



**Analysis of Impediments to Fair  
Housing Choice, Marion County, FL.  
Consortium 2015 - 2019**



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## Executive Summary

The purpose of the Analysis of Impediments to Fair Housing Choice (AI) is to examine social and economic characteristics of public sector and private industry housing practices, as well as housing market conditions that may expose certain population groups to housing discrimination. This report covers the entitlement jurisdictions of both the City of Ocala and Marion County.

In addition to analyzing background information on demographic, economic, and housing characteristics of the consortium, this AI Report reviews and analyzes potential impediments to the jurisdictions.

Both the City of Ocala and Marion County “support an ethnically/racially diverse population.” Foreclosure and predatory lending practices, like all others parts of the county, have contributed to many of the fair housing issues. In addition, persons with disabilities face barriers to housing choice and independent living. There is generally a lack of housing with accessibility features (e.g. hallways wide enough for wheelchair access).

Both the City of Ocala and Marion County have an increasing minority population; however, some of these groups are significantly limited to the affordable areas of the county. Blacks, for instance, have the highest percentage in the West Ocala area, whereas the highest percentage of Hispanics are located in Silver Springs and Marion Oaks. It appears all low income racial groups with limited income have serious challenges finding decent, safe, and sanitary housing at a cost in line with their income. Addressing fair housing impediments will increase the number of strong families, increase the economic capacity of all Marion County, attract businesses, and build the tax base. It will also improve the quality of life for thousands of low income families. Strong community leadership is needed to develop support throughout the county for the creation of health mixed income communities.

This analysis of impediments was prepared by Marion County Community Services and the City of Ocala Community Revitalization Strategies Department as a consortium and prepared in accordance with the requirements of the U.S. Department of Housing and Urban Development. This document serves as a companion to the Marion County and The City of Ocala five-year Plan which outlines the City and County’s affordable housing and community development needs, provides goals and strategies for addressing them, and describes federally funded actions to be undertaken in carrying out plan strategies. The purpose of these actions is to identify and eliminate patterns or actions which lead to discrimination on the basis of race, color, religion, sex, disability, familial status, or national origin, and to expand housing options for all residents. As part of this effort, HUD requires cities to undertake proactive fair housing planning efforts. This process requires:

- The development of an Analysis of Impediments to Fair Housing Choice.
- The development of activities to overcome the effects of any identified impediments.
- The development of a system of recordkeeping to monitor and record the activities undertaken to reduce or overcome the identified impediments.

The Ocala/Marion County Consortium has long pursued a variety of actions to further fair housing. This analysis will serve as a resource to document continuing fair housing efforts and as a planning and educational tool to guide future activities.

## What is Fair Housing?

The Fair Housing Act 42 U.S.C. 3601 et. Seq., prohibits discrimination by direct providers of housing, such as landlords and real estate companies, as well as other entities, such as municipalities, banks or other lending institutions, and homeowners insurance companies whose discrimination practices make housing unavailable to persons because of race, color, religion, sex, disability, national origin, or familial status.

For person with disabilities, fair housing law makes it illegal to:

- Fail to make reasonable accommodation in rules, policies, and services or to not give a person with a disability equal opportunities to occupy and enjoy the full use of a housing unit; and
- Fail to allow reasonable modification to the premises if the modification is necessary to allow full use of the premises.

Barriers to fair housing exist when members of a protected class wish to exercise their rights to housing choice and are barred from doing so based on their protected status (i.e. ethnicity or gender). Segregation is only a barrier when institutional, social, or governmental forces (other than income or personal preference) dictate housing choices (persons of authority).

According to the City of Ocala and Marion County, local residents with income at or below 50% of the median income have the highest risk of homelessness. This includes all categories and individuals: the elderly, people with special needs families, renters, and homeowners. There is an identified need for affordable housing within all of Marion County.

## **Acknowledgements**

This Analysis of Impediments (AI) to Fair Housing Choice for The City of Ocala Revitalization Strategies Department and Marion County Community Services was completed by the City-County Consortium for 2015-2019.

### County Commissioners

David Moore, District 1  
 Kathy Bryant, District 2 (Chairman)  
 Stan McClain, District 3  
 Carl Zalak, III, District 4 (Vice Chairman)  
 Earl Arnett, District 5

### Ocala Elected Officials

Kent Guinn, Mayor  
 Jay Musleh, Councilman  
 James P. Hilty Sr., Council President  
 Matthew Wardell, Councilman  
 Mary S. Rich, Councilwoman  
 Brent Malever, Council President Pro-Tem

### Agency/Entity Responsible for Preparing the Analysis of Impediments

Agency Role	Name	Department/Agency
Housing Grant Manager	Marion County	Community Services
Administrator of City CDBG	City of Ocala	Revitalization Strategies

Marion County Community Service and the City of Ocala have a signed cooperative agreement to participate in an updated consortium agreement on April 1, 2015 through September 30, 2019. In preparation for the 5 year Analysis of Impediments, the Consortium consulted with other public and private agencies that provided assisted housing and social services, including those focusing on services to children, veterans, elderly persons, persons with disabilities, people with HIV/AIDS, and homeless persons.

## Fair Housing Laws

The Federal Fair Housing Act of 1968 and the Fair Housing Amendments Act of 1988 prohibit discrimination in all aspects of housing, including the sale, rental, lease, or negotiation for real property. The Fair Housing Act prohibits discrimination based on a person's race, color, religion, sex, disability, familial status, or national origin. In addition, HUD issued a Final Rule on February 3, 2012, that prohibits communities and organizations participating in its grant programs from discriminating on the basis of actual or perceived sexual orientation, gender identity, or marital status. Person who are protected from discrimination by fair housing laws are referred to as members of the protected classes.

### State of Florida Fair Housing Laws

The Florida Civil Rights Act of 1992 (State Statute 760) prohibits housing discrimination on the basis of race, color, religion, sex, national origin, age, handicap, or marital status.

### Federal Accessibility Standards

**Fair Housing Amendment Act:** The Act requires owners of housing facilities make “reasonable accommodation” (exceptions) in their rules, policies, and operations to give people with disabilities equal housing opportunities. The Fair Housing Act also requires landlords to allow tenants with disabilities to make reasonable access-related modifications to their private living space, as well as to common use spaces, at the tenant's own expense when working with a private landlord. Finally, the Act requires that new multi-family housing with four or more units be designed and built to allow access for persons with disabilities. This includes accessible common use areas, doors that are wide enough for wheelchairs, kitchens and bathrooms that allow a person using a wheelchair to maneuver, and other adaptable features within the units.

**Americans with Disabilities Act (ADA):** ADA standards are required to ensure equal access to places of public accommodation and commercial facilities for individuals with disabilities. Title II of the ADA applies to state and local services, including state and local housing programs. Government entities are obliged to ensure that housing financed through state and local programs complies with ADA accessibility guidelines.

### Additional Protection for the Disabled

If someone has a physical or mental disability (including: hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex, and mental retardation) that substantially limits one or more major life activities, or has a record of such a disability, or is regarded as having such a disability, a landlord may not:

- Refuse to let the disabled person make reasonable modifications to a dwelling or common use areas, at the disabled person's expense, if necessary for the disabled person to use the housing. Where reasonable, the landlord may permit changes only if the disabled person agrees to restore the property to its original conditions when he or she moves.
- Refuse to make reasonable accommodations in rules, policies, practices, or services if

necessary for the disabled person to use the housing. For example, a building with a “no pets” policy must make a reasonable accommodation and allow a visually impaired tenant to keep a guide dog.

**Section 504:** Section 504 of the Rehabilitation Act of 1973 states: “No otherwise qualified individual with a disability in the United States . . . shall, solely by reason of her or his disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program, service or activity receiving federal financial assistance or under any program or activity conducted by any Executive agency or by the United States Postal Service. (29 U.S.C. 794)”. This means that Section 504 prohibits discrimination on the basis of disability in any program or activity that receives financial assistance from any federal agency, including HUD.

**Architectural Barriers Act:** The Architectural Barriers Act of 1968 (ABA) (42 U.S.C. 4151-4157) requires that certain buildings financed with Federal funds must be designed, constructed, or altered in accordance with standards that ensure accessibility for persons with physical disabilities. The ABA requires that covered buildings comply with the Uniform Federal Accessibility Standards (UFAS). The ABA does not cover privately-owned housing, but covers buildings or facilities financed in whole or in part with Federal funds. The ABA applies to public housing (24 CFR 40), and to buildings and facilities constructed with CDBG funds (24 CFR 570.614). In practice, buildings built to meet the requirements of Section 504 and Title II of the ADA will conform to the requirements of the ABA.

### **Assessing Barriers to Fair Housing**

Fair housing is not only a legal requirement, it is a moral concern and a matter of economics. No community can reach its full potential for economic growth and well-being if some of its residents are unable to fully participate in the housing market. Studies clearly show the relationship between housing, jobs, transportation, and the ability to build and maintain wealth. Home seekers who do not have access to the full range of available housing choices may not be able to live in neighborhoods that enhance their opportunities and their future success. When housing choices are limited by discriminatory housing practices and policies, communities and individuals are denied opportunities for growth. Discrimination in housing and housing-related services is prohibited by federal, state, or county fair housing laws when it is based on race, color, religion, sex, disability, familial status, or national origin in the state and the County.

It is widely accepted that access to safe, decent, and affordable housing underlies unequal education, unequal access to jobs, and unequal income. A truly open housing market is essential to conquering these disparities. Encouraging adequate investment in both human capital and the built environment is critical in overcoming barriers and ensuring that all neighborhoods are diverse, healthy, and attractive places to live. This report does not say that some neighborhoods are better than others in either The City of Ocala or Marion County, but it does recognize that impediments to fair housing have historically contributed to the decline of neighborhoods that

suffer due to lack of investment. The recommendations resulting from this report are not intended to force people to make pro-integrative housing choices regardless of other criteria, but they are certainly intended to make such choices easier and more likely.

The recommendations in this report are intended to provide a practical basis for eliminating a wide variety of impediments to housing choice. Some will be relatively easy to accomplish, while others will be more difficult. We are confident, however, that the County's commitment to addressing the issues identified in this report will ultimately do a great deal to promote open housing in the County. Eliminating the barriers to fair housing will not only improve the quality of life for many individuals and families, but will also enhance the economic health of the entire region.

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## Key Terms

**Fair Housing:** A condition in which individuals of similar income levels in the same housing market have a like range of housing choice available to them regardless of race, color, religion, sex, disability, familial status, or national origin.

**Impediments:** HUD defines impediments to fair housing choice as: 1) any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices; 2) any actions, omissions, or decisions that have the effect of restricting housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

**Persons with Disabilities:** Federal law defines a 'disability' or 'handicap' as having a physical or mental impairment which substantially limits one or more of such person's major life activities; a record of having such an impairment; or being regarded as having such an impairment.

**Federal Protected Classes:** Race, color, religion, sex, disability, familial status, or national origin.

**Administrative Law Judge (ALJ):** The officer employed by HUD or a state fair housing agency who presides over an administrative hearing and decides whether an act of discrimination has taken place and, if so, the remedy that should be imposed.

**Blockbusting:** Blockbusting, or 'panic peddling', occurs when real estate agents frighten people to move out of a neighborhood because of fear of a rapid influx of minority persons.

**Broker:** A person who acts as an intermediary between a buyer and seller of real estate to negotiate a contract for the purchase or sale of property.

**Civil Penalty:** This is a monetary penalty that can be imposed upon a defendant found guilty of willful, malicious, or reckless discriminatory acts. The penalty is paid to the government, not to the plaintiff.

**The Civil Right Act of 1866:** This statute passed after the Civil War gives all persons the same right as white citizens to make and enforce contracts, and all citizens the same right as white citizens to inherit, purchase, lease, sell, hold, and convey real and personal property.

**Compensatory Damages:** The damages a victim of housing discrimination can recover to compensate for injuries actually sustained. Compensatory damages can include: out-of-pocket expenses, compensation for loss or rights, and compensation for humiliation and emotional distress.

**Conciliation:** Conciliation refers to the efforts of HUD or a state agency to attempt the resolution of a fair housing complaint without a hearing by securing a settlement between the parties.

**Defendant:** The person or person who are sued in a private fair housing lawsuit. Anyone who participated in, or was responsible for, the discrimination can be named as a defendant.

**The Department of Housing and Urban Development (HUD):** The federal agency charged with enforcing the fair housing laws.

**Disparate Impact:** A rule or regulation that may be neutral on its face, but nonetheless has a discriminatory impact on a protected class.

**Disparate Treatment:** Disparate treatment occurs when a housing provider treats a member of a protected class different from other persons.

**The Fair Housing Act of 1968:** This Act prohibited discrimination in residential housing on the basis of race, color, religion, sex disability, familial status, or national origin.

**Amendments Act of 1988:** This Act expanded the Fair Housing Act of 1968 to prohibit discrimination on the basis of familial status and handicap and to broaden the remedies available to aggrieved persons.

**Familial Status Discrimination:** The Fair Housing Act defines “familial status” to mean one or more individuals (who have not attained the age of 18 years) being domiciled with a parent or person having legal custody, or the designee of the parent or the person having custody with the written permission of the parent or other person. It also applies to pregnant women or someone in the process of securing legal custody of a minor.

**Disability Discrimination:** A handicapped individual is someone with a physical or mental impairment that substantially limits one or more of that person’s major life activities, or someone who has a record of having such an impairment, or who is regarded as having such an impairment. It does not include persons who currently illegally use or are addicted to drugs.

**Housing for older persons:** Under the Fair Housing Act, housing for older persons can exclude families with children.

**The Act defines housing for older persons as housing:**

- A. Provided under any State or Federal program that the Secretary determines is specifically designed and operated to assist elderly persons (as defined in the State of Federal program); or
- B. Intended for, and solely occupied by, persons 62 years of age or older; or
- C. Intended and operated for occupancy by at least one person 55 years of age or older per unit. In determining whether housing qualifies as housing for older persons under this subsection, the Secretary shall develop regulations which require at least the following factors:
  - a. The existence of significant facilities and services specifically designed to meet the physical or social needs of older persons, or if the provision of such facilities and services is not practicable, that such housing is necessary to provide important housing opportunities for older person; and
  - b. That at least 80 percent of the units are occupied by at least one person 55 years of age or older per unit; and
  - c. The publication of, and adherence to, policies and procedures which demonstrate an intent by the owner or manager to provide housing for persons 55 years of age or older.

**Injunction:** An order by a court requiring a defendant to do something or to stop from doing something. An injunction can normally be imposed only after there is a hearing.

**Occupancy Standards:** Municipalities and landlords frequently regulate the number of persons that can occupy a unit. Such regulations must be reasonable to pass scrutiny under the Fair Housing Act.

**Plaintiff:** The person or persons who file a private fair housing lawsuit. Any person who is injured by a discriminatory act can be a plaintiff.

**Protective Class:** Persons protected from discrimination under the fair housing laws.

**Protective Classes for Ocala and Marion County:** Race, color, religion, sex, disability, familial status, or national origin

**Punitive Damages:** These are damages awarded to a plaintiff to punish a defendant for willful, malicious, or reckless discriminator act.

**Quota:** A quota is where a specific number of units are set aside for minority applicants. Often minorities are not allow to exceed the quota. Quotas are generally illegal under the fair housing laws. Quotas are distinguished from Goals, which are generally legal and set out targets to be achieved.

**Realtor:** A person who is a real estate agent or appraiser who is a member of the National Association of Realtors.

**Reasonable Accommodation:** Under the Fair Housing Act, a housing provider must provide reasonable accommodation to disabled persons. A reasonable accommodation is something that the landlord may provide to make hosing more accessible to the disabled and that will not involve an unreasonable cost or administration burden.

**Redlining:** Redlining occurs when lenders or insurance companies refuse to do business in a particular neighborhood.

**Steering:** Steering occurs when members of a protected group are shown housing only in certain areas or neighborhoods.

**Substantially “Equivalent”:** A state agency may be certified as “substantially equivalent” by HUD if the substantive rights, procedures, remedies, and availability for judicial review under the state act are substantially equivalent to those under the federal Fair Housing Act.

**Temporary Restraining Order (TRO):** An emergency order that lasts for only 10 days that prevents a defendant from doing something. It can be entered without the court first holding a formal hearing. In a fair housing case a TRO may prevent a landlord from renting a unit until a hearing can be held to determine if discrimination occurred.

**Testing:** This is a procedure approved by the courts whereby non-applicants post as applicants to see if members of different classes are treated DIFFERENTLY.

**Zoning Laws:** Municipalities frequently pass zoning laws to regulate density or the type of buildings or activities that can take place in a neighborhood.

## This Analysis Consists of Four Sections:

1. Overview of demographic and housing market conditions in the City and County, particularly as they pertain to housing choice.
2. Summary of the federal, state, and local laws that guide fair housing activities and provide for the identification of discriminatory practices and the enforcement of penalties against those who commit them.
3. Summary of the fair housing complaint process in the City and the County and the number and status of recent complaints filed with Community Legal Services of Mid-Florida.
4. Discussion of identified and potential market and public policy impediments to fair housing choice and recommendations for addressing them.

The following is a list of identified or potential fair housing impediments as outlined in this Analysis:

- Mortgage Lending Disparities
- Lack of Fair Housing Act Language / Notice in Advertising Rental Units
- Inadequate Supply of Affordable Rental Units / Barriers for Low-income Population
- Income Barriers to and Location Concerns of Accessible Rental Housing
- Perceptions of Affordable Rental Housing – NIMBYism / Rental Up Front Cost
- Language Barriers / Cultural Differences
- Landlord and Tenant Education

This analysis has been developed by the Marion County Consortium to identify current impediments, review actions taken by the Consortium to prevent impediments, and outline future plans for the elimination of impediments to fair housing throughout the County and City. Marion County's housing programs service the unincorporated area of the County and the City of Ocala programs serve those within the City limits. This Analysis of Impediments was prepared cooperatively by the Marion County Community Service Department and the City of Ocala's Revitalization Strategies Services Department, both of which also prepared the Consolidated Plan (2015-2019). The source of funding for completion of this analysis is through Community Development Block Grant funds.

Many of these impediments are already addressed by actions of the City and County or other partner entities. They continue to be mentioned here because the actions are very recent and results are still uncertain or because additional work may still be required to ensure that they do not return as future impediments. Others can still be considered obstacles that are preventing some households from obtaining the housing of their choice. Following each impediment are some recommendations that the City, County, and its partners might take to remove the fair housing barrier.

## Fair Housing Choice

Equal and free access to residential housing (housing choice) is fundamental to meeting essential needs and pursuing personal, educational, employment, and other goals. Because housing choice is so critical, fair housing is a goal that government, public officials, and private citizens must achieve if equality of opportunity is to become a reality.

Federal law defines fair housing choices as the ability of persons to have the same housing choices available to them, regardless of race, color, religion, sex, disability, familial status, or national origin. Persons that are protected from discrimination by fair housing laws are referred to as members of the protected classes.

This analysis encompasses the following areas related to fair housing choice:

- The sale or rental of housing, both public and private;
- The provision of housing brokerage services;
- The provision of financing assistance for dwellings;
- Public policies and action affecting the approval of sites and other building requirements;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority or ethnic concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by the U.S. Department of Housing and Urban Development regarding assisted housing in a recipient's jurisdiction, and analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570 (i.e. the CDBG program regulations).

As a recipient of federal entitlement funds, the Marion County Consortium has specific fair housing planning responsibilities. These include:

- Conducting an Analysis of Impediments to Fair Housing Choices;
- Developing actions to overcome the effects of identified impediments to fair housing; and
- Maintaining records to support initiatives within the county to affirmatively further fair housing.

The U.S. Department of Housing and Urban Development interprets these 5 certifying elements to include:

- Analyzing housing discrimination in a jurisdiction and working towards its elimination;
- Promoting fair housing choice for all people;
- Providing racially and ethnically inclusive patterns of housing occupancy;

- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

The U.S. Department of Housing and Urban Development defines an impediment to fair housing choice as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin.

This analysis serves as the basis for fair housing planning, provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates, and assists in building public support for fair housing efforts. The Marion County Consortium is expected to review and approve the analysis and use it for direction, leadership, and resources for future fair housing planning.

The analysis will serve as a baseline for progress against which implementation efforts will be judged and recorded.

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## Report Methodology

The Analysis consists of a comprehensive review of laws, regulations, policies and practices affecting housing affordability, accessibility, availability, and choice within Marion County. The assessment specifically includes an evaluation of:

- Public and private organizations that impact housing issues in the County and their practices, policies, regulations, and insights relative to fair housing choices; and
- The range of impediments to fair housing choice that exist within both the upper income and lower income; and
- Specific recommendations and activities for Marion County and its municipalities to address any real or perceived impediments that exist.

The planning process was launched with a comprehensive review of existing studies for importation of data relevant to housing need and related issues. These documents included: the Consolidated Plan for Marion County, the Analysis of Impediments for Fair Housing Choices for Ocala and Marion County 2005-2009 and 2010-2015, and other policy documents. Additional service provider data and observations were incorporated to include qualitative and quantitative information on special populations.

Additional data was obtained from sources including: Census report, American Community Survey data, Florida Housing Finance, Department of Health, Shimberg Center, Marion County Homeless Commission, Community Legal Services of Mid-Florida, Federal Financial Institutions Examination Council, and US Department of Housing and Urban Development (HUD), as well as many others.

## Impact

Safe, decent, and sanitary housing is a consensus goal for all residents of Marion County. It is the intent of this *Analysis of Impediments* and its accompanying *Action Plan* to achieve the following goals:

- Assess current public and private strategies to meet the County's housing, infrastructure, and community development needs and identify new strategies and approaches to enhance fair housing choice among Marion County residents.
- Identify and cultivate areas for potential governmental, nonprofit, and private sector partnerships within Marion County.
- Foster coordination among service providers and jurisdictions throughout the County to maximize the use of limited fiscal resources to improve housing choice.
- Broaden housing opportunities for low to moderate-income residents and strengthen neighborhoods by stimulating community development and investment.

## Housing Profile – Marion County, Florida

Located in north central Florida, Marion County covers 1,652 square miles and is home to a population of approximately 331,296. It is larger than the state of Rhode Island and is Florida's fifth largest county.

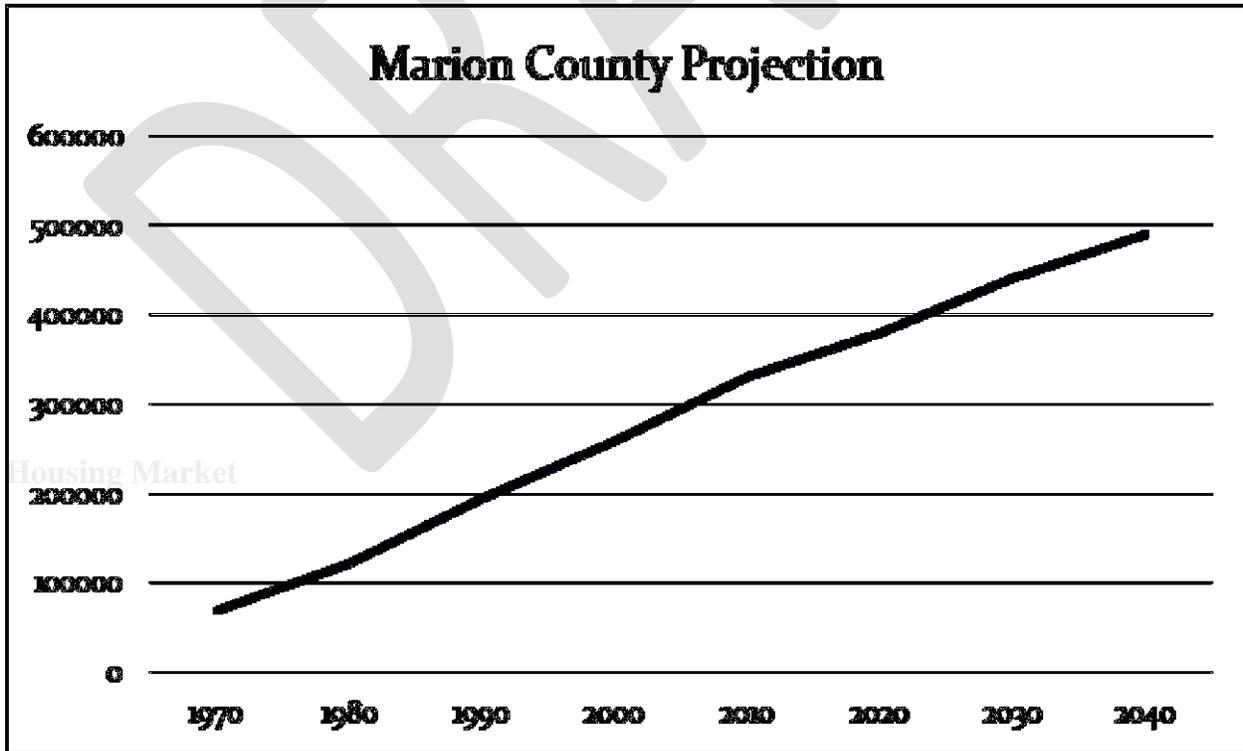
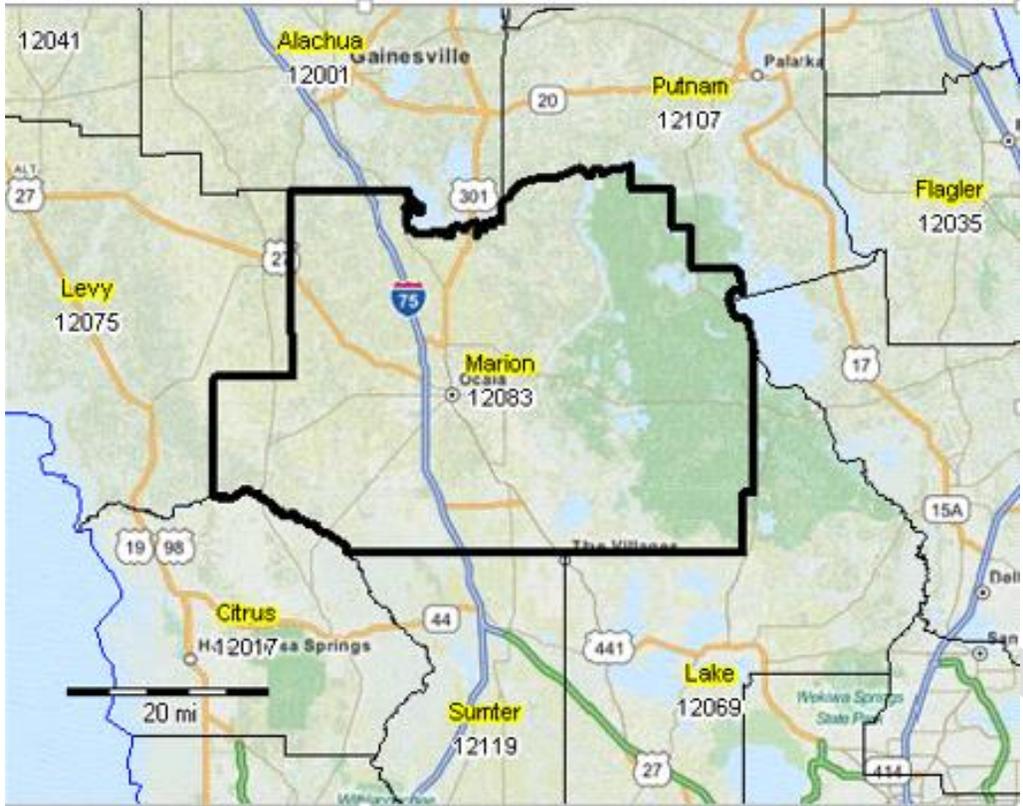
Known as the "Horse Capital of the World," the county's rich equine and agricultural heritage is internationally renowned. Marion's natural resources are equally admired. It comprises thousands of acres of national forest, 32,000 acres of lakes, 92 miles of rivers and more than 40 springs, including Silver Springs, which is recognized as one of the largest artesian spring formations in the world.

Enhancing Marion's stunning landscape of beautiful countryside and horse farms is a vibrant community where residents and visitors alike enjoy a diversity of year-round cultural, nature, hobby, and sporting events for all ages.

### Projected Total Population, Marion County, 2010-2040

Place	1970	1980	1990	2000	2010	2020	2030	2040
Marion County	69,050	122,488	194,835	258,916	331,298	380,302	440,330	490,241

- Population, 2014: 337,452. Marion County ranks # 16 of Florida's 67 counties in population.
- Population, 2010: 331,296.
- Households, 2014 (Marion County): 141,401.
- Homeownership Rate, 2014 (Marion County): 76.7%. Statewide, Florida's homeownership rate is 67.7%.
- Single Family Home, average just value, 2014: \$104,097. (Statewide, the average just value of a single family home in Florida in 2014 was \$184,781).
- The average sales price for a single family home was \$137,753 in 2014. The median sales price that year was \$118,000, compared to a statewide median sales price of \$185,000.
- Mobile Home, average just value, 2014: \$34,445.
- Condominium, average just value, 2014: \$41,404.
- Married Population: 56.2%.
- Median Age: 47.4.
- Household size: 2.41.
- In 2040, Marion County is projected to have a population of 490,241.



## Housing Profile – Ocala, Florida

Ocala, a small agricultural and manufacturing center, is about halfway between Gainesville to the north and Orlando to the southeast. With its attractive tree-lined streets and Old South-style homes, it more resembles a typical Southern city than a Florida City or beach town. Ocala is the capital of Florida's thoroughbred industry, and ranching and horse-breeding are popular.

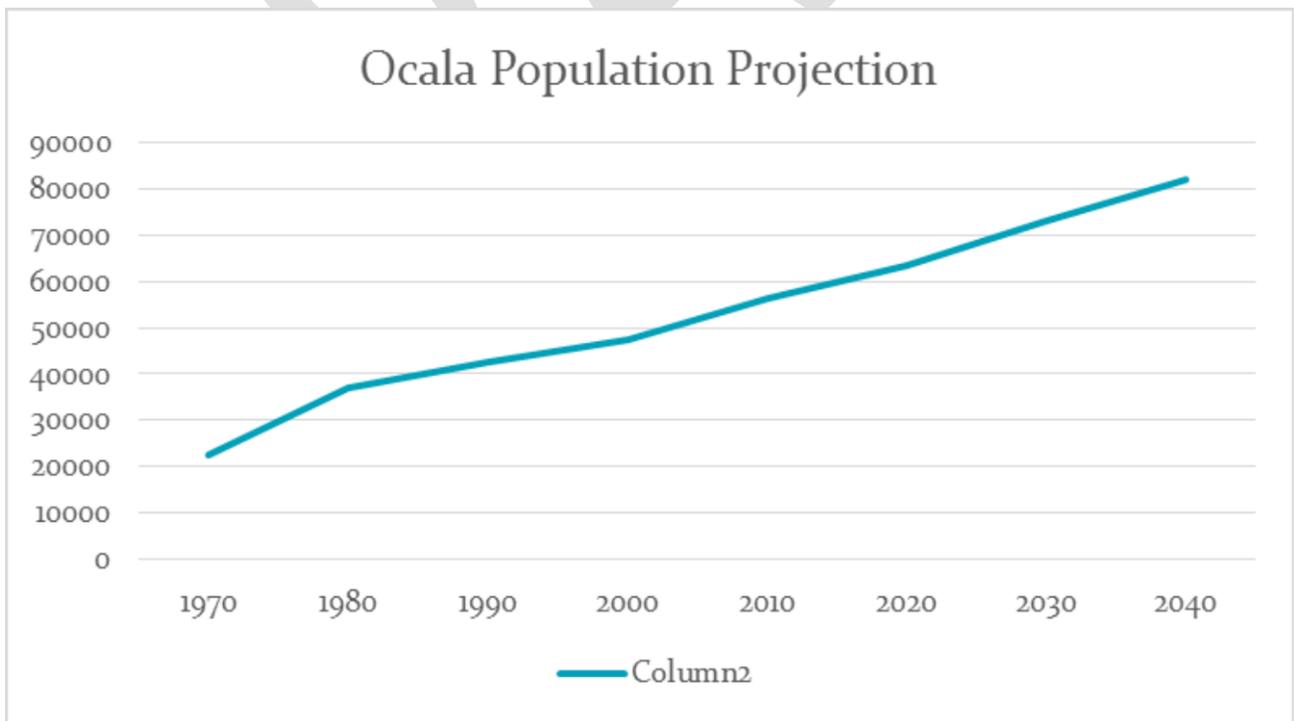
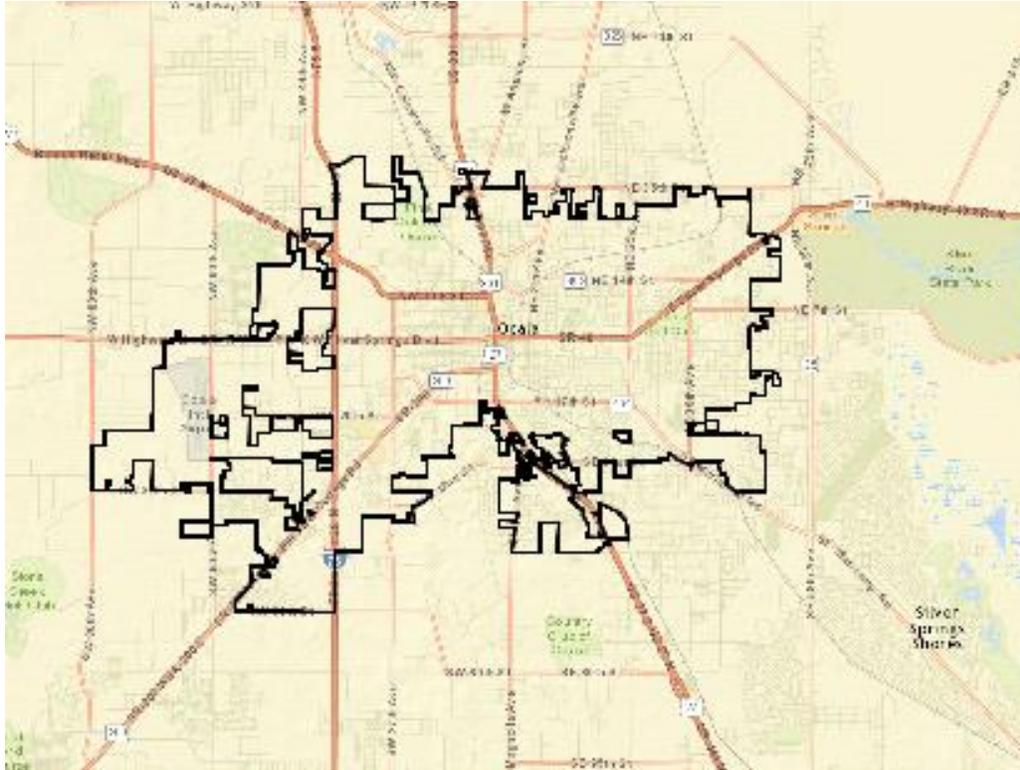
### Projected Total Population, Ocala, 2010-2040

Place	1970	1980	1990	2000	2010	2020	2030	2040
Ocala	22,583	37,170	42,045	45,943	56,135	63,226	77,965	82,057

**Sources:** University of Florida Bureau of Economic and Business Research, Population Projections; U.S. Census Bureau, 2010 Decennial Census.

### Existing Home Values (Based on County Property Appraisers' Just Value)

- Population, 2014: 57,492.
- Population, 2010: 56,135.
- Households, 2014: 23,619.
- Homeownership Rate, 2014: 50.7%. Statewide, Florida's homeownership rate is 67.7%.
- Single Family Home, average just value, 2014: \$101,421. (Statewide, the average just value of a single family home in Florida in 2014 was \$184,781).
- The average sales price for a single family home was \$139,927 in 2014. The median sales price that year was \$125,000, compared to a statewide median sales price of \$185,000.
- Mobile Home, average just value, 2014: \$19,765.
- Condominium, average just value, 2014: \$50,631.
- Married Population: 45%.
- Median Age: 36.4.
- Household size: 2.4.
- 2040, Ocala is projected to have a population of 82,057.



U.S. Decennial Census

## Population Growth

As of the 2010 census, the population of Marion County was 331,298 increasing from the 2000 population of 258,916. The City of Ocala has increased in population from 45,943 in 2000 to 56,135 in 2010 a 22.18% increase.

Based on the Bureau of Economic and Business Research (BEBR), University of Florida estimates by the year 2030, Marion County's population is projected to reach 440,330 – an increase of approximately 25 percent from the 2010 level. Population growth creates demands for not only housing, but also jobs, facilities, and infrastructure, such as open space recreation opportunities, transportation options, water, emergency services, schools, and more.

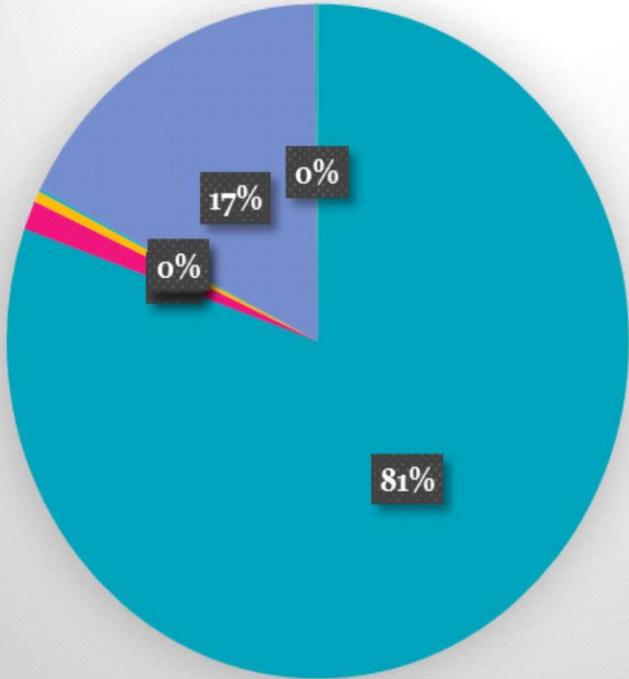
Assessment of demographic characteristics can indicate the need for, and the extent of, equal access to housing in a community. Factors such as population growth, age characteristics, and racial/ethnic mix shape a community housing needs and play a role in identifying potential impediments to fair housing choice. While affordability is not a fair housing issue, the relationships among housing income, household types, and other factors often create misconceptions and biases that raise fair housing concerns.

The Race and Income Profile below provides an insight into the community's current and future demand for housing based on its past, present, and future population, race, and housing data.

## Race and Income Profile for Marion County Communities

	Marion County		Bellevue		Dunnellon		McIntosh		Ocala		Reddick	
<b>Total Population</b>	331,298		4,585		1,756		452		57,586		507	
	#	% of Total	#	% of Total	#	% of Total	#	% of Total	#	% of Total	#	% of Total
<b>White</b>	268,284	81%	3,513	78%	1,544	88%	415	92%	34,784	61%	209	41%
<b>Black</b>	40,828	12%	230	5%	161	9%	20	4%	6,792	12%	45	9%
<b>Hispanic</b>	36,137	11%	594	13%	86	5%	20	4%	6,792	12%	45	9%
<b>Two or More</b>	6,814	2%	71	2%	17	1%	5	1%	926	2%	4	1%
<b>Asian</b>	4,407	1%	51	1%	12	1%	3	1%	1,302	2%	1	0%
<b>Other</b>	9,512	3%	11	0%	5	0%	0	0%	0	0%	0	0%
<b>Male</b>	158,993	47%	2,077	45%	709	40%	709	40%	28,052	49%	248	52%
<b>Female</b>	172,300	62%	2,510	45%	709	40%	182	40%	29,416	51%	29,416	51%
<b>Median Income</b>	\$38,695		\$23,948		\$22,097		\$49,754		\$36,033		\$29,940	
<b>Housing Value</b>	\$107,100		\$69,785		\$87,994		\$142,710		\$112,392		\$76,422	
<b>Gross Rent</b>	\$623		\$774		\$533		\$737		\$777		\$775	

# Marion County Population



- Rest of Marion Co.
- Bellevue
- Dennellon
- McIntosh
- Ocala
- Reddick

DRAFT

## Assessing Barriers to Fair Housing

Fair housing is not only a legal requirement – it is a moral concern and a matter of economics and it can easily be said that fair housing makes good economic sense. No community can reach its full potential for economic growth and well-being if some of its residents are unable to fully participate in the housing market. Studies clearly show the relationship between housing and education, jobs, and the ability to build and maintain wealth. Home seekers who do not have access to the full range of available housing choices may not be able to live in neighborhoods that enhance their opportunities and their future success. When housing choices are limited by discriminatory housing practices and policies, communities and individuals are denied opportunities for growth. Discrimination in housing and housing-related services is prohibited by federal, state, or county fair housing laws when it is based on race, color, religion, sex, disability, familial status, or national origin and – in the state and the County – elderliness, and – in the County alone – marital status.

A thorough analysis of the impediments to fair housing is more than a catalog of illegal acts – it is an analysis of social and demographic trends, a study of the barriers to housing choice, and recommendations to overcome identified impediments. Such a comprehensive study must identify those systemic or structural issues that limit a person's ability to take advantage of the full range of housing that is available. This report addresses a variety of social problems related to housing, such as affordability, poverty, and homelessness.

However, while there may be other factors that influence housing, such as lower income levels for minorities and those with disabilities, it is beyond the scope of this report to explain or provide solutions for all of the causes of these social problems. For example, this report does not analyze the factors that lead to a high correlation between minorities or those with disabilities and poverty. Instead, it attempts to identify the immediate barriers to equal and free access to residential housing (housing choice) for particular segments of the community and to propose solutions without addressing why minorities or those with disabilities are more likely to be poor.

It is widely accepted that inability to access decent, safe, and affordable housing underlies unequal education, unequal access to jobs, and unequal income. A truly open housing market is essential to conquering these disparities. Encouraging adequate investment in both human capital and the built environment is critical in overcoming barriers and ensuring that all neighborhoods are diverse, healthy, and attractive places to live. This report does not say that some neighborhoods are better than others in the city or the county, but it does recognize that impediments to fair housing have historically contributed to the decline of neighborhoods that suffer for lack of investment. The recommendations resulting from this report are not intended to force people to make pro-integrative housing choices regardless of other criteria, but they are certainly intended to make such choices easier and more likely.

The recommendations in this report are intended to provide a practical basis for eliminating a wide variety of impediments to housing choice. Some will be relatively easy to accomplish, while others

will be more difficult. We are confident, however, that the City and the County’s commitment to addressing the issues identified in this report will ultimately do a great deal to promote open housing in City of Ocala and Marion County. Eliminating the barriers to fair housing will not only improve the quality of life for many individuals and families, but will also enhance the economic health of the entire region.

Housing barriers can be difficult to detect through quantitative analysis alone. The guidance of experts helped to identify potential barriers that may be difficult to quantify, but should be considered in the city’s and county’s plan nonetheless. Similarly, the rich information on housing choice barriers shared by the many residents who participated in surveys and focus groups for the Housing Market Study and AI was imperative in the development of this AI. Their honesty and frankness in describing what can be sensitive information was invaluable.

### **Areas of Racial / Ethnic Concentration**

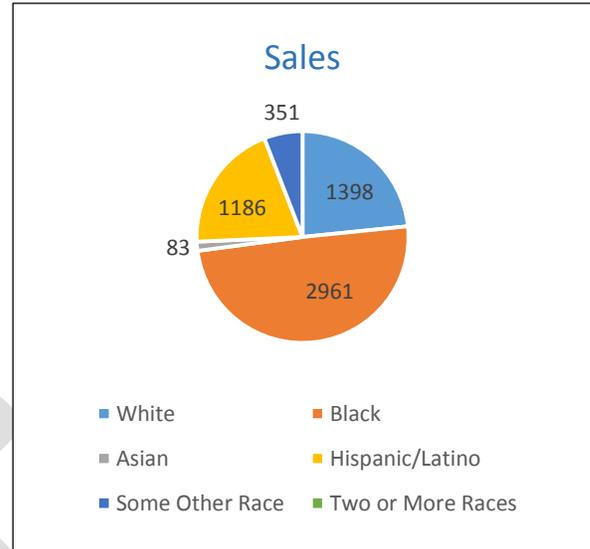
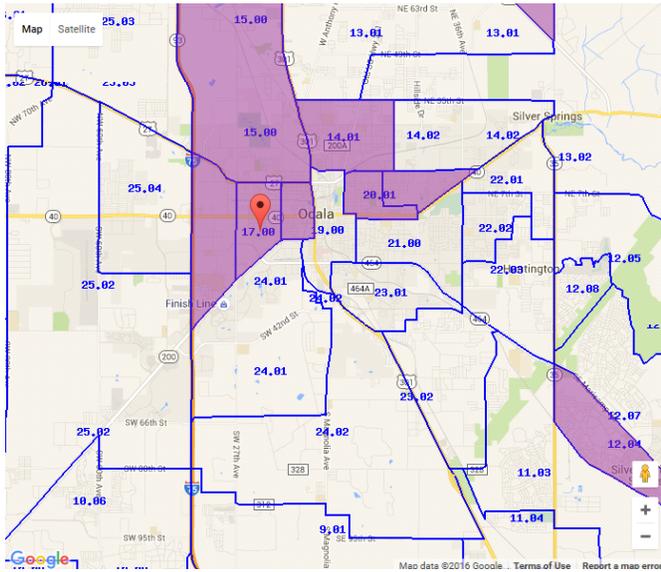
The U.S. Department of Housing and Urban Development has defined “Areas of Poverty, Racial and Ethnic Concentration and Segregation (RCAP/ECAP)” as census tracts comprised of 50% or greater minority population and 3 times or more the poverty level of the MSA and generally lacking the basic amenities and failing to provide a quality of life expected and desired for any. The goal of de-concentration would be to achieve minority concentrations and poverty levels less than defined above and to transform these areas of concentration into “Opportunity Areas”. Opportunity Areas are areas offering access to quality goods and services, exemplary schools, health care, a range of housing, transportation to employment and service centers, adequate public infrastructure, utilities, and recreation.

<b>Census Tract</b>	<b>% Black/African American – 1990</b>	<b>% Black/African American – 2000</b>	<b>% Black/African American – 2010</b>
15.00	58.22%	61.46%	67.01%
17.00	85.56%	83.36%	85.23%
18.00	98.69%	97.16%	95.71%

The three census tracts represent the highest black population in Marion County where there has been a great deal of Federal funding in the past placed in these areas. There is a stigma that these areas are not safe and are not areas where there is promotion of potential homebuyers to rent or purchase a home. The West Ocala Vision & Community Plan presented November 29, 2011 is a long range effort to promote strong economic growth in these areas.



## Census Tract 17



### LIHTC Projects in this Tract

Project	Total Units
STEEPLECHASE APARTMENTS	159
GREEN GABLES II	124
GREEN GABLES APTS.	131
MAGNOLIA WALK APARTMENTS	64
MAGNOLIA WALK II	144
LAUREL PARK	170
BLICHTON STATION	119



# Anatomy of a Fair Housing Complaint

## The Complaint Process

### 1. Who can file a complaint?

Anyone who is willing to sign their name and give contact information.

### 2. Where does a complaint get the correct forms?

From the regional HUD office in Jacksonville or online at [www.hud.gov](http://www.hud.gov).

### 3. Where are complaints files?

HUD regional office or office of Florida "Attorney General Office.

## Steps in the Complaint Process

### Notification

HUD will notify a complainant when it receives a complaint. Normally, HUD will also:

- Notify the alleged violator of the complaint and permit that person to submit an answer.
- Investigate the complaint and determine whether there is reasonable cause to believe the Fair Housing Act has been violated.
- Notify the complainant if it cannot complete an investigation within 100 days of receiving a complaint.

### Conciliation

HUD will try to reach an agreement with the person a complaint is made against (the respondent). A conciliation agreement must protect both the complainant and the public interest. If an agreement is signed, HUD will take no further action on a complaint. However, if HUD has reasonable cause to believe that a conciliation agreement is unable to be reached, HUD will recommend that the Attorney General file suit.

### Complaint Referral

If HUD has determined that a State or local agency has the same fair housing powers as HUD, HUD will refer complaints to that agency for investigation and notify complainants of the referral. That agency must begin work on the complaint within 30 days or HUD may take it back.

### Quick Action

If a complainant needs immediate help to stop a serious problem that is being caused by a Fair Housing Act violation, HUD may be able to assist them as soon as they file a complaint. HUD may authorized the Attorney General to go to court to seek temporary or preliminary relief, pending the outcome of the complaint, if:

- Irreparable harm is likely to occur without HUD's intervention.

- There is substantial evidence that a violation of the Fair Housing Act occurred.

Example: a builder agrees to sell a house but after learning the buyer is black, fails to keep the agreement. The buyer files a complaint with HUD. HUD may authorize the Attorney General to go to court to prevent a sale to any other buyer until HUD investigates the complaint.

### **Complaint Assessment**

If, after investigating a complaint, HUD finds reasonable cause to believe that discrimination occurred, it will inform the complainant. The case will be heard in an administrative hearing within 120 days, unless the complainant or the respondent wants the case to be heard in Federal District Court. Either way, there is no cost to the complainant.

### **Administrative Hearing**

If the case goes to an administrative hearing, HUD attorneys will litigate the case on behalf of the complainant. The complainant may intervene in the case and be represented by their own attorney if they wish. An Administrative Law Judge will consider evidence from the complainant and the respondent. If the Judge decides that discrimination occurred, the respondent can be ordered:

- To compensate the complainant for actual damages, including humiliation, pain, and suffering.
- To provide injunctive or other equitable relief, for example, to make housing available to the complainant.
- To pay the Federal Governmental civil penalty to vindicate the public interest. The maximum penalties are \$10,000 for a first violation and \$50,000 for a third violation within seven years.
- To pay reasonable attorney's fees and costs.

### **Federal District Court**

If a complainant or respondent chooses to have the case decided in Federal District Court, the Attorney General will file a suit and litigate it on behalf of the complainant. The District Court can order relief and award actual damages, attorney's fees, and costs. In addition, the court can award punitive damages.

### **Civil Suit**

A complainant may file suit, at their expense, in Federal District Court or State Court within two years of an alleged violation. If the complainant cannot afford an attorney, the Court may appoint one for them.

A complainant may bring suit even after filing a complaint, if they have not signed a conciliation agreement and an Administrative Law Judge has not started a hearing. A court may award actual and punitive damages and attorney's fees and costs.

## Public Transit

All services of public transportation are located within the City of Ocala. Transportation has been identified as an impediment for the past two AI studies. The vast land area of Marion County – larger than the State of Rhode Island – represents overwhelming challenges to the county.

The City of Ocala provides public transit services that include 6 fixed transit routes where local services have been in operation since 1999. The major trip generators include the medical area, education facilities, shopping centers, downtown, and businesses.

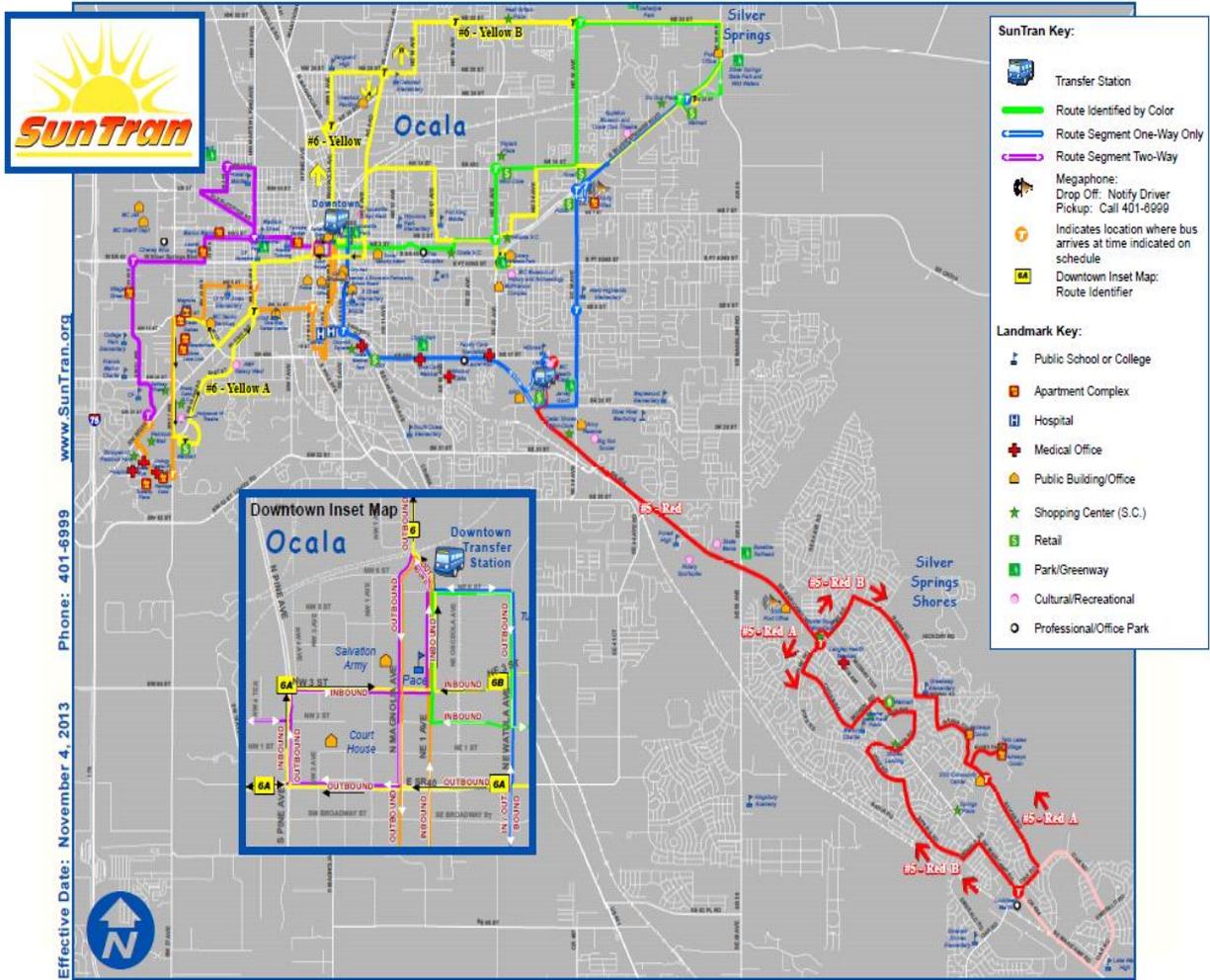
The cost to ride the SunTran is very affordable as demonstrated by the SunTran fee schedule (see chart to right).

SunTran – One Way Trip	
Regular fare:	\$1.50
Youth/Student fare:	\$1.10
Senior/Disabled:	\$.75
Medicare Card Holder	\$.75
Veteran fare	\$.75
Children 5 years & under	\$ FREE

Households without a vehicle, which in most cases are low-moderate income households, are at a disadvantage in accessing jobs and services, particularly if public transit is absent. Access to public transit is critical to those households. Without convenient access, employment is potentially at risk and the ability to remain housed is threatened. The linkages between residential areas of LMI persons and employment opportunities are key to expanding fair choosing choices.

Public transportation services are concentrated in the City of Ocala. The rest of Marion County is virtually without access to public transportation. According to local affordable housing providers and Marion County Affordable Housing Advisory Committee (AHAC) members, the absence of adequate public transportation throughout Marion County limits the development of affordable housing to those areas served by public transit. It should be noted the vast size of Marion County makes it almost impossible by conventional means to offer services in all areas of Marion County.

# SunTran Public Transportation



## **What Does the Federal Fair Housing Act Protect?**

The Federal Fair Housing Act (1968) and Fair Housing Amendments Act (1988) are Federal fair housing laws that prohibit discrimination in all aspects of housing, such as the sale, rental, lease, or negotiation for real property. The 1968 Fair Housing Act prohibits discrimination based on race, color, religion, sex, disability, familial status, or national origin.

## **What is an Impediment to Fair Housing Choice?**

Many factors in the public and private domains have the potential to impede equal access to housing or fair housing choice. HUD defines an impediment to fair housing choice as:

Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices.

Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

## **Marion County and the City of Ocala**

Both the City of Ocala and Marion County have agreed to follow the Federal definition of protective classes (race, color, religion, sex, disability, familial status, or national origin) while not adding any additional classes.

## **Relationship Between Fair Housing and Affordable Housing**

Fair housing choice is understood as the ability of persons to have the same housing choices available to them, regardless of race, color, religion, sex, disability, familial status, or national origin. Persons that are protected from discrimination by fair housing laws are referred to as members of the protected classes.

This analysis of impediments analyzes a range of fair housing issues that can affect housing choice. Income is associated to fair housing issues to the extent that members of protected classes tend to have lower incomes. A primary impediment to fair housing is the relative absence of affordable housing. However, the policies implemented by Marion County and the City of Ocala can create or contribute to the lack of affordable housing within the community.

The scope of this study extends beyond the adequacy of affordable housing in the Marion County Consortium. Included within the scope of this analysis is the presence of the protected class within the context of factors that influence their ability to achieve equal access to housing.

## What Does the Fair Housing Act Prohibit?

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

- Refuse to rent or sell housing.
- Refuse to negotiate for housing.
- Make housing unavailable.
- Deny a dwelling.
- Set different terms, conditions, or privileges for the sale or rental of a dwelling.
- Provide different housing services or facilities.
- Falsely deny that housing is available for inspection, sale, or rental.
- For profit, persuade owners to sell or rent (blockbusting).
- Refuse to make a mortgage loan.
- Refuse to provide information regarding loans.
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees.
- Discriminate in appraising property.
- Refuse to purchase a loan.

## Existing Impediments Identified in 2010 Marion County Consortium

The following impediments were defined in the past two AI studies in both 2005-2010 and 2010-2015.

- **Lack of Public Education and Lack of Awareness Regarding Rights and Responsibilities under Federal; State and Local Fair Housing Laws:** Based upon the analysis of fair housing complaints and trends in Marion County and comparing those with the other counties served by Community Legal Services of Mid-Florida, Marion County had more fair housing cases filed with HUD than the other nine counties.
- **Limited Choice in Affordable Housing Due to Unit Availability:** A shortage of affordable rental units limits housing choice, especially among the routes of public transportation. Mortgage lending requirements that focus on high down payments and excellent credit act to block low-income and minority families from home ownership.
- **Limited Choice of Affordable Housing in Relation to the Location of Employers and a Lack of Public Transportation:** Many employers are located in and around the City of Ocala. Affordable rental units, especially multi-family units, are primarily located in the city limits. In the incorporated portions or the county, there are more single-family units for rent and sale.
- **West Ocala has Been Perceived as a Less Desirable Location to Live or Invest in than Other City Neighborhoods:** Stagnant property values limit equity resources that could be used to reinvest in homes and businesses. West Ocala and the City in general have difficulty attracting private investment. West Ocala is an area of minority concentrations.
- **Multicultural Nature of Communities within the County:** Non-English speaking residents may encounter significant difficulties in obtaining housing, whether it is for

ownership or rental. Additionally, it may hinder their ability to find programs available to help obtain housing or assist them in purchasing, rehabilitation or renting a home.

The above impediments have been identified in the past two AI studies and will continue to be impediments in this study as well.

### **According to HUD, Impediments to Fair Housing Choice are:**

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choices.
- Any actions, omissions, or decisions that have the effect of restricting housing choices or availability of housing choices on that basis of race, color, religion, sex, disability, familial status, or national origin.

The AI uses available information from the U.S. Census to analyze demographic patterns and trends, along with County and City staff assessment of public policies, practices, and procedures, and zoning and land-use policies. Interviews with housing providers and community groups were conducted during the Consolidated Planning process to determine if there is evidence of fair housing problems in the private sector.

### **Promote Fair Housing Enforcement and Education**

- Support education and training for landlords regarding fair housing obligations.
- Support testing for the incidence of housing discrimination.
- Support the enforcement of fair housing laws.

### **Local Municipal Impediment**

- Lack of affordable housing in a variety of locations.
- Lack of affordable rental housing units, primarily one (1) bedroom affordable units.
- Lack of transit to more rural communities within Marion County.
- Allowing special driving privilege to individuals that have lost their driver's license due to past child support or court fines.
- Lack of court data prevents knowing how many evictions occur during a year and if there are red flags that may need to be brought to the Consortium's attention.

### **Developer Impediment**

From the recommendation of Marion County Affordable Housing Advisory Committee (AHAC), the following represents suggestions to support affordable housing:

1. Develop a 5-10 year Strategic Plan for Affordable Housing Needs in Marion County to include, at a minimum, the following items:
  - Mapping all vacant units vs affordable vacant units.

- Develop a Community Needs Assessment to include rental properties vs homeowner properties.
  - Needs Assessment regarding unit sizes for rental.
  - Identification of target area for affordable housing that meet requirements for services, transportation, utilities, transportation, location to major employers, utilities, etc.
  - Maps illustrating locations of utilities, transportation, critical services, and major employment centers.
2. Coordinate with Planning Offices to determine if “small houses” could reasonably be incorporated into the Land Development and Zoning Regulations.
  3. If a new update or change to current affordable housing incentives is determined as necessary through the activities listed above, prepare a specific and detailed proposal that includes recommendations for funding stream(s), if applicable.

DRAFT

**Impediment #: 1**

Lack of Affordable Housing within the City and the County.

**Strengths:**

1. Ocala and Marion County average housing cost is far below the State average.
2. The creation and continuation of the LHAP Committee to review low income housing opportunities.
3. Community Services, Purchase Assistance, ESG, and SHIP Programs.

**Threats / Barriers:**

1. Families living in motels.
2. Living in non-decent, unsafe, and unsanitary housing.
3. Over crowdedness.
4. Declining health due to living in close quarters.

**Action:**

1. Stronger advertisement of homeownership opportunities.
2. Seek opportunities of the Tax Credit Program or other State and Federal housing grant programs.

**Timeline:**

1. December 2017.

**Impediment #: 2**

No Tenant Association

**Strengths:**

1. Many federal laws and programs are available to help tenants with financial difficulties.

**Threats / Barriers:**

1. Tenants being taken advantage of through violations of the Fair Housing Laws and Landlord and Tenant rights.
2. Tenants not taking advantage of federal programs to keep them in decent, safe, and sanitary housing.

**Action:**

1. The development of a tenant association.
2. To better inform both landlords and tenants of local, state, and federal fair housing and landlord tenant laws.

**Timeline:**

1. June 2017.

**Impediment #: 3**

Lack of Public Education and Awareness Regarding Rights and Responsibilities Under Federal Fair Housing Laws

**Strengths:**

1. Having a staff member of the consortium with over 25 years of fair housing experience.
2. Financial education classes.
3. Two (2) staff members in Community Services that speak fluent Spanish for those persons that do not speak English.

**Threats / Barriers:**

1. Persons seeking housing being taken advantage of.
2. Tenants not knowing their rights in regards to housing.
3. Has been an impediment for the past two (2) AI studies.

**Action:**

1. Increase fair housing material throughout Ocala and Marion County in both English and Spanish.
2. To work closer with Community Legal Services of Mid-Florida.
3. To better inform the segment of the population that do not understand or speak English very well.
4. Testing possible discriminatory actions in Ocala/Marion County in the past.

**Timeline:**

1. June 2016.

**Impediment #: 4**

Lack of Affordable One (1) Bedroom Rental Housing Units

**Strengths:**

1. Both Ocala and Marion County have many vacant or abandoned hotels and available land to either build or renovate into affordable housing.
2. People desiring to move into smaller housing units will make larger units available for rent.

**Threats / Barriers:**

1. Single persons, small families, and the elderly are paying more for housing that they may not want or need.
2. People are paying more rent than needed.

**Action:**

1. Explore the opportunity of the Tax Credit Funding to build affordable housing units.
2. Explore the possibility of the development of tiny homes.
3. Explore the possibility of retrofitting used mobile home school rooms or portables into affordable housing.

**Timeline:**

1. January 2018.

**Impediment #: 5**

Lack of Transportation Outside the City of Ocala

**Strengths:**

1. Many of the community social services agencies have this impediment as one of their highest concerns.

**Threats / Barriers:**

1. The lack of riders makes it not cost effective to offer services outside of present routes.
2. Residents living outside the bus routes and without cars will find it very difficult to find jobs, lower cost groceries, lower cost housing, etc.
3. Has been an impediment for the past two (2) AI studies.

**Action:**

1. Look at possible transportation services through social services agencies in the non-transit area at a reduced cost.
2. Explore Uber Service that could be subsidized with various funding.

**Timeline:**

1. December 2016.

**Impediment #: 6**

Lack of Knowledge About Fair Housing Requirements that Create Barriers to Affirmatively Furthering Fair Housing

**Strengths:**

1. Two (2) staff members in Community Services that speak fluent Spanish for those persons that do not speak English.
2. Having a staff member of the consortium with over 25 years of fair housing experience.
3. Being part of Community Legal Services of Mid-Florida, Inc. FIP Grant.
4. Legal Services has a full-time staff attorney over landlord-tenant problems.
5. Legal Services has a full-time Fair Housing Program Manager.

**Threats / Barriers:**

1. Lack of knowledge may cause local residents to be taken advantage of in buying and renting housing.
2. Has been an impediment for the past two (2) AI studies.

**Action:**

1. Increase Fair Housing material at all meetings and circulation to all organizations and agencies dealing with housing or social services.
2. All Fair Housing brochures are printed in both English and Spanish.

**Timeline:**

1. February 2017.

**Impediment #: 7**

Lack of a Central Intake and Data Storage Center.

**Strengths:**

1. Existing community data.
2. 211 United Way call center.

**Threats / Barriers:**

1. Lack of community needs.
2. Missed grant opportunities.
3. Lack of agency needs.
4. Not known where available services are at any given time.

**Action:**

1. Identify an agency as point of contact to collect all grant, studies, and report for all agencies.

**Timeline:**

1. January 2017.

**Impediment #: 8**

Marion County Lacks a Point of Contact to Address Landlord and Tenant Concerns.

**Strengths:**

1. A community willingness to assist residents in housing.

**Threats / Barriers:**

1. Lack of information will cause tenants to be taken advantage of.
2. Landlords leaving themselves open to legal actions.
3. Wrongful evictions.
4. Cost burden of tenants having to move.
5. Increased social conflict between neighbors, landlords, tenants, etc.

**Action:**

1. Establish a point of contact where landlords, owners, and tenants can call for information.

**Timeline:**

1. June 2016.

## Assessment of Fair Housing Impediments

1. Lack of knowledge of fair housing laws that creates barriers to affirmatively furthering fair housing.

The lack of knowledge of their fair housing rights against discrimination allow others to take advantage of them.

2. Lack of Affordable Housing within the City and the County.

For Marion County, the Median Gross Rent is \$822. For those families needing first month, last month, and one month deposit, this makes renting a near impossibility.

3. Community lack of landlord-tenant laws community-wide.

The City of Ocala and Marion County are similar to many Southern communities with strong community commitment. It appears there is a great separation in income in Marion County. In some of the agency one-on-one meetings, many clients have experienced serious violations in housing discrimination without regulatory actions to protect the client. Education to renters and those seeking to purchase a home is vital to ensure all resident are treated equally.

4. The lack of a Central Intake and data storage center.

With no central location where studies, statistical data, reports, and grants are held, it's difficult to assess the needs of the community and explore future opportunities for grants and other funding.

5. Lack of affordable one (1) bedroom rental housing units.

Many community agencies stated families are downsizing due reduce housing costs. In addition, more single individuals and couples are looking to reduce their housing costs.

6. Lack of Transportation outside the City of Ocala.

As stated in the past two A.I. Studies the major employers in Marion County are located in and around the City of Ocala. In addition most of the employment opportunities available are low-level labor and service industry jobs. Almost all of the affordable rental units are located within the City of Ocala, while much of the affordable housing is located in the unincorporated areas of the County.

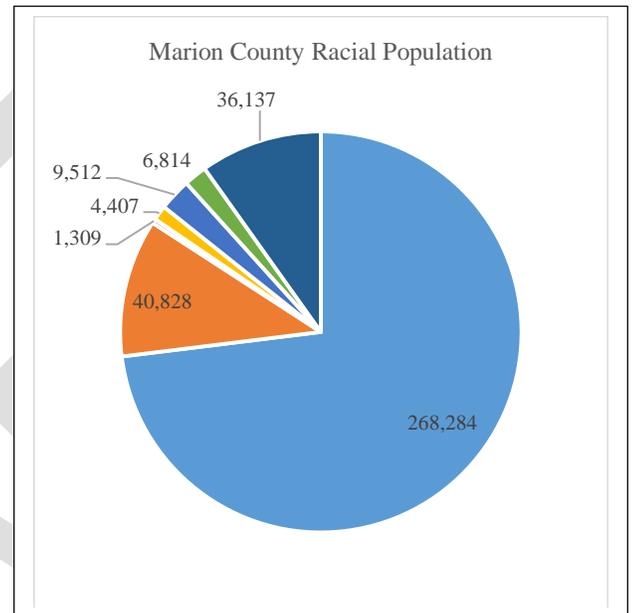
Although affordable rental units continue to be built, the vacancy rate was around 3% which is very low.

7. Marion County lacks a point of contact to address landlord tenant concerns.

8. No tenant association.

## Marion County Total Population

Category	Number	% in Total Population	% Change 2000-2010
<b>Total</b>	<b>331,298</b>	<b>100%</b>	<b>27.96</b>
Total: Population of one race:	324,484	97.94%	27.15
Total: Population of one race: White	268,284	80.98%	23.12
Total: Population of one race: Black or African American	40,828	12.32%	36.55
Total: Population of one race: American Indian and Alaska Native	1,309	0.40%	13.04
Total: Population of one race: Asian:	4,407	1.33%	144.02
Total: Population of one race: Some Other Race	9,512	2.87%	118.02
Total: Population of Two or More Races	6,814	2.06%	83.02
White alone or in combination with one or more other races	273,999	82.70%	24.01
Black or African American alone or in combination with one or more other races	43,757	13.21%	40.95
Asian alone or in combination with one or more other races	5,594	1.69%	137.84
Some Other Race alone or in combination with one or more other races	11,544	3.48%	98.01
Hispanic or Latino	36,137	10%	





Marion County has seen a 21.8% increase from 2000 to 2010 with an estimated 21.8% by 2020, where land is not the major obstacle in increased population. The lack of higher wages, the cost of infrastructure, lack of transportation outside of Marion County, and affordable housing are factors that will continue to be a concern with increases in population. During that same time period, the country was faced with the highest foreclosure rate and economic loss since the Great Depression. With thousands of Marion County residents losing their homes, their only option was to rent. At this time the City of Ocala and Marion County face a low vacancy rate and a high rental cost.

### Concentration of Racial/Ethnic Minorities

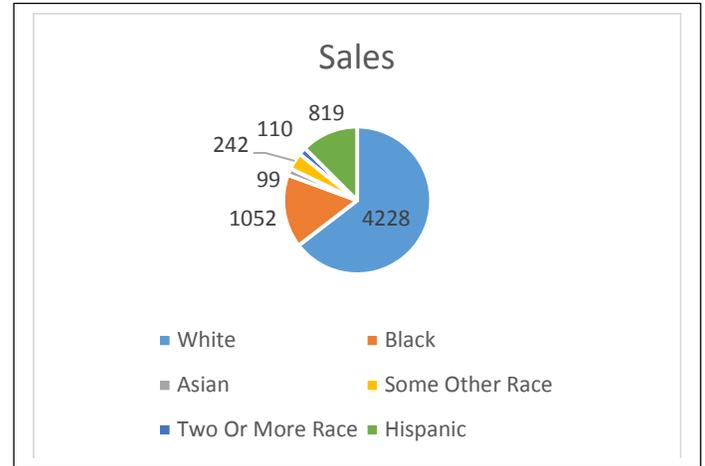
For purposes of this document, “Areas of Minority Concentration” are defined as areas, based on U.S. Census tract and block group data, wherein the total percentage of minority residents, i.e. Black (Non-Hispanic), Hispanic (all races), and Asian and Pacific Islander, exceeds 50 percent of the total population of that area.

“Areas of Low Income Concentration” are defined as areas, based on U.S. Census tract and block group data, wherein the percentage of families with incomes at or below 80 percent of the area median income for the Ocala MSA, adjusted for family size, exceeds 50 percent of the total households residing in that area. This definition includes populations that fall into the very-low and low-income categories.

When “Areas of Racial and Ethnic Minority Concentration” and “Areas of Low Income” are mapped together, it becomes evident that the great majority of the areas identified with concentrated racial/ethnic minority populations are located within areas populated by low-income families, graphically representing the low-income experienced by many racial/ethnic minority families.

	2010 Population		Change 2000-2010	
	Number	Percent	Percent	Number
Total Population	4,338		10.27%	404

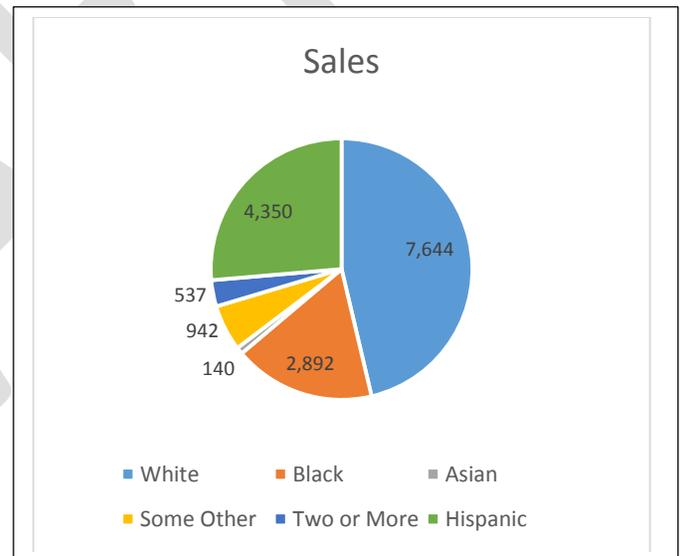
Population of one race:	4,228	97.46%	10.77%	411
White	2,798	64.50%	7.82%	203
Black or African American	1,058	24.39%	8.74%	85
American Indian & Alaska Native	27	0.62%	-27.03%	-10
Asian	99	2.28%	47.76%	32
Native Hawaiian & Other Pacific Islander	4	0.09%	None%	4
Some Other Race	242	5.58%	66.90%	97
Two or More Races:	110	2.54%	-5.98%	-7
Hispanic or Latino:	819	18.88%	111.63%	432
Not Hispanic or Latino:	3,519	81.12%	-0.79%	-28



### Highest Hispanic Population - Census Tract 10.04 "Marion Oaks"

	2010 Population		Change 2000-2010	
	Number	Percent	Percent	Number
<b>Total Population</b>	<b>12,236</b>		<b>69.42%</b>	<b>5,634</b>
Population of one race:	11,699	95.81%	67.46%	5,307
White	7,644	65.75%	50.84%	3,047
Black or African American	2,892	21.20%	187.19%	1,900
American Indian & Alaska Native	72	0.55%	16.92%	11
Asian	140	1.07%	157.89%	90
Native Hawaiian & Other Pacific Islander	9	0.07%	125.00%	5
Some Other Race	942	7.18%	34.65%	254
Two or More Races:	537	4.19%	131.33%	327
Hispanic or Latino:	4,350	33.00%	92.53%	2,181
Not Hispanic or Latino:	7,886	67.00%	59.96%	3,453
Age 18 and over:	9,199	75.43%	71.14%	4,311
Age 17 and under:	3,037	24.57%	64.35%	1,323

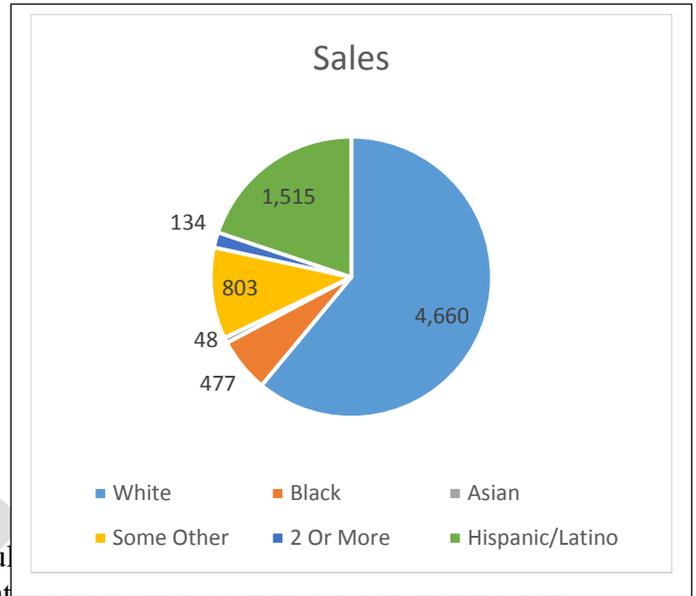
\* This Census tract was a part of one 2000 Census tract. Changes from 2000 is calculated based on 2000 Census tract area.



### Highest Hispanic Population - Census Tract 26.02 "The Shores"

	2010 Population		Change 2000-2010	
	Number	Percent	Percent	Number
<b>Total Population</b>	<b>6,169</b>		<b>19.18%</b>	<b>993</b>
Population of one race:	6,035	97.83%	18.96%	962
White	4,660	75.54%	8.90%	381

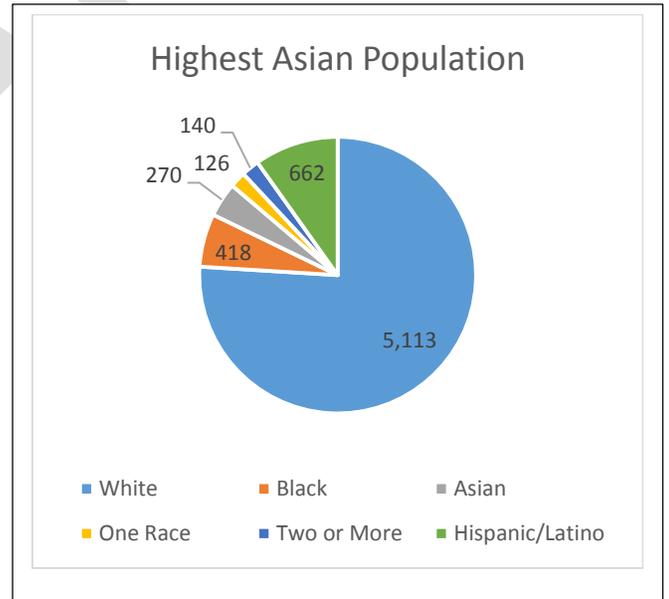
Black or African American	477	7.73%	4.38%	20
American Indian & Alaska Native	46	0.75%	130.00%	26
Asian	48	0.78%	200.00%	32
Native Hawaiian & Other Pacific Islander	1	0.02%	0.00%	0
Some Other Race	803	13.02%	167.67%	503
Two or More Races:	134	2.17%	30.10%	31
Hispanic or Latino:	1,515	24.56%	115.50%	812
Not Hispanic or Latino:	4,654	75.44%	4.05%	181
Age 18 and over:	4,713	76.40%	21.59%	837
Age 17 and under:	1,456	23.60%	12.00%	156



The two census tracts with the highest Hispanic population are “The Shores” and “Marion Oaks”. The Hispanic population increased 115.5% in The Shores and 92.53% in Marion Oaks from 2000 to 2010. It’s safe to expect that the Hispanic populations of both the City of Ocala, as well as Marion County, will drastically increase.

### Highest Asian Population - Census Tract 24.01

	2010 Population		Change 2000-2010	
	Number	Percent	Percent	Number
<b>Total Population</b>	<b>5,253</b>		<b>45.84%</b>	<b>1,651</b>
Population of one race:	5,113	97.33%	43.70%	1,555
White	4,280	81.48%	36.18%	1,137
Black or African American	418	7.96%	129.67%	236
American Indian & Alaska Native	17	0.32%	-15.00%	-3
Asian	270	5.14%	39.18%	76
Native Hawaiian & Other Pacific Islander	2	0.04%	0%	2
Some Other Race	126	2.40%	563.16%	107
Two or More Races:	140	2.67%	218.18%	96
Hispanic or Latino:	662	12.60%	289.41%	492
Not Hispanic or Latino:	4,591	87.40%	33.77%	1,159
Age 18 and over:	4,229	80.51%	49.01%	1,391
Age 17 and under:	1,024	19.49%	34.03%	260



All the other categories represent the state average. During this time period there was a positive population increase.

Category	Number	% in Total Households	% Change 2000-2010
<b>Total: Households</b>	<b>137,726</b>	<b>100.00</b>	<b>29.01</b>
Family households (families)	92,554	67.20	24.01
Family households: With own children under 18 years	29,492	21.41	11.67
Family households: Husband-wife family	70,058	50.87	18.06
Family households: Husband-wife family: With own children under 18Yrs	17,932	13.02	1.75
Family households: Male householder, no wife present	5,987	4.35	
Family households: Male householder, no wife present: With own children under 18 years	2,941	2.14	
Family households: Female householder, no husband present	16,509	11.99	44.49
Family households: Female householder, no husband present: With own children under 18 years	8,619	6.26	28.87
Nonfamily households	45,172	32.80	40.64
Householder living alone:	36,749	26.68	37.84
Householder living alone: Male	14,876	10.80	
Householder living alone: Male: 65 years and over	6,164	4.48	
Householder living alone: Female	21,873	15.88	
Householder living alone: Female: 65 years and over	13,134	9.54	
Households with individuals under 18 years	34,480	25.04	16.17
Households with individuals 65 years and over	58,725	42.64	37.93
Average household size	2.35	0.00	-0.42
Average family size	2.80	0.00	0.36

Like most communities in the United States trying to recover from the housing crash over the past 7 years, the numbers shown above are based on 2010 census data and the vacant rate is now lower. The number of vacant housing units are decreasing and housing values are now closer to the values they were in the early 2000's but are not expected to peak to the 2007 to 2008 highs. One factor contributing to the high vacancy rate is the large number of residents who lost their homes during the economic downturn are now renting.

## Marion County Household Demographics

Category	Number	% in Total Population	% Change 2000-2010
<b>Total population</b>	<b>331,298</b>	<b>100.00</b>	<b>27.96</b>
In households:	323,059	97.51	28.18
In households: Householder	137,726	41.57	29.01
In households: Spouse	70,058	21.15	18.06
In households: Child	75,824	22.89	23.23
In households: Child - Own child under 18 years	53,851	16.25	11.60
In households: Other relatives	20,626	6.23	66.70
In households: Other relatives - Under 18 years	8,477	2.56	63.52
In households: Other relatives - 65 years and over	3,701	1.12	
In households: Nonrelatives	18,825	5.68	56.39

Category	Number	% in Total Housing Units	% Change 2000-2010
Total housing units	164,050	100.00	33.74
Occupied housing units	137,726	83.95	29.01
Vacant housing units:	26,324	16.05	65.48
Vacant housing units: For rent	5,351	3.26	
Vacant housing units: Rented, not occupied	218	0.13	
Vacant housing units: For sale only	4,786	2.92	
Vacant housing units: Sold, not occupied	710	0.43	
Vacant housing units: For seasonal, recreational, or occasional use	7,426	4.53	41.29
Vacant housing units: All other vacates	7,833	4.77	
Homeowner vacancy rate (percent)	4.3	N/A	59.26
Rental vacancy rate (percent)	14.0	N/A	42.86
Total: Occupied housing units	137,726	83.95	29.01
Owner-occupied housing units	105,075	64.05	23.35
Owner-occupied housing units: Owned with mortgage or loan	60,170	43.70	
Owner-occupied housing units: Owned free and clear	44,905	32.60	
Renter-occupied housing units	32,651	19.90	51.36
Population in occupied housing units: Owner-occupied housing units	239,828		
Population in occupied housing units: Renter-occupied housing units	83,231		
Occupied housing units Average household size: Owner-occupied	2.3	N/A	-2.13
Occupied housing units Average household size: Renter-occupied	2.6	N/A	7.44

## Housing Needs Assessment Demographic

### Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	11,165	13,835	21,225	15,030	69,685
Small Family Households *	3,450	3,030	6,230	5,010	30,465
Large Family Households *	740	765	1,395	805	3,870
Household contains at least one person 62-74 years of age	2,240	4,210	5,650	4,890	21,390
Household contains at least one person age 75 or older	1,855	4,085	5,315	3,255	9,175
Households with one or more children 6 years old or younger *	1,943	1,754	2,695	1,704	6,255
* the highest income category for these family types is >80% HAMFI					

Data 2006-2010 CHAS

## Households by Income and Cost Burden, Ocala and Marion County, 2014

Household Income as Percentage of Area Median Income	Amount of Income Paid for Housing		
	0-30%	30-50%	50% or more
<=30% AMI	390	339	2272
30.01-50% AMI	483	772	1791
50.01-80% AMI	1050	1771	1092
80.01+% AMI	11177	2073	409
Total	89982	26922	24497

Ocala Florida Housing Data Clearinghouse

Household Income as Percentage of Area Median Income	Amount of Income Paid for Housing		
	0-30%	30-50%	50% or more
<=30% AMI	1153	987	9376
30.01-50% AMI	3789	4379	6967
50.01-80% AMI	10551	8485	4972
80.01+% AMI	74489	13071	3182
Total	89982	26922	24497

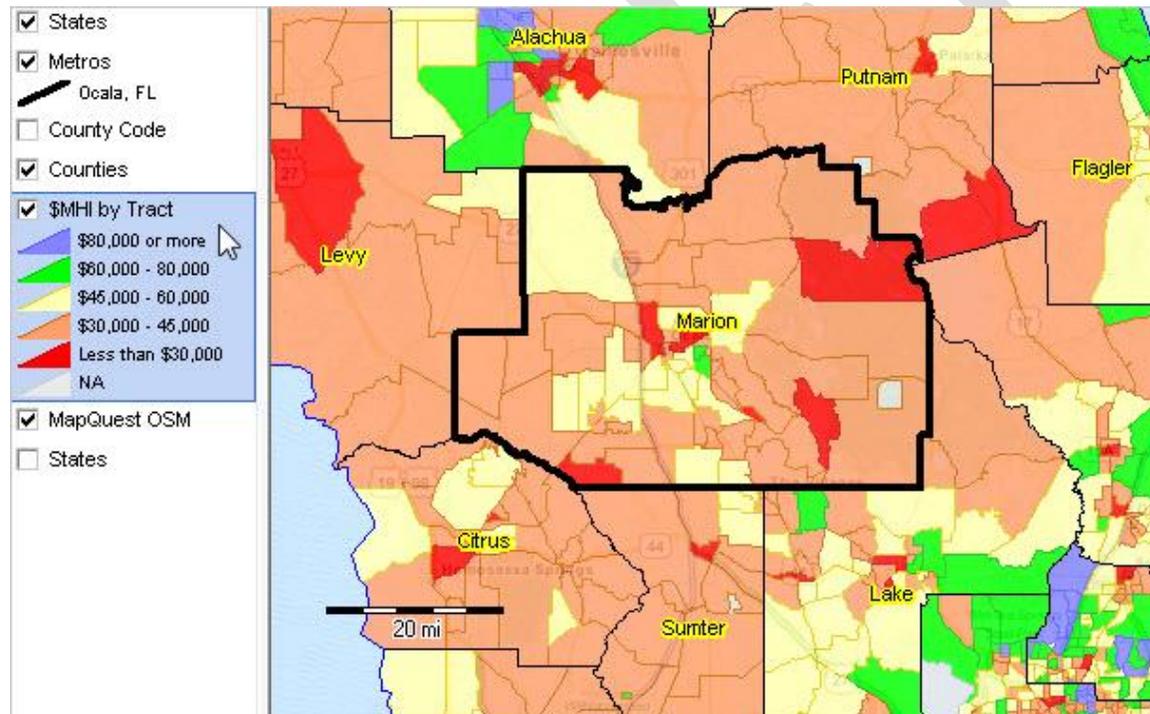
Marion County Florida Housing Data Clearinghouse

## Households by Monthly Rent Paid, Marion County, 2009-2013

Place	<\$200	\$200-\$299	\$300-\$499	\$500-\$749	\$750-\$999	\$1,000-\$1,499	\$1,500 or More	No Cash Rent	Total
Marion County	208	390	2464	8512	10441	5890	828	2479	31212
Ocala	149	246	970	2730	3919	2061	393	423	10891

From 2010 to present, persons looking for rental units has greatly increased – mostly due to the household losing their homes through foreclosure. As the vacancy rate decreases, the monthly rental rates increase – leaving those households with tarnished credit from a foreclosure viewed as high risk renters. The Marion County rental market continues to be tight and seriously in need of additional housing units built.

## Marion Count Household Values



Place	Housing Type	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
Marion County	Condominiums	57500	58950	60000	68650	95000	130000	119700	78000	65000	60000	45000	34250	37500	35250
Marion County	Single Family Homes	94500	115000	129650	137950	160400	190000	192000	160000	145000	130000	112000	112500	121650	118000

Housing	Ocala, Florida	Marion Co. Florida	United States
Median Home Age	27	22	37
Median Home Cost	\$89,100	\$98,100	\$170,100
Home Owned	42.90%	63.31%	57.34%
Homes Rented	39.79%	18.94%	30.19%
<b>AVERAGE RENT FOR HOME OR APARTMENT</b>			
Studio Apartment	516	516	661
1 Bedroom Home or Apt.	639	639	7965
2 Bedroom Home or Apt	801	801	957
3 Bedroom Home or Apt	1,079	1,079	1,289
4 Bedroom Home or Apt	1,072	1,072	1,490
<b>VALUE OF OWNER-OCCUPIED HOUSING</b>			
Less Than \$20,000	8.14%	4.89%	3.30%
\$20,000-39,999	2.44%	6.12%	3.44%
\$40,000-\$59,999	4.58%	6.32%	4.18%
\$60,000-\$79,999	7.56%	9.24%	5.80%
\$80,000-\$99,999	11.22%	11.06%	7.09%
\$100,000-\$149,999	22.73%	19.22%	15.77%
\$150,00-\$199,999	16.07%	16.52%	15.03%
\$200,000-\$299,999	15.47%	16.28%	18.50%
\$300,000-\$399,999	4.99%	5.20%	10.39%
\$400,000-\$499,999	3.25%	2.11%	5.66%
\$500,000-\$749,999	1.08%	1.25%	6.39%
\$750,000-\$999,999	0.96%	0.65%	2.28%
\$1,000,000 or more	1.52%	1.14%	2.18%
<b>HOUSING UNITS BY YEAR BUILT</b>			
2010 and newer	0.23%	0.33%	.29%
2000 to 2009	22.96%	28.01%	14.18%
1990 to 1999	16.03%	22.17	13.96%
1980 to 1989	20.57%	23.33%	13.99%
1970 to 1979	17.53%	14.72%	16.09%
1960 to 1969	16.03%	22.17%	13.96%
1950 to 1959	7.02%	3.18%	11.05%
1940 to 1949	2.47%	1.12%	5.59%
1939 to Earlier	2.76%	1.33%	13.68%

## Households by Income and Cost Burden, Marion County, 2014

The single largest housing problem in Marion County for both renters and owners is a housing cost burden of 50% or more afflicting those households with 50% or less AMI. Overcrowding is not predominant in Marion County and a low percentage of housing lacks complete plumbing or kitchen facilities.

Household Income as Percentage of Area Median Income	Amount of Income Paid for Housing		
	0-30%	30-50%	50% or more
<=30% AMI	1153	987	9376
30.01-50% AMI	3789	4379	6967

Monthly housing rents between \$750 and \$999 represent the largest percentage that people pay at ( %). With such a high percentage of their monthly income going to rent, households have very little left over for other needs that the household may require.

Ocala	Amount of Income Paid for Housing		
	0-30%	30-50%	50% or more
Owner	8020	1977	1971
Renter	5080	2978	3593

Marion County	Amount of Income Paid for Housing		
	0-30%	30-50%	50% or more
Owner	75284	18331	14901
Renter	14698	8591	9596

## Housing Condition Characteristics (Occupied Units), Marion County, 2009-2013 American Community Survey

Place	Persons Per Room		House Heating Fuel		Kitchen Facilities		Plumbing Facilities	
	1.01 or More Persons per Room	Share of Occupied Units (%)	No Fuel Used	Share of Occupied Units (%)	Lacking Complete Facilities	Share of Occupied Units (%)	Lacking Complete Facilities	Share of Occupied Units (%)
Marion County	2889	2.2	855	0.6	4493	2.8	4227	2.6

Sources: U.S. Census Bureau, 2009-2013 American Community Survey 5-Year Summary File

## Households by Homeowner/Renter Status and Cost Burden, Marion County, 2014

With the increase in rental unit prices and salaries staying stagnant, over ( %) of Marion County residents pay more than 50% of their income for rent.

50.01-80% AMI	10551	8485	4972
80.01+% AMI	74489	13071	3182
Total	89982	26922	24497

## Median Sales Price for Single Family Homes

The peak of the housing market, like most of the country, was 2006-2007 – at which time the housing market crashed. Foreclosures spiked due to the overwhelming effect the economic downturn had on the stock and housing markets. Over the past years, efforts have been made to inform and educate those faced with home foreclosure on how to stay in their homes to protect their home values.

## Median Gross Rent, Marion County, 2009-2013 American Community Survey

Place	Median Gross Rent	State Median Gross Rent
Marion County	822	990
Ocala	813	990

U.S. Census Bureau, 2009-2013

Based on 2010 census data, Marion County rent is 17% less than State average but the average wage in Marion County are far less than State average as well. It's very difficult for individuals and families living further in the County without a vehicle, as there are less opportunities of buying goods and services at the best prices.

## Household Characteristics

### Housing Problems (Households with One of the Listed Needs)

	Renter					Owner				
	0-30%	>30-	>50-	>80-	Total	0-30%	>30-	>50-	>80-	Total
	AMI	50%	80%	100%		AMI	50%	80%	100%	
		AMI	AMI	AMI		AMI	AMI	AMI	AMI	
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	80	30	165	80	355	80	110	10	15	215
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	80	0	50	20	150	10	0	95	25	130
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	295	280	145	15	735	105	119	205	184	613
Housing cost burden greater than 50% of income (and none of the above problems)	2,545	2,305	1,265	70	6,185	4,020	3,180	3,150	1,245	11,595
Housing cost burden greater than 30% of income (and none of the above problems)	305	945	2,940	1,195	5,385	840	2,670	3,460	2,590	9,560
Zero/negative Income (and none of the above problems)	680	0	0	0	680	1,170	0	0	0	1,170

Families >30% of the median income level represent the highest segment of the population being cost burdened.

### Manufactured Housing Parks and Condominiums

- There were 84 licensed manufactured housing parks in Marion with 8,138 lots in 2012.
- Source: Florida Department of Business and Professional Regulation

### Home Purchase Loans by Property Type, Marion County, 2005-2013

			Application Count								
Place	County	Property Type	2005	2006	2007	2008	2009	2010	2011	2012	2013
Marion County	Marion	One to four-family (other than manufactured housing)	9700	9420	4798	2445	1875	2036	2026	3252	4131
Marion County	Marion	Manufactured housing	684	606	426	242	122	114	82	122	133
Marion County	Marion	Multifamily	7	6	4	1	1	0	3	4	5

**Notes:** Shows loan applications resulting in loan origination only. For more information, see [HMDA User Guide](#)  
**Sources:** Home Mortgage Disclosure Act data 2005-2013

## The Motel Effect

2013 Service Category	2014 Service Category	2015 Service Category
37	37	49

Placing persons and families in motels is a necessary evil based on the fact most of these families are living in what is considered an overcrowded living area. One definition of an overcrowded housing unit is a unit with more than 1.5 persons per room, excluding bathrooms, kitchens, hallway, and porches. It appears the use for motels in Marion County results from the combined effect of low earnings and high housing costs and reflects the inability of households to rent housing that provides a reasonable level of privacy. Most of the families assisted with funds to live in motels are the “working poor” families. However, these families are actually paying more by living in motels but are unable to save the necessary funds for first and last months’ rent, deposit, and sometimes utility deposits.

## Housing Conditions & Market Analysis

Marion County experienced significant growth in both demand and construction of new units during the housing boom years of 2004-2008. During these years, home prices and, subsequently, rents increased dramatically. Since 2008, foreclosures have been significant and many former homeowners have looked for affordable rental units as they recover from the economic downturn. Most recently, foreclosure numbers have leveled off and home sales are slightly increasing. Unfortunately, there are large numbers of low-moderate income renter households in the community that remain cost burdened and, in many cases, severely cost burdened.

Between 2000 and 2008 home demand and housing production skyrocketed in Marion County. However, like most of the county between 2008 and 2012, Marion County has witnessed extremely high unemployment leading to rampant home foreclosures. Furthermore, Marion County has always had a high prevalence of secondary homes and seasonal rentals. In the past, these homes tended to drive housing prices (and values) higher. Unfortunately, these secondary homes were also hit hard during the foreclosure crisis.

## Anti-Poverty Strategy - 91.415, 9L215(j)

Jurisdiction Goals, Programs, and Policies for reducing the number of Poverty-Level Families.

The American Dream is defined in terms of economic independence and self-sufficiency as a home, a good job, and the resources to raise children. The alternative is poverty, consisting of dependence on society to provide for basic needs.

There is no one factor that causes poverty – thus initiatives aimed at eradicating poverty have to address a variety of interrelated social issues, education training, access to healthcare, family problems, crime, unemployment, inadequate housing, deteriorating neighborhoods, welfare independence and issues related to the lack of self-worth and aspiration.

The County and City recognize the interrelationship between housing and economic opportunities and the need to pursue both in order to assist households attain self-sufficiency. Both recognize while they have defined priority strategy areas, that they are not separate or isolated strategies. These strategies are interrelated and impact, reinforce, and contribute to each other to achieve the common goal of a viable, vibrant community. The health of the County, its special needs populations and the community at large cannot be artificially separated as they are an integral part of the whole. The betterment and improvement of any part inevitably contributes to the betterment of the other segments of the community. The County and City believe the implementation of the housing and neighborhood revitalization activities outlined in the Consolidated Plan will help reduce the number of households in poverty. All of the programs outlined in the Consolidated Plan are intended to provide benefits to Marion County residents that are considered low income and/or fall below the federal poverty line.

To promote economic opportunity in Marion County, the Chamber and Economic Partnership (CEP) was formed to create a one-stop approach to business retention, attraction and creation efforts. Moving forward is a charge reflecting the desire to be a unified voice and catalyst for the business community. By working together with partners and community investors, the CEP continues to improve the quality of life and build a strong base for economic development in Marion County.

### **How are the Jurisdiction Poverty Reducing Goals, Programs, and Policies Coordinated with this Affordable Housing Plan?**

Recognizing that poverty is a complex issue, Marion County will consider prioritizing projects for this affordable housing plan that are targeted towards individual self-sufficiency. Because Marion County and the City of Ocala receive separate CDBG funding, this funding is governed by different authorities. Both the County and City work diligently to complement and maximize efforts taken to ensure a seamless coordination of services. The following agencies are engaged in efforts to fight poverty and improve working relationships to enhance efforts in serving the most vulnerable residents:

#### **Community Assistance:**

- Community Legal Services of Mid-Florida provides representation in eviction, foreclosures, and public housing proceedings.
- Marion County Homeless Council provides mortgage, rental, and utility assistance, including relocation and motel/hotel placement;
- **Ocala Housing Authority provides consumer credit counseling and re-modification;**
- One Stop Workforce Connection provides job development, prepares participants for job searches, provides counseling, identifies job skills, and assists in preparation of resume writing and interview skills;

- Vocational Rehabilitation provides retraining for persons with documented disabilities;
- Department of Children and Families provides economic services, including TANF, food stamps, Medicaid, challenge grant, grant-in-aid for homeless shelters, and plans and coordinates direct services.
- Community Action Agency provides financial assistance for utility payments and weatherization assistance;
- Marion County School Board helps refer families to local services to prevent homelessness and provides breakfast and weekend backpack meals for homeless students identified at the beginning of the school year;
- First Call for Help provides free information and referral services, linking the caller with the agency, organization, or program that may best help to meet their needs;
- United Way of Marion County provides unity between local resources and Marion residents;
- Experience Works provides retraining job opportunities for senior residents 55 and over;
- Marion County Veteran Services educates and assists veterans with getting eligible services through veteran programs and links veterans with local training, healthcare, and veteran services;
- The Centers provides case management, detoxification and outpatient treatment, and emergency sheltering for 50 persons.

The County and City are committed to eliminating the effects of poverty among its residents. The jurisdiction recognizes that it may not be possible to end poverty altogether, but is dedicated none-the-less to better understanding its causes and finding a way to reverse the cycle of privation.

The City has an Economic Improvement Fund, financed from profits from the City's electric utility. Funds are provided to existing or incoming businesses, usually an industrial sector business, that will increase the number of jobs available in the community.

## Continuum of Care

### “Point-In-Time Count”

The point-in-time count of homelessness in Marion County provides a snapshot of the individuals and families experiencing homelessness on a given night in our community. The data collected from the count ensures our community’s continued eligibility for state and federal funding and helps the Marion County Collaborative and their nonprofit partners plan for the funding and services needed to meet the needs of people experiencing homelessness in our community.

Data for the point-in-time count comes from the Street Count, which is sponsored by Marion County Homeless Commission. In 2013-15, the City, County, and their partners worked together to achieve unprecedented levels of coordination between the two counts. This report represents the first time that the findings from both counts have been analyzed together and released in a joint report.

The 2013-2015 counts showed: an average of 286 individuals living in shelters and an average of 459 people who were “literally homeless” – sleeping in an emergency shelter, vouchered into a motel, or unsheltered.

Due to the inherent difficulties of obtaining a complete count of everyone who is homeless in Marion County on a given night, the count represents an estimate rather than a complete enumeration. The actual number of people who are homeless in our community on a given night is likely higher than the number documented in this report.

During the 2016 point-in-time count, these two shots of an encampment site show a situation that is not uncommon, as many similar sites have 30 -50 homeless persons living and or sleeping there.



2013		2014		2015	
Sheltered	Unsheltered	Sheltered	Unsheltered	Sheltered	Unsheltered
325	205	274	644	259	528
Total homeless county 530		Total homeless count 918		Total homeless count 787	

2013 Service Request		2014 Service Request		2015 Service Request	
519		438		252	
Male	Female	Male	Female	Male	Female
211	308	196	242	110	142

Year	Multiple	White	Black	Native American	Asian	Hispanic
2013	11	135	304	4	2	63
2014	9	118	258	7	0	46
2015	7	72	123	4	2	44

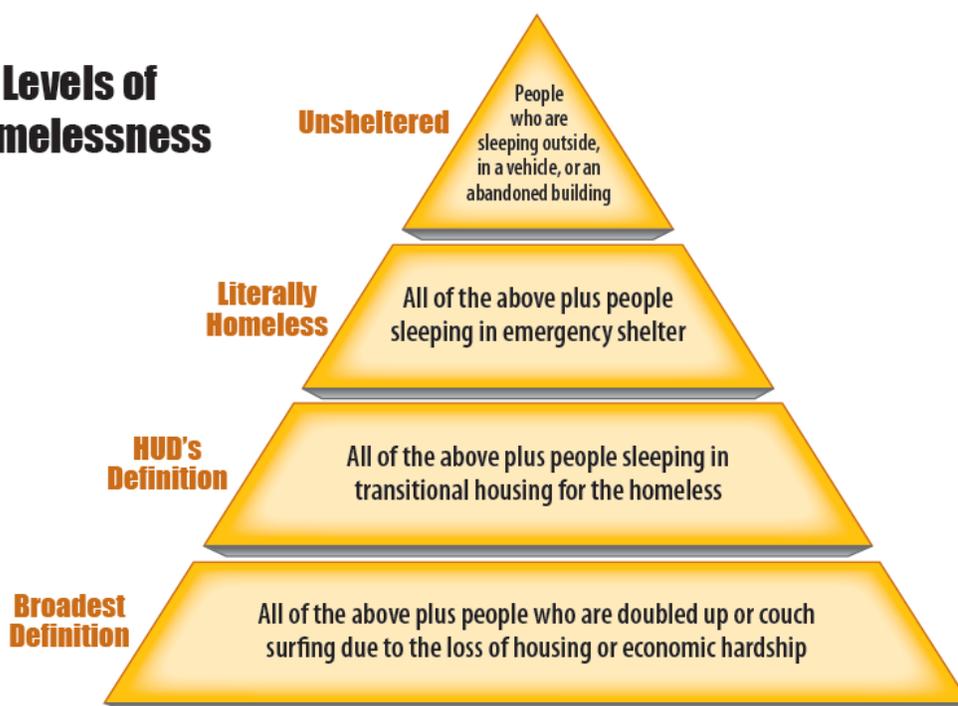
**Service Request by Race Category**

Person enrolled in Projects 2013	191; 54 or 28% from Emergency Shelter situation
Person enrolled in Projects 2014	253; 54 or 21% from Emergency Shelter situation
Person enrolled in Projects 2015	5,180; 211 or 4% from Emergency Shelter situation

The point in time count's findings represent an increase in the levels of homelessness in Marion County since the most recent Street Count and One Night Shelter Count took place. The extent of the increase depends on how we define homelessness.

## Continuum of Care

### Levels of Homelessness



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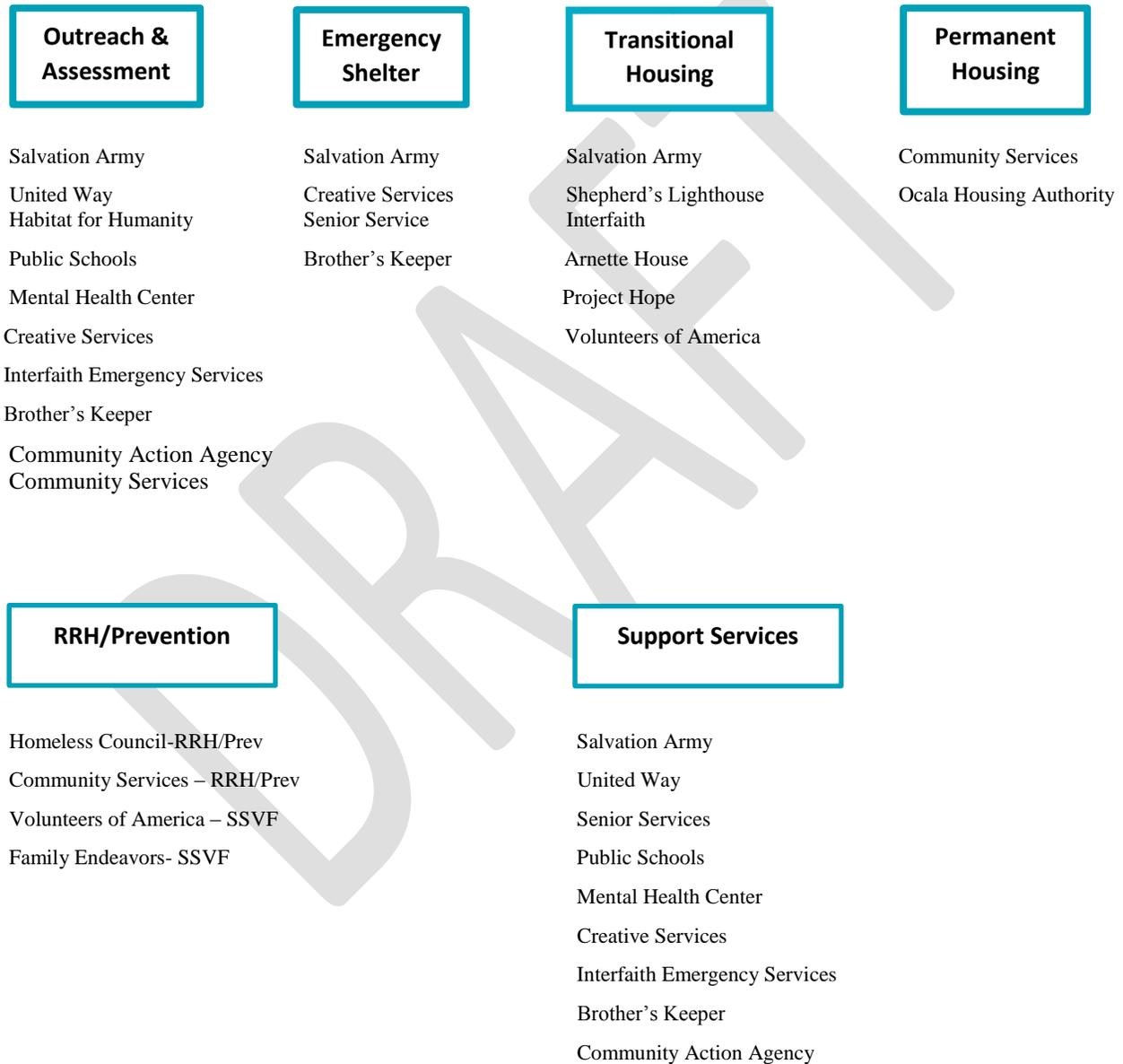
**Unsheltered:** The most visible homeless population is the unsheltered homeless, including people sleeping outside, in vehicles, abandoned buildings, or other places not intended for human habitation.

**Literally Homeless:** The federal department of Housing and Urban Development (HUD) uses the term “literally homeless” to refer to the unsheltered homeless, as well as people sleeping in emergency shelters or vouchered into motels.

**HUD’s Definition:** HUD’s definition of homelessness for the point-in-time count includes the literally homeless as well as those sleeping in transitional housing for the homeless.

**Broadest Definition:** Some advocates and government agencies (including the Department of Education) define homelessness more broadly to include individuals and families who are sharing the housing of other persons due to the loss of housing or economic hardship.

Many organizations and individuals were and continue to be involved in the process of developing Marion County/Ocala Continuum of Care strategy. They include advocates concerned with affordable housing opportunities for homeless persons, as well as groups specifically concerned with the needs of subpopulations of homeless people, such as: domestic violence, mental illness, substance abuse, veterans, and HIV/AIDS. Government agencies, as well as churches in the community, also play an important part in the process.



## Strategy for Prevention

The County’s social service agencies and nonprofit service providers will continue to provide short-term and long-term aid, supportive services, and counseling to families that are in danger of becoming homeless.

## Strategy for Outreach

The County’s social services agencies and nonprofit service provider will continue to provide outreach services to the City/County’s homeless population. During the next five years, in conjunction with the County’s collective service providers, the Consortium will continue to improve its collective strategy for outreach to families in need of assistance.

## Strategy for Shelter and Transitional Housing Needs

Marion County community services will continue to provide shelter and transitional housing to the County’s homeless. During the next five years, in conjunction with the County’s services providers, the County may provide additional shelter assistance to families in need of assistance.

## Homeless Priorities

Based on the assessment of need the Consortium believes that the highest priority for providing homeless assistance should go to families.

## Obstacles

The major obstacle to meeting the needs of the homeless is the lack of funds. Federal programs for the homeless are currently allocated on a competitive basis, rather than to each community.

<b>Emergency Shelters</b>	<b>Transitional Shelters</b>	<b>RRH/Prevention</b>
Arnette House; 30 beds (youth)	Arnette House; 12 beds (youth)	MC Homeless Council –RRH/Prev
Open Arms Village; 30 beds (adults)	Project Hope; 32 beds	MC Community Services-RRH/Prev
The Salvation Army; 105 beds	Salvation Army; 45 beds	Volunteers of America - SSVF
Interfaith Emergency Services; 32 beds	Shepherd’s Lighthouse; 12 beds	Family Endeavors – SSVF
Creative Services; 51 beds	Volunteers of America; 50 beds	

## Available Shelter Facilities

### Crowding (More than One Person per Room)

	Renter					Owner				
	0-30%	>30-	>50-	>80-	Total	0-30%	>30-	>50-	>80-	Total
	AMI	50%	80%	100%		AMI	50%	80%	100%	
	AMI	AMI	AMI		AMI	AMI	AMI			
NUMBER OF HOUSEHOLDS										
Single family households	355	280	175	35	845	50	58	235	140	483
Multiple, unrelated family households	20	0	20	0	40	55	55	65	68	243
Other, non-family households	0	0	0	0	0	15	0	0	0	15
Total need by income	375	280	195	35	885	120	113	300	208	741

Small family households and households containing at least one person 62-74 years of age account for the largest number of households in Marion County. This is consistent with why small related households for renters and elderly households for owners are the household types more affected than others by housing problems at both >30% and >50% cost burden. 42% of small related rental households suffer from a cost burden at >30% AMI and 45% have a cost burden at >50% AMI. 51% of elderly households suffer from a cost burden at >30% AMI and 48% at >50% AMI.

Expanded assistance for low-income individuals and families is crucial both to promoting recovery and minimizing the growth and extent of poverty. Lack of sustainable employment is a large factor impacting low-income individuals and families with children. The number one employer in Marion County is the education and health care industry followed by retail trade. The health care industry often requires a degree, certification, or license which are costly to obtain and not feasible for low-income individuals or families. Retail often requires long hours at minimal wages resulting in high rates of staff turnover. Employment training and assistance in obtaining employment with the goal of self-sufficiency is a large need in Marion County.

Further, lack of public transportation and adequate child care are also needs. Affordable child care is imperative to helping families obtain self-sufficiency. Without child care, many families would be unable to work or even pursue career opportunities, keeping them dependent on federal or state resources.

### Analysis of Fair Housing Complaints

Fair housing complaint information was received from the U.S. Department of Housing and Urban Development and provides a breakdown of complaints filed for the City of Ocala and Marion County from January 1, 2010 through December 23, 2015. The complaints filed with HUD are received from the Fair Housing and Equal Opportunity (FHEO) regional office in Jacksonville

Florida. A total of 110 complaints were filed according to one of seven basis including; race, color, religion, sex, disability, familial status, or national origin between 2010 and 2015.

### Legal Services of Mid-Florida, Inc.

Community Legal Services of Mid-Florida provides legal representation and advice to homeowners and renters on a wide range of legal issues including foreclosures, mortgage scams, landlord tenant disputes, subsidized housing, fair lending, and fair housing. Mid-Florida also receives Fair Housing Initiative Program funding (FHIP) from the department of HUD. FHIP funds are used to enforce federal law and educate the public and the industry on their fair housing rights and responsibilities. HUD estimates that only one percent of fair housing violations committed are ever reported – though even this number is conservative. Every year, it is estimated that nearly 4 million fair housing violations shall occur annually against African Americans, Latinos, Native Americans, and Asian Pacific Islanders. Millions more violations are committed against people of all of the seven protected classes: families with children, disability, religion, color, race, sex, or national origin.

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Study of the Fair Housing Initiative Program, U.S. Department of HUD, Mary 2011

### Type of Case Closure (2010 - 2015)

Protected Class	Race/ Color	National Origin	Familial Status	Handicap Disability	Gender/ Sex	Religion	Totals
2010	1	3		1			5
2011	8	3	1	2			14
2012	6	3		19	1	1	30
2013	4	9		5			18
2014	8	6	4	11	1	2	32
2015	3	1	2	6	1		13
<b>Total</b>	30	25	7	44	3	3	112

### Number of Complaints

HUD Office of Fair Housing and Equal Opportunity (FHEO) receives complaints from persons regarding alleged violations of the Federal Fair Housing Act. Fair Housing complaints originating in Marion County were obtained from HUD Jacksonville FHEO and analyzed from FY 2010 to FY 2015. In total, 112 complaints originating in Marion County were filed during that time, an average of twenty-two complaints per year.

## Number of Fair Housing Complaints Filed with HUD 2010 - 2015

Type of Closure		2010	2011	2012	2013	2014	2015	Total
Cases remain open		0	1	4	8	0	3	15
Case Conciliated / FHAP Judicial Consent Order			4	2	0	0	3	5
No Probable Cause / FHAP Judicial Dismissal		1	4	4	1	2	0	12
Withdrawn/Conciliated		2	1	10	2	11	2	28
Unable to Locate Complainant / Complainant failed to cooperate		2	7	4	5	15	3	36
Administrative Closure		2	2	6	1	8	3	23
<b>Totals</b>	30	25	7	44	10	3	3	2

## Barriers and Proposed Fair Housing Activities

The Fair Housing Amendments Act of 1988, Section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act protect the right of people with disabilities to keep emotional support animals, even when a landlord's policy explicitly prohibits pets. Because emotional support and service animals are not "pets" but rather are considered to be more like assistive aids such as wheelchairs, the law will generally require the landlord to make an exception to its "no pet" policy so that a tenant with a disability can fully use and enjoy his or her dwelling. As long as the tenant has a letter or prescription from an appropriate professional and meets the definition of a person with a disability, he or she is entitled to a reasonable accommodation that would allow an emotional support animal in the apartment.

## Home Mortgage Disclosure Act

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and was implemented by the Federal Reserve Board's Regulation C. Under HMDA, lenders are required to disclose information on the disposition of home loan applications and on the race or national origin, gender, and annual income of loan applicants.

This section examines detailed 2014 HMDA data for Ocala MSA and Marion County. Two types of financing – conventional and government-backed – are discussed. Conventional financing refers to market-rate loans provided by private lending institutions such as banks, mortgage companies, savings and loans, and thrift institutions. Government-backed financing refers to loans, typically issued by private lenders that are guaranteed by federal agencies, often at below market interest rates. These loans are offered to lower and moderate income Marion County households who may experience difficulty in obtaining home mortgage financing in the private market due to income and equity issues. Several federal government agencies offer loan products that have below-market interest rates and are insured ("backed" by the agencies). Sources of government-backed financing include the Federal Housing Administration (FHA), the Department of Veterans Affairs (VA), and

the Rural Housing Services/Farm Service Agency (RHS/FSA). Although government-backed loans are usually offered to consumers through private lending institutions, loans backed by local jurisdictions (such as silent second loans by cities and counties) are not covered by HMDA.

HMDA data provides some insight into the lending patterns that exist in a community. However, HMDA data is only an indicator of potential problems. The data cannot be used to conclude definite redlining or discrimination practices due to the lack of detailed information on loan terms.

## **Mortgage Lending Activities**

Historically, many lending institutions engaged in discrimination against racial and ethnic minorities and in “redlining,” in which individuals living in minority neighborhoods were denied access to mortgage credit. Denial rates are important in determining whether individuals of different races or ethnicities have fair access to credit in order to purchase a home or refinance their mortgage.

High-cost lending rates provide further evidence of possible biases in the lending industry for those individuals who are approved for loans. Loans made for home purchases and refinancing were examined separately to determine if there were any significant differences between the two groups. The Home Mortgage Disclosure Act requires lenders to report data on the race, ethnicity, gender, and income of an applicant; the type, amount, and, in some instances, price of the loan; the disposition of the application; the type and location of the property; and whether the loan was sold. While some HMDA data on race and ethnicity is not reported, under Federal Reserve Board guidelines, lenders are required to complete this information based on “visual observation or surname.

Under U.S. Census definitions, “Hispanic” is considered an ethnic designation and not a racial designation; individuals categorized as “Hispanic” may be of any racial group. The U.S. Census considers the vast majority of Hispanic individuals as white. Therefore, adding up the racial and ethnic categories will result in double-counting of those who identify as Hispanic or Latino.

## **Background**

This section of the AI evaluates lending practices in the housing market area of Marion County Florida using Home Mortgage Disclosure Act (HMDA) data information from banking oversight agencies, and complaint data from local, state, and federal organizations and agencies, as well as an assessment of advertising practices.

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and was implemented by the Federal Reserve Board's Regulation C. On July 21, 2011, the rule-writing authority of Regulation C was transferred to the Consumer Financial Protection Bureau (CFPB). This regulation provides that public loan data that can be used to assist:

- In determining whether financial institutions are serving the housing needs of their communities;
- Public officials in distributing public-sector investments so as to attract private investment to areas where it is needed; and

- In identifying possible discriminatory lending patterns.

This regulation applies to certain financial institutions, including banks, savings associations, credit unions, and other mortgage lending institutions. Using the loan data submitted by these financial institutions, the Federal Financial Institutions Examination Council (FFIEC) creates aggregate tables for each metropolitan statistical area (MSA) or metropolitan division (MD) (where appropriate), and individual institution disclosure reports. The aggregate tables and individual disclosure reports for 2014 are available on the website ([www.ffiec.gov/hmda](http://www.ffiec.gov/hmda)) and on the FFIEC website ([www.ffiec.gov/reports.htm](http://www.ffiec.gov/reports.htm)).

Much of the data provided by the Federal Financial Institutions Examination Council (FFIEC) is at the Metropolitan Statistical Area (MSA) level which is Marion County Florida. The figures presented in this analysis will reflect the entire MSA and, where available, the City of Ocala, Florida, and Marion County.

## Home Loan Activity

A key aspect of fair housing choice is equal access to financing for the purchase or improvement of a home. In 1977, the Community Reinvestment Act (CRA) was enacted to encourage regulated financial institutions to help meet the credit needs of entire communities, including low and moderate-income persons and neighborhoods. The Home Mortgage Disclosure Act (HMDA) requires financial institutions with assets exceeding ten (10) million dollars to submit detailed information on the disposition of home loans. HMDA data was evaluated in this AI with respect to lending patterns.

Two types of purchase financing – conventional and government-backed – are examined, as well as refinancing and home improvement loans. Conventional financing refers to market-rate loans provided by private lending institutions such as banks, mortgage companies, savings and loans, and thrift institutions. Government-backed financing refers to loans offered at below-market interest rates that are typically issued by private lenders and are guaranteed by federal agencies. These loans are offered to lower and moderate income households who may experience difficulty in obtaining home mortgage financing in the private market due to income and equity issues. Several federal government agencies offer loan products that have below-market interest rates and are insured (“backed”) by the agencies. Sources of government-backed financing include the Federal Housing Administration (FHA), the Department of Veterans Affairs (VA), and the Rural Housing Services/Farm Service Agency (RHA/FSA). Loans backed by local jurisdictions, such as silent second loans by cities and counties, are not covered under HMDA.

HMDA data provides some insight into the lending patterns that exist in a community. However, HMDA data is only an indicator of potential problems; the data cannot be used to conclude definite redlining or discrimination practices. In the format provided on the website, HMDA data lacks the detailed information on loan terms or specific reasons for denial to make conclusive statements.

## Loan Activity

In 2014, the most recent year for which complete data is available, there were 1,314 loans applications of the four types under review in the Marion County Metropolitan Statistical Area

(MSA). The table below shows the total number of loans applied for, the numbers of loans originated, and the number denied as well as the results of other actions.

Aggregate Loan	FHA, FSA/RHS & VA (Purchase)		Conventional (Purchase)		Refinancing		Home Improvement		Total #	Total %
	#	% of Total	#	% of Total	#	% of Total	#	% of Total		
Loans Originated	1314	65.28%	2017	57.71%	1617	41.18%	307	25.67%	5255	49.43%
Approved, Not Accepted	47	2.33%	172	4.92%	190	4.84%	52	4.35%	461	4.34%
Applications Denied	371	18.43%	796	22.78%	1185	30.18%	766	64.05%	3118	29.33%
Applications Withdrawn	245	12.17%	461	13.19%	686	17.47%	51	4.26%	1443	13.57%
File Closed for Incompleteness	36	1.79%	49	1.40%	249	6.34%	20	1.67%	354	3.33%
Total Applications	2013	100%	3495	100%	3927	100%	1196	100%	10631	100%

The above figures are for the entire MSA show that while 65.28% of government-backed and 57.71% of conventional home purchase loans were originated, 18.43% of government-backed and 22.78% of conventional loans were denied. Only a modest number of government-backed loans were approved but not accepted, indicating the potential buyer's failure to close on the chosen property.

An important variable in dissecting lending outcomes is the percentage of withdrawn or incomplete loan applications. An understanding of the home buying and loan processes, income/equity requirements, and financial responsibility are important to a successful loan application and home purchase. Many households, particularly those entering the homeownership market for the first time, lack the financial knowledge to deal with the home buying process and may end up closing or withdrawing their application. A high rate of withdrawn or closed applications can be indicative of a lack of knowledge of the loan application and/or home buying process, or a lack of adequate assistance by the lender throughout the process. The lack of lender assistance may be discriminatory in motive or outcome. However, HMDA data is inadequate in proving motive. In any event, the percentage of withdrawn or incomplete purchase applications in the Marion County was not excessive.

The rate of acceptance for refinancing loans was relatively low – only 41.18% of the applications submitted were approved. The percentage of refinancing loan denials is high, as is the figure for applications withdrawn. The topic is often a complicated one for the borrower and the rate of

withdrawal may reflect this fact. The approval rate for home improvement loans was also extremely low – at only 25.67%.

## Ocala Housing Authority

The Ocala Housing Authority (OHA) administers public housing programs and is the governing authority for matters related to the administration, operation, and management of the federal public housing and rental assistance programs. OHA operates ( ) units of public housing. Public housing is established to provide decent, safe, and sanitary rental housing for eligible families, the elderly, and persons with disabilities. The Section 8 program provides housing assistance to low-income renters and homeowners in the form of rental subsidies.

Presently there are 492 households on the waiting list for Section 8 and 1,192 participating in all OHA programs.

The OHA certifies that it does not discriminate on a racial/ethnic basis in providing assistance to eligible households between its Public Housing and Housing Voucher Programs.

## Assisted Housing Inventory

Inventory of Federally-, State- and Locally- Assisted Rental Housing									
Development Name	Street Address	City	Zip Code	County	Total Units	Assisted Units	Occupancy Status	Housing Program(s)	Population or Target Area
Meadow field Apt	5155 SE 115th St	Bellevue	34420	Marion	30	30	Ready for Occupancy	Rental Assistance/RD;Section 515	Family

Oakbrook Villas	11703 SE 57th Avenue	Bellevue	34420	Marion	42	42		Housing Credits 9%;Rental Assistance/RD;Section 514/516	Family;Farmworker; Link
Woodside – Bellevue	6745 S.E. 107th Street	Bellevue	34420	Marion	42	42		Housing Credits 9%;Rental Assistance/RD;Section 515	Elderly; Family
Rainbow Gardens	11850 Rainbow Garden Circle	Dunnellon	34432	Marion	37	37		Housing Credits 9%;Rental Assistance/RD;Section 515	Elderly; Family
Rolling Hills	11150 Rolling Hills Road	Dunnellon	34431	Marion	67	67		Housing Credits 9%;Rental Assistance/RD;Section 515	Family; Link
Blitchton Station	1741 NW 7th Street	Ocala	34474	Marion	119	118		Housing Credits 9%	Family
DEER RUN	2193 NW 1st Ave	Ocala	34475	Marion	186	186	Ready for Occupancy	Public Housing	Elderly; Family
Evangeline Booth Gardens	2921 NE 14th St	Ocala	34470	Marion	65	64	Ready for Occupancy	Rental Assistance/HUD; Section 202 Capital Advance	Elderly
Green Gables – Ocala	2600 S.W. 10th Street	Ocala	34474	Marion	131	131		Housing Credits 9%	Family
Green Gables II	2600 SW 10th Street	Ocala	34474	Marion	124	124		Housing Credits 9%	Family
Harvey's Fellowship Homes	1415 NW 5th St	Ocala	34475	Marion	50	50	Ready for Occupancy	Refi Section 221(d)(3) MR; Rental Assistance/HUD	Family
Heritage Oaks Of Ocala	2820 SW 34th St	Ocala	34474	Marion	72	72	Ready for Occupancy	Rental Assistance/HUD; Section 202 Direct Loan	Elderly
Hickory Knoll Apartments	507 NE 22nd Ave	Ocala	34470	Marion	96	94	Ready for Occupancy	Refi Section 221(d)(4) MR; Rental Assistance/HUD	Family
Hilltop Manor	7334 NE Jacksonville road	Ocala	34471	Marion	36	36	Ready for Occupancy	Rental Assistance/RD;Section 515	Family
Hilltop Manor II	7334 NE Jacksonville road	Ocala	34471	Marion	45	45	Ready for Occupancy	Rental Assistance/RD;Section 515	Family
Landfair Homes	7745 NE 22nd Terrace	Ocala	34479	Marion	117	117		Housing Credits 9%	Family
Laurel Park	2300 NW 4th Street	Ocala	34475	Marion	170	170		Housing Credits 9%	Family
Laurel Park II	100 NW 23rd Avenue	Ocala	34475	Marion	68	68		Housing Credits 9%	Family
Magnolia Walk	2501 SW 10th Street	Ocala	34474	Marion	64	64		Housing Credits 9%	Elderly; Family
Magnolia Walk II	2501 SW 10th Street	Ocala	34474	Marion	144	144		Housing Credits 9%;SAIL	Elderly; Family
Oakhurst Apartments	3001 Southeast Lake Weir Ave	Ocala	34471	Marion	214	43	Ready for Occupancy	Local Bonds	Family
Ocala Place	2135 NW 1st Ave	Ocala	33475	Marion	40	40	Ready for Occupancy	Rental Assistance/HUD	Family
Paddock Park	2901 Southwest 41st St.	Ocala	34474	Marion	200	40	Ready for Occupancy	Local Bonds	Family
Parkside Garden Apartments	621 N.W. 2nd St.	Ocala	34475	Marion	144	144		Rental Assistance/HUD; State HOME	Family
Shady Acres	8660 SW 27 Avenue	Ocala	34476	Marion	12	11		Federal Deposit Insurance Corporation; State HOME	Family
Spring Manor	2833 NE 7th Street	Ocala	34470	Marion	160	160		Extremely Low Income; Housing Credits 4%;SAIL; State Bonds	Family; Link
Spring Manor Apartments	2833 NE 7th St	Ocala	34470	Marion	160	145	Ready for Occupancy	Rental Assistance/HUD	Family
Steeplechase II	1421 SW 27 Ave	Ocala	34474	Marion	80	80		Housing Credits 9%	Family
Sutton Place Apartments.	523 NE 23rd Circle	Ocala	34470	Marion	130	130		Exchange; Housing Credits 9%;Rental Assistance/HUD; Section	Family

								221(d)(4) MKT; State HOME; Tax Credit Assistance Program	
Trinity Villas I	3728 NE 8th Pl	Ocala	34470	Marion	162	161	Ready for Occupancy	Rental Assistance/HUD; Section 207/223(f)	Elderly

## Public and Private Sector Barriers

Education to all is vital to the strength of our community, economic development, and housing as the effects of one will have drastic effects on the others. There is a need for a tenant association, with changes in the Federal fair housing laws it is very important all persons renting understand their rights.

## Education and Outreach

Education of the public regarding the rights and responsibilities afforded by fair housing law is an essential ingredient of fair housing enforcement. This includes outreach and education to the general public, landlords and tenants, housing and financial providers, as well as citizens concerning fair housing and discrimination. It is important that potential victims and violators of housing and/or lending discrimination law be aware of: general fair housing issues, what may constitute a violation, and what they can do in the event that they believe they have been discriminated against. Likewise, it is important for lenders, housing providers, and their agents to know their responsibilities and when they may be violating fair housing law.

Often, people may be unaware of their fair housing rights. Present day housing discrimination tends to be subtle. Instead of saying that no children are allowed, they may impose unreasonable occupancy standards that have the effect of excluding families with children. Rather than saying “We do not rent to Hispanics.” They may say “Sorry we do not have any vacancies right now, try again in a few months”, when in fact they do have one or more vacancies. Printed advertisements do not have to state, “no families with children or minorities allowed” to be discriminatory.

## Veterans

Marion County Veteran Services is a department of Marion County that provides assistance to and represents more than 45,650 veterans and their families.

## Elderly and Poverty

The Department of Elder Affairs released their County Profiles in 2014 that should still be fairly accurate (see attached).

33.9% (114,332) of Marion County residents are 60+ years old. Of these, 13.8% (15,768) are below 125% of poverty guideline. Households with cost burdens above 30% and income below 50% AMI for 65+ age households (2010) was 56,014 – 12.4%.

Cost of living for a single elder renting a 1 bedroom is \$20,592 annually while having a mortgage is \$25,056 annually. Cost of living for an elder couple renting a 1 bedroom is \$29,496 while having a mortgage is \$33,960.

According to Shimberg Institute data, 30% of elderly households (headed by a person 65 or older) pay more than 30% of income for rent or mortgage costs.

### Elderly Households

- 57,928 households in Marion County (41.0%) are headed by a person age 65 or older in 2014. In comparison, 29.4% of households statewide are headed by elderly persons.
- 51,878 of elderly households in Marion (89.6%) own their homes.
- 17,500 elderly households (30%) pay more than 30% of income for rent or mortgage costs.

### Elderly Households by Age and Cost Burden, Marion County, 2014

Age of Householder	Amount of Income Paid for Housing		
	0-30%	30-49.9%	50+ %
65 or more	40428	9518	7982

### Elderly Households by Age and Cost Burden, Marion County, 2014

#### Households by Household Income

All Households										
County	Place	Income	2010	2014	2015	2020	2025	2030	2035	2040
Marion	Marion	30% AMI or less	11318	11516	11665	12806	13851	14837	15834	16730
Marion	Marion	30.1-50% AMI	14702	15135	15381	17294	18912	20761	22078	23444
Marion	Marion	50.1-80% AMI	23287	24008	24409	27527	30192	33289	35365	37534
Marion	Marion	80.1-120% AM	28681	29560	30052	33939	37224	41050	43632	46295
Marion	Marion	More than 120% AMI	59732	61182	62091	68916	74816	81004	86410	91541

### Homeless Population

## Summary of Housing Needs

Located in Central Florida, the warm weather of Marion County is an attraction to many of the homeless. However, with the lowest paying service jobs in the state, and many residents commuting to other counties for work, Marion County is not the solution that many very low-income and homeless persons expect. Many of the homeless are working, but at minimum-wage jobs with no benefits. The cost burden for housing for the working poor makes it very difficult for individuals and families to afford permanent shelter.

Marion County has experienced significant growth during the past decade, largely due to the number of persons relocating to Central Florida for warmth and quality of life. Retirees are a large portion of transplants coming to Marion County and household growth has been driven by new development of 55+ communities in west and southeast Marion County.

Despite this growth, the economic climate in Marion County has not changed. This has a direct effect on the number of households with housing problems, especially for owners earning 0-30% percent of the AMI. Most housing in Marion County, including the City of Ocala, was built between 2000-2009, accounting for only 5.6% of renters and 9.5% of owners having one or more of the four housing problems. Despite these low percentages, housing within city limits tend to be older, dilapidated homes, requiring significant rehabilitation or, in some cases, demolition.

Almost 30% of the permanent housing stock is mobile homes. These serve as a cornerstone in Marion County's affordable housing rental market. Many of the mobile homes that are rented are older (pre-1990) and, as these units continue to age, and over the next five years, the stock of decent and affordable rental housing is at risk of significantly decreasing.

Homelessness is a continuing problem in Ocala/Marion County. According to some interviewed for this report, the founding of the Marion County Homeless Commission entrusted with working on Ending Homelessness understands the issues facing the homeless. However, it was further stated that much still needs to be done to end homelessness in Ocala/Marion County

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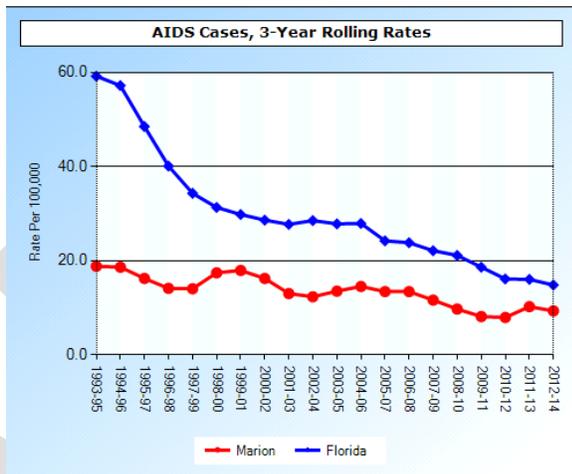
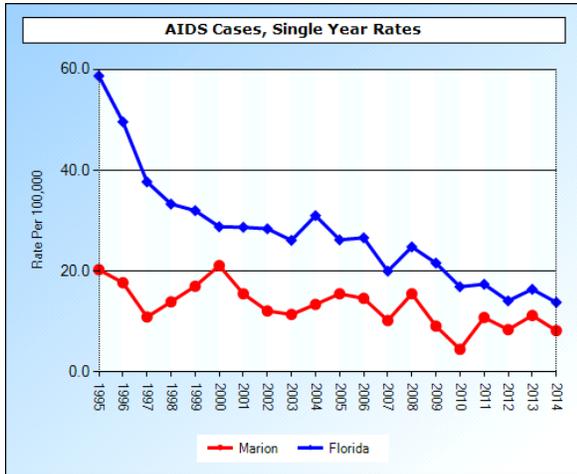
2015-2020 Consolidated Plan

## Persons with HIV/AIDS

For persons living with HIV/AIDS, access to safe, affordable housing is nearly as important to their general health and well-being as access to quality health care. For many persons with HIV/AIDS, lack of stable housing can be the primary barrier to consistent medical care and treatment. Persons with HIV/AIDS also require a broad range of services, including counseling, medical care, in-house care, transportation, and food, in addition to stable housing. Today, persons with HIV/AIDS live longer and require longer provisions of services and housing. Research has proven that stable housing promotes improved health, a return to paid employment, and prospective social activities resulting in an improved quality of life.

The number of HIV/AIDS persons living in Marion County is substantially lower than the State average. It is important to continue educating housing complexes that individuals with HIV/AIDS are regarded as having a disability, just as someone with a physical disability would be.

Year	Infected
2014	28
2013	38
2012	28
2011	36
2010	15



AIDS Cases, Single Year Rates				
Year	Marion		Florida	
	Count	Rate	Count	Rate
1995	46	20.3	8,452	58.7
1996	41	17.7	7,293	49.6
1997	26	10.9	5,659	37.7
1998	34	13.9	5,094	33.3
1999	43	17.0	5,014	32.0
2000	55	21.1	4,627	28.8
2001	41	15.5	4,697	28.7
2002	33	12.1	4,748	28.4
2003	32	11.4	4,452	26.1
2004	39	13.4	5,422	31.0
2005	47	15.5	4,677	26.2
2006	46	14.6	4,848	26.6
2007	33	10.2	3,707	20.0
2008	51	15.5	4,622	24.8
2009	30	9.1	4,038	21.6
2010	15	4.5	3,175	16.9
2011	36	10.8	3,297	17.4
2012	28	8.4	2,679	14.1
2013	38	11.2	3,177	16.4
2014	28	8.2	2,698	13.8

AIDS Cases, 3-Year Rolling Rates				
Year	Marion		Florida	
	Count	Rate	Count	Rate
1993-95	124	18.8	25,055	59.2
1994-96	126	18.6	24,746	57.2
1995-97	113	16.2	21,404	48.5
1996-98	101	14.1	18,046	40.1
1997-99	103	14.0	15,767	34.3
1998-00	132	17.4	14,735	31.3
1999-01	139	17.9	14,338	29.8
2000-02	129	16.2	14,072	28.6
2001-03	106	13.0	13,897	27.7
2002-04	104	12.3	14,622	28.5
2003-05	118	13.5	14,551	27.8
2004-06	132	14.5	14,947	27.9
2005-07	126	13.4	13,232	24.2
2006-08	130	13.4	13,177	23.8
2007-09	114	11.6	12,367	22.1
2008-10	96	9.7	11,835	21.1
2009-11	81	8.1	10,510	18.6
2010-12	79	7.9	9,151	16.1
2011-13	102	10.2	9,153	16.0
2012-14	94	9.3	8,554	14.8

Marion County's HIV/AIDS rate is substantially lower than the States average, Marion County does not received either Ryan White or HOPWA grant dollars due to our low numbers of those effected.

## Cost Burden Households

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	11,165	13,835	21,225	15,030	69,685
Small Family Households *	3,450	3,030	6,230	5,010	30,465
Large Family Households *	740	765	1,395	805	3,870
Household contains at least one person 62-74 years of age	2,240	4,210	5,650	4,890	21,390
Household contains at least one person age 75 or older	1,855	4,085	5,315	3,255	9,175
Households with one or more children 6 years old or younger *	1,943	1,754	2,695	1,704	6,255
* the highest income category for these family types is >80% HAMFI					

2006-2010 CHAS

2010 Census Data

## Cost Burden >30% for Marion County

	Renter					Owner				
	0-30% AMI	>30 - 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	3,015	2,610	1,620	185	7,430	4,215	3,415	3,460	1,470	12,560
Having none of four housing problems	895	1,825	4,520	2,930	10,170	1,175	6,000	11,615	10,435	29,225
Household has negative income, but none of the other housing problems	680	0	0	0	680	1,170	0	0	0	1,170

## Cost Burden > 50% for Marion County

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	1,450	1,005	510	2,965	1,125	724	1,179	3,028
Large Related	350	155	80	585	120	190	120	430
Elderly	395	525	335	1,255	1,990	1,795	1,290	5,075
Other	645	690	405	1,740	855	570	580	2,005
Total need by income	2,840	2,375	1,330	6,545	4,090	3,279	3,169	10,538

Cost burden is defined by HUD as when a household spends more than 30% of its income on housing, excluding the cost of utilities. As shown in the above two (2) table, it is becoming an increasing problem.

### Fair Housing Questionnaire

Marion County Consortium is mandated to conduct an Analysis of Impediments every five years, the purpose of the questionnaire is to identify and eliminate patterns or actions which lead to discrimination on the basis of race, color, religion, sex, disability, familial status, or nation origin, and to expand housing options for all residents of Ocala/Marion County.

1. Do you believe housing discrimination is an issue where you live?

Yes     No     Don't know

2. Have you ever experienced housing discrimination, if so what area of the community?

Yes     No     Not sure    \_\_\_\_\_ Zip or area

3. Who do you believe discriminated against you? \*

Landlord/Property Manager

Mortgage Lender

Government Housing Program Staff Person (Federal, State, County, City)

Real Estate Agent

Mortgage Insurer

55+ Community

Other

\*Multiple answers may be given by a respondent.

**4. On what type of property or situation did the act of discrimination occur?**

Apartment Complex

Single-Family Neighborhood

Trailer or Mobile Home Park

Condo Development

Public or Subsidized Housing Project

When applying for a Government Program

\*Multiple answers may be given by a respondent.

**5. On what basis do you believe you were discriminated against? (Check all that apply)?**

Race

Marital Status

Family Status

Color

Sexual Orientation

Source of Income

Religion

Gender

Age

Other

**6. Have you even been denied flexibility (“reasonable accommodation”) in the rules, policies, or practices at your residence that you need because of a disability?**

Yes     Not     Not Sure of the Question

**7. If you believe you have been discriminated against, have you reported the incident?**

Yes     No

Reasons for not reporting were: The two most common were: “Please circle your best choice”

Don’t know where to report and don’t believe it makes a difference.

One person also claimed they feared retaliation and one other said they could not prove what was said.

8. Are you aware of any hate crimes that have been committed in your neighborhood in the last five years?

Yes     No

**Demographics of Respondents:**    Female                      Male

**Employed:**                                       Yes                       No

**Disabled:**                                       Yes                       No

**Race**

White     American Indian  
 Black/African American                       Asian  
 White     Other

**Language Other Than English:**     Yes                       No

**Highest Level of Education** “Please circle your best choice”

Less than High School  
 High School GED  
 Some College  
 2-Year College Degree  
 4-Year College Degree  
 Master’s Degree

9. Are you a veteran:                                       Yes     No

10. Do you know who to contact if you feel you have been discriminated against:

Yes                                       No

11 If you feel you have been a victim of a discriminatory act how far back did this act happen?

\_\_\_\_\_

**After completing the questionnaire please return back to the agency given or email to [donnie.mitchell@marioncountyfl.org](mailto:donnie.mitchell@marioncountyfl.org). If you have questions please call Donnie Mitchell, at 352-671-8774.**

**AFFIRMATIVE FAIR HOUSING MARKETING PLAN AND  
PROCEDURES**



MARION COUNTY  
HOME CONSORTIUM

HOME Investment Partnership Program  
2631 SE Third Street

Ocala, Florida



DRAFT

# **MARION COUNTY HOME CONSORTIUM**

## **AFFIRMATIVE FAIR HOUSING MARKETING PLAN AND PROCEDURES**

### **I. STATEMENT**

This Affirmative Fair Housing Marketing Plan and Procedures (“Marketing Plan”) is developed for the use with the HOME Investment Partnership (“HOME”) Program and HOME-funded projects in accordance with the HOME Program regulations, including but not limited to 24 CFR 92.351, of the U.S. Department of Housing and Urban Development (“HUD) regulations. The HOME Program has established procedures to affirmatively market all projects resulting in five (5) or more HOME-assisted housing units. The Plan is a commitment of the County’s HOME consortium (“the Consortium), Consortium staff, and the HOME-funded participated (Grantee”) to affirmatively further Fair Housing. The Grantee shares responsibility with the Consortium in informing the public about the Federal Fair Housing laws, soliciting eligible persons without regard to race, color, religion, sex, disability, familial status or national origin into the affordable housing market and evaluating the effectiveness of these marketing efforts.

Affirmative marketing differs from general marketing activities because it specifically targets potential tenants and home buyers who are least likely to apply for and/or purchase housing. Efforts are made to make these persons aware of the available affordable housing, this Market Plan is a guide to assist the County’s HOME Consortium and its grantees by summarizing the affirmative marketing procedures required by HUD.

This Plan is documented and maintained in the office of Marion County, Department of Community Service files, and shall be included by reference in all HOME project proposals, made an integral part of all HOME and CHDO funding agreements and HOME case files. The Grantee is held to the terms of the Marketing Plan by the requirements in the applicable HOME or Community Housing Development Organization (“CHDO”) agreement

### **II. PUROSE**

In accordance with the regulations of the HOME Program and in furtherance of the Consortium’s commitment to non-discrimination and equal housing opportunity, the

Consortium establishes procedures to affirmatively market the distribution of its annual HOME allocation and housing units acquired, constructed or rehabilitated under the HOME Program.

It is the Affirmative Marketing Policy of the Consortium to assure that organizations, non-profit and for-profit, and local units of government which might not normally apply for use of the Consortium's HOME funds because they are unaware of the availability of said funds:

- Be informed of HOME funding availability
- Be encouraged to apply for use of HOME funding
- Have an equal opportunity to apply for use of HOME funding

It is the Affirmative Marketing Policy of the Consortium to assure that individuals who normally might not apply for available housing units because they are socially and/or economically disadvantaged:

- Be informed of available housing units
- Be encouraged to apply for available housing units
- Have an equal opportunity to rent/own their own housing units

### **III. METHODS TO DISSEMINATE AFFIRMATIVE FAIR HOUSING MARKETING REQUIREMENTS:**

Marion county Consortium has revised our Affirmative Fair Housing Marketing Plan and will use the following methods to inform the public, potential tenants, potential homeowners, potential and existing for-profit developers, and potential and existing non-profit developers, and local units of government about Federal Fair Housing laws and Affirmative Fair Housing Marketing Plan and Procedures.

- A. The County HOME Consortium staff shall be responsible for implementing the Marketing Plan and evaluating its effectiveness as required by the HOME Program.
- B. The Consortium shall inform the community about its Affirmative Marketing Policy through periodic updates at public forums, Fair Housing meetings as well as training workshops with HOME and CHDO grantees or other similar forums.
- C. At the time of HOME funding for rental housing development, the Consortium will provide copies of Housing Discrimination & Civil Rights brochures to the initial tenants and/or rental property owners.
- D. The Consortium will continue to provide general information and telephone reference numbers to person contacting the County Community Service Office with questions regarding Affirmative Marketing and Federal Fair Housing laws.

#### **IV. CONCSORTIUM AFFIRMATIVE MARKETING REQUIREMENTS**

The consortium will, at least annual, adhere to the following, or similar, Marketing Plan policies regarding announcement of availability of HOME funds:

- A. Post a notice of HOME funding availability on the County's website.
- B. Purchase an advertisement for a public notice in a newspaper of general circulation.

#### **V. CONSORTIUM REQUIRED AFFIRMATIVE MARKETING RECORD KEEPING**

In order to verify that the Consortium is following Marketing Plan requirements the following record keeping procedures will be required:

- A. The Consortium will main records of how HOME funding availability was advertised (copies of advertisement, emails, etc.).
- B. Copies will be maintained of all training materials and meeting agendas where the Consortium's Affirmative Marketing Policy was discussed.

#### **VI. GRANTEE AFFIRMATIVE FAIR HOUSING MARKETING REQUIREMENTS**

The Consortium HOME funds must adhere to the following Marketing Plan policies with HOME-assisted housing units become available for rent or purchase:

- A. Incorporate and Equal Housing Opportunity statement or logo in any correspond associated with rental or home ownership opportunities developed with the use of Consortium HOME funds.
- B. All marketing of HOME-assisted housing will be jurisdiction-wide and all advertising will be placed in sources of wide circulation. All ads must contain and Equal Housing Opportunity statement or logo.
- C. Media sources should include advertisement to all particular audience (e.g., newspapers or radio stations that serve protected classes).

- D. All advertisements, brochures, and other written materials should be published in at least English and Spanish, in order to reach non-English speaking audiences ad displayed.
- E. Contact should be made with organizations whose membership or clientele consists primarily of protected class members.
- F. The project owner must display the Equal Opportunity logo and Fair Housing poster in an area accessible to the public (e.g., rental office).

## **VII. GRANTEE REQUIRED AFFIRMATIVE MARKETING RECORD KEEPING**

In order to verify that Consortium Grantees are following Marketing Plan, the Consortium requires the following record keeping procedures will be required:

- A. Grantee maintains records of how vacancies were advertise (copies of advertisements, etc.).
- B. Copies of all brochures, leaflets, and letter to community contacts shall be maintained in an easily accessible file.
- C. Grantee shall have a written policy that outlines how all applications will be reviewed and processed. Grantee records shall show how all completed and filed applications were processed including whether an applicant was accepted or unaccepted and why an applicant was not accepted.
- D. Maintain information of the race, sex, ethnicity, and whether the applicant is disabled for all applicants, homebuyers, and tenants. The Consortium will submit this information as part of its Consolidated Annual Performance and Evaluation Report (“CAPER”).

This information will be gathered when an application is taken for either a tenant or a home buyer and information will be maintained during the entire affordability period.

## **VIII. CONSORTIUM ASSESSMENT OF ITS AFFIRMATIVE MARKETING POLICY**

The following actions will be taken by the Consortium to evaluate the success of its Affirmative Fair Housing Marketing Policy and that of its Grantees:

- A. The Consortium will assess the results of its Affirmative Fair Housing Marketing plan annually with a summary of “good faith efforts” taken by the Consortium as well as its Grantees in the CAPER.
- B. The Consortium will compare the information compiled in the manner described under Section V and Section VII above and evaluate the degree to which statutory and policy objectives were met. If the required steps were taken, the Consortium will determine that good faith efforts have in fact, been made.
- C. To determine results, the Consortium may examine whether specific groups in the Consortium’s service area applied for or became tenants or owners of HOME-or CHDO-funded units that were affirmatively marketed. If the Consortium finds that specific groups are represented, particularly Hispanics, African Americans, Asians, American Indians, persons with disabilities, and women, the Consortium will assume that represented within the context of existing neighborhood composition, the Consortium will review its procedures to determine what changes, if any, might be made to make the affirmative marketing efforts more effective.
- D. The Consortium will take corrective action if it is determined that a Grantee has failed to carry out Affirmative Marketing efforts as required. If a Grantee continues to neglect responsibilities made incumbent by the terms of the HOME or CHDO Agreement, the Consortium will consider taking one or both of the following actions:
  1. Declare the Grantee disqualified from any further assistance made available under the HOME Program.
  2. Notify the Grantee of the HOME Program funds that were in violation of the terms of the HOME or CHDO Agreement and the Consortium may exercise its right to require immediate repayment of the HOME funding.
- E. The Consortium will not proceed with corrective action without allowing time and effort by staff to counsel the grantee in accordance with the terms of the HOME or CHDO Agreement.