population (39%).
- For African Americans, the composition of public housing (60%), project-based section 8 (40%), and housing choice vouchers (80%) are all significantly higher than the eligible population (25%).
- For Hispanics, the composition of public housing (9%), project-based section 8 (14%), and housing choice vouchers (13%) are all significantly lower than the eligible population (28%).

In consultations with the HHA, data for the public housing developments as of May 2016 was provided. As part of this consultation, there was discussion on why Hispanic participation was low compared to the eligible population. While HHA does provide some print information in Spanish, there is not a Spanish-version of information on the HHA web site. In addition to language barriers, there may be a perception among the Hispanic population, especially foreign-born populations, that they are not eligible for federal housing assistance.

May 2016 Data	White	Black/AA	Hispanic	Non -Hispanic	Total
Turner Park	74	112	18	168	186
American Heartland 1	11	28	2	37	39
American Heartland 2	1	14		15	15
TOTAL	86	154	20	220	240
Turner Park	40%	60%	10%	90%	100%
American Heartland 1	28%	72%	5%	95%	100%
American Heartland 2	7%	93%	0%	100%	100%
TOTAL	36%	64%	8%	92%	100%

HUD Tables 7 and 8 provides publicly supported housing data based on program type and location within Racially/Ethnicity Concentrated Areas of Poverty (RECAP). For each program type, the table provides data on race, ethnicity, and household type.

Public Housing Developments

- 189 units (67%) are located within the RECAP while 93 units (33%) are located outside the RECAP. In consultation with HHA, they feel that the data in HUD Table 7 may be dated based on their redevelopment efforts. According to HHA, there are 186 units in Turner Park, which is located within the RECAP, and 54 units in American Heartland 1 and 2, which is located outside of the RECAP at Columbia Center. Based on these numbers, 78% of the public housing units are located within the RECAP and 22% of the units are outside the RECAP.
- In comparing the data between the RECAP (Turner Park) and non-RECAP (Columbia Center), the RECAP developments have a higher percentage of elderly (22% to 12%), persons with a disability (29% to 15%), and Whites (32% to 27%). The non-RECAP developments have a higher percentage of African Americans (64% to 58%) and families with children (59% to 35%). The percentage of Hispanics is consistent (10% to 9%).

Project-based Section 8 Housing

- According to the HUD table, 147 units are located within the RECAP. Based on local knowledge, the City feels these units represent the 150-unit Hammond Elderly Apartments. 80% of these units are reported as elderly, while a higher percentage than other types of public housing were reported as White (46%).
- Two other publicly assisted housing developments that appear on Table 8 but that do not seem to be included on HUD Table 7 are Renaissance Towers and Mount Zion. Renaissance Towers is listed as a HAP property per HUD's Multifamily database with 450 units. Renaissance Towers is located within the RECAP. Mount Zion is a 202 property with 127 1-bedroom units located outside the RECAP.

Housing Choice Vouchers

- HUD Table 7 lists a total of 667 vouchers. Of those, 99% of voucher holders are located outside the RECAP. Only eight voucher holders are reported to be located within the RECAP.

- Of the reported voucher holders, the vast majority are families with children (70%) and African American (80%). Hispanics (13%) and Whites (7%) compose the remainder. A small fraction (5%) are elderly or report a disability (12%).

HUD Table 11 presents data for publicly supported housing data based on program type and unit size. This data is included to determine if a sufficient number of units exist to support the level of demand for units by families with children, which is a protected class under fair housing law,

- For public housing developments, Table 11 shows 141 1-bedroom units (50%), 67 2-bedroom units (24%), and 70 units with three or more bedroom units (25%). The table also shows 43% of the households have children, meaning that are only sufficient larger units if most are occupied by families with children.
- For housing choice vouchers, a greater percentage of the vouchers are used by households with children (70%) who end up selecting larger units. Only 18% of voucher holders selected a 1 bedroom unit. 42% selected 2 bedroom units and 36% selected units with 3 or more bedrooms.

Low Income Tax Credit Properties

In addition to the developments discussed above, the City of Hammond also has a number of developments funded through Low Income Housing Tax Credits. Of the following list, only one, the 7-unit development on 584 Sibley, is located within the RECAP. The first four developments listed (American Heartland 1 & 2, Saxony Town Homes, and Golden Manor, are clustered around HHA's Columbia Center. Douglas Pointe Apartments, and the two additional properties, 237 Highland and 15 Waltham, are due south of the RECAP near Harrison Park.

Project Name:	Project Address:	Total Units
American Heartland Homes Two	7418 7422 Linden Pl	49
American Heartland Homes One	1402 173rd St	94
Saxony Town Homes	1349 175th St	57
Golden Manor Apts	1201 175th St	80
Sibley	237 Highland St	44
15 Waltham St	15 Waltham St	6
584 Sibley St	584 Sibley St	7
Douglas Pointe Apts I	5525 Hyles Blvd	108
Douglas Pointe Apts II	5525 Hyles Blvd	112
Douglas Pointe Apts III	5525 Hyles Blvd	64

Fair Housing Analysis > Publicly Supported Housing Analysis > Analysis > Publicly Supported Housing Location and Occupancy and Disparities in Access to Opportunity

V.C.1.b. Publicly Supported Housing Location and Occupancy

V.C.1.b.i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs.

As mentioned in the previous section, there is a concentration of publicly supported housing within the RECAP. The RECAP includes a total of 793 publicly supported units:

- Turner Park/Hubert Humphrey:186 units
- Renaissance Towers: 450 units
- Hammond Elderly Apartments: 150 units
- 584 Sibley St: 7 units

According to the 2014 ACS five year estimates, there are a total of 979 occupied housing units, meaning that of those units, 81% are publicly supported. The three large developments are clustered on the northern portion of the downtown commercial area and are somewhat geographically isolated from other neighborhoods. The downtown area, which is predominantly commercial and institutional is to the south, industrial property in Illinois is to the west, and the Grand Calumet River forms the northern border. Some single family housing is located to the east.

The other large concentration of publicly assisted housing is clustered around Columbia Center. These developments are managed by HHA. The original public housing in Columbia Center, built in the 1940s, was functionally obsolete. In several phases, HHA has replaced the older units with new, less dense units. The condition and quality of the new units has had a dramatic effect on the neighborhood and is considered an asset to the area.

The area due south of the downtown area (and the RECAP) could be considered a third concentration of publicly assisted housing. This area includes Douglas Pointe, 237 Highland, 15 Waltham, and a new Low Income Tax Credit property currently under construction which will serve elderly residents.

The City also analyzed the location of Housing Choice Vouchers provided in the HUD CPD maps GIS system. Nine percent of vouchers chose housing in North Hammond and Robertsdale, located north of the RECAP. Most of the voucher holders (68%) are located in the area south of downtown and west of Indianapolis. While the remainder (23%) located east of Indianapolis. According to this data set, four of the census tracts within Hammond did not have any voucher holders, including the RECAP.

V.C.1.b.ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs?

Other than the concentration of developments in the RECAP and at Columbia Center, there are no other discerning patterns among housing serving families with children, elderly persons, and persons with disabilities.

V.C.1.b.iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs?

According to Table 7, there is not a significant difference in the demographic compositions between the publicly assisted housing located within and outside of the RECAP.

V.C.1.b.iv.(A). Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category? Describe how these developments differ.

Based on the data presented in HUD Table 8 and the updated information provided through consultation with the Hammond Housing Authority, there are no large discrepancies or patterns among types of developments and race and ethnicity.

V.C.1.b.iv.(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing.

No other information, other than that provided in other responses within this section such as updated data from the Hammond Housing Authority and information gathered via public meetings and consultations (discussed below), was used in the assessment.

V.C.1.b.v. Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. Describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

Based on the data presented in HUD Table 8 and the updated information provided through consultation with the Hammond Housing Authority, there are no large discrepancies or patterns among types of developments and race and ethnicity of the areas in which they are located. Both the developments themselves and the neighborhoods in which they are located are relatively well integrated.

V.C.1.c. Disparities in Access to Opportunity

V.C.1.c.i. Describe any disparities in access to opportunity for residents of publicly supported housing, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

In the course of the community meetings held by the City, there was concern voiced that the concentration of publicly assisted housing could be a fair housing issue. The City agrees that the site selection for large affordable housing developments can become a fair housing issue if members of a protected class, such as racial minorities, are disproportionately represented among low-income populations who would benefit from low-cost housing and the housing developments are segregated or located in areas that offer a relative lack of opportunity. In the case of Columbia Center, the Hammond Housing Authority has attracted huge amounts of investment to increase the overall standard of housing and serves as an asset to the surrounding neighborhood.

While the RECAP may be geographically isolated from other neighborhoods, its location does possess some assets as well. The downtown area is an employment center and includes assets such as a strong presence by the First Baptist Church. The City has made significant investments in the downtown area that is starting to attract additional private investment. The Hammond Station on the South Shore Commuter Train is only one mile from the developments. The area also includes open space and recreational areas.

In the course of the community meetings, some residents voiced concern that there was a lack of community services and social services available at Renaissance Towers.

Fair Housing Analysis > Publicly Supported Housing Analysis > Additional Information

V.C.2. Additional Information

V.C.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.

The Chicago Metropolitan Agency for Planning (CMAP) recently completed a regional fair housing study recently for the Chicago metropolitan region. That report cited resistance to low income housing in predominantly white, higher opportunity communities as a reason behind the clustering of publicly assisted housing in minority areas. The report found that affordable housing is often sited in locations where community opposition is low and where any improvements to the neighborhood and subsidies to neighborhood stakeholders are viewed as positive. This contributing factor fits within the specific narrative of Hammond as well. Earlier, it was shown that very little private development, as measured by the number of permits for new housing units, was occurring in Hammond. In fact, the majority of new units permitted in Hammond in the last several years have been through publicly supported housing development, including the redevelopment of Columbia Center and the new Low Income Tax Credit property under development on Sohl Avenue.

V.C.2.b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.

Programs such as the Housing Choice Voucher program administered by the Hammond Housing Authority offers a way for low-income families to access low poverty areas. However, the program rules, such as rent ceilings and the requirement to stay within the City for the first year, have a limiting effect on a household's ability to access low poverty areas throughout the region.

Fair Housing Analysis > Publicly Supported Housing Analysis > Contributing Factors of Publicly Supported Housing Location and Occupancy

V.C.3. Contributing Factors of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

Lack of private investment in specific neighborhoods

Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs

Source of income discrimination

V.C.3. Contributing Factors of Publicly Supported Housing Location and Occupancy - Other

Fair Housing Analysis > Disability and Access Analysis

Fair Housing Analysis > Disability and Access Analysis > Analysis

Fair Housing Analysis > Disability and Access Analysis > Analysis > Population Profile

V.D.1. Population Profile

V.D.1.a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

HUD Table 13 provides data by disability type for the City and the region. The data is based on information collected through the American Community Survey and includes the following categories:

- Hearing difficulty includes deafness and having serious difficulty hearing.
- Vision difficulty includes blindness and having serious difficulty seeing, even when wearing glasses.
- Cognitive difficulty includes those with difficulty remembering, concentrating, or making decisions due to a physical, mental, or emotional problem.
- Ambulatory difficulty includes those who have serious difficulty walking or climbing stairs.
- Self-care difficulty includes those who have difficulty bathing or dressing (DDRS).
- Independent living difficulty includes those who have difficulty doing errands alone such as visiting a doctor's office or shopping due to a physical, mental, or emotional problem.

The City has slightly higher representation in each of the six categories, including hearing (4%), vision (2.5%), cognitive (6%), ambulatory (8%), self-care (3.5%), and independent living difficulty (5.6%).

HUD Table 15 provides detail on the number and percent of persons with disabilities living in publicly supported housing. Despite higher incidence of disability for the population as a whole (as noted above), the percentage of public housing residents with a disability in Hammond is lower than the region as a whole. Persons with disabilities across the region account for 34% of public housing development residents compared to only 24% in Hammond. The participation of disabled population in the Housing Choice Voucher program on a regional level (19.2%) is also higher than that of disabled Hammond residents (11.6%). Further discussion is needed with HHA to determine if there may be impediments to outreach and marketing materials.

HUD provided disability data in HUD Maps 16 and 17 and Tables 13 and 15. Map 16 depicts a dot density distribution by disability type (hearing, vision, cognition, ambulatory, self-care, independent living) for the City and the region. Table 13 provides data on the percentage of the population with types of disabilities in the jurisdiction and the region.

HUD Map 16a depicts a dot density distribution of persons with disabilities by disability type, including Hearing, Vision, and Cognitive disabilities. When evaluating the map for Hammond, the distribution appears uniform throughout the City with no significant

concentrations. Regionally, the distribution is heavier closer to Chicago, with clustering in and around RECAPS. HUD Map 16b depicts a dot density distribution of persons with disabilities by disability type, including ambulatory, self-care, and independent living disabilities. When evaluating the map for Hammond, the distribution appears uniform throughout the City without significant concentrations. Regionally, the distribution is heavier closer to Chicago, with clustering in and around RECAPS on the western and southern sections of Chicago, and also a concentration in the northern portions of Chicago. HUD Map 17 presents disability information by age group. The clusterings for disabilities by age appear similar to those in Map 16.

V.D.1.b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges.

HUD Table 14 provides data for persons with disabilities by age group, including minors under the age of 18, working age adults between ages of 18 and 65, and those over 65 years of age. Again, Hammond has relatively higher levels of persons with disabilities in each category than the region as a whole. While the percentage of persons with disabilities is only slightly higher for minors and seniors, the percentage of working age Hammond residents with a disability is significantly higher (9% to 5%). This age group will require greater levels of supportive services in terms of maintaining employment and self-sufficiency.

Fair Housing Analysis > Disability and Access Analysis > Analysis > Housing Accessibility

V.D.2. Housing Accessibility

V.D.2.a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

The majority of housing within Hammond is single-family detached. From a regional perspective, the City contains affordable housing in a range of bedroom sizes. The City incentivizes seniors and persons with disabilities to maintain their homes through the Ramp Assistance Program. The program is available as a grant to both owners and renters to improve mobility access to the City's housing stock.

For persons with disabilities that require additional supportive services, there are a number of in-home supportive services, such as We Care From the Heart, and group homes. The City supports We Care From the Heart through its community development block grant funding. The group homes are clustered in the southern communities of Lake County, although In-Pact does manager one property within Hammond. A number of half-way houses for persons recovering from substance and alcohol abuse are also available throughout the County.

Name	City State Zip	Beds
BETHESDA LUTHERAN COMMUNITIES INC	LOWELL, IN 46356	6
DUNGARVIN INDIANA LLC	MERRILLVILLE, IN 46410	8
IN-PACT INC	DYER, IN 46311	5
IN-PACT INC	MERRILLVILLE, IN 46410	5
IN-PACT INC	MERRILLVILLE, IN 46410	5
IN-PACT INC	HOBART, IN 46342	6
IN-PACT INC	CROWN POINT, IN 46307	6
IN-PACT INC	CROWN POINT, IN 46307	5
IN-PACT INC	HAMMOND, IN 46324	5
REM-INDIANA INC	HOBART, IN 46342	8
REM-INDIANA INC	MERRILLVILLE, IN 46410	8
TRADEWINDS SERVICES INC	CROWN POINT, IN 46307	8
TRADEWINDS SERVICES INC	CROWN POINT, IN 46307	8
TRADEWINDS SERVICES INC	HOBART, IN 46342	8
TRADEWINDS SERVICES INC	ST JOHN, IN 46373	8
TRADEWINDS SERVICES INC	CROWN POINT, IN 46307	8

TRADEWINDS SERVICES INC	ST JOHN, IN 46373	8
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Licensed Residential Care Facilities	City Location
ASSISTED LIVING AT HARTSFIELD VILLAGE	MUNSTER, IN 46321
BICKFORD OF CROWN POINT	CROWN POINT, IN 46307
BRENTWOOD AT HOBART	HOBART, IN 46342
BROOKDALE MERRILLVILLE	MERRILLVILLE, IN 46410
LAKE PARK RESIDENTIAL CARE INC	LAKE STATION, IN 46405
MILLER BEACH TERRACE	GARY, IN 46403
RESIDENCES AT DEER CREEK	SCHERERVILLE, IN 46375
TERRACE AT TOWNE CENTRE THE	MERRILLVILLE, IN 46410
CEDAR CREEK HEALTH CAMPUS	LOWELL, IN 46356
CROWN POINT CHRISTIAN VILLAGE	CROWN POINT, IN 46307
DYER NURSING AND REHABILITATION CENTER	DYER, IN 46311
SPRING MILL HEALTH CAMPUS	MERRILLVILLE, IN 46410
SYMPHONY OF CROWN POINT LLC	CROWN POINT, IN 46307
SYMPHONY OF DYER LLC	DYER, IN 46311

V.D.2.b. Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated?

The City does not have good reliable data on the location of affordable accessible housing units. In a review of the raw data sets provided by HUD, persons with disabilities aged 18 to 64 are dispersed throughout the City. Census Tracts 203 and 210 have the largest populations (784 and 640, respectively) while Census Tract 213 has the lowest (173). All of the other tracts are clustered toward the average of 366. If this reflects the availability of accessible housing that suits each person's needs, it could be assumed that the accessible housing is not clustered in any specific area of the City or align with the RECAP boundaries. The City does administer a Disability Ramp Assistance Program that provides grants to income-qualified households with disabilities, both owner and renter, to improve the accessibility of their home and provide greater freedom in choosing which areas to live.

V.D.2.c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing?

Based on the data in HUD Table 15, persons with disabilities are represented in each of the three categories of public housing (public housing, project-based section 8, and HCV) for which there is data. Project-based Section 8 has 27% of residents with disabilities, while public housing developments have 24% and the HCV program has 11.5%.

Fair Housing Analysis > Disability and Access Analysis > Analysis > Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

V.D.3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

V.D.3.a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

Zoning ordinances with a single-family zoning district must contain a definition of family. The definition cannot be written to exclude certain family members, families which are not biologically related, or are non-traditional, or have a disparate impact on one of the protected classes. In 1995, the U.S. Supreme Court reviewed *City of Edmonds v. Oxford House, Inc.* where the City of Edmonds cited a halfway house for violating a city ordinance because it was located in a neighborhood zoned for single-family residences. The city ordinance defined "family" as "persons related by genetics, adoption, or marriage, or a group of five or fewer [unrelated] persons." While the court did not find the city ordinance in violation of the Fair Housing Act, the court ruled the ordinance was not exempt from the Fair Housing Act since it sets a limit for the number of unrelated occupants but not related occupants.

Hammond Zoning Ordinance defines Family as "One (1) or more persons by blood, marriage, adoption, foster care or guardianship together with incidental domestic servants and temporary, non-compensating guests; or not more than four (4) persons not so related, occupying a dwelling unit and living as a single housekeeping unit."

From a fair housing perspective, a zoning ordinance that does not distinguish between related and unrelated occupants is favorable. For example: "One or more persons living as a single housekeeping unit, as distinguished from a group occupying a hotel, club, nursing home, fraternity or sorority house, or Group Home". While Hammond's definition is not an impediment on its face, the distinction between related and un-related households could potentially pose an impediment to fair housing choice for a member of the protected classes.

Group Homes and Special Needs Housing

The updates to the Fair Housing Act in 1988 were intended, in part, to prohibit the application of special requirements through land-use regulations, restrictive covenants, and conditional or special use permits that have the effect of limiting the ability of persons with disabilities to live in the residence of their choice in the community. This includes regulation and licensing requirements for group homes. The majority of group homes for persons with disabilities are subject to state regulations intended to protect the health and safety of their residents.

HUD has found licensing requirements are necessary and serve a legitimate purpose. However, local decision makers must recognize not all individuals with disabilities living in group home settings desire or need the same level of services or protection. Requests for reasonable accommodation that are denied without substantial justification may constitute an impediment to fair housing choice.

Indiana state law (IC 12-28-4-8) does provide protections and standards in regard to zoning requirements for residential facilities that serve individuals with a developmental disability. This law permits this type of facility as a residential use that may not be disallowed by any zoning ordinance in a zoning district or classification that permits residential use. A similar state law (IC 12-28-4-7) provides protections and standards in regard to zoning requirements for residential facilities for individuals with a mental illness:

A zoning ordinance (as defined in IC 36-7-1-22) may not exclude a residential facility for individuals with a mental illness from a residential area solely because the residential facility is a business or because the individuals residing in the residential facility are not related. The residential facility may be required to meet all other zoning requirements, ordinances, and laws.

However, the same law allows zoning jurisdictions to impose dispersion requirements for these facilities:

A zoning ordinance may exclude a residential facility for individuals with a mental illness from a residential area if the residential facility will be located within three thousand (3,000) feet of another residential facility for individuals with a mental illness, as measured between lot lines.

In *Larkin v. State of Michigan*, a U.S. district court held that the spacing and notice requirements of the Michigan Adult Foster Care Licensing Act are preempted by the federal Fair Housing Act and violate the equal protection clause of the fourteenth amendment to the United States Constitution. If this dispersion requirement is enforced to prohibit a group home that serves persons with mental illness, this could constitute as an impediment to fair housing choice.

V.D.3.b. Describe the range of options for persons with disabilities to access affordable housing and supportive services.

There are several options for persons with disabilities to access affordable housing and supportive services. The City funds programs such as the Disability Ramp Program to increase accessibility in their existing unit and supportive services such as We Care From the Heart which provides home-based assistance to the elderly and persons with disabilities. Both the City and the Hammond Housing Authority have policies to provide reasonable accommodations as needed to persons with disabilities.

Fair Housing Analysis > Disability and Access Analysis > Analysis > Disparities in Access to Opportunity

V.D.4. Disparities in Access to Opportunity

V.D.4.a. To what extent are persons with disabilities able to access the following?

Identify major barriers faced concerning:
i. Government services and facilities

- ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)
- iii. Transportation
- iv. Proficient schools and educational programs
- v. Jobs

The major disparity to access to opportunity for persons with disabilities is transportation. The City administered a public bus service until 2010, when the administration of the bus service was transferred to the Regional Bus Authority due to fiscal pressures. The Regional Bus Authority was never able to secure an adequate funding source and ended operations in June 2012. Portions of the City currently receive limited service from PACE Bus Lines and the Gary Public Transportation Corporation (GPTC).

The lack of public transportation is one of the most frequently cited issues facing low income persons in the City of Hammond. A lack of public transportation can become a fair housing issue when members of a protected class, such as persons with disabilities and racial minorities, are disproportionately represented among transit users and are limited in their housing choice.

Northwest Indiana Regional Planning Commission (NIRPC) is the planning agency that coordinates public transit for the region, including fixed route, complementary paratransit, and demand response services. In 2006, a local advocacy group for persons with disabilities obtained a federal court consent decree ordering NIRPC and several local public transit agencies to comply with the Americans with Disabilities Act. While the federal litigation was ended in June 2014 through a conciliation agreement, the adequacy of transportation for persons with disabilities remains an issue in the City and Lake County as a whole.

During the community planning meetings, a need for more accessible commercial properties was cited. The City was commended for the number of improvements made to sidewalks and curb cuts, but it was stated that those types of infrastructure improvements did little good if the shops and stores remained inaccessible.

V.D.4.b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

Hammond has adopted an ADA Grievance Procedure (below). Most requests, however, are received through the 311 non-emergency system, which allows residents to report issues and track the City's efforts to resolve them.

CITY OF HAMMOND
Grievance Procedure under
The Americans with Disabilities Act

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the City of Hammond. The City's Personnel Policy governs employment-related complaints of disability discrimination. The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for persons with disabilities upon request. The complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than 60 calendar days after the alleged violation to: Executive Director of Human Relations Hammond Human Relations—City Hall 5925 Calumet Avenue, First Floor Hammond, IN 46320. Within 15 calendar days after receipt of the complaint, the Executive Director or his/her designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, the Executive Director or [his/her] designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the City of Hammond and offer options for substantive resolution of the complaint. If the response by the Executive Director or his/her designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within 15 calendar days after receipt of the response to the Mayor's Chief of Staff or [his/her] designee. Within 15 calendar days after receipt of the appeal, the Mayor's Chief of Staff or [his/her] designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the Mayor's Chief of Staff or [his/her] designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint. All written complaints received by the Executive Director or his/her designee, appeals to the Mayor's Chief of staff or his/her designee, and responses from these two offices will be retained by the City of Hammond for at least three years.

V.D.4.c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities.

As discussed above, barriers to employment opportunities adversely affect the ability to generate income. This in turn will affect the ability to purchase a home. The City offers two programs, the Homebound Program and the Disability Ramp Program, that offer to make homeownership more achievable for persons with disabilities.

Fair Housing Analysis > Disability and Access Analysis > Analysis > Disproportionate Housing Needs

V.D.5. Disproportionate Housing Needs

V.D.5.a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities.

A data-driven assessment on levels of need for other protected classes is difficult based on the lack of Census data and other data sets. For persons with disabilities, it can be inferred that the number of cost-related housing problems will be greater for persons with disabilities than the population as a whole based on barriers to employment and housing options. According to the 2014 ACS data for the nation, 73% of persons 16 years and older with a disability are not in the labor force, compared to 29% of the population as a whole. Persons with disabilities are also more likely to be in poverty (21% to 12%). In terms of housing options, persons with disabilities will have fewer choices in housing due to physical barriers common in older homes.

As mentioned above, the City makes efforts to support both seniors and persons with disabilities in maintaining independence and remaining integrated in the community through the support of organizations like We Care From the Heart and through the installation of ramps on both owner and rental housing through the Disability Ramp Program.

Fair Housing Analysis > Disability and Access Analysis > Additional Information

V.D.6. Additional Information

V.D.6.a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region affecting groups with other protected characteristics.

No additional information other than the sources previously cited was used in the analysis.

V.D.6.b. The program participant may also describe other information relevant to its assessment of disability and access issues.

No additional information other than the sources previously cited was used in the analysis.

Fair Housing Analysis > Disability and Access Analysis > Disability and Access Issues Contributing Factors

V.D.7. Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

Access to transportation for persons with disabilities

V.D.7. Disability and Access Issues Contributing Factors - Other

Fair Housing Analysis > Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

Fair Housing Analysis > Fair Housing Enforcement, Outreach Capacity, and Resources Analysis > Analysis

V.E.1. List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.

There are no currently unresolved findings or legal issues involving fair housing currently at the City.

V.E.2. Describe any state or local fair housing laws. What characteristics are protected under each law?

The City's Human Relations Commission is a testament to the City's commitment to fair housing. By investing in the Human Relations Commission, the City of Hammond is one of only fifty-one local governments in the nation to achieve a substantial equivalence certification from HUD, meaning the City enforces a law that provides substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the federal Fair Housing Act.

In recent years, the Human Relations Commission underwent staff re-organization and almost lost its certification. The Commission is now again under the direction of an Executive Director and has the capacity to administer its fair housing ordinance.

In addition to the Human Relations Commission, Hammond residents are served by the Indiana Civil Rights Commission (ICRC). Like the Hammond Human Relations Commission, the ICRC has also been certified by HUD as substantially equivalent in its capacity to administer fair housing law.

Going beyond the requirements of the federal fair housing law, the City has extended protections for fair housing based on sexual orientation and gender identity. In April 2015, the City passed ordinance 9293 which prohibits discrimination based upon sexual orientation and gender identity in employment, housing, services and accommodations.

V.E.3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

There are a number of non-profit agencies in the area who play an important role in providing fair housing information, outreach, and enforcement. South Suburban Housing Center (SSHC), located in Homewood, receives HUD funds through the Fair Housing Initiatives Program (FHIP). In recent years, SSHC received funding for comprehensive fair housing enforcement activities in the south Chicago metropolitan region and in underserved areas of northwest Indiana and central Illinois. SSHC has the capacity to undertake complaint intake, strategic testing, systemic investigations, and dispute resolution. Northwest Indiana Reinvestment Alliance is a HUD-approved housing counseling agency that includes fair housing outreach in its services.

Fair Housing Analysis > Fair Housing Enforcement, Outreach Capacity, and Resources Analysis > Additional Information

V.E.4. Additional Information

V.E.4.a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.

In community meetings and discussions with fair housing providers, there seems to be a consensus in the belief that a more coordinated approach to fair housing would benefit both residents served in the area and make more efficient use of limited resources.

V.E.4.b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

No additional information.

Fair Housing Analysis > Fair Housing Enforcement, Outreach Capacity, and Resources Analysis > Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

V.E.5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing enforcement, outreach capacity, and resources and the fair housing issues, which are Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

V.E.5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors - Other

Lack of regional coordination.

Fair Housing Goals and Priorities > Prioritization of Contributing Factors

VI.1. For each fair housing issue, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.

Private Discrimination

In reviewing data for the City's down-payment assistance program, Homebound, there was a lack of African American homebuyers purchasing homes in the northern portion of the City, including the North Hammond and Robertsdale neighborhoods. While the City has not been able to determine specific instances of discrimination, African Americans born and raised in the City did not find this statistic surprising. Further investigation is needed.

Access to Financial Services / Lending Discrimination

Based on an assessment of HMDA data, African Americans and Hispanics are less likely to originate home purchase loans. The data cannot determine if the cause of this disparate outcome is discrimination. Other possible contributing factors would include a lack of access to financial services, credit counseling, and economic opportunities.

Deteriorated and Abandoned Properties / Land use and zoning laws

Hammond has an older housing stock that is not being replaced in large number through rehabilitation or redevelopment. A large number of housing units fall into disrepair and in some cases are abandoned. The most appropriate solution to remove the negative effects of these blighted properties is to demolish them. Many of these older homes were built on small lots, in some cases only 25 feet wide. The zoning requirements call for a minimum lot width of 40 feet to redevelop. In order to build a new unit, a builder would need to combine two lots together or seek a variance.

The impediments to redeveloping these blighted properties have a disparate impact on their surrounding areas, which are increasingly populated with Hispanic and African American residents. The latest Census shows that Hammond's two largest minority populations, Hispanics and African Americans, now account for 56% of the City population. Since 1990, the City has gained 17,643 Hispanic residents and 9,442 African American residents while the White Non-Hispanic population decreased by 33,534. Put into a regional context, these demographic trends lead to an increasingly segregated living pattern.

Lack of Private Investment in Specific Neighborhoods

New housing development in Lake County continues to be concentrated in the communities on the outskirts of the metropolitan region. Over the last six years, new housing development and investment within Lake County is primarily located in its southern communities. Crown Point, St. John, Merrillville, Cedar Lake, and Winfield account for 75% of the new housing units authorized by permits reported from 2010-2015. Communities in the northern portion of Lake County, including Hammond, East Chicago, Whiting, and Gary, accounted for only 5% of the permit activity.

This lack of private investment within the City creates regional disparities in access to opportunity and results in deteriorating quality of housing stock, poor school performance, and fewer employment opportunities. From a regional context, these disparities have a disparate impact on the populations of Hammond, East Chicago, and Gary which have relatively larger minority populations. These are large, complex issues that will require coordinated and comprehensive strategies at the regional level to address.

Siting selection policies / decisions for publicly supported housing

A RECAP is a neighborhood with a high poverty rate and a non-white population of 50 percent or more. The City of Hammond has one area identified as a Racially/Ethnically Concentrated Area of Poverty (RECAP). This area's qualification as a RECAP is largely a result of the clustering of affordable housing developments into one area. Most of the housing units within the RECAP identified within Hammond are subsidized.

According to the South Suburban Housing Center, of the eleven affordable housing developments in Hammond, including public housing, low-income housing tax credit or privately assisted housing, nine of the eleven are located in two clusters. Four developments are located within the RECAP and five additional developments are located in Columbia Center. These multi-family developments contain 973 units (83.6%) of Hammond's total subsidized developments. The RECAP is a majority low-income African American area. The Columbia Center area has a population that is 64.5% low to moderate income African American and Hispanic.

The site selection for large affordable housing developments can become a fair housing issue if members of a protected class, such as racial minorities, are disproportionately represented among low-income populations who would benefit from low-cost housing **and** the housing developments are segregated or located in areas that offer a relative lack of opportunity. In the case of Columbia Center, the Hammond Housing Authority has attracted huge amounts of investment to increase the overall standard of housing and serves as an asset to the surrounding neighborhood. The City will continue to explore potential issues and solutions within the RECAP.

Availability, type, frequency, and reliability of public transportation

The City administered a public bus service until 2010, when the administration of the bus service was transferred to the Regional Bus Authority due to fiscal pressures. The Regional Bus Authority was never able to secure an adequate funding source and ended operations in June 2012. Portions of the City currently receive limited service from PACE Bus Lines and the Gary Public Transportation Corporation (GPTC).

The lack of public transportation is one of the most frequently cited issues facing low income persons in the City of Hammond. A lack of public transportation can become a fair housing issue when members of a protected class, such as persons with disabilities and racial minorities, are disproportionately represented among transit users and are limited in their housing choice.

Northwest Indiana Regional Planning Commission (NIRPC) is the planning agency that coordinates public transit for the region, including fixed route, complementary paratransit, and demand response services. In 2006, Everybody Counts, Inc., a local advocacy organization for persons with disabilities, obtained a federal court consent decree ordering NIRPC and several local public transit agencies to comply with the Americans with Disabilities Act. While the federal litigation was ended in June 2014 through a conciliation agreement, the adequacy of transportation for persons with disabilities remains an issue in the City and Lake County as a whole.

V. Fair Housing Analysis > B. General Issues > Segregation/Integration > Contributing Factors of Segregation

Lack of private investments in specific neighborhoods

Private discrimination

Based on the data examined, patterns of housing segregation exist at both the regional and City level. Statistically, the City is more integrated than the region at the moment. If demographic trends continue, Hammond will become less integrated as the White Non-Hispanic population continues to decrease and the two largest minority populations, Hispanic and Black Non-Hispanic, continue to increase.

In addition to the lack of private housing investment within the City and potential private discrimination, the legacy of past housing patterns continues to slow the integration of specific neighborhoods. When discussing the lack of African American homebuyers buying homes in Robertsdale, several long time African American City residents stated that they were not surprised by the numbers.

V. Fair Housing Analysis > B. General Issues > R/ECAPs > Contributing Factors of R/ECAPs

The segregation patterns in Chicago metropolitan area have a long history. The roots of the current housing patterns have been well documented and challenged. Fifty years ago, Martin Luther King, Jr. led the Chicago Freedom Movement in an effort to push for open housing and an end to the slum conditions in Chicago. Of his experience in the Chicago area, King stated "I've been in many demonstrations all across the south, but I can say that I have never seen, even in Mississippi and Alabama, mobs as hostile and as hate-filled as I'm seeing in Chicago."

Much has happened in the past fifty years, but many of the housing patterns in place then are still in place now. And many of the causes are similar in nature. In a 2008 testimony given to the National Commission on Fair Housing and Equal Opportunity, the South Suburban Housing Center found that the causes of the segregation patterns in the southern suburbs of Cook County were similar to the white flight experienced by Chicago south side neighborhoods. While the earlier episodes of white flight from the Chicago neighborhoods were driven by more blatant forms of discrimination, such as steering and blockbusting, the more current forms of white flights are more subtle and harder to detect.

The 2013 CMAP report cited earlier found that economics could not account for the racial segregation patterns in the region. Instead, one of the primary driving factors for the housing patterns in Chicago region was the willingness, or lack thereof, of White Non-Hispanics to move into areas with significant minority populations. In addition, the report found that Hispanics and Asians have similar attitudes to

African American neighborhoods. When faced with such a weak demand in a market, the prices of those areas will fall and create economic burdens on a neighborhood and its residents. The end result are neighborhoods with higher minority concentrations and fewer economic opportunities.

Hammond's RECAP fits within this same pattern. The RECAP has a large Black, Non-Hispanic population coupled with high levels of poverty. The RECAP is also the location of a cluster of publicly assisted housing developments. It is clear that the site selection policies of the past have contributed to the formation of the RECAP.

The lack of private investment also contributed to the concentrations of poverty within the RECAP. As the area's population declined, up to a third of the single family housing fell into disrepair, became blighted, and was removed from the housing stock. Redevelopment of many of the vacant single family properties is complicated by the small lot sizes that do not conform to the minimum lot widths called for in the zoning ordinance.

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Contributing Factors of Disparities in Access to Opportunity

- The availability, type, frequency, and reliability of public transportation
- Lack of private investments in specific neighborhoods
- Lack of regional cooperation

V. Fair Housing Analysis > B. General Issues > Disproportionate Housing Needs > Contributing Factors of Disproportionate Housing Needs

Lending Discrimination

In reviewing the HUD-provided data, there is clear levels of disproportionate housing needs for African Americans and Hispanic households in both the City and the region. The primary contributing factor for the variation in housing problems, which are mostly caused through cost burdens as opposed to overcrowding or lack of kitchen and plumbing facilities, are the variances in household income for African Americans and Hispanics within the City.

To address disproportionate needs in housing cost burdens, it is necessary to address the underlying issues and contributing factors to the differences in household income. A strong contributing factor to family poverty is the type of household (single parent vs. married couple) and the presence of children.

Fair Housing Analysis > Publicly Supported Housing Analysis > Contributing Factors of Publicly Supported Housing Location and Occupancy

- Lack of private investment in specific neighborhoods
- Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
- Source of income discrimination

Fair Housing Analysis > Disability and Access Analysis > Disability and Access Issues Contributing Factors

- Access to transportation for persons with disabilities

Fair Housing Analysis > Fair Housing Enforcement, Outreach Capacity, and Resources Analysis > Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

- Lack of regional coordination.

Fair Housing Goals and Priorities > Fair Housing Goals

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
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Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Regional Coordination Testing and Enforcement	Private Discrimination	The specific issue cited above, namely the lack of African American Homebound participants purchasing homes in North Hammond and Robertsdale, will be further assessed in the first year of this plan and develop specific recommendations to ensure any identified issues are addressed.	Ten (10) Fair Housing Complaint investigations each year. Systemic testing of mortgage lending and/or steering of African American homebuyers.	Hammond, IN
<p>Discussion:</p> <p>There is a need to better coordinate the efforts of all fair housing agencies within the region to ensure that the limited resources available to each are used to their maximum efficiency. The City will continue to support the Hammond Human Relations Commission to investigate instances of private discrimination. When necessary, the Human Relations Commission will coordinate with other fair housing agencies, including South Suburban Housing Center and Northwest Indiana Reinvestment Alliance, to conduct investigations and enforcement efforts.</p> <p>In addition, the South Suburban Housing Center has the capacity to conduct a substantial testing monitoring project to analyze systemic rental, sales, mortgage lending, disability accessibility and REO property testing with funds made available from HUD for this purpose, or to jointly apply with SSHC to obtain funding for the project.</p>				
Provide Greater Access to Financial Services / Examine Lending Discrimination	Lending Discrimination		(1) Systemic testing of mortgage lending. (2) Creation of credit repair program / Individual Development Accounts (IDA)	Hammond, IN
<p>Discussion:</p> <p>The City currently requires homebuyer counseling for all of its federally-funded homebuyer programs, including the Homebound down payment assistance program and the development of homebuyer housing through partner agencies like United Neighborhoods, Inc. In addition, agencies such as the Northwest Indiana Reinvestment Alliance, a HUD-approved housing counseling agency, and local lenders sponsor homebuyer counseling workshops and clinics. These workshops are well attended and have helped a number of homebuyers from protected classes. However, the final metric of loan origination for minority buyers remains disproportionately low. An underlying issue may be poor credit for potential buyers.</p>				
Encourage Redevelopment and Private Investment	Lack of private investment	Disparate Impact on neighborhoods with racial and ethnic concentrations	(1) Examine potential strategies to encourage redevelopment of vacant lots with small lot widths. (2) Funding subsidies for the development of new in-fill housing.	Hammond, IN
<p>Discussion:</p> <p>The City needs to strategically link the redevelopment of new housing units to parcels that are now vacant due to demolition of vacant structures.</p>				

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Siting selection policies / decisions for publicly supported housing	Siting selection policies		(1) All new or redeveloped multi-family affordable housing be scattered in small developments throughout the city in opportunity areas outside of the RECAP and Columbia Center locations. (2) As units in older developments in the RECAP are removed from the housing stock, they are replaced with an equal number of affordable units outside of this area.	Hammond, IN
<p>Discussion: In the course of the planning process, South Suburban Housing Center recommended the following actions in regard to site selection policies of publicly supported housing.</p>				
Increase the reliability of public transportation		Disparate impact on persons with disabilities and low income minority households.	(1) Modify existing bus routes to better serve neighborhoods with concentrations of assisted housing and the RECAP. (2) Explore the possibility of using federal grant dollars to supplement public transportation to increase access to employment centers, especially for neighborhoods with concentrations of assisted housing and the RECAP.	Hammond, IN
<p>Discussion: The City Department of Planning and Development needs to work with existing transit providers, including NIRPC, PACE, GPTC, and North Township, to improve access to reliable to transportation to person with disabilities.</p>				

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Promote Mobility			(1) Development of a voluntary mobility counseling program for Housing Choice Voucher holders to assist them in locating units and allowing movement to opportunity areas in Hammond and other communities in the region. (2) Introduction of "source of income" protections in fair housing ordinances, on a county-wide basis, to create access to a larger supply of housing units in opportunity areas for voucher holding families.	Hammond, IN
Discussion: In the course of the planning process, South Suburban Housing Center recommended the following proposed actions in order to promote greater mobility.				
Address disparities in access to opportunities in RECAP			(1) Work with existing community service providers to better service residents living the RECAP and other areas with relatively high concentrations of minorities and poverty. These programs include services directed at youth development, such as Parents as Teachers, Youthbuild, and Big Brothers/Big Sisters.(2) Support a new or existing Community Based Development Organization that can lead a coordinated response to the priority needs of RECAP residents .	Hammond, IN
Discussion:				

Documents			
File	Description	Uploaded	User

File	Description	Uploaded	User
Attachments.pdf (/Afh/Document/View/169)	Attachments	10/5/2016 10:38:30 AM	MVQ019
Dudley Letter 9.30.2016.pdf (/Afh/Document/View/170)	Dudley Letter	10/5/2016 10:40:48 AM	MVQ019
SSHC's Comments on Hammond's AFH-9-29-16.pdf (/Afh/Document/View/171)	South Suburban Comments	10/5/2016 10:41:46 AM	MVQ019
CAFHA Hammond AFH Comment.pdf (/Afh/Document/View/172)	CAFHA Letter	10/5/2016 10:43:16 AM	MVQ019
Carlotta Blake-King comment.pdf (/Afh/Document/View/173)	Carlotta Blake-King Comment	10/5/2016 10:45:20 AM	MVQ019
South Suburban Housing Center Public Hearing Testimony 8-23-16.docx (/Afh/Document/View/174)	SSHC Testimony	10/5/2016 10:45:51 AM	MVQ019

Maps					
Map 1 - Race/Ethnicity (Race/Ethnicity)	Hammond, Indiana	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/100/181272/R)	IL-IN-WI	Region
Map 2 - Race/Ethnicity Trends (Race/Ethnicity Trends, 1990 and Race/Ethnicity Trends, 2000)					
Race/Ethnicity Trends, 1990	Hammond, Indiana	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/200/181272/J)	IL-IN-WI	Region
Race/Ethnicity Trends, 2000	Hammond, Indiana	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/201/181272/R)	IL-IN-WI	Region
Map 3 - National Origin (National Origin)	Hammond, Indiana	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/300/181272/R)	IL-IN-WI	Region
Map 4 - LEP (Limited English Proficiency)	Hammond, Indiana	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/400/181272/J)	IL-IN-WI	Region
Map 5 - Publicly Supported Housing and Race/Ethnicity (Publicly Supported Housing and Race/Ethnicity)	Hammond, Indiana	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/500/181272/R)	IL-IN-WI	Region
Map 6 - Housing Choice Vouchers and Race/Ethnicity (Housing Choice Vouchers and Race/Ethnicity)	Hammond, Indiana	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/600/181272/R)	IL-IN-WI	Region
Map 7 - Housing Burden and Race/Ethnicity (Housing Burden and Race/Ethnicity)	Hammond, Indiana	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/700/181272/R)	IL-IN-WI	Region
Map 8 - Housing Burden and National Origin (Housing Burden and National Origin)	Hammond, Indiana	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/800/181272/J)	IL-IN-WI	Region
Map 9 - Demographics and School Proficiency (School Proficiency and Race/Ethnicity, National Origin and Family Status)					
School Proficiency and Race/Ethnicity	Hammond, Indiana	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/900/181272/R)	IL-IN-WI	Region
School Proficiency and National Origin					

Hammond, Indiana (../ArcGis/Map/901/181272/J)	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/901/181272/R)	IL-IN-WI	Region
School Proficiency and Family Status				
Hammond, Indiana (../ArcGis/Map/902/181272/J)	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/902/181272/R)	IL-IN-WI	Region
Map 10 - Demographics and Job Proximity (Job Proximity and Race/Ethnicity, National Origin and Family Status)				
Job Proximity and Race/Ethnicity				
Hammond, Indiana (../ArcGis/Map/1000/181272/J)	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/1000/181272/R)	IL-IN-WI	Region
Job Proximity and National Origin				
Hammond, Indiana (../ArcGis/Map/1001/181272/J)	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/1001/181272/R)	IL-IN-WI	Region
Job Proximity and Family Status				
Hammond, Indiana (../ArcGis/Map/1002/181272/J)	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/1002/181272/R)	IL-IN-WI	Region
Map 11 - Demographics and Labor Market Engagement (Labor Market Engagement and Race/Ethnicity, National Origin and Family Status)				
Labor Market and Race/Ethnicity				
Hammond, Indiana (../ArcGis/Map/1100/181272/J)	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/1100/181272/R)	IL-IN-WI	Region
Labor Market and National Origin				
Hammond, Indiana (../ArcGis/Map/1101/181272/J)	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/1101/181272/R)	IL-IN-WI	Region
Labor Market and Family Status				
Hammond, Indiana (../ArcGis/Map/1102/181272/J)	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/1102/181272/R)	IL-IN-WI	Region
Map 12 - Demographics and Transit Trips (Transit Trips and Race/Ethnicity, National Origin and Family Status)				
Transit Trips and Race/Ethnicity				
Hammond, Indiana (../ArcGis/Map/1200/181272/J)	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/1200/181272/R)	IL-IN-WI	Region
Transit Trips and National Origin				
Hammond, Indiana (../ArcGis/Map/1201/181272/J)	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/1201/181272/R)	IL-IN-WI	Region
Transit Trips and Family Status				
Hammond, Indiana (../ArcGis/Map/1202/181272/J)	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/1202/181272/R)	IL-IN-WI	Region
Map 13 - Demographics and Low Transportation Cost (Low Transportation Cost and Race/Ethnicity, National Origin and Family Status)				
Low Transportation Cost and Race/Ethnicity				
Hammond, Indiana (../ArcGis/Map/1300/181272/J)	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/1300/181272/R)	IL-IN-WI	Region
Low Transportation Cost and National Origin				
Hammond, Indiana (../ArcGis/Map/1301/181272/J)	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/1301/181272/R)	IL-IN-WI	Region
Low Transportation Cost and Family Status				
Hammond, Indiana (../ArcGis/Map/1302/181272/J)	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/1302/181272/R)	IL-IN-WI	Region
Map 14 - Demographics and Poverty (Poverty and Race/Ethnicity, National Origin and Family Status)				
Poverty and Race/Ethnicity				
Hammond, Indiana (../ArcGis/Map/1400/181272/J)	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/1400/181272/R)	IL-IN-WI	Region
Poverty and National Origin				
Hammond, Indiana (../ArcGis/Map/1401/181272/J)	Jurisdiction	Chicago-Naperville-Elgin, (../ArcGis/Map/1401/181272/R)	IL-IN-WI	Region

Poverty and Family Status					
Hammond, Indiana	Jurisdiction	Chicago-Naperville-Elgin,	IL-IN-WI	Region	(../ArcGis/Map/1402/181272/J)
Map 15 - Demographics and Environmental Health (Environmental Health and Race/Ethnicity, National Origin and Family Status)					
Environmental Health and Race/Ethnicity					
Hammond, Indiana	Jurisdiction	Chicago-Naperville-Elgin,	IL-IN-WI	Region	(../ArcGis/Map/1500/181272/J)
Environmental Health and National Origin					
Hammond, Indiana	Jurisdiction	Chicago-Naperville-Elgin,	IL-IN-WI	Region	(../ArcGis/Map/1501/181272/J)
Environmental Health and Family Status					
Hammond, Indiana	Jurisdiction	Chicago-Naperville-Elgin,	IL-IN-WI	Region	(../ArcGis/Map/1502/181272/J)
Map 16 - Disability by Type (Hearing, Vision, Cognitive Disability, Ambulatory, Self-Care and Independent Living Disability)					
Hearing, Vision and Cognitive Disability					
Hammond, Indiana	Jurisdiction	Chicago-Naperville-Elgin,	IL-IN-WI	Region	(../ArcGis/Map/1600/181272/J)
Ambulatory, Self-Care and Independent Living Disability					
Hammond, Indiana	Jurisdiction	Chicago-Naperville-Elgin,	IL-IN-WI	Region	(../ArcGis/Map/1601/181272/J)
Map 17 - Disability by Age Group (Disability by Age Group)					
Hammond, Indiana	Jurisdiction	Chicago-Naperville-Elgin,	IL-IN-WI	Region	(../ArcGis/Map/1700/181272/J)

Tables

<p>Table 1 - Demographics - Tabular demographic data for Jurisdiction and Region (including total population, the number and percentage of persons by race/ethnicity, national origin (10 most populous), LEP (10 most populous), disability (by disability type), sex, age range (under 18, 18-64, 65+), and households with children) Hammond, Indiana (181272) (../ArcGis/Table/1/181272)</p> <p>Table 2 - Demographic Trends - Tabular demographic trend data for Jurisdiction and Region (including the number and percentage of persons by race/ethnicity, total national origin (foreign born), total LEP, sex, age range (under 18, 18-64, 65+), and households with children) Hammond, Indiana (181272) (../ArcGis/Table/2/181272)</p> <p>Table 3 - Racial/Ethnic Dissimilarity Trends - Tabular race/ethnicity dissimilarity index for Jurisdiction and Region Hammond, Indiana (181272) (../ArcGis/Table/3/181272)</p> <p>Table 4 - R/ECAP Demographics - Tabular data for the percentage of racial/ethnic groups, families with children, and national origin groups (10 most populous) for the Jurisdiction and Region who reside in R/ECAPs Hammond, Indiana (181272) (../ArcGis/Table/4/181272)</p> <p>Table 5 - Publicly Supported Housing Units by Program Category - Tabular data for total units by 4 categories of publicly supported housing in the Jurisdiction (Public Housing, Project-Based Section 8, Other Multifamily, Housing Choice Voucher (HCV) Program) Hammond, Indiana (181272) (../ArcGis/Table/5/181272)</p> <p>Table 6 - Publicly Supported Housing Residents by Race/Ethnicity - TTabular race/ethnicity data for 4 categories of publicly supported housing (Public Housing, Project-Based Section 8, Other Multifamily, HCV) in the Jurisdiction compared to the population as a whole, and to persons earning 30% AMI, in the Jurisdiction Hammond, Indiana (181272) (../ArcGis/Table/6/181272)</p> <p>Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category - Tabular data on publicly supported housing units and R/ECAPs for the Jurisdiction Hammond, Indiana (181272) (../ArcGis/Table/7/181272)</p> <p>Table 8 - Demographics of Publicly Supported Housing Developments by Program Category - Development level demographics by Public Housing, Project-Based Section 8, and Other Multifamily, for the Jurisdiction</p>

Hammond, Indiana (181272) (../ArcGis/Table/8/181272)

Table 9 - Demographics of Households with Disproportionate Housing Needs - Tabular data of total households in the Jurisdiction and Region and the total number and percentage of households experiencing one or more housing burdens by race/ethnicity and family size in the Jurisdiction and Region

Hammond, Indiana (181272) (../ArcGis/Table/9/181272)

Table 10 - Demographics of Households with Severe Housing Cost Burden - Tabular data of the total number of households in the Jurisdiction and Region and the number and percentage of households experiencing severe housing burdens by race/ethnicity for the Jurisdiction and Region

Hammond, Indiana (181272)
(../ArcGis/Table/10/181272)

Table 11 - Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children - Tabular data on the number of bedrooms for units of 4 categories of publicly supported housing (Public Housing, Project-Based Section 8, Other Multifamily, HCV) for the Jurisdiction

Hammond, Indiana (181272)
(../ArcGis/Table/11/181272)

Table 12 - Opportunity Indicators, by Race/Ethnicity - Tabular data of opportunity indices for school proficiency, jobs proximity, labor-market engagement, transit trips, low transportation costs, low poverty, and environmental health for the Jurisdiction and Region by race/ethnicity and among households below the Federal poverty line.

Hammond, Indiana (181272)
(../ArcGis/Table/12/181272)

Table 13 - Disability by Type - Tabular data of persons with vision, hearing, cognitive, ambulatory, self-care, and independent living disabilities for the Jurisdiction and Region

Hammond, Indiana (181272)
(../ArcGis/Table/13/181272)

Table 14 - Disability by Age Group - Tabular data of persons with disabilities by age range (5-17, 18-64, and 65+) for the Jurisdiction and Region

Hammond, Indiana (181272)
(../ArcGis/Table/14/181272)

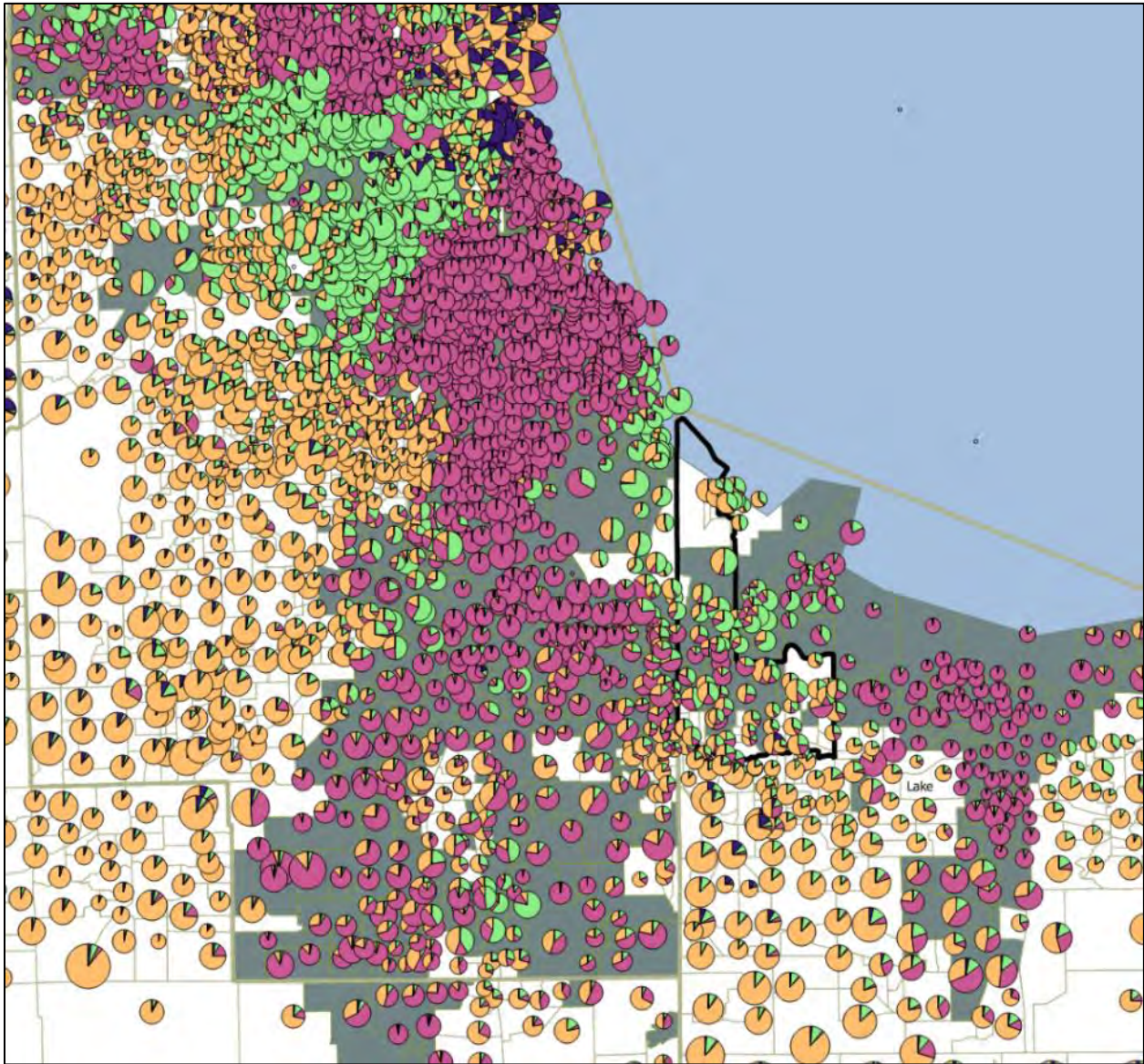
Table 15 - Disability by Publicly Supported Housing Program Category - Tabular data on disability and publicly supported housing for the Jurisdiction and Region

Hammond, Indiana (181272)
(../ArcGis/Table/15/181272)

Attachments

1. 2010 Population by Race and Ethnicity - Region
2. 2010 Population by Race and Ethnicity – City Vicinity
3. Homebound Participants by Race
4. RECAP Land Use Map
5. School Proficiency Index
6. Labor Market Index
7. Jobs Proximity Index
8. Transportation Cost Index
9. Transit Index
10. Low Poverty Index
11. Environmental Index
12. 2014 Household Income by Race and Ethnicity

CUSTOM MAP #1: 2010 POPULATION BY RACE AND ETHNICITY - REGION



2010 Census Data by Block Group

Race/Ethnicity Pie Chart (2010)

- White, Non-Hispanic
- Black, Non-Hispanic
- Hispanic
- Asian / Pacific Islander

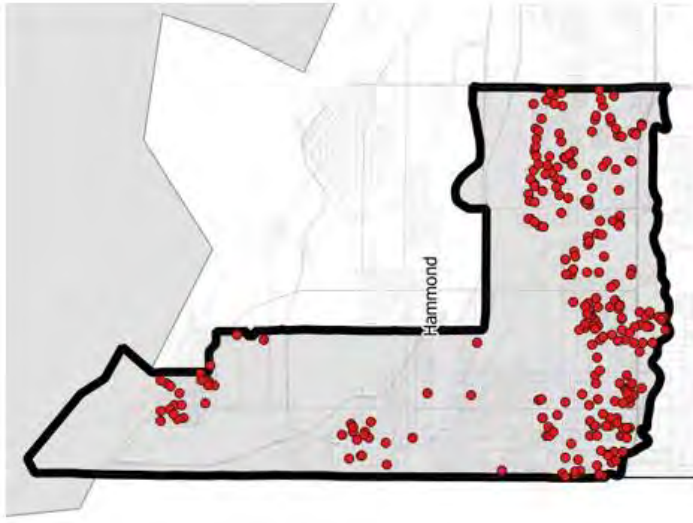
Racial Majority (2010)

- Non-White Majority
- White Non-Hispanic Majority

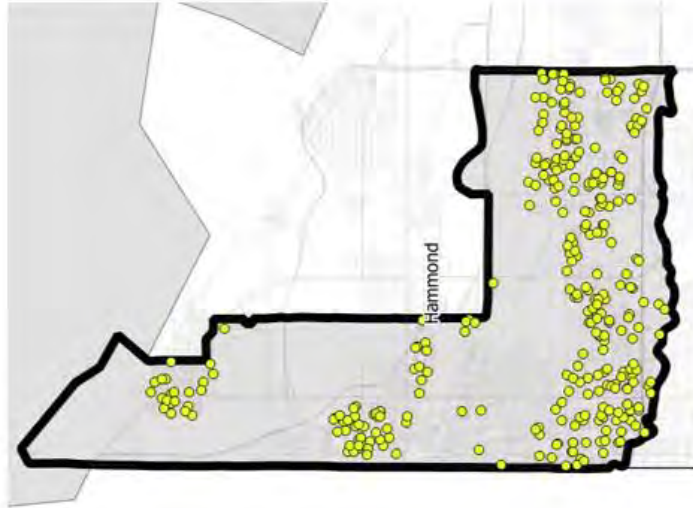
CUSTOM MAP #2: 2010 POPULATION BY RACE AND ETHNICITY – CITY



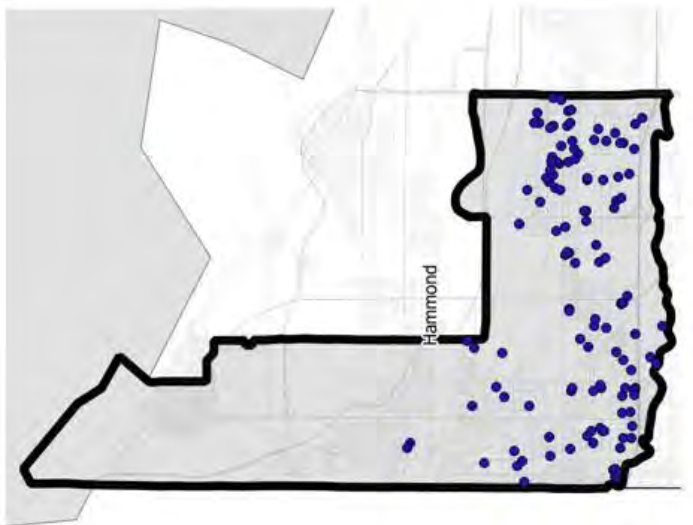
CUSTOM MAP #3: HOMEBOUND PARTICIPANTS BY RACE



White, Non-Hispanic

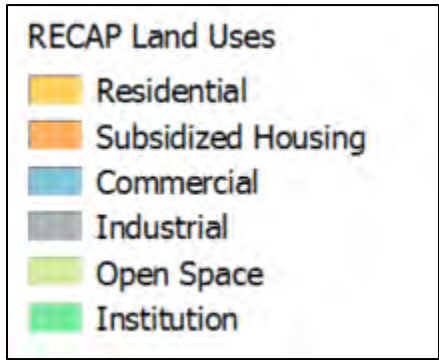
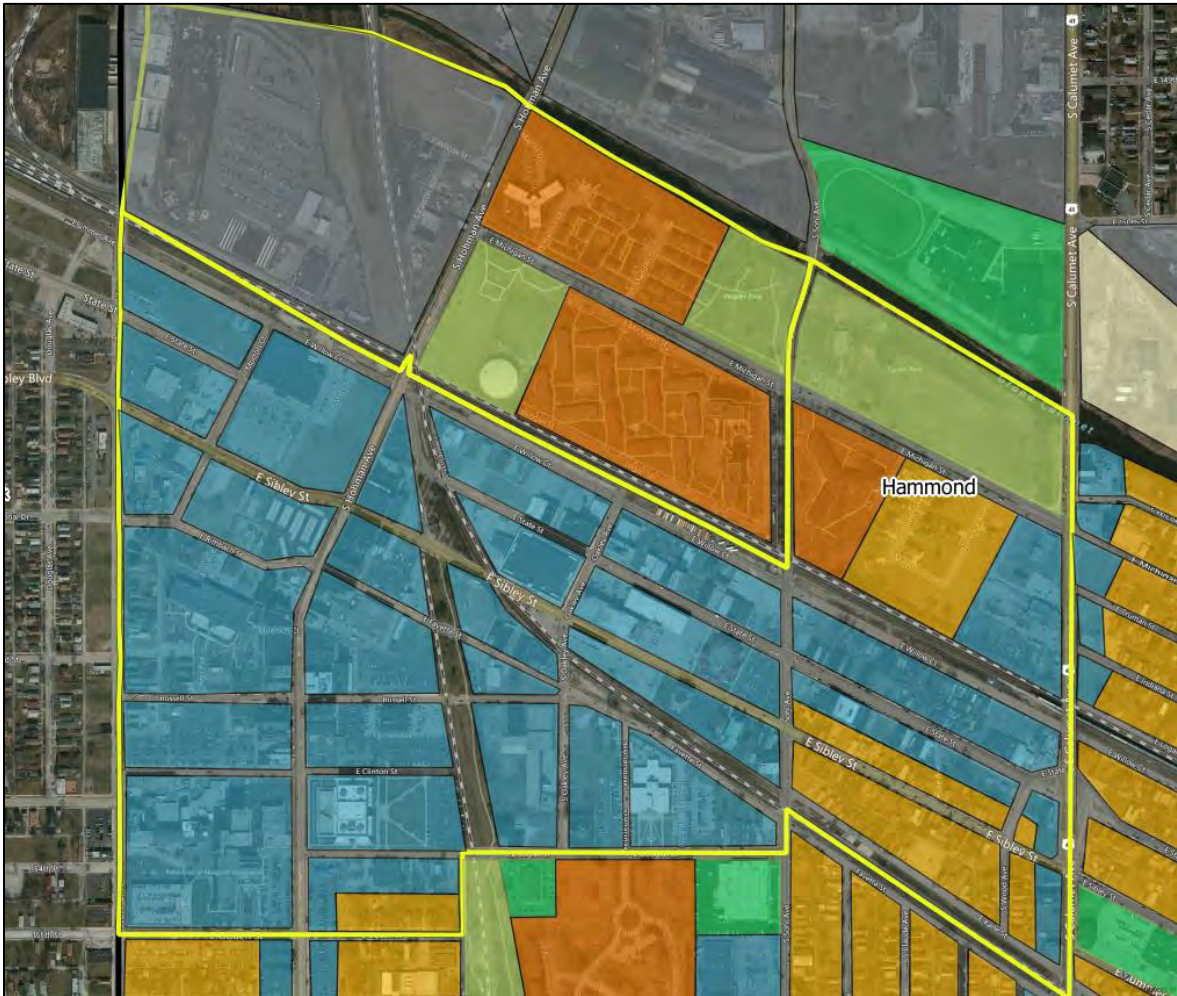


Hispanic



African American

CUSTOM MAP #4: RECAP LAND USE MAP



GRAPHIC #1: SCHOOL PROFICIENCY INDEX



GRAPHIC #2: LABOR MARKET INDEX



GRAPHIC #3: JOBS PROXIMITY INDEX



GRAPHIC #4: TRANSPORTATION COST INDEX



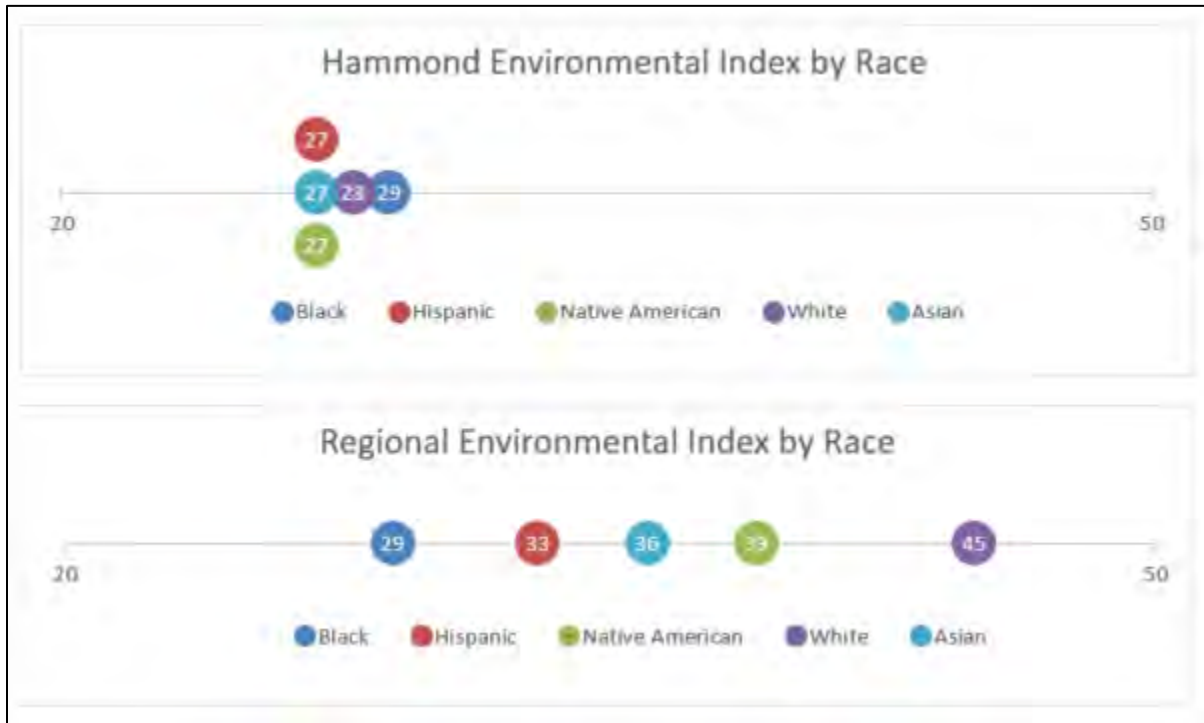
GRAPHIC #5: TRANSIT INDEX



GRAPHIC #6: LOW POVERTY INDEX



GRAPHIC #7: ENVIRONMENTAL INDEX



GRAPHIC #8: 2014 HOUSEHOLD INCOME BY RACE AND ETHNICITY

	African American	White-Non Hispanic	Hispanic
Less than \$20,000	2,215	2,925	1,621
\$20,000 to \$50,000	2,408	4,873	3,187
\$50,000 to \$100,000	1,327	4,561	2,426
\$100,000 or more	477	1,608	588

Source: Household Income 2014 ACS 5 Year Estimates

