LIHTC Awards in Ohio, 2006-2015: Where Are They Providing Housing for Families with Children?



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Executive Summary

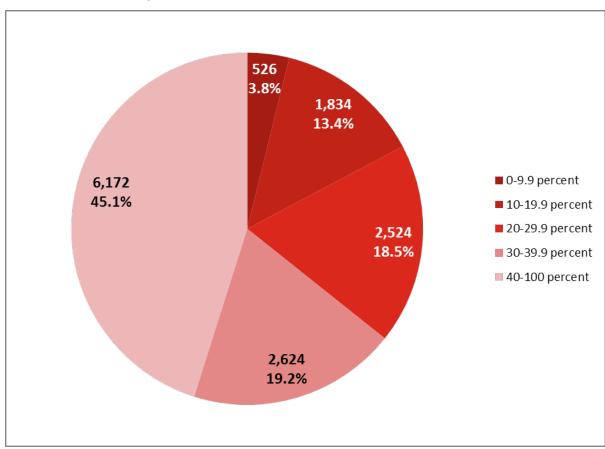
The Legal Aid Society of Southwest Ohio, on behalf of a group of Ohio legal aid programs, engaged Abt Associates to conduct an analysis of the locations of LIHTC properties and units awarded by the Ohio Housing Finance Agency (OHFA) between 2006 and 2015. The analysis presented in this report reviews the history of LIHTC allocations in Ohio to show the extent to which past LIHTC awards have placed family housing in areas that are not racially or economically concentrated. The focus of the analysis is on housing for families with children and on metropolitan areas in Ohio, and the intention is to help inform OHFA's efforts to broaden opportunities for families with children to live in areas of high opportunity.

From 2006 through 2015, OHFA awarded federal Low Income Housing Tax Credits to 509 properties across the state, with 34,255 units. According to OHFA's designations, 243 of those properties, with 17,089 units, were intended for occupancy by families with children, 47.7 percent of the properties and 49.9 percent of the units. Over that time period, the share of LIHTC allocations that were made for family housing dropped, from 60.3 percent in 2006 to 46.0 percent in 2015, while the share providing housing for seniors grew.

More than three quarters of OHFA's LIHTC allocations, 391 properties in total, have been in metropolitan statistical areas (MSAs). Within metropolitan areas, about a third of the 177 properties designated for occupancy by families with children are in suburbs rather than in principal cities. Over time, however, the share of suburban housing intended for families with children dropped, from nearly two thirds of units with LIHTC allocations in 2006 to less than 10 percent in 2015. Taking a closer look at the locations of family housing with LIHTC awards in metropolitan Ohio, we use two definitions of areas of opportunity, one based on the percentage of people in a location who are in households with incomes below the federal poverty level and the other based on the percentage of people who are black or African American. Instead of characterizing locations as principal cities or suburbs, we use census tracts as proxies for neighborhoods.

The analysis uses standard cutoffs for high and low poverty rates. A high opportunity area has a poverty rate of less than 10 percent. Between 2006 and 2015, OHFA made allocations to just nine properties and 526 units of family housing in census tracts in which less than 10 percent of the population is poor. Even were the definition of low poverty expanded to include all tracts in which less than 20 percent of the population is poor, only 17 percent of all LIHTC awards of family housing were made to such locations. We do not recommend such an expansion of the definition, as neighborhoods with poverty rates between 10 and 20 percent are often experiencing economic and racial transition. In contrast, between 2006 and 2015, OHFA made more than 45 percent of all awards of family housing in metropolitan areas—more than 6,000 units—in neighborhoods with extreme poverty concentrations, more than 40 percent of the population living below the poverty line. Such neighborhoods are considered highly distressed.

Exhibit ES-1: LIHTC Awards 2006-2015 Units in OHFA Family Properties in Metropolitan Areas by Census Tract **Poverty Rate**



Sources: Ohio Housing Finance Agency LIHTC Awards, 2006-2015 American Community Survey 2010-2014 5-year estimates

We characterize census tracts as having low racial concentrations if less than 25 percent of the population is black or African American. Between 2006 and 2015, less than a third of the units in family properties in metropolitan Ohio (31.8 percent) were allocated in areas in which less than 25 percent of the population is black or African American, and just over a third (34.4 percent) were in areas in which more than 75 percent of the population is black.

OHFA is focusing its effort to increase the extent to which LIHTC provides housing for families with children in high opportunity areas in the central counties of Ohio's six largest metropolitan areas: Cuyahoga County (Cleveland), Franklin County (Columbus), Hamilton County (Cincinnati), Lucas County (Toledo), Montgomery County (Dayton), and Summit County (Akron). Analysis of the locations of LIHTC family housing in those counties shows that no LIHTC awards were made for family housing in low poverty areas of Cuyahoga, Franklin, and Summit Counties and relatively little in the other counties. In contrast, these counties have high percentages of LIHTC family housing in locations with extreme concentrations of poverty, census tracts where 40 percent or more of the population is poor: more than two thirds of the properties in Cuyahoga, Franklin, and Lucas counties and high percentages in the other three counties.

Some 60 to 70 percent of family units in Cuyahoga, Hamilton, and Montgomery Counties were allocated in census tracts in which more than 75 percent of the population is black or African American. Lucas County has a lower percentage in such highly concentrated tracts, but 54.5 percent of the properties are in tracks where between 50 and 75 percent of the population is black. Even in Franklin County, which has a relatively low percentage of African Americans compared to the other central counties of Ohio MSAs, more than a third (36.7 percent) of the family properties are in tracks where more than half the population is black.

OHFA's effort to increase family housing in areas of opportunity is not based on economic or racial concentration but instead uses an opportunity index developed by the Kirwan Institute of Ohio State University. That index is based on multiple factors that include education quality, job access, transportation, and environmental hazards and classified census tracts in the six largest central counties of Ohio metropolitan areas as providing high or very high opportunity. When we examined the locations of past allocations for LIHTC family housing, we found that several properties in areas considered by the Kirwan Opportunity Index to have high or very high opportunity were not in areas with low racial or economic concentration.

We broadened the focus of the analysis to consider the locations of LIHTC family housing across all of the counties in the six metropolitan areas, since poverty and racial concentrations are likely to be most common in the large cities that dominate the central counties. We still find that relatively few LIHTC awards were made for family housing in low poverty areas. Cleveland still has no properties in census tracts with poverty rates below 10 percent. The highest percentage of family housing in low poverty areas is in the Cincinnati MSA, which also has the highest percentage of family units in the suburbs. Cincinnati still has only 13.6 percent of units in family properties across the metropolitan area in tracts with poverty rates below 10 percent. More than half of the family units awarded across the Cleveland MSA and 85 percent of those in the Toledo MSA were allocated to areas with very high concentrations of poor people.

To put the economic and racial concentration of locations of LIHTC properties in context, we compared the percentages of LIHTC family properties in each of the six metropolitan areas to the percentages of all housing units in the MSA that were in census tracts with high and low poverty rates and with high and low percentages of African Americans. In each of the MSAs, LIHTC family units are much more likely to be in high poverty areas and areas with high concentrations of African Americans than housing units overall. To support further examination of the locational patterns of family housing in Ohio's metropolitan areas, we present maps of each of the MSAs that show the locations of properties and the poverty and racial concentration of each of the census tracts in the metropolitan area.

For the analysis presented in this report, we relied on OHFA's classifications of properties to identify family housing. We also applied an alternate definition of family housing based on whether a property appears to be suitable for families. We classified properties as family housing if more than half of the units had two or more bedrooms. This resulted in dropping some properties designated as family housing by OHFA but adding even more properties that OHFA classifies as senior housing but in which more than half of the units have two or more bedrooms. We do not know if the policies of the owners of these properties units permit the larger units to be occupied by families with children. This reclassification produced few notable changes in patterns. The appendix presents additional exhibits that use the alternate definition of family housing.

1. Introduction

The Legal Aid Society of Southwest Ohio, on behalf of a group of Ohio legal aid programs, engaged Abt Associates to conduct an analysis of the locations of LIHTC properties and units awarded by the Ohio Housing Finance Agency (OHFA) between 2006 and 2015. The purpose of the analysis is to help inform OHFA's efforts to broaden opportunities for families with children to live in areas that are not racially or economically concentrated. In its Qualified Allocation Plan (QAP) that covers the years 2016 and 2017, OHFA included a set-aside of one newly constructed property each year (with a maximum award of \$1 million) for family housing in an area of high opportunity in one of the six largest metropolitan counties in the state (Cuyahoga, Franklin, Hamilton, Lucas, Montgomery, and Summit). OHFA defined a high opportunity area based on an index of location characteristics created for OHFA by the Kirwan Institute of Ohio State University. 1

The analysis presented in this report reviews the history of LIHTC allocations in Ohio to show the extent to which past LIHTC awards have placed family housing in areas that are not racially or economically concentrated and how that has changed over time. We do not use the Kirwan index that was used to define high opportunity areas in the OAP. Instead, we use the poverty rate of the census tract in which the property is located and the percentage of the population that is black or African American to identify areas of low and high poverty and racial concentration. Racial concentration in particular is related to OHFA's responsibility under the Fair Housing Act. Poverty concentration is a traditional measure of the quality of a location and is highly correlated with racial concentration and with other indicators of neighborhood health (Newman and Schnare 1997; Galster et al. 2008; Jargowsky 2013).

We focus on housing for families with children. Families with children are a protected class under the fair housing act, and an extensive literature has shown that the quality of the neighborhood in which a child grows up has a profound influence on that child's life chances (Brooks-Gunn et al. 1997; Chetty et al. forthcoming). In addition, it often has proved easier to locate affordable housing for seniors in high opportunity areas than it has to locate housing for families in those locations. Mobility programs that make use of Housing Choice Vouchers are a frequently used approach to helping families with children move to good neighborhoods. A recent report by the Housing Research and Advocacy Center shows the challenges such efforts face and, by implication, the important role the LIHTC housing can play in providing housing to which families with vouchers can move (Healy and Lepley 2016).

OHFA assisted this analysis of the locations of LIHTC housing by providing data on LIHTC property awards or allocations from 2006 through 2015. OHFA also provides data for HUD's public use dataset on LIHTC developments that have been placed in service for occupancy by tenants.² For this analysis, we

See p.30 of the 2016-2017 OAP at Ohio Housing Finance Agency 2015, pp.30. Census tracts that are eligible for the set-aside can be identified through the *Opportunity Mapping Tool* at the OHFA website (https://ohiohome.org/ppd/opportunitymap.aspx). Developments in areas of moderate to high opportunity also may be awarded 5 competitive points in the competition for a total pool of \$4 million for new production of family housing, and OHFA will consider a basis boost for developments that qualify for this and other policy priorities (Ohio Housing Finance Agency 2015, pp.27 and 43).

For a description of HUD's database on units placed in service under LIHTC, see U.S. Department of Housing and Urban Development, Office of Policy Development and Research. Data on Tenants in LIHTC Units as of December 31, 2013. March 2016.

used data on allocations rather than on properties already placed in service so that we could include awards for the most recent years.³ The data file provided by OHFA covered 509 LIHTC properties for which allocations were made from 2006 through 2015 and included the year the property was awarded tax credits, the location of the awarded property (address, county, latitude and longitude), the number of units in the property, the number of units by number of bedrooms in the unit, and whether the property was planned to be developed as new construction, rehabilitation of an existing property, or both. Using the latitude and longitude data, we mapped each property to determine its census tract location. Whether the property was in a principal city of a metropolitan area, a suburb of a metropolitan area, or a nonmetropolitan area, was based on designations made by the US Office of Management and Budget (OMB).4

The analysis focuses on metropolitan areas in Ohio because that is where housing is most often located in areas of poverty and racial concentration. OHFA has been placing its efforts to locate new awards of LIHTC in areas of opportunity within six large Ohio metropolitan areas. However, unlike OHFA, we broaden the focus within the six metropolitan areas beyond the central counties⁵ of those metropolitan areas and include other counties. In some analyses, we focus separately on the suburban portions of metropolitan areas, defined as areas not within a principal city. The broader focus and the focus on suburbs are motivated by the overall greater likelihood that families with children will have access to high performing schools and other well-funded services in locations outside principal cities.

In addition to the OHFA data file on LIHTC allocations, the other major source of data used in the analysis was US Census data from the 2014 American Community Survey 5-year estimates. Census tractlevel descriptors included poverty rate and percent black or African American.

This report begins with an overview of LIHTC allocations in Ohio between 2006 and 2015 (Section 2). Section 3 describes the extent to which LIHTC family housing is located in areas of high or low poverty and racial concentration across all metropolitan areas in Ohio. Section 4 turns to the six large metropolitan areas that are the focus of OHFA's current efforts to expand housing opportunities for families with children, focusing first on the central counties of those metropolitan areas and then on the metropolitan areas as a whole. Section 4 includes maps showing the locations of OHFA awards of tax credits to family properties in each of the six metropolitan areas and the extent of poverty and racial concentration in the census tracts in which the properties are located.

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There is no guarantee that a property to which a LIHTC award has been made will actually be placed in service. A fall-off between units allocated by state housing finance agencies and those placed in service was common in the earliest years of the LIHTC program, but became much less common over time. Thus, most if not all properties for which OHFA has made allocations since 2006 have been placed in service under LIHTC rules or will be placed in service.

We used the designations of metropolitan areas and principal cities within metropolitan areas by the Office of Management and Budget in February 2013 and considered an area within a metropolitan area but not in a principal city to be a suburb.

The central counties include the city that is named first in the OMB designations of metropolitan areas.

2. **LIHTC Allocations for Family Housing, 2006-2015**

From 2006-2015, the Ohio Housing Finance Agency (OHFA) awarded federal Low Income Housing Tax Credits (LIHTC) to 509 properties with 34,255 units. Units for which investors in a low-income rental property take tax credits must be rented to qualifying households, usually with incomes below 60 percent of the local area median, and must have rents below 18 percent (30 percent of 60 percent) of the local area median income. Although the rules of the LIHTC program permit tax credits to be taken on less than 100 percent of the units in a property, the property-level average qualifying ratio of tax credit units to total units was 98.99 percent for the 509 properties. Therefore, we make no attempt to distinguish between qualifying and non-qualifying units.

About half of the LIHTC awards from 2006 through 2015 were for newly constructed properties (48.7 percent), and half were for the rehabilitation (or acquisition and rehabilitation) of existing properties (51.3) percent). A larger share of units were in existing properties (63.9 percent), indicating that existing properties on average were larger than newly constructed properties. The analysis presented in this report includes both types of properties, because pre-existing properties may be located in areas that are not racially or economically concentrated, and preserving those properties and bringing them under LIHTC program rules would expand opportunities for families with children. Conversely, preserving properties in areas with large concentrations or poor people or African Americans may exacerbate patterns in which low-income families with children live in economically and racially concentrated areas.

2.1 **Identifying Family Housing**

OHFA's data file on properties with LIHTC allocations identifies properties as "family," "senior," or "permanent supportive housing," based presumably on the LIHTC developer's characterization of the intended occupancy of the development. According to these designations, 243 of the 509 LIHTC allocations during this ten-year period were for family developments (47.7 percent), 216 were for senior developments (42.4 percent), and 50 were to develop permanent supportive housing (9.8 percent). ⁷ The distribution of units across the development types was similar—17,089 units in family developments (49,9 percent), 14,106 units in senior developments (41.2 percent), and 3,060 units for permanent supportive housing (8.9 percent).

Given the focus of OHFA's efforts—and of this analysis—to expand on opportunities for families with children, we wanted to make sure we correctly identified properties that can serve families with children. Therefore, we also developed an alternate definition of family housing, based on whether a majority of units in the property were large enough to be suitable for families. Looking at the developments classified as family or senior by OHFA, if at least 50 percent of a property's units had at least two bedrooms, then the property was classified as a family development. Exhibit 1 shows how the properties and units were classified based on OHFA's designations and based on the percentage of units with two or more bedrooms. Properties OHFA identified as permanent supportive housing were not reviewed for possible reclassification.

For this analysis, we defined a property with any newly constructed units as new construction.

Permanent supportive housing included developments for homeless populations, those with mental illness, and those with developmental disabilities.

LIHTC Awards, 2006-2015 Exhibit 1: Family Properties Based on Number of Bedrooms in Units

Number of Properties												
	Target Population Based on Percentage of Units with 2 or More Bedrooms											
OHFA Target Population	Family	Senior/Other										
Family	207	36										
Senior	83	133										
Number of Units												
	Target Population Based on Percentage	of Units with 2 or More Bedrooms										
OHFA Target Population	Family	Senior/Other										
Family	14,019	3,070										
Senior	4,205	9,901										

Notes: A property was classified as a family property if at least 50 percent of its units had two or more bedrooms. Properties with less than 50 percent two or more bedroom units were classified as senior/other. Permanent Supportive Housing (50 properties, 3.060 units) was not reclassified. The calculations showing numbers of units include all units in each property regardless of size.

Most of the allocations identified by OHFA as family developments were still classified as family developments based on the alternate definition. Of the 243 developments classified by OHFA as serving families, 207 continued to be considered family developments because at least half of their units have two or more bedrooms. The other 36 properties OHFA had classified as family developments were reclassified as "senior/other" properties, since at least half of their units are likely to be occupied by seniors or by younger adults without children.

At the same time, we found that more than a third of the properties identified by OHFA as senior developments had a large percentage of two bedroom units, and we reclassified them as family developments. In all, 83 developments described by OHFA's data set as senior properties were reclassified as family, including 4,205 units. Whether the two-bedroom units in these properties are available to families with children is hard to determine. It depends on policies and practices of the property owners and managers and on the demand for senior housing (including housing with two or more bedrooms) in those locations.⁹

The rest of this report uses OHFA's identification of properties as housing for families. We also point out how the patterns of locations of family housing in areas that are or are not concentrated by income or race would differ based on the alternate definition that requires that at least half of the units in family housing have two or more bedrooms.

Within each property, all units are categorized as family, senior/other, or permanent supportive housing based on the classification of the property.

Under the rules of the LIHTC program, the maximum rent that can be charged for a unit is based on the size of the household presumed to occupy a unit of that size, not the size of the household actually occupying the unit. Thus, the two-bedroom units in "senior" properties may have higher rents than the onebedroom units, even if they are occupied by a single person or a couple.

2.2 Allocations for Family Housing over Time

Over the 2006 to 2015 time period, the majority of LIHTC awards were made to family developments. However, as Exhibit 2 shows, there was a clear downward trend during the time period in the share of allocated units in family housing. In 2006, about 60 percent (60.3 percent) of all awarded units were in family developments, but by 2014 less than half of all awarded units (46.0 percent) were in family developments. Meanwhile, the percentage of awarded units in senior developments climbed from about a third in 2006 to close to half in 2015. By 2010, senior housing represented about half of all awarded units. 10 We have not attempted to compare the relative amount of family housing in OHFA allocations with a measure of the relative need for housing for families with children and for seniors. However, given that families with children are a protected class under the Fair Housing Act, OHFA officials may want to consider the implications of this marked downward trend in the extent to which the LIHTC program serves families with children in Ohio.

Based on the alternate definition that classifies any property in which at least half of the units have two or

more bedrooms as family housing, the drop in family housing is more dramatic. In 2006, nearly 80 percent of all units not designated as permanent supportive were allocated to family properties using this alternate definition, and less than 20 percent of the allocated units are considered senior housing. (See Appendix Exhibit A-1.)

100.0 Percent of All Units by Development Type (OHFA Target Population) 90.0 80.0 70.0 60.0 50.0 Family Senior 40.0 PSH 30.0 20.0 10.0 0.0 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 Year of LIHTC Award

LIHTC Awards Annually by OHFA Target Population, 2006-2015 Percentage of All Units Exhibit 2:

Notes: The calculations showing numbers of units include all units in each property.

2.3 Family Housing in Metropolitan Areas

Regardless of the target population, developments and units awarded low income tax credits in Ohio have been primarily in metropolitan statistical areas (MSAs). As shown in Exhibit 3, less than a quarter (23.3 percent) of LIHTC allocations was outside metropolitan areas. (Here we consider all metropolitan areas in Ohio, not just the six that are the focus of OHFA's effort to increase family housing in areas of opportunity.) 11 The percentage of LIHTC housing in non-metro areas is slightly larger than the 20.6 percent of the population of Ohio living in non-metropolitan areas. 12

Exhibit 3 also shows how LIHTC awards have been distributed between the principal cities and suburbs of metropolitan areas. We consider locations within metropolitan areas that are not in principal cities—that is, not in one of the largest cities in the metropolitan area—to be suburbs. 13 Placing family housing in suburban locations is important because of the smaller likelihood that such locations will be in areas with concentrations of poor people or racial minorities and the greater likelihood that they will have high-performing schools. Over the entire time period, 2006-2015, about a third of LIHTC awards for family housing were in the suburbs (33.9 percent or 60 of 177 properties within metropolitan areas and a similar percentage of units).

Some metropolitan areas within the state of Ohio are also part of metropolitan areas of neighboring states, including Indiana, Kentucky, Pennsylvania, and West Virginia. Metropolitan areas in Ohio include Akron OH, Canton-Massillon OH, Cincinnati OH-KY-IN, Cleveland-Elyria OH, Columbus OH, Dayton OH, Huntington-Ashland WV-KY-OH, Lima OH, Mansfield OH, Springfield OH, Toledo OH, Weirton-Steubenville WV-OH, Wheeling WV-OH, and Youngstown-Warren-Boardman OH-PA. Ohio also has 33 micropolitan areas, defined as a county or counties with an urban cluster that has population between 10,000 and 50,000. For this analysis, we are considering them non-metropolitan.

The share of the Ohio population in principal cities of metropolitan areas is 22.4 percent, and 57.0 percent of the population is in the suburbs.

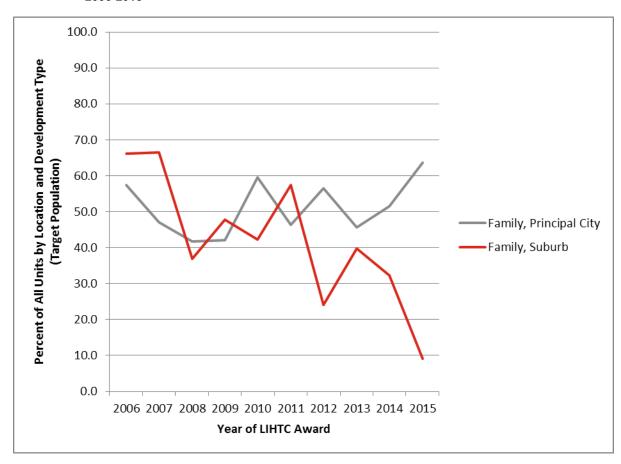
Principal cities include the largest city of a metropolitan area with a population of at least 10,000. Additional principal cities are designated based on counts of population and workers.

Exhibit 3: LIHTC Awards and OHFA Target Population, 2006-2015 By Type of Metropolitan Location: Principal City or Suburb

Number of Properties							
	Princip	al City	Sub	urb	Total		
OHFA Target Population	Number Percent		Number	Percent	Number	Percent	
Family	117	66.1	60	33.9	177	100.0	
Senior	76	45.5	91	54.5	167	100.0	
PSH	43	91.5	4	8.5	47	100.0	
Total	236	60.4	155	39.6	391	100.0	
Number of Units							
	Princip	al City	Sub	urb	To	tal	
OHFA Target Population	Number	Percent	Number	Percent	Number	Percent	
Family	9,252	67.6	4,428	32.4	13,680	100.0	
Senior	6,243	53.4	5,450	46.6	11,693	100.0	
PSH	2,416	91.8	216	8.2	2,632	100.0	
Total	17,911	64.0	10,094	36.0	28,005	100.0	

Notes: Metropolitan, suburb includes all areas of a Metropolitan Statistical Area that are not in a principal city. The calculations showing numbers of units include all units in each property.

From 2006 to 2015, the share of family units dropped in all location types, and the decrease was particularly large in the suburbs, as shown in Exhibit 4. In suburban locations in 2006, nearly twothirds of all units with LIHTC awards were in family developments. In suburban locations, the share of units that were in family developments decreased over time to less than 10 percent in 2015.



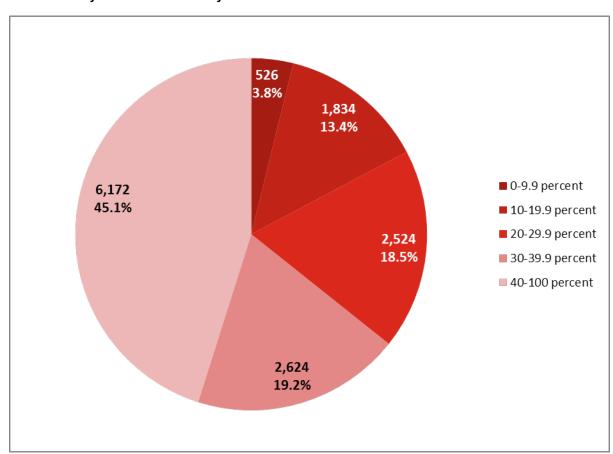
Percentage of LIHTC Units in Principal Cities and in Suburbs that Is OHFA Family Housing, Exhibit 4: 2006-2015

Note: Metropolitan, Suburb includes all areas of a Metropolitan Statistical Area that are not in a principal city. Properties were identified as a family property based on the OHFA target population. Percentages of family housing include all units in each property classified as a family property.

3. LIHTC Family Housing in Areas of Opportunity in Metropolitan Ohio

This section takes a closer look at the locations of family properties and units with LIHTC awards within metropolitan Ohio using two definitions of areas of opportunity, one based on the percentage of people in a location who are in households with incomes below the federal poverty level and the other based on the percentage of people who are black or African American. Instead of characterizing locations as principal cities or suburbs, we use census tracts as proxies for neighborhoods. Principal cities may have neighborhoods with low concentrations of poor people and racial minorities, and poverty and racial concentrations may occur outside of principal cities. Exhibit 5 presents the LIHTC awards for family developments in metropolitan areas by census tract poverty rate, using standard cutoffs for low and high poverty rates (Devine et al. 2002; Orr et al. 2003).

A high opportunity area has a low poverty rate, less than 10 percent. Between 2006 and 2015, only 526 units in nine properties were located in areas of low poverty in metropolitan Ohio. This is only 5.1 percent of properties and 3.9 percent of units. In contrast, LIHTC awards were made for more than 6,000 units of family housing in neighborhoods with the highest concentrations of poverty, census tracts where more than 40 percent of the population is poor. Close to half (45.1 percent) of all awards for family housing in metropolitan areas were made to those locations.



LIHTC Awards for Units in OHFA Family Properties in Metropolitan Areas, 2006-2015 Exhibit 5: **By Census Tract Poverty Rate**

Notes: Census tract poverty rates were calculated from American Community Survey 2010-2014 5-year estimates. Properties were identified as a family property based on the OHFA target population. Family properties awarded tax credits in metropolitan areas included 13,680 units. The calculations showing numbers of units include all units in each property.

If we use an alternate way of distinguishing family and senior housing based on percentage of twobedroom units in a property, a somewhat higher percentage of unit allocations were in low poverty areas (9.5 percent), and only 36 percent were in areas with extreme concentrations of poverty. What is not known is whether families with children are permitted to occupy the two-bedroom units in the properties in locations with relatively lower poverty rates that this reclassification considers family housing despite the OHFA designation of those properties as "senior/other."

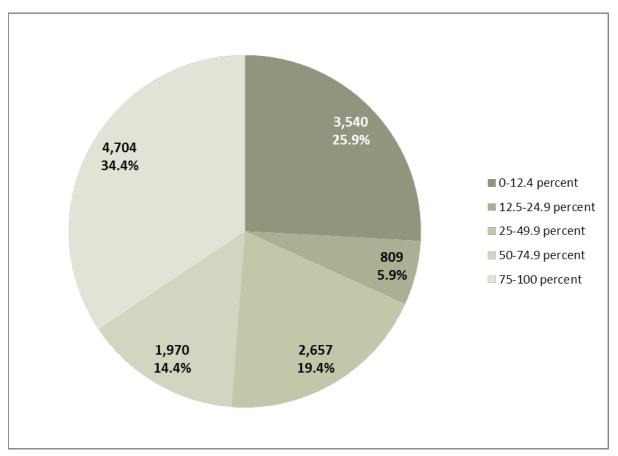
We have defined an area with a low concentration of African Americans as one in which less than 25 percent of the population is black or African American, a commonly used standard. We also use a more stringent measure, less than 12.5 percent black, reflecting the approximate percentage of Ohio's population that is African American. We use the more stringent standard in order to make sure we are not including areas of racial transition or census tracts in which most of the black population lives within a largely white metropolitan area.

About a third of the family properties (60 of 177 LIHTC awards) and of units in family properties in metropolitan (31.8 percent) were in areas in which less than 25 percent of the population is black or

LIHTC FAMILY HOUSING IN AREAS OF OPPORTUNITY IN METROPOLITAN OHIO

African American. Using the more stringent definition shows that only a quarter of the unit allocations are in tracts in which African Americans are less than 12.5 percent of the population. LIHTC awards include all family developments in all of metropolitan Ohio, including portions of metropolitan areas that may have little racial concentration. Yet a sizable portion, just over one-third of units, was in census tracts in which at least three quarters of the population are African American.

LIHTC Awards for Units in OHFA Family Properties in Metropolitan Areas, 2006-2015 By Census Tract Percent Black or African American



Notes: Census tract percent black or African American was calculated from American Community Survey 2010-2014 5-year estimates and includes population identified as Black or African American alone. Properties were identified as a family property based on the OHFA target population. Family properties awarded tax credits in metropolitan areas included 13,680 units. The calculations showing numbers of units include all units in each property.

Areas of racial concentration are not necessarily high poverty areas. To further examine locations of family property awards, units in family properties in metropolitan areas were sorted by both census tract poverty rate and census tract percent black or African American. Exhibit 7 presents the results of the cross tabulations. The exhibits show the percentages of all units in family LIHTC property awards in metropolitan areas throughout the 2006-2015 time period. Based on these two census tract measures, defining high opportunity areas as low poverty (less than 10 percent) and low percent black or African American (less than 25 percent) gives the same result as just the poverty rate: only 3.8 percent of family units were awarded in high opportunity areas.

LIHTC FAMILY HOUSING IN AREAS OF OPPORTUNITY IN METROPOLITAN OHIO

LIHTC Awards for Units in OHFA Family Properties in Metropolitan Areas, 2006-2015 Exhibit 7: Percent of Units by Census Tract Percent Black or African American and Poverty Rate

Census Tract Poverty	Rate				
Census Tract	0-9.9 percent	10-19.9 percent	20-29.9 percent	30-39.9 percent	40-100 percent
Percent Black or					
African American					
0-12.4 percent	3.8	9.0	9.9	1.6	1.6
12.5-24.9 percent	Ī	1.9	1.6	ı	2.5
25-49.9 percent	-	1.7	3.7	4.6	9.5
50-74.9 percent	-	0.9	0.3	4.4	8.8
75-100 percent	-	-	3.0	8.6	22.8

Notes: Census tract poverty rates and percent black or African American were calculated from American Community Survey 2010-2014 5-year estimates. Census tract percent black or African American includes population identified as Black or African American alone. Properties were identified as a family property based on the OHFA target population. The calculations showing numbers of units include all units in each property.

Furthermore, almost a quarter of LIHTC units (22.8 percent) are in areas that are more than 75 percent black and have a poverty rate of 40 percent or more. Across metropolitan Ohio, by contrast, only 2.8 percent of all housing units are in such census tracts. 14

Census tracts with poverty rates between 10 and 20 percent do not have extreme concentrations of poor people. If the definition of an area with a low poverty concentration were expanded to include areas in which between 10 and 20 percent of the population is poor, such areas would include only 17.3 percent of units in family developments in metropolitan Ohio (the sum of the first two columns in Exhibit 7), still not a high percentage. Such an expansion of the definition of a low-poverty location is problematic. Neighborhoods with poverty rates between 10 and 20 percent are often in transition, on the way to becoming areas with high concentrations of poor people and minorities (Galster et al. 2008).

Across all of metropolitan America, census tracks with poverty rates of 40 percent or more are rare. Jargowsky (2013) characterizes them as "urban ghettos," highly distressed neighborhoods.

4. LIHTC Family Housing in Ohio's Six Largest Metropolitan **Areas**

4.1 LIHTC Family Housing in Ohio's Six Largest Counties

The Ohio Housing Finance Agency's effort to increase the extent to which LIHTC provides housing for families with children in high-opportunity areas focuses on the largest Ohio counties, which are also the central counties of Ohio's six largest metropolitan areas: ¹⁵ Cuyahoga County (Cleveland), Franklin County (Columbus), Hamilton County (Cincinnati), Lucas County (Toledo), Montgomery County (Dayton), and Summit County (Akron). OHFA's Qualified Allocation Plan for 2016 and 2017 proposes to make an award each year for a family property in a high opportunity location within one of these counties. To provide some historical context for the LIHTC program in these counties, Exhibit 8 shows the number of properties and units awarded in these counties from 2006 to 2015 and the distribution across family, senior/other, and permanent supportive housing. The highest numbers of all LIHTC awards were made in Cuyahoga and Franklin Counties. In Cuyahoga County, 31 LIHTC properties (51.4 percent) were family housing, as were 30 properties (43.5 percent) in Franklin County. Examining units rather than properties, Cuyahoga, Franklin, and Lucas Counties had more units in family properties than in senior properties.

If we use the alternate way of distinguishing family from senior properties, based on whether a property has a majority of units large enough for families, Cuyahoga has fewer family properties (down from 37 to 30), while the other five counties have a somewhat larger number of family properties (Exhibit 9). For this alternate definition, a property cannot be considered a family property unless more than half of its units have two or more bedrooms, but a senior property can be considered family housing if more than half its units have two or more bedrooms.

These "central" counties include the city that appears first in the name of the metropolitan statistical area.

Exhibit 8: LIHTC Awards and OHFA Target Population, 2006-2015 Largest Metropolitan Area Counties

Number of Pro	Number of Properties													
	Cuyahoga County		Franklin County		Hamilton	County	Lucas (County	Montgo Cou	•	Summit County			
OHFA Target Population	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent		
Family	37	51.4	30	43.5	15	35.7	11	42.3	16	53.3	10	43.5		
Senior	28	38.9	21	30.4	19	45.2	12	46.2	11	36.7	11	47.8		
PSH	7	9.7	18	26.1	8	19.0	3	11.5	3	10.0	2	8.7		
Total	72	100.0	69	100.0	42	100.0	26	100.0	30	100.0	23	100.0		
Number of Unit	s													
	Cuyal Cou		Franklin County		Hamilton	County	Lucas (County	Montgo Cou	,	Summit	County		
OHFA Target Population	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent		
Family	3,593	54.5	2,477	47.0	945	34.1	1,067	55.0	828	37.9	656	45.2		
Senior	2,608	39.6	1,565	29.7	1,494	53.9	694	35.8	1,212	55.5	676	46.6		
PSH	387	5.9	1,228	23.3	332	12.0	180	9.3	143	6.6	120	8.3		
Total	6,588	100.0	5,270	100.0	2,771	100.0	1,941	100.0	2,183	100.0	1,452	100.0		

Notes: The central counties presented are the six largest counties in Ohio and the counties in which the city that appears first in the name of the metropolitan statistical area is located. The calculations showing numbers of units include all units in each property.

Exhibit 9: LIHTC Awards and Target Population (Alternate Definition for Family Property), 2006-2015 **Largest Metropolitan Area Counties in Ohio**

Number of Prop	Number of Properties													
	Cuya Cou	_	Franklin County		Ham Cou	ilton ınty	Lucas	County	Montg Cou	-	Summit County			
Target Population	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent		
Family	30	41.7	35	50.7	19	45.2	14	53.8	18	60.0	12	52.2		
Senior/Other	35	48.6	16	23.2	15	35.7	9	34.6	9	30.0	9	39.1		
PSH	7	9.7	18	26.1	8	19.0	3	11.5	3	10.0	2	8.7		
Total	72	100.0	69	100.0	42	100.0	26	100.0	30	100.0	23	100.0		
Number of Units	;													
	Cuya Cou	•	Franklin County		Ham Cou	ilton ınty	Lucas	County	Montg Cou	-	Summit	County		
Target Population	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent		
Family	2,847	43.2	2,598	49.3	1,198	43.2	662	34.1	1,000	45.8	583	40.2		
Senior/Other	3,354	50.9	1,444	27.4	1,241	44.8	1,099	56.6	1,040	47.6	749	51.6		
PSH	387	5.9	1,228	23.3	332	12.0	180	9.3	143	6.6	120	8.3		
Total	6,588	100.0	5,270	100.0	2,771	100.0	1,941	100.0	2,183	100.0	1,452	100.0		

Notes: The central counties presented are the six largest counties in Ohio and the counties in which the city that appears first in the name of the metropolitan statistical area is located. A property was classified as a family property if at least 50 percent of its units had two or more bedrooms. Properties with less than 50 percent two or more bedroom units were classified as senior/other. Permanent Supportive Housing (50 properties, 3,060 units) was not reclassified. The calculations showing numbers of units include all units in each property regardless of

For the analysis of the locations of family housing in these six counties, we again define opportunity based on poverty and racial concentration. First looking at income, Exhibit 10 shows that no LIHTC awards were made for family housing in low poverty areas of Cuyahoga, Franklin, and Summit Counties and

relatively little in the other counties. The alternate definition of a family property, based on the percentage of units with two or more bedrooms, would add five properties in Franklin County and two in Lucas County that provide family housing in low poverty areas (Exhibit 11). The seven properties across the two counties were OHFA LIHTC awards for senior properties.

In contrast, these counties have high percentages of LIHTC family housing in locations with extreme concentrations of poverty, census tracts where 40 percent or more of the population is poor: more than two thirds of the properties in Cuyahoga, Hamilton, and Lucas counties and high percentages in the other three counties (Exhibit 10). Under the alternate definition of a family property, the pattern is similar. For example, Cuyahoga has a net of six fewer family properties in tracts with extreme concentrations of poverty and Lucas County has two fewer. 16

Exhibit 10: LIHTC Awards for OHFA Family Developments in the Largest Metropolitan Area Counties in Ohio, 2006-2015 **By Census Tract Poverty Rate**

Number of Prop	erties												
	Cuya Cou	•	Fran Cou		Ham Cou		Lucas	County	Montg Cou	omery inty		Summit County	
Census Tract Poverty Rate	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	
0-9.9 percent	0	0.0	0	0.0	1	6.7	1	9.1	1	6.3	0	0.0	
10-19.9 percent	0	0.0	5	16.7	1	6.7	0	0.0	1	6.3	2	20.0	
20-29.9 percent	3	8.1	6	20.0	1	6.7	1	9.1	4	25.0	1	10.0	
30-39.9 percent	9	24.3	5	16.7	2	13.3	1	9.1	1	6.3	3	30.0	
40-100 percent	25	67.6	14	46.7	10	66.7	8	72.7	9	56.3	4	40.0	
Total	37	100.0	30	100.0	15	100.0	11	100.0	16	100.0	10	100.0	
Number of Units													
	Cuya Cou	•		Franklin County		ilton ınty	Lucas	County	Montg Cou		Summit County		
Census Tract Poverty Rate	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	
0-9.9 percent	0	0.0	0	0.0	85	9.0	55	5.2	30	3.6	0	0.0	
10-19.9 percent	0	0.0	450	18.2	120	12.7	0	0.0	25	3.0	64	9.8	
20-29.9 percent	245	6.8	539	21.8	47	5.0	40	3.7	265	32.0	50	7.6	
30-39.9 percent	1,265	35.2	283	11.4	86	9.1	24	2.2	182	22.0	354	54.0	
40-100 percent	2,083	58.0	1,205	48.6	607	64.2	948	88.8	326	39.4	188	28.7	
Total	3,593	100.0	2,477	100.0	945	100.0	1,067	100.0	828	100.0	656	100.0	

Notes: The central counties presented are the six largest counties in Ohio and the counties in which the city that appears first in the name of the metropolitan statistical area is located. Census tract poverty rates were calculated from American Community Survey 2010-2014 5-year estimates. Properties were identified as a family development based on the OHFA target population. The calculations showing numbers of units include all units in each property.

In Cuyahoga County, with the alternate definition of a family property, four senior properties became classified as family properties, and ten family properties became classified as senior properties, resulting in a net loss of six family properties. In Lucas County, one senior property became classified as a family property, and three family properties became classified as senior properties, resulting in a net loss of two family properties.

Exhibit 11: LIHTC Awards for Family Developments (Alternate Definition) in the Largest Metropolitan Area Counties in Ohio, 2006-2015 **By Census Tract Poverty Rate**

	Curre	hana	Fran	مدااءا	Ham	lton	Lucas	2 acceptor	Manta		Cummit	Country
	Cuya Cou	-	Cou		Cou		Lucas (Sounty	Montge Cou	-	Summit	County
Census Tract Poverty Rate	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
0-9.9 percent	0	0.0	5	14.3	1	5.3	3	21.4	1	5.6	0	0.0
10-19.9 percent	2	6.7	6	17.1	1	5.3	0	0.0	1	5.6	3	25.0
20-29.9 percent	4	13.3	5	14.3	3	15.8	4	28.6	6	33.3	1	8.3
30-39.9 percent	5	16.7	6	17.1	3	15.8	1	7.1	1	5.6	3	25.0
40-100 percent	19	63.3	13	37.1	11	57.9	6	42.9	9	50.0	5	41.7
Total	30	100.0	35	100.0	19	100.0	14	100.0	18	100.0	12	100.0
Number of Units	;											
	Cuya Cou	•	Fran Cou		Ham Cou		Lucas (County	Montgo Cou	-	Summit County	
Census Tract Poverty Rate	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
0-9.9 percent	0	0.0	320	12.3	85	7.1	138	20.8	30	3.0	0	0.0
10-19.9 percent	110	3.9	510	19.6	120	10.0	0	0.0	25	2.5	112	19.2
20-29.9 percent	295	10.4	309	11.9	156	13.0	168	25.4	437	43.7	50	8.6
30-39.9 percent	940	33.0	357	13.7	152	12.7	24	3.6	182	18.2	185	31.7
	4 = 0.0		4 400	40.4	005	F7.0	220	E0.0	200	20.0	000	40 F
40-100 percent	1,502	52.8	1,102	42.4	685	57.2	332	50.2	326	32.6	236	40.5

Notes: The central counties presented are the six largest counties in Ohio and the counties in which the city that appears first in the name of the metropolitan statistical area is located. Census tract poverty rates were calculated from American Community Survey 2010-2014 5-year estimates. A property was classified as a family property if at least 50 percent of its units had two or more bedrooms. Properties with less than 50 percent two or more bedroom units were classified as senior/other. Permanent Supportive Housing (50 properties, 3,060 units) was not reclassified. The calculations showing numbers of units include all units in each property regardless of size.

Turning to racial concentration, the pattern across these six central counties of metropolitan areas is varied (see Exhibit 12). The high rate of LIHTC family awards in the low concentration areas of Franklin County (less than 25 percent black) may reflect a small population of black or African Americans overall in the central county of the Columbus metropolitan area. Conversely, several of the central counties of Ohio metropolitan areas have very high percentages of family properties and units in highly concentrated black or African American census tracts. Some 60 to 70 percent of family units in Cuyahoga, Hamilton, and Montgomery Counties were allocated in census tracts in which more than 75 percent of the population is black or African American. Lucas County has a lower percentage in such highly concentrated tracts, but 54.5 percent of the properties are in tracks where between 50 and 75 percent of the population is black. Even in Franklin County, more than a third (36.7 percent) of the family properties are in tracks where more than half the population is black. ¹⁷

For the pattern using the alternate definition of family housing, see Appendix Exhibit A-6.

Exhibit 12: LIHTC Awards for OHFA Family Developments in the Largest Metropolitan Area Counties in Ohio, 2006-2015 By Census Tract Percent Black or African American

Number of Propertie	s											
•	_	.,		Franklin County		ilton unty	Lucas	County		omery inty		nmit unty
Census Tract Percent Black or African American	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
0-12.4 percent	4	10.8	7	23.3	1	6.7	1	9.1	4	25.0	2	20.0
12.5-24.9 percent	2	5.4	7	23.3	0	0.0	0	0.0	0	0.0	0	0.0
25-49.9 percent	6	16.2	5	16.7	3	20.0	3	27.3	1	6.3	0	0.0
50-74.9 percent	1	2.7	5	16.7	2	13.3	6	54.5	0	0.0	3	30.0
75-100 percent	24	64.9	6	20.0	9	60.0	1	9.1	11	68.8	5	50.0
Total	37	100.0	30	100.0	15	100.0	11	100.0	16	100.0	10	100.0
Number of Units												
	Cuya Cou		Fran Cou		Hamilton County		Lucas County		Montg Cou	omery inty	Summit County	
Census Tract Percent Black or African American	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
0-12.4 percent	240	6.7	592	23.9	85	9.0	55	5.2	135	16.3	64	9.8
12.5-24.9 percent	162	4.5	323	13.0	0	0.0	0	0.0	0	0.0	0	0.0
25-49.9 percent	580	16.1	551	22.2	98	10.4	124	11.6	182	22.0	0	0.0
50-74.9 percent	24	0.7	335	13.5	170	18.0	788	73.9	0	0.0	354	54.0
75-100 percent	2,587	72.0	676	27.3	592	62.6	100	9.4	511	61.7	238	36.3
Total	3,593	100.0	2,477	100.0	945	100.0	1,067	100.0	828	100.0	656	100.0

Notes: The central counties presented are the six largest counties in Ohio and the counties in which the city that appears first in the name of the metropolitan statistical area is located. Census tract percent black or African American was calculated from American Community Survey 2010-2014 5-year estimates and includes population identified as Black or African American alone. Properties were identified as a family development based on the OHFA target population. The calculations showing numbers of units include all units in each property.

OHFA's 2016-2017 QAP introduces the goal of expanding opportunities for families with children to live in high opportunity areas. The QAP defines areas of high and low opportunity not on the basis of poverty or racial concentration but instead on an opportunity index developed for OHFA by the Kirwan Institute for the Study of Race and Ethnicity, Ohio State University. The Kirwan-OHFA index is based on multiple factors that include education quality, job access, transportation, and environmental hazards. The opportunity index is complex, and it is meant to take into account a wide range of factors when assessing neighborhood conditions.

The Opportunity Index classifies census tracts in the six largest central counties of Ohio metropolitan areas as very high, high, moderate, low, or very low areas of opportunity. OHFA provided us with the census tract-level data used for the opportunity index. ¹⁸

For designations of census tracts within the six largest metropolitan counties in Ohio by levels of opportunity based on the index, see through the *Opportunity Mapping Tool* at the OHFA website (https://ohiohome.org/ppd/opportunitymap.aspx).

Exhibit 13 shows the nature of locations of LIHTC family housing awards between 2006 and 2015, shown in terms of units, in the six central counties of large Ohio metropolitan areas based on the Kirwan-OHFA definitions. The exhibit also presents the LIHTC family housing awards in areas of high and low opportunity when defined by census tract poverty rate and by census tract percent African American.

The implications of applying these different measures of high and low opportunity vary sharply across the six counties. In some counties, LIHTC awards in areas that would be classified as high or very high opportunity by the Kirwan index are not in areas with low or even moderate poverty rates (poverty rates under 20 percent). In other counties, LIHTC award locations that have low poverty rates or concentrations of African Americans are not considered by the Kirwan index to have high opportunity.

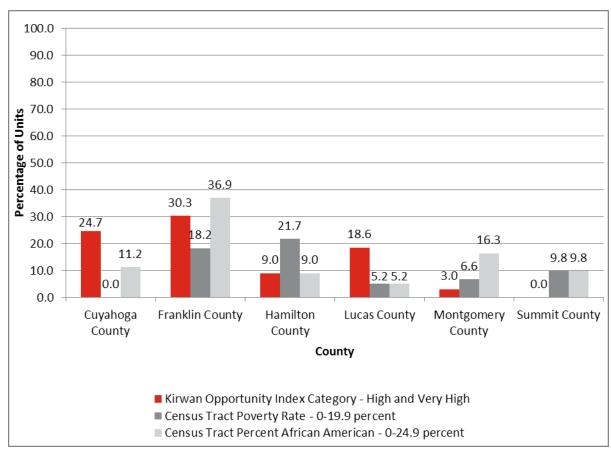
In Cuyahoga County, almost a quarter of the family development units are in census tracts deemed to have high or very high opportunity by the Kirwan Index, but no family development units are in tracts in which less than 20 percent of the population is poor, and only 11.2 percent are in tracts in which less than a quarter of the population is black. In Lucas County, only 5.2 percent of units in family properties are in tracts with low percentages of poor people or of African Americans, whereas the Kirwan definitions would classify 18.6 percent of the units as located in high or very high opportunity areas.

In Franklin County, some family housing units considered by the Kirwan index to be in locations with high or very high opportunity are in locations in which 20 percent or more of the population is poor. However, when the absence of racial concentration is used as the measure of opportunity, Franklin County has more family property units in areas of opportunity than if the Kirwan index is used

In Hamilton, Montgomery, and Summit counties, applying the Kirwan-OHFA index results in *lower* percentages of family housing units identified as located in high opportunity areas than is the case when measures based on the poverty rate or the racial concentration of the location are used. 19

For this comparison using the alternate approach to classifying developments as family housing, see Appendix Exhibit A-7.

Exhibit 13: Locations of LIHTC Awards for Units in OHFA Family Developments in the Largest Metropolitan Area Counties in Ohio, 2006-2015 Using Alternative Definitions of High and Low Opportunity



Notes: Census tract poverty rates were calculated from American Community Survey 2010-2014 5-year estimates. Census tract percent black or African American was calculated from American Community Survey 2010-2014 5-year estimates and includes population identified as Black or African American alone. The Kirwan Institute Opportunity Index was created for OHFA for the six largest counties of metropolitan areas in Ohio. Index values are at the census tract level. Properties were identified as a family development based on the OHFA target population. The calculations showing numbers of units include all units in each property.

4.2 LIHTC Family Housing Ohio's Largest Metropolitan Areas

In this section, we broaden the focus beyond the central counties of the six largest metropolitan areas in Ohio to consider the locations of LIHTC families housing across all counties that comprise those metropolitan areas.

- Cuyahoga County is part of the Cleveland-Elyria, OH MSA;
- Franklin County is part of the Columbus, OH MSA;
- Hamilton County is part of the Cincinnati, OH-KY-IN MSA;²⁰

The analysis only includes the counties and portion of the Cincinnati OH-KY-IN MSA located in Ohio.

- Lucas County is part of the Toledo, OH MSA;
- Montgomery County is part of the Dayton, OH MSA; and
- Summit County is part of the Akron, OH MSA.

Including other counties may show that additional properties and units of family housing have been awarded for locations in high opportunity areas, since poverty and racial concentrations are likely to be most common in the large cities that dominate the central counties. Exhibit 14 shows, across the entire metropolitan areas, the extent to which family properties and units in family properties are located in principal cities or in suburbs (areas outside of principal cities). The Cleveland-Elyria MSA and Toledo Dayton MSAs have the lowest percentages of family housing in the suburbs, 13.6 percent and 16.7 percent. The Cincinnati MSA has the highest percentage of suburban properties, 52.2 percent. Looking at units, the Cleveland MSA appears to have larger family properties and, in turn, a higher percentage of units (24.2 percent) in suburban locations compared to its share of family properties in the suburbs. Using the alternate method of classifying properties as family housing shows somewhat more family housing in suburban portions of several of the metropolitan areas (Exhibit 15).

Exhibit 14: LIHTC Awards for OHFA Family Developments in Principal Cities and Suburbs in the Six Largest Ohio Metropolitan Areas, 2006-2015

Number of Properties												
	Cleveland- Elyria, OH MSA		Columbus, OH MSA		Cincinnati, OH- KY-IN MSA		Toledo, OH MSA		Dayton, OH MSA		Akron, OH MSA	
Location in Metropolitan Areas	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Principal City	38	86.4	26	55.3	11	47.8	10	83.3	12	70.6	8	66.7
Suburb	6	13.6	21	44.7	12	52.2	2	16.7	5	29.4	4	33.3
Total	44	100.0	47	100.0	23	100.0	12	100.0	17	100.0	12	100.0
Number of Unit	ts											
		eland- OH MSA	Columbus, OH MSA		Cincinnati, OH- KY-IN MSA		Toledo, OH MSA		Dayton, OH MSA		Akron, OH MSA	
Location in Metropolitan Areas	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Principal City	3,419	75.8	2,127	64.1	718	41.6	1,012	90.8	581	66.0	592	79.0
Suburb	1,094	24.2	1,192	35.9	1,007	58.4	103	9.2	299	34.0	157	21.0
Total	4,513	100.0	3,319	100.0	1,725	100.0	1,115	100.0	880	100.0	749	100.0

Notes: In these six metropolitan statistical areas, LIHTC awards were made to 155 family properties and 12,301 units in family properties. Metropolitan, suburb includes all areas of a Metropolitan Statistical Area that are not in a principal city. Properties were identified as a family development based on the OHFA target population. The calculations showing numbers of units include all units in each property.

Exhibit 15: LIHTC Awards for Family Developments (Alternate Definition) in Principal Cities and Suburbs in the Six Largest Ohio Metropolitan Areas, 2006-2015

Number of Properties												
	Cleveland- Elyria, OH MSA		Columbus, OH MSA		Cincinnati, OH- KY-IN MSA		Toledo, OH MSA		Dayton, OH MSA		Akroi MS	
Location in Metropolitan Areas	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Principal City	30	78.9	27	45.8	15	53.6	11	57.9	13	65.0	9	52.9
Suburb	8	21.1	32	54.2	13	46.4	8	42.1	7	35.0	8	47.1
Total	38	100.0	59	100.0	28	100.0	19	100.0	20	100.0	17	100.0
Number of Units	;											
	Cleveland- Elyria, OH MSA		Columbus, OH MSA		Cincinnati, OH- KY-IN MSA		Toledo, OH MSA		Dayton, OH MSA		Akron, OH MSA	
Location in Metropolitan Areas	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Principal City	2,627	69.1	2,024	52.6	938	46.5	524	56.1	681	62.7	471	55.6
Suburb	1,174	30.9	1,822	47.4	1,081	53.5	410	43.9	405	37.3	376	44.4
Total	3,801	100.0	3,846	100.0	2,019	100.0	934	100.0	1,086	100.0	847	100.0

Notes: In these six metropolitan statistical areas, LIHTC awards were made to 181 family properties and 12,533 units in family properties. Metropolitan, suburb includes all areas of a Metropolitan Statistical Area that are not in a principal city. A property was classified as a family property if at least 50 percent of its units had two or more bedrooms. Properties with less than 50 percent two or more bedroom units were classified as senior/other. Permanent Supportive Housing (50 properties, 3,060 units) was not reclassified. The calculations showing numbers of units include all units in each property regardless of size.

After broadening the focus to entire metropolitan areas, we still find that relatively few LIHTC awards were made for family housing in low poverty areas. Cleveland still has no properties in census tracts with poverty rates below 10 percent (Exhibit 16). The highest percentage is in the Cincinnati MSA, which has only 13.6 percent of units in family properties across the metropolitan area in tracts with poverty rates below 10 percent. More than half of the family units awarded across the Cleveland MSA and over 85 percent of those in the Toledo MSA were allocated to areas with very high concentrations of poor people.

Using the alternate way of classifying properties as family or senior housing shows a different pattern, especially in the Toledo MSA, where three properties, with 152 units, classified as senior housing would be redefined as family housing (Exhibit 17).

Exhibit 16: LIHTC Awards for Units in OHFA Family Developments in the Six Largest Metropolitan Areas in Ohio, 2006-2015 **By Census Tract Poverty Rate**

Number of Units													
	Cleveland- Elyria, OH MSA		Columbus, OH MSA		Cincinnati, OH- KY-IN MSA		Toledo, OH MSA		Dayton, OH MSA		Akron, OH MSA		
Census Tract Poverty Rate	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	
0-9.9 percent	0	0.0	178	5.4	235	13.6	55	4.9	30	3.4	28	3.7	
10-19.9 percent	243	5.4	706	21.3	458	26.6	48	4.3	77	8.8	64	8.5	
20-29.9 percent	533	11.8	947	28.5	147	8.5	40	3.6	265	30.1	50	6.7	
30-39.9 percent	1,354	30.0	283	8.5	236	13.7	24	2.2	182	20.7	419	55.9	
40-100 percent	2,383	52.8	1,205	36.3	649	37.6	948	85.0	326	37.0	188	25.1	
Total	4,513	100.0	3,319	100.0	1,725	100.0	1,115	100.0	880	100.0	749	100.0	

Notes: Census tract poverty rates were calculated from American Community Survey 2010-2014 5-year estimates. Properties were identified as a family development based on the OHFA target population. The calculations showing numbers of units include all units in each property.

Exhibit 17: LIHTC Awards for Units in Family Developments (Alternate Definition) in the Six Largest Metropolitan Areas in Ohio, 2006-2015 By and Census Tract Poverty Rate

Number of Units													
	Cleveland- Elyria, OH MSA		Columbus, OH MSA		Cincinnati, OH- KY-IN MSA		Toledo, OH MSA		Dayton, OH MSA		Akron, OH MSA		
Census Tract Poverty Rate	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	
0-9.9 percent	0	0.0	562	14.6	275	13.6	207	22.2	64	5.9	28	3.3	
10-19.9 percent	387	10.2	947	24.6	501	24.8	139	14.9	77	7.1	283	33.4	
20-29.9 percent	583	15.3	878	22.8	256	12.7	168	18.0	437	40.2	50	5.9	
30-39.9 percent	1,029	27.1	357	9.3	302	15.0	24	2.6	182	16.8	250	29.5	
40-100 percent	1,802	47.4	1,102	28.7	685	33.9	396	42.4	326	30.0	236	27.9	
Total	3,801	100.0	3,846	100.0	2,019	100.0	934	100.0	1,086	100.0	847	100.0	

Notes: Census tract poverty rates were calculated from American Community Survey 2010-2014 5-year estimates. A property was classified as a family property if at least 50 percent of its units had two or more bedrooms. Properties with less than 50 percent two or more bedroom units were classified as senior/other. Permanent Supportive Housing (50 properties, 3,060 units) was not reclassified. The calculations showing numbers of units include all units in each property regardless of size.

Turning to racial concentration as a measure of high and low opportunity, in some Ohio metropolitan areas, LIHTC family housing has been concentrated in census tracts with high percentages of African Americans, as shown in Exhibit 18. In the Cleveland-Elyria and Dayton MSAs, over 50 percent of the awards for units in family properties were in census tracts that are more than 75 percent African American 21

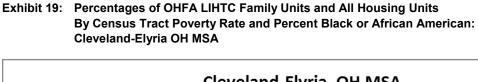
For the pattern based on the alternate definition of family properties, see Appendix Exhibit A-8.

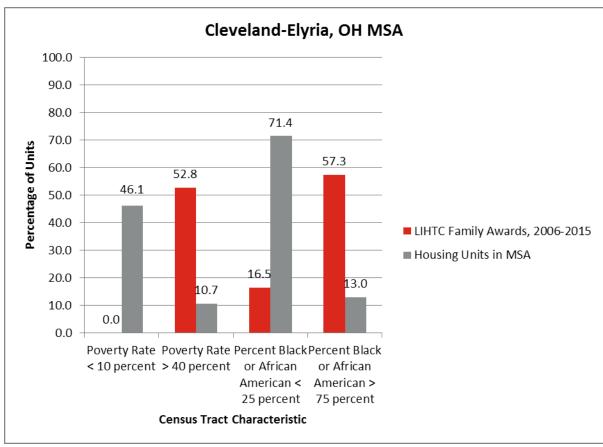
Exhibit 18: LIHTC Awards for Units in OHFA Family Developments in the Six Largest Metropolitan Areas in Ohio, 2006-2015 By Census Tract Percent Black or African American

Number of Units													
	Cleveland- Elyria, OH MSA		Columbus, OH MSA		Cincinnati, OH- KY-IN MSA		Toledo, OH MSA		Dayton, OH MSA		Akron, OH MSA		
Census Tract Percent Black or African American	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	
0-12.4 percent	258	5.7	1,434	43.2	715	41.4	103	9.2	187	21.3	157	21.0	
12.5-24.9 percent	486	10.8	323	9.7	0	0.0	0	0.0	0	0.0	0	0.0	
25-49.9 percent	1,158	25.7	551	16.6	248	14.4	124	11.1	182	20.7	0	0.0	
50-74.9 percent	24	0.5	335	10.1	170	9.9	788	70.7	0	0.0	354	47.3	
75-100 percent	2,587	57.3	676	20.4	592	34.3	100	9.0	511	58.1	238	31.8	
Total	4,513	100.0	3,319	100.0	1,725	100.0	1,115	100.0	880	100.0	749	100.0	

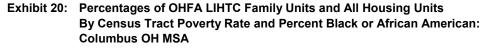
Notes: Census tract percent black or African American was calculated from American Community Survey 2010-2014 5-year estimates and includes population identified as Black or African American alone. Properties were identified as a family development based on the OHFA target population. The calculations showing numbers of units include all units in each property.

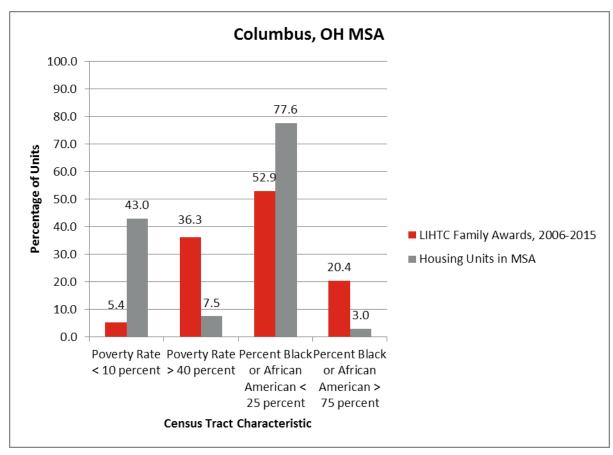
Exhibits 19 through 24 put the percentages of LIHTC family housing as defined by OHFA in each of the six MSAs in context by comparing the share of LIHTC family units in low and high poverty areas and with low and high percentages of African Americans to the shares of all housing units in each metropolitan area that are in such locations. For each of the six MSAs, the distributions of LIHTC units are very different from the distributions of all housing units. LIHTC family units are much more likely to be in higher poverty areas and areas with higher concentrations of African Americans than housing units overall.





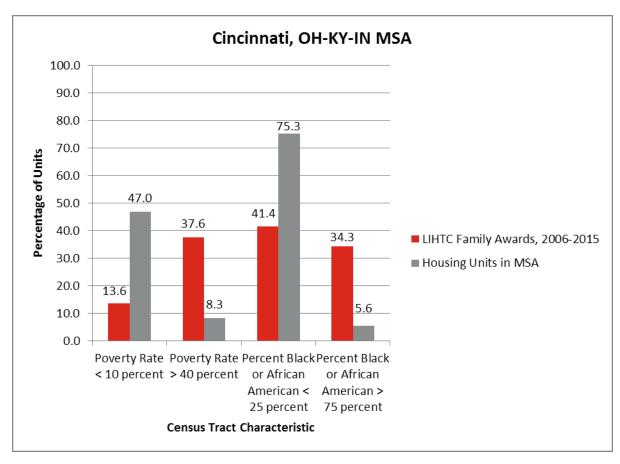
In the Cleveland-Elyria MSA, 46.1 percent of all housing units are in census tracts with less than 10 percent of the population living in poverty, but no LIHTC awards for units in family properties were made in these areas. On the other end of the spectrum, just 10.7 percent of housing units across the Cleveland-Elyria MSA are in high poverty areas, but more than half (52.8 percent) of LIHTC family units are in these areas with extreme concentrations of poverty. Looking at census tract percent black or African American, the comparison shows a similar pattern. Over 70 percent of all housing units in the Cleveland-Elyria MSA are in census tracts with less than 25 percent African Americans, but only 16.5 percent of LIHTC family units. While only 13.0 percent of all housing units in the MSA are in areas that are more than 75 percent African American, more than half of the LIHTC family units in the MSA are in these racially concentrated areas.





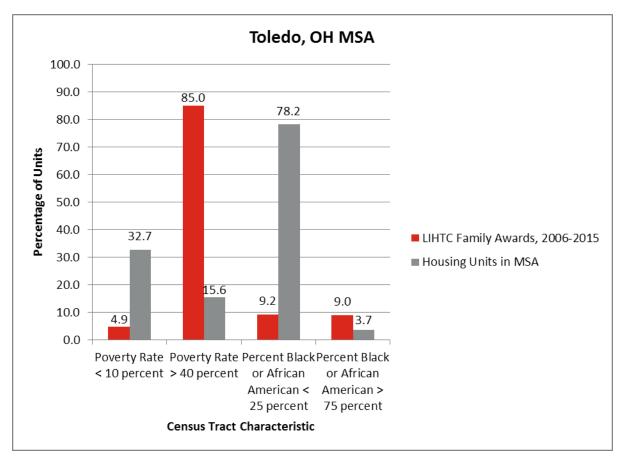
In the Columbus MSA, more than three quarters of all housing units (77.6 percent) are in census tracts that are less than 25 percent African American, and a majority of LIHTC family units (52.9 percent) are in these locations. However, looking at poverty rates in the Columbus MSA, while 43.0 percent of all housing units were in low poverty areas, only 5.4 percent of LIHTC family units are in these areas. More than a third (36.3 percent) of LIHTC family units in the Columbus MSA are in areas with concentrated poverty, whereas only 7.5 percent of all housing units are in such census tracts.

Exhibit 21: Percentages of OHFA LIHTC Family Units and All Housing Units By Census Tract Poverty Rate and Percent Black or African American: Cincinnati OH MSA

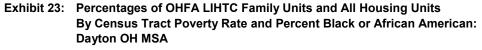


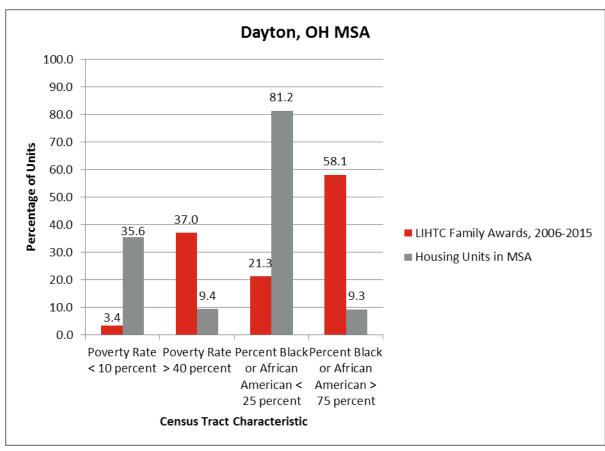
In the Cincinnati MSA, units in LIHTC family properties are much more likely to be in low opportunity areas compared to housing units overall. Almost half of all housing units (47 percent) are in areas across the Cincinnati MSA that have poverty rates of less than 10 percent, but only 13.6 percent of LIHTC family units are in such areas. More than a third of awards for LIHTC family units were made in areas with extreme concentrations of poverty, but only 8.3 percent of all housing units across the Cincinnati MSA are located there.

Percentages of OHFA LIHTC Family Units and All Housing Units By Census Tract Poverty Rate and Percent Black or African American: **Toledo OH MSA**



In the Toledo MSA, 32.7 percent of all housing units are located in census tracts with poverty rates less than 10 percent but only 4.9 percent of LIHTC family units. Just 9.2 percent of LIHTC family units are in areas with low concentrations of African Americans, compared with 78.2 percent of all housing units. In the Toledo MSA, 85 percent of LIHTC family housing is in tracts with extreme poverty concentrations, whereas only 15.6 percent of all housing units are in such areas.

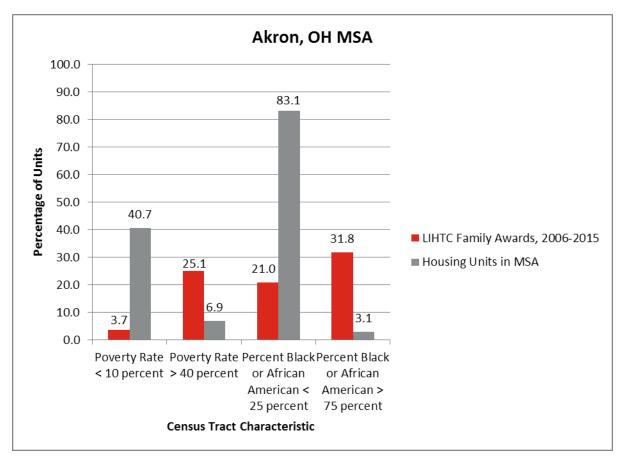




Notes: Percentage of housing units in the MSA and census tract poverty rates and percent black or African American were calculated from American Community Survey 2010-2014 5-year estimates. Properties were identified as a family development based on the OHFA target population. The calculations showing numbers of units include all units in each property regardless of size.

In the Dayton MSA, only 3.4 percent of units in LIHTC family properties were awarded in areas with less than 10 percent poverty, where 35.6 percent of all housing units in the MSA are in such areas. Areas with extreme poverty concentrations have 37 percent of LIHTC family units but only 9.4 percent of all housing units. Looking at areas by percent black or African American, an overwhelming majority of housing units, 81.2 percent, is in areas with low concentrations of African Americans, but only 21.3 percent of LIHTC family units.

Percentages of OHFA LIHTC Family Units and All Housing Units By Census Tract Poverty Rate and Percent Black or African American: **Akron OH MSA**



Notes: Percentage of housing units in the MSA and census tract poverty rates and percent black or African American were calculated from American Community Survey 2010-2014 5-year estimates. Properties were identified as a family development based on the OHFA target population. The calculations showing numbers of units include all units in each property regardless of size.

Akron is another MSA in which the contrast between locations of LIHTC family units and locations of all housing units is stark. Much smaller shares of LIHTC family units are in low poverty and low percentages black or African American census tracts compared to the shares of housing units overall, and larger shares of LIHTC family units were in high poverty and high percentage African American census tracts compared to the shares of housing units overall.

4.3 LIHTC Family Housing Locations in Six Ohio Metropolitan Areas

Instead of describing the locations of LIHTC family housing as percentages of properties and units in census tracts characterized by high and low poverty and high and low racial concentration, this section uses maps to further illustrate where units in family properties are located. Maps for six metropolitan areas in Ohio make it possible to understand further the location patterns of LIHTC family housing.

The maps overlay LIHTC family property awards from 2006 to 2015 against census tract poverty rate and also against census tract percent black or African American. In this case, we do not show properties considered family housing by OHFA unless they have at least 50 percent of units with two or more bedrooms. We do show properties reclassified from senior to family housing because more than half the units have two or more bedrooms, but we indicate those properties by showing their locations with triangles rather than circles. Units in these properties may not be available to families with children.

Exhibit 21: Locations of LIHTC Family Properties in the Cleveland-Elyria MSA (2006-2015 Awards)

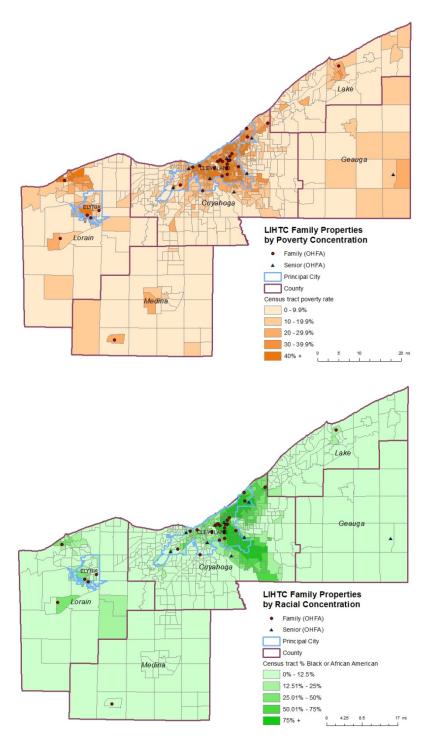
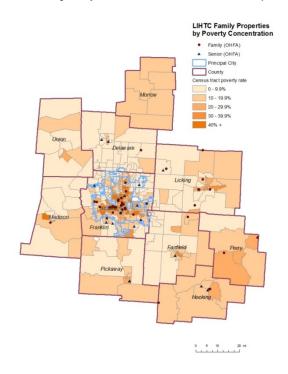


Exhibit 22: Locations of LIHTC Family Properties in the Columbus MSA (2006-2015 Awards)



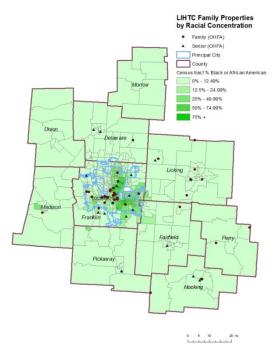
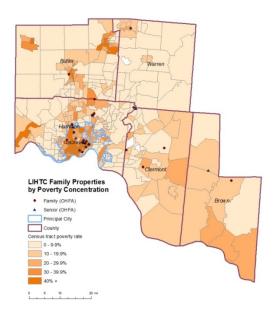


Exhibit 23: Locations of LIHTC Family Properties in the Cincinnati MSA (2006-2015 Awards)



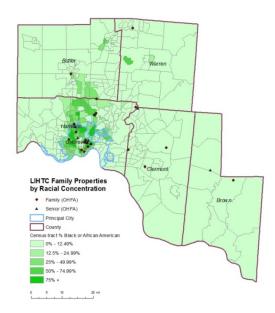
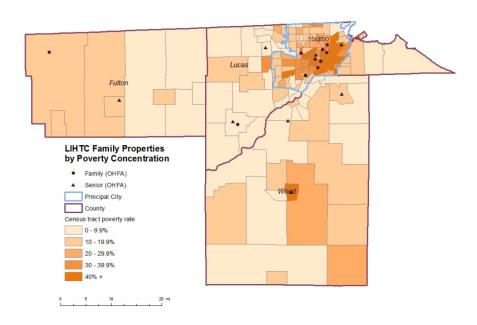


Exhibit 24: Locations of LIHTC Family Properties in the Toledo MSA (2006-2015 Awards)



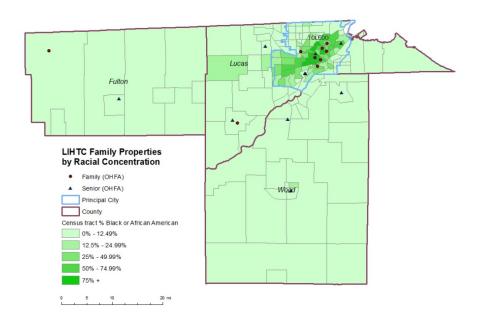
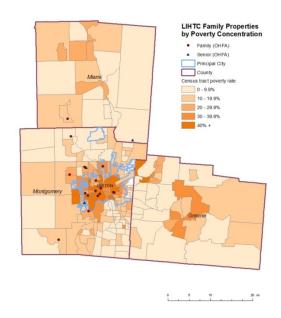


Exhibit 25: Locations of LIHTC Family Properties in the Dayton MSA (2006-2015 Awards)



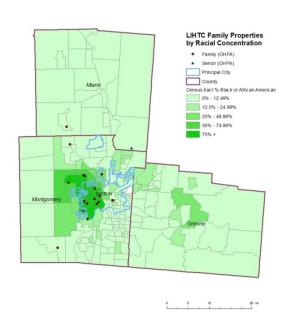
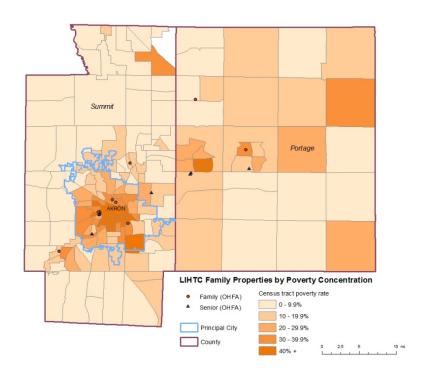
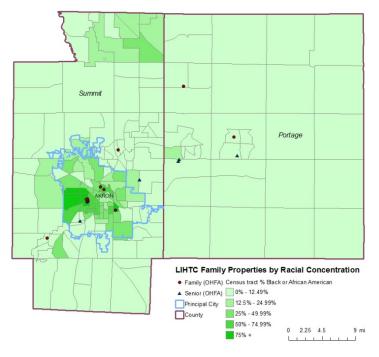


Exhibit 26: Locations of LIHTC Family Properties in the Akron MSA (2006-2015 Awards)





References

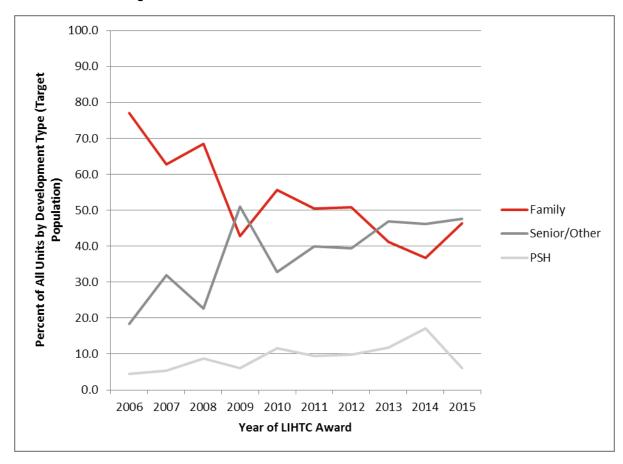
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Appendix

Analysis presented in this report is mainly based on OHFA's classification of properties as family housing. We also completed analysis using an alternate definition of family housing based on whether a property appears to be suitable for families. Properties were reclassified as family housing if more than half of the units had two or more bedrooms. This resulted in both dropping some properties designated as family housing by OHFA and adding properties that OHFA classifies as senior housing but in which more than half of the units have two or more bedrooms. We do not know if the policies of the owners of these properties units permit the larger units to be occupied by families with children. This reclassification produced few notable changes in patterns.

Exhibits based on the alternate definition for family properties not included in the body of the report are presented in this appendix.

Exhibit A-1: LIHTC Awards Annually by Target Population (Alternate Definition for Family Property), 2006-2015 Percentage of All Units



Notes: A property was classified as a family property if at least 50 percent of its units had two or more bedrooms. Properties with less than 50 percent two or more bedroom units were classified as senior/other. Permanent Supportive Housing (50 properties, 3,060 units) was not reclassified. The calculations showing numbers of units include all units in each property regardless of size.

Data using the OHFA target population are presented in Exhibit 2.

Exhibit A-2: LIHTC Awards and Target Population (Alternate Definition for Family Property), 2006-2015 By Type of Metropolitan Location: Principal City or Suburb

Number of Properties											
	Princip	al City	Sub	urb	Total						
Target Population	Number Percent		Number	Percent	Number	Percent					
Family	120	56.9	91	43.1	211	100.0					
Senior/Other	73	54.9	60	45.1	133	100.0					
PSH	43	91.5	4	8.5	47	100.0					
Total	236	60.4	155	39.6	391	100.0					
Number of Units											
	Princip	al City	Sub	urb	Total						
Target Population	Number	Percent	Number	Percent	Number	Percent					
Family	8,173	57.3	6,094	42.7	14,267	100.0					
Senior/Other	7,322	65.9	3,784	34.1	11,106	100.0					
PSH	2,416	91.8	216	8.2	2,632	100.0					
Total	17,911	64.0	10,094	36.0	28,005	100.0					

Notes: Metropolitan, suburb includes all areas of a Metropolitan Statistical Area that are not in a principal city. A property was classified as a family property if at least 50 percent of its units had two or more bedrooms. Properties with less than 50 percent two or more bedroom units were classified as senior/other. Permanent Supportive Housing (50 properties, 3,060 units) was not reclassified. The calculations showing numbers of units include all units in each property regardless of size.

Data using the OHFA target population are presented in Exhibit 3.

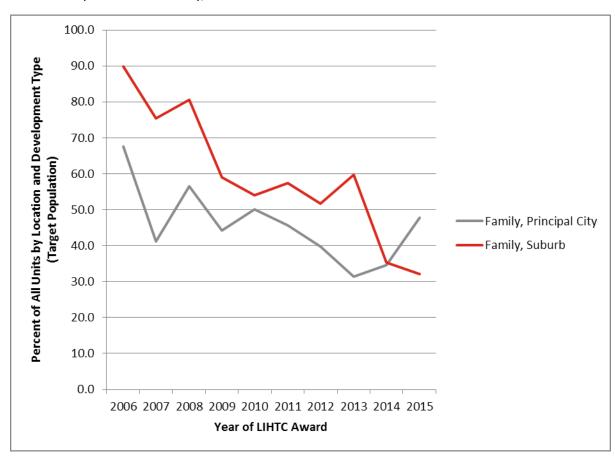
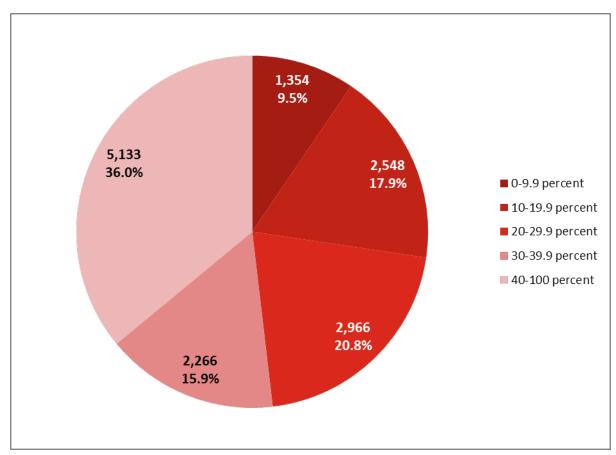


Exhibit A-3: Percentage of LIHTC Units in Principal Cities and in Suburbs that Is Family Housing (Alternate Definition), 2006-2015

Note: Metropolitan, suburb includes all areas of a Metropolitan Statistical Area that are not in a principal city. A property was classified as a family property if at least 50 percent of units had two or more bedrooms. Percentages of family housing include all units in each property classified as a family property.

Data using the OHFA target population are presented in Exhibit 4.

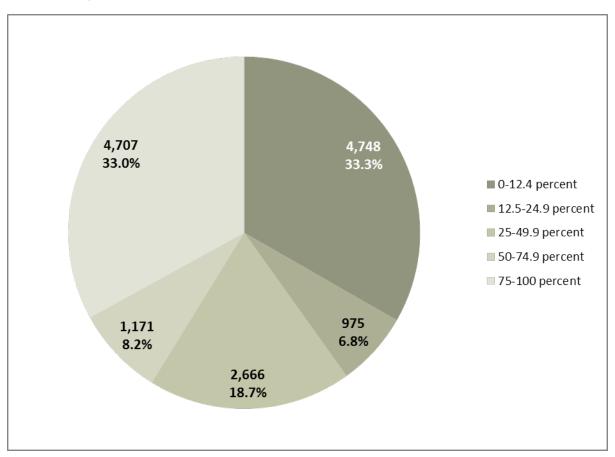
Exhibit A-3: LIHTC Awards for Units in Family Properties (Alternate Definition) in Metropolitan Areas, 2006-2015 **By Census Tract Poverty Rate**



Notes: Census tract poverty rates were calculated from American Community Survey 2010-2014 5-year estimates. A property was classified as a family property if at least 50 percent of its units had two or more bedrooms. Properties with less than 50 percent two or more bedroom units were classified as senior/other. Permanent Supportive Housing (50 properties, 3,060 units) was not reclassified. Family properties awarded tax credits in metropolitan areas included 14,267 units. The calculations showing numbers of units include all units in each property regardless of size.

Data using the OHFA target population are presented in Exhibit 5.

Exhibit A-4: LIHTC Awards for Units in Family Properties (Alternate Definition) in Metropolitan Areas, 2006-2015 By Census Tract Percent Black or African American



Notes: Census tract poverty rates were calculated from American Community Survey 2010-2014 5-year estimates. Census tract percent black or African American was calculated from American Community Survey 2010-2014 5-year estimates and includes population identified as Black or African American alone. A property was classified as a family property if at least 50 percent of its units had two or more bedrooms. Properties with less than 50 percent two or more bedroom units were classified as senior/other. Permanent Supportive Housing (50 properties, 3,060 units) was not reclassified. Family properties awarded tax credits in metropolitan areas included 14,267 units. The calculations showing numbers of units include all units in each property regardless of size.

Data using the OHFA target population are presented in Exhibit 6.

Exhibit A-5: LIHTC Awards for Units in Family Properties (Alternate Definition) in Metropolitan Areas, 2006-2015 Percent of Units by Census Tract Percent Black or African American and Poverty Rate

Census Tract Poverty Rate										
Census Tract	0-9.9 percent	10-19.9 percent	20-29.9 percent	30-39.9 percent	40-100 percent					
Percent Black or										
African American										
0-12.4 percent	8.7	12.4	9.6	1.6	1.0					
12.5-24.9 percent	0.8	2.3	1.5	0.4	1.9					
25-49.9 percent	-	2.0	4.4	3.7	8.5					
50-74.9 percent	•	0.8	0.7	2.8	3.9					
75-100 percent	-	0.3	4.7	7.4	20.6					

Notes: Census tract poverty rates and percent black or African American were calculated from American Community Survey 2010-2014 5-year estimates. Census tract percent black or African American includes population identified as Black or African American alone. A property was classified as a family property if at least 50 percent of its units had two or more bedrooms. Properties with less than 50 percent two or more bedroom units were classified as senior/other. Permanent Supportive Housing (50 properties, 3,060 units) was not reclassified. The calculations showing numbers of units include all units in each property regardless of size.

Data using the OHFA target population are presented in Exhibit 7.

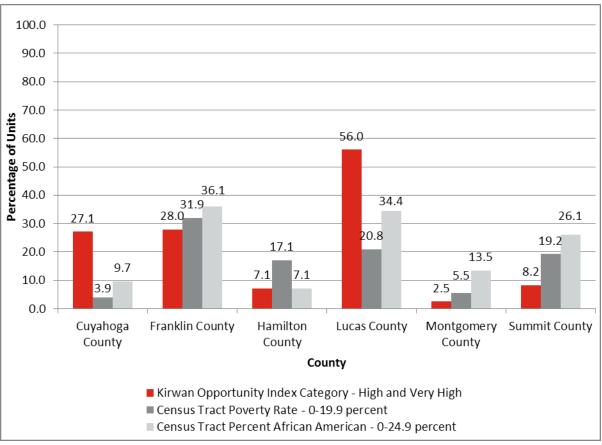
Exhibit A-6: LIHTC Awards for Family Developments (Alternate Definition) in the Largest Metropolitan Area Counties in Ohio, 2006-2015 By Census Tract Percent Black or African American

Number of Properties												
	Cuyahoga County		Franklin County		Hamilton County		Lucas County		Montgomery County		Summit County	
Census Tract Percent Black or African American	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
0-12.4 percent	3	10.0	7	20.0	1	5.3	5	35.7	4	22.2	4	33.3
12.5-24.9 percent	1	3.3	10	28.6	0	0.0	0	0.0	0	0.0	0	0.0
25-49.9 percent	6	20.0	7	20.0	2	10.5	3	21.4	1	5.6	0	0.0
50-74.9 percent	1	3.3	4	11.4	3	15.8	4	28.6	0	0.0	2	16.7
75-100 percent	19	63.3	7	20.0	13	68.4	2	14.3	13	72.2	6	50.0
Total	30	100.0	35	100.0	19	100.0	14	100.0	18	100.0	12	100.0
Number of Units												
		hoga unty	Franklin County		Hamilton County		Lucas County		Montgomery County		Summit County	
Census Tract Percent Black or African American	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
0-12.4 percent	210	7.4	449	17.3	85	7.1	228	34.4	135	13.5	152	26.1
12.5-24.9 percent	66	2.3	489	18.8	0	0.0	0	0.0	0	0.0	0	0.0
25-49.9 percent	484	17.0	675	26.0	103	8.6	124	18.7	182	18.2	0	0.0
50-74.9 percent	24	8.0	235	9.0	223	18.6	172	26.0	0	0.0	145	24.9
75-100 percent	2,063	72.5	750	28.9	787	65.7	138	20.8	683	68.3	286	49.1
Total	2,847	100.0	2,598	100.0	1.198	100.0	662	100.0	1.000	100.0	583	100.0

Notes: The central counties presented are the six largest counties in Ohio and the counties in which the city that appears first in the name of the metropolitan statistical area is located. Census tract percent black or African American was calculated from American Community Survey 2010-2014 5-year estimates and includes population identified as Black or African American alone. A property was classified as a family property if at least 50 percent of its units had two or more bedrooms. Properties with less than 50 percent two or more bedroom units were classified as senior/other. Permanent Supportive Housing (50 properties, 3,060 units) was not reclassified. The calculations showing numbers of units include all units in each property regardless of size.

Data using the OHFA target population are presented in Exhibit 12.

Exhibit A-7: Locations of LIHTC Awards for Family Developments (Alternate Definition) in the Largest Metropolitan Area Counties in Ohio, 2006-2015 **Using Alternative Definitions of High and Low Opportunity**



Notes: Census tract poverty rates were calculated from American Community Survey 2010-2014 5-year estimates. Census tract percent black or African American was calculated from American Community Survey 2010-2014 5-year estimates and includes population identified as Black or African American alone. The Kirwan Institute Opportunity Index was created for OHFA for the six largest counties of metropolitan areas in Ohio. Index values are at the census tract level. A property was classified as a family property if at least 50 percent of its units had two or more bedrooms. Properties with less than 50 percent two or more bedroom units were classified as senior/other. Permanent Supportive Housing (50 properties, 3,060 units) was not reclassified. The calculations showing numbers of units include all units in each property regardless of size.

Data using the OHFA target population are presented in Exhibit 13.

Exhibit A-8: LIHTC Awards for Units in Family Developments (Alternate Definition) in the Six Largest Metropolitan Areas in Ohio, 2006-2015 By Census Tract Percent Black or African American

Number of Units												
	Cleveland- Elyria, OH MSA		Columbus, OH MSA		Cincinnati, OH-KY-IN MSA		Toledo, OH MSA		Dayton, OH MSA		Akron, OH MSA	
Census Tract Percent Black or African American	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
0-12.4 percent	262	6.9	1,697	44.1	756	37.4	500	53.5	221	20.3	416	49.1
12.5-24.9 percent	390	10.3	489	12.7	0	0.0	0	0.0	0	0.0	0	0.0
25-49.9 percent	1,062	27.9	675	17.6	253	12.5	124	13.3	182	16.8	0	0.0
50-74.9 percent	24	0.6	235	6.1	223	11.0	172	18.4	0	0.0	145	17.1
75-100 percent	2,063	54.3	750	19.5	787	39.0	138	14.8	683	62.9	286	33.8
Total	3,801	100.0	3,846	100.0	2,019	100.0	934	100.0	1,086	100.0	847	100.0

Notes: Census tract percent black or African American was calculated from American Community Survey 2010-2014 5-year estimates and includes population identified as Black or African American alone. A property was classified as a family property if at least 50 percent of its units had two or more bedrooms. Properties with less than 50 percent two or more bedroom units were classified as senior/other. Permanent Supportive Housing (50 properties, 3,060 units) was not reclassified. The calculations showing numbers of units include all units in each property regardless of size.

Data using the OHFA target population are presented in Exhibit 18.