



2024 – 2028 Analysis of Impediments
to Fair Housing Choice
City of Greenwood, Indiana

DRAFT Version

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I: Introduction

In 1872, Samuel Greenwood recorded the first plat that would eventually become incorporated as the City of Greenwood. However, this was not the beginning of settlement in the area; since 1825, a town here took the name “Greenfield,” leading to a “naming” conflict with a nearby Hancock County community that still bears the name today. Before that time, various indigenous peoples, most recently the Delaware tribe, had called the community their home.

Today, a diverse population of ethnicities, creeds, and races calls the City of Greenwood home. The local evolution of this diverse community reflects the growing regional diversity of Central Indiana, as Greenwood has adapted to its envelopment by an expanding Indianapolis metropolitan region. The City now finds itself in the position of being a “first-tier” suburban community, simultaneously grappling with growth on its edges while addressing redevelopment and community development needs in its older core areas.

In 2019, the City has reached the threshold to be considered an “Entitlement” community under the U.S. Department of Housing and Urban Development’s (HUD) Community Development Block Grant (CDBG) Program. This designation provides redeveloping communities with supplemental federal resources intended to benefit low-income persons and/or alleviate slums and blight. As a requirement of receiving these funds, the City must take steps to ensure that discriminatory actions, whether explicit or implicit, that constrain people’s choices to secure adequate housing are identified and mitigated. This Analysis of Impediments to Fair Housing (AI) document is one step in this ongoing process.

History of the Fair Housing Act

The Fair Housing Act, passed by the U.S. Congress in 1968, is a landmark piece of legislation aimed at extending the protections of the Civil Rights movement to ensure equal housing opportunities for all. The Act, enforced by the U.S. Department of Housing and Urban Development (HUD) through its Office of Fair Housing and Equal Opportunity, seeks to prevent discrimination and intimidation in housing-related activities. These activities include the rental or sale of homes, apartments, and condominiums, as well as the provision of mortgage financing. The Act exempts owner-occupied buildings with no more than four units, single-family housing sold or rented without the use of a real estate agent or broker, and housing operated by organizations and private clubs that limit occupancy to members.

The Fair Housing Act protects individuals from discrimination based on race, color, religion, sex, disability, familial status, and national origin. Although income level is not a protected class under the Act, many individuals within the protected classes tend to have lower incomes. Therefore, this document will examine the location of households based on income in addition to the protected classes.

The act prevents the following activities based on race, color, religion, sex, disability, familial status or national origin:

- Refusal to rent or sell a property;
- Refusal to negotiate on housing;
- Refusal to make housing available;
- Denial of housing;
- Setting different terms, provisions or conditions for the sale or rental of the housing;
- Providing different housing services or facilities;

- Persuading a person to sell their home or rent their home by suggesting a certain race has moved into the community;
- Denial of a person access to membership or participation in an organization, facility or service on the basis or related to the sale or rental of housing;
- Refusal to provide a mortgage;
- Refusal to provide information on mortgages;
- Imposing different terms for mortgages;
- Appraising property differently;
- Refusal to purchase a loan or mortgage;
- Intimidation or interference with anyone exercising fair housing or assisting others with fair housing;
- Refusal to provide homeowners insurance;
- Providing different insurance rates or terms related to insurance;
- Refusal to provide all terms of homeowners insurance or all information regarding available insurance;
- Making or printing any information regarding the sale or rental of housing, including mortgage and insurance information that indicates a preference or limitation to one of the protected classes.

State of Indiana Fair Housing Acts

The primary enforcement agency for fair housing in Indiana is the Indiana Civil Rights Commission (ICRC). Established in 1961 as the Indiana Fair Employment Practices Commission, the agency initially had limited scope and enforcement capabilities. In 1963, it expanded to include broader civil rights issues and was renamed the Indiana Civil Rights Commission (ICRC). The ICRC's jurisdiction further expanded in 1965 to include housing discrimination.

In 1991, the Indiana General Assembly passed the Indiana Fair Housing Act. This legislation, along with subsequent rules and regulations, enabled the ICRC to be certified as a substantially equivalent fair housing enforcement agency by the U.S. Department of Housing and Urban Development (HUD). The Indiana Fair Housing Act prohibits activities such as blockbusting and discriminatory advertising, which can make it difficult for individuals to live in neighborhoods or housing units of their choice. The Indiana Fair Housing Act is considered substantially equivalent to the federal Fair Housing Act.

In 2014, the ICRC issued its 2015-2018 Strategic Plan. Since no formal update has been released, it is assumed that the 2015-2018 Strategic Plan continues to serve as the current policy document for the ICRC. The Plan has its primary focus on affirmatively furthering fair housing through the following objectives:

1. Effectively educating Hoosiers on civil rights issues;
2. Providing efficient services to Indiana residents; and
3. Better understanding civil rights issues Statewide.

The three strategic objectives each have a number of performance measures detailing outcomes to be achieved, although the timeframes for completion are no longer relevant. The different outcomes are designed to measure the Commission's progress in carrying out its mission in a time of static resources and an increasing need for services.

Fair Housing Provisions in the City of Greenwood

In 2016, the Greenwood Mayor issued an Executive Order clarifying the City’s Non-Discrimination Policy, which includes compliance with Title VI of the U.S. Civil Rights Act. This policy states (emphasis in the original):

“The City of Greenwood values each individual’s civil rights and strives to provide equal opportunity and equitable service to all. As a recipient of federal funds, the City complies with Title VI and all related statutes, regulations, and directives which provide that ***no person shall be excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance from the City on the grounds of race, color, age, sex, sexual orientation, gender identity, disability, national origin, religion, income status, veteran status, limited English proficiency, or any other protected classification under federal law.*** The City further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, regardless of whether those programs and activities are federally funded.”

There does not appear to be a local ombudsman for hearing and referring fair housing complaints, and the City has not adopted any specific policies in this area beyond the general non-discrimination policy.

Research Methodology

City Consultants and Research, LLC (CCR) drafted the Analysis of Impediments to Fair Housing Choice on behalf of Greenwood, Indiana. The Fair Housing Planning Guide, Volume 1 guided CCR to prepare this document. Our scope of work included:

1. Project Initiation: This included a meeting with Greenwood staff to begin the project. Meeting topics included communicating important stakeholders’ contact information for consultation interviews, the review of previous actions taken and collected other relevant data.
2. Community Data Review: CCR conducted a community profile review using 2000, 2010, and 2020 U.S. Census information, American Community Survey for pertinent non-Census years, data from the U.S. Bureau of Labor Statistics and the Indiana Business Research Center. Information was broken down into demographic information, income information and household type.
3. Housing Profile: CCR conducted a review of the housing market of the city of Greenwood and the surrounding Central Indiana region. Information and data were collected from the 2010 and 2020 U.S. Census, pertinent years of the American Community Survey, data from the National Low Income Housing Coalition and the most recent U.S. Department of Housing and Urban Development CHAS data sets. CCR also examined reports analyzing Home Mortgage Disclosure Act (HMDA) data and foreclosure information to determine if any racial disparities occurred.
4. Compliance Profile: CCR examined legal documents such as zoning regulations, zoning variance procedures, fair housing education programs and reporting to determine if any legal structures exist that prohibit fair housing choice. At the time of publication of this document, the City of Greenwood was in the process of updating its Comprehensive Plan and was not available to the public. Updates to this document will be required once the new Comprehensive Plan is released.
5. Survey and Community Input: Past participation of surveys in Greenwood have been unsuccessful with low rates of return. Greenwood utilized an electronic format to solicit input, including the use of social media to reach a wider group of residents. CCR also conducted listening sessions with stakeholders to determine the housing issues with greatest need as it pertains to fair housing choice.

6. Self-Evaluation and Identification of Impediments: CCR reviewed all sections of the analysis to identify any impediments to fair housing choice. CCR also evaluated the progress made by the City of Greenwood to address impediments identified in the previous AI reports.
7. Strategic Plan: CCR worked with the City of Greenwood Office of the Mayor and local stakeholders to develop a strategic plan for addressing fair housing choice as part of the Consolidated Planning process. CCR worked to develop goals that would be realistic and achievable, based on the progress made from previous AI documents.

Several methodological issues, particularly pertaining to data collection, should be noted at this point:

- The City of Greenwood is an incorporated municipality located in Johnson County. Several categories of information, such as commuting data, are available only at the County level; these data are used where applicable, under the assumption that their general conclusions also apply to Greenwood specifically.
- Several other data categories are only available at the level of Census Block Groups and Census Tracts, which are small area classifications used by the U.S. Census Bureau. These geographies do not exactly match up with the City's corporate boundaries; maps in this document using Block Groups and Tracts will display units that are within and in the immediate environs of the City. Analyses using Block Groups and Tracts will use those units that fall partially or completely within the City's corporate boundary.

Fair Housing Assessment

In 2015, the U.S. Department of Housing and Urban Development (HUD) released a new rule, the Affirmatively Furthering Fair Housing (AFFH) Rule, which was followed by smaller updates in subsequent years. The AFFH Rule requires jurisdictions that receive HUD funding to assess fair housing issues and identify steps to address them. Here are the key components and requirements:

1. **Assessment of Fair Housing (AFH):** The AFFH Rule introduced the AFH, which replaced the previous Analysis of Impediments (AI) to Fair Housing Choice. The AFH requires jurisdictions to use HUD-provided data and tools to assess fair housing issues in their communities.
2. **Data and Mapping Tools:** HUD provides data and mapping tools to help jurisdictions analyze patterns of segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity (such as quality schools, transportation, and employment), and disproportionate housing needs.
3. **Community Participation:** The rule emphasizes the importance of community participation in the fair housing planning process. Jurisdictions must engage with the public, including residents, community organizations, and other stakeholders, to gather input on fair housing issues and priorities.
4. **Fair Housing Goals and Priorities:** Jurisdictions must identify fair housing goals and priorities based on their assessment. These goals should address the factors that contribute to fair housing issues and outline specific actions to overcome them.
5. **Integration with Consolidated Plans:** The AFH must be integrated with the jurisdiction's Consolidated Plan. This ensures that fair housing goals are aligned with broader housing and community development plans and resources.

6. **Submission and Review:** Jurisdictions are required to submit their AFH to HUD for review. HUD evaluates the AFH to ensure it meets the requirements and provides feedback to jurisdictions. If necessary, jurisdictions must revise and resubmit their AFH based on HUD's feedback.
7. **Implementation and Reporting:** Jurisdictions must implement the actions identified in their AFH and report on progress in their annual performance reports to HUD. This ensures accountability and continuous improvement in addressing fair housing issues.
8. **Flexibility for Local Context:** While HUD provides a structured framework, the AFFH Rule allows jurisdictions flexibility to address local context and priorities. Jurisdictions can tailor their fair housing strategies to reflect the specific needs and challenges of their communities.

These requirements aim to promote a comprehensive and data-driven approach to fair housing planning, ensuring that jurisdictions take meaningful steps to address discrimination and promote equal housing opportunities for all residents.

Acknowledgements

City Consultants and Research, LLC would like to thank the many people who helped complete this document. A complete list of the key personnel interviewed for this document are listed within Appendix B of the final draft, many of which helped with research and identified useful reports on fair housing issues.

II: Community Profile

This section of the fair housing document analyzes the demographic makeup of the City of Greenwood and illustrates the socioeconomic geography to create a background for analysis of the housing and lending profiles that follow in this report. Because the City continues to grow, the trends noted in this report may indicate a direction and rate of change, but may also under-represent the current conditions.

Figure 1 (below) shows the City and its immediate environs. Greenwood is a community of 27.9 square miles (17,861 acres) abutting the southern boundary of the City of Indianapolis-Marion County; its area has increased by about 3.6% from that reported in the last AI, primarily due to annexations to the east and southeast. The City occupies all or part of the Townships of Clark, Pleasant, and White River in Johnson County.

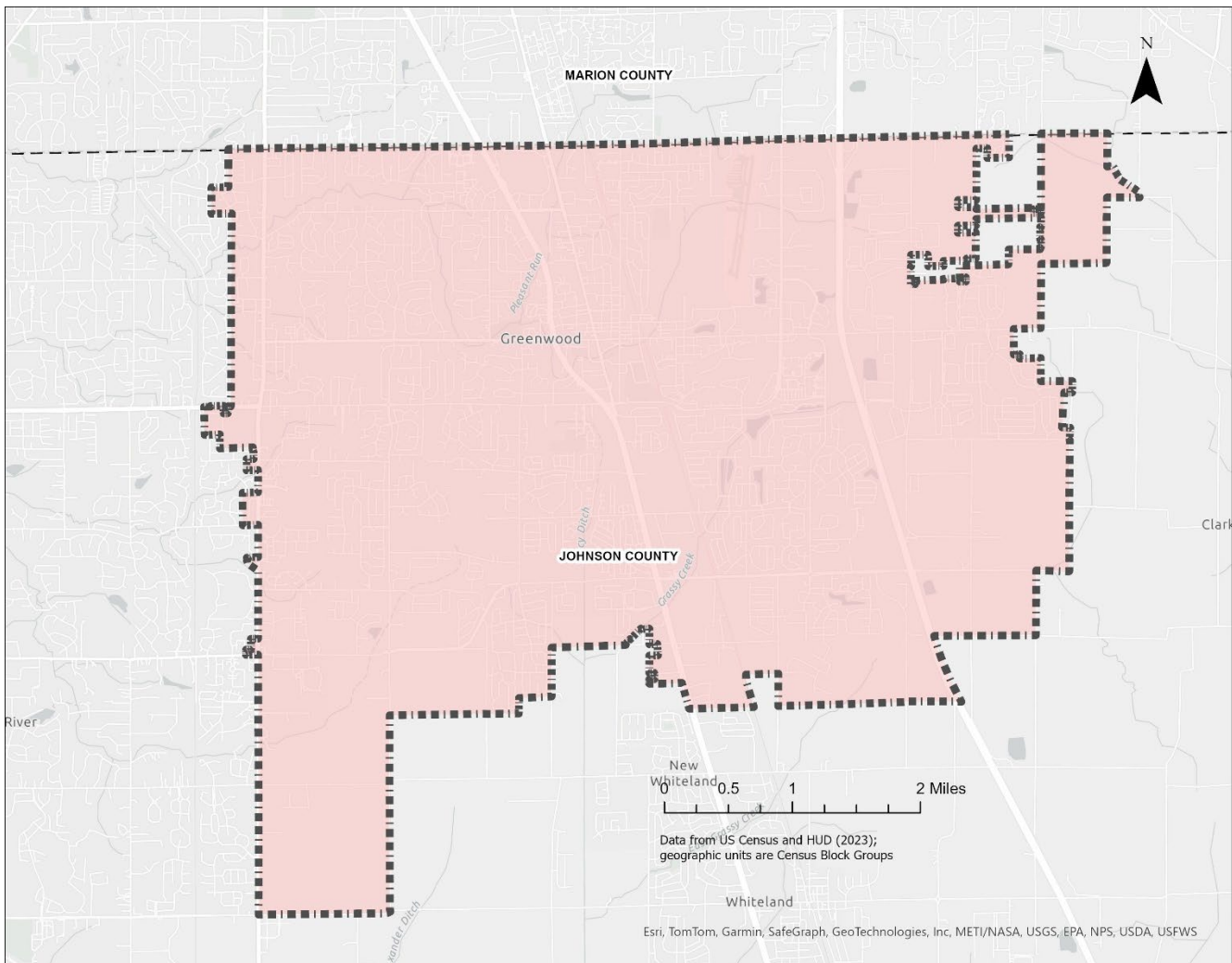


Figure 1: Base Map

Figure 2 shows the relative size and location of Greenwood within the Indianapolis metropolitan region. Situated as the northernmost incorporated municipality in the southern three counties (Johnson, Morgan, and Shelby), Greenwood has ready access to I-65, with relatively short travel times to the other major Interstate corridors (I-69, I-70, I-74, and I-465). North-south mobility is quite good, thanks to both I-65 and US 31, and

commuters can be in Downtown Indianapolis in under 20 minutes under most travel conditions. SR37/I-69 and SR 135 provide supplemental means of north-south access.

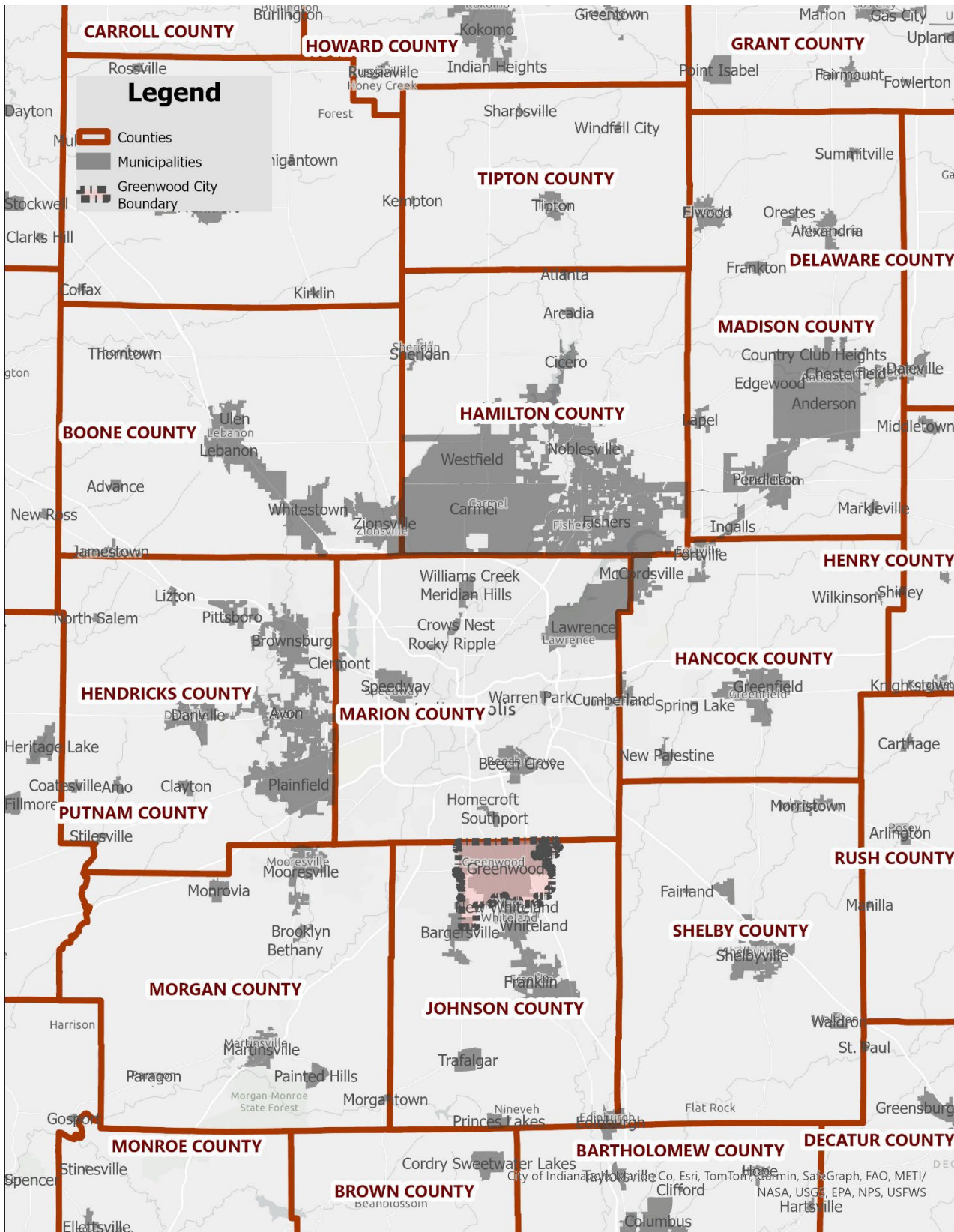


Figure 2: Regional Context

Due to its abutment of Indianapolis, Greenwood was significantly impacted when suburbanization started to spill over Marion County's boundaries in the 1980's. Figure 3 shows the expansion of the Census urbanized area (which is based upon residential density) for the successive Census years of 2000, 2010, and 2020. Even by 2000, a significant portion of the City was considered "urban", primarily extending north-south along US 31 (continuing south to Whiteland and the City of Franklin) and SR 135 (into the Town of Bargersville), and east west along Main Street and County Line Road. The 2010 urban area expanded the development fringe further around these communities.

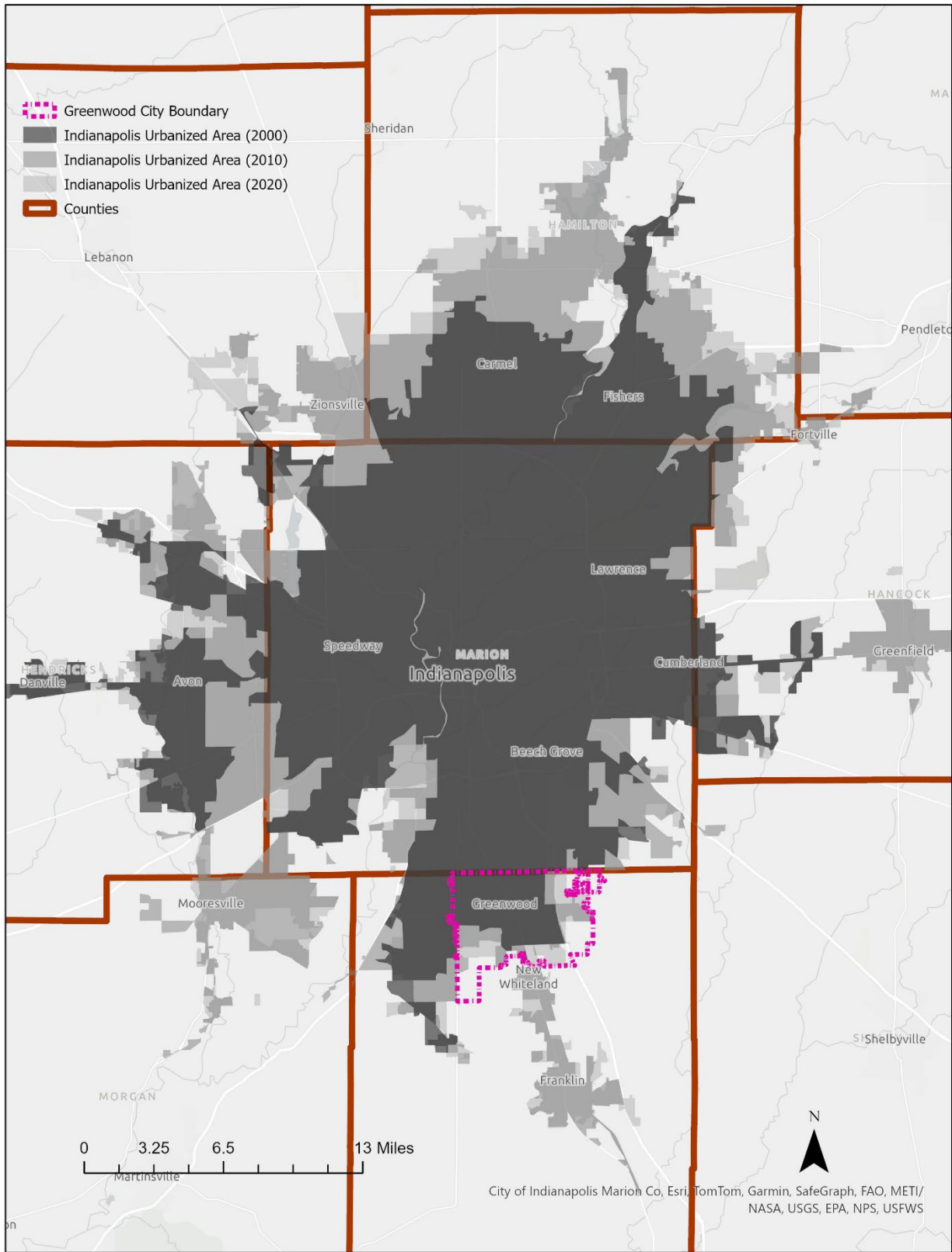


Figure 3: Growth of the Indianapolis Urbanized Area

In summary, Greenwood has an interesting mix of older urban areas and newly suburbanizing neighborhoods. The City's proximity to Indianapolis has produced a unique configuration of development; in most cities, the older sections are centrally located, but in Greenwood, the older areas (along with higher concentrations of older housing units) towards the north end of the City, as well as towards US 31.

Greenwood's most recent (2020) Census population figure is 63,830 people, an increase of over 28 percent from its 2010 figure. The population trend over time is shown in Figure 4, below.

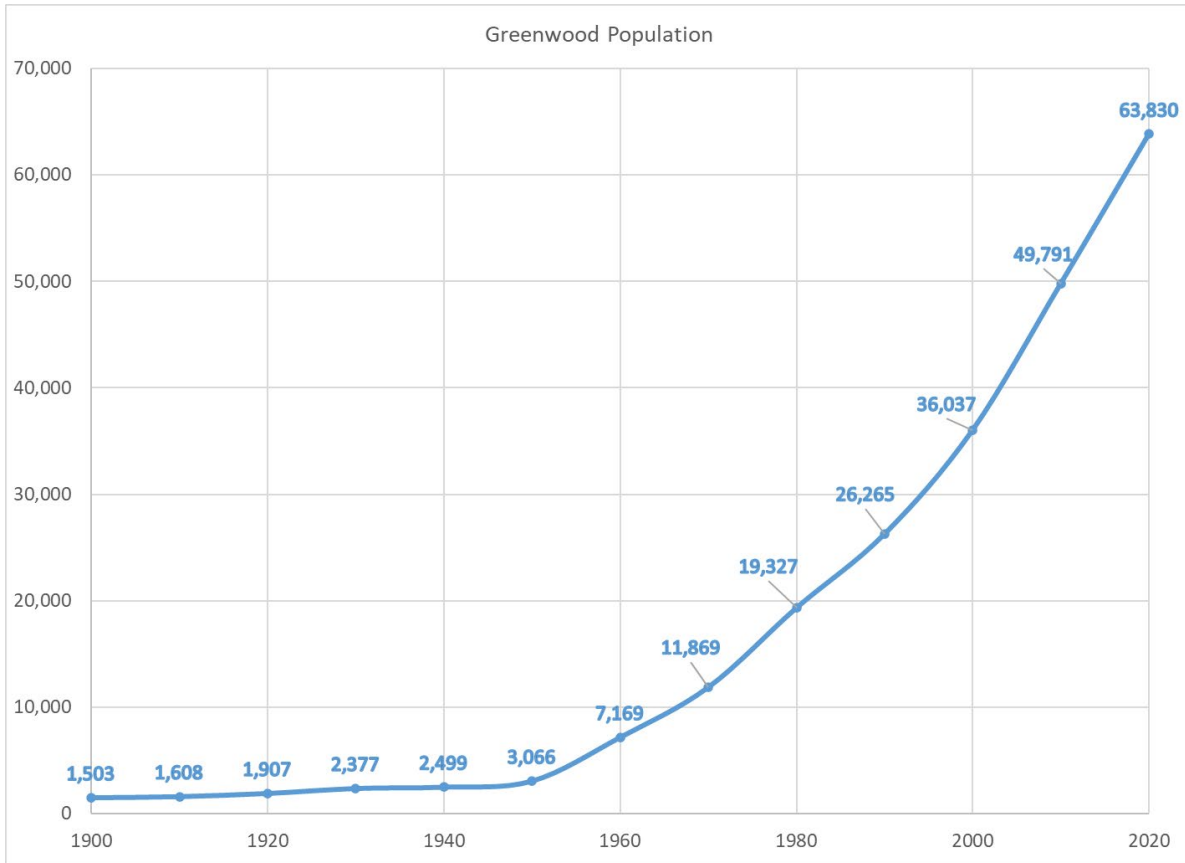


Figure 4: Greenwood Historical Population Growth

Race and Ethnicity

Figure 5 shows the proportion of races represented in the City, showing comparisons between 2010 and 2020. The majority (49,612 people, or 78 percent) of residents are White/Caucasian, followed by Asian (5,729 people, or 9 percent) and African-American (2,732 people, or 4 percent). Native Americans number 167 persons (0.3 percent), and Polynesians number 46 (0.1 percent). There are 5,544 people (9 percent) with multiple racial backgrounds.

The growth of the non-White population is striking. The City grew by 14,039 persons between the Census years of 2010 and 2020, yet only 4,771 of these persons were White, with the proportion of White residents dropping from 90.1 percent in 2010 to 77.7 percent in 2020.

“Hispanic” is considered a category of ethnicity by the U.S. Census Bureau, and thus is not a racial group. A person who identifies himself or herself as Hispanic must also identify themselves as a race, which may be

White, African American or another racial category. As of 2020, 3,475 Greenwood residents (5.4 percent) identify themselves as Hispanic; this number grew modestly from its 2010 figure of 2,476 (5.0 percent).

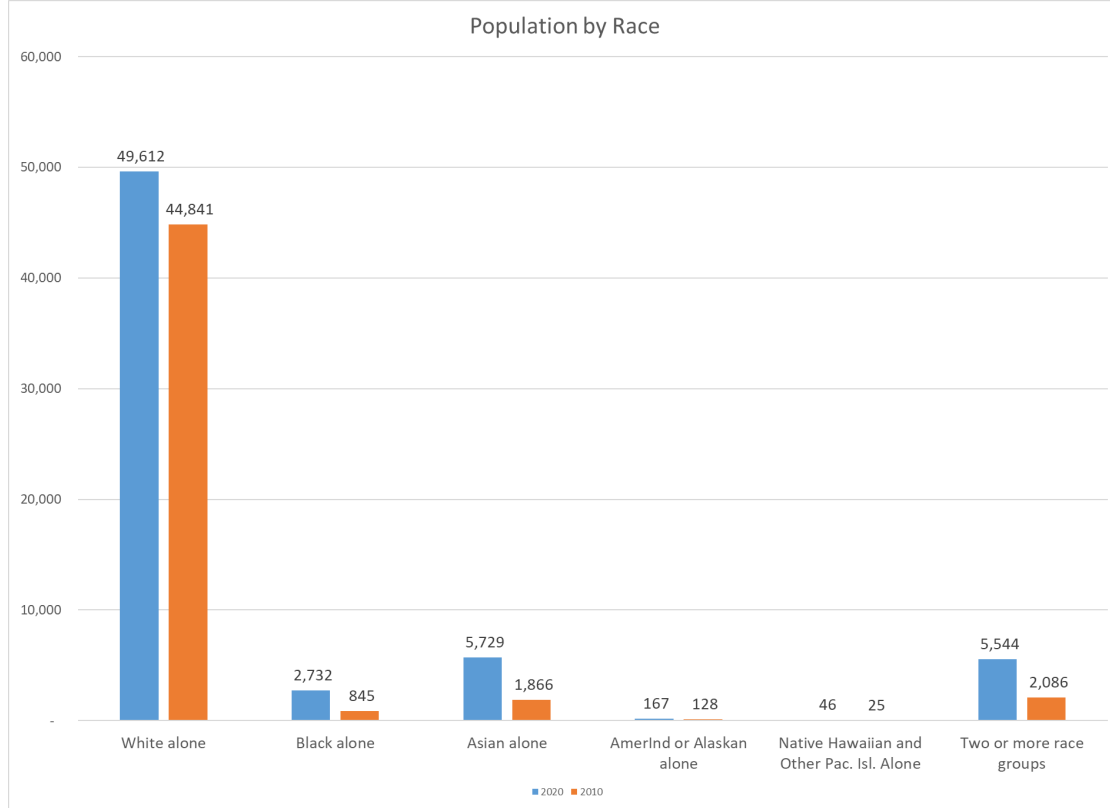


Figure 5: Racial Makeup of Greenwood

Figure 6 shows the racial distribution within the City, comparing these areas to predominately low-income areas from Figure 8. There appears to be a correlation between low-income areas and minority populations, particularly for the “multiracial” category, which seems concentrated in a low-income area centered on Stop 18 Road.

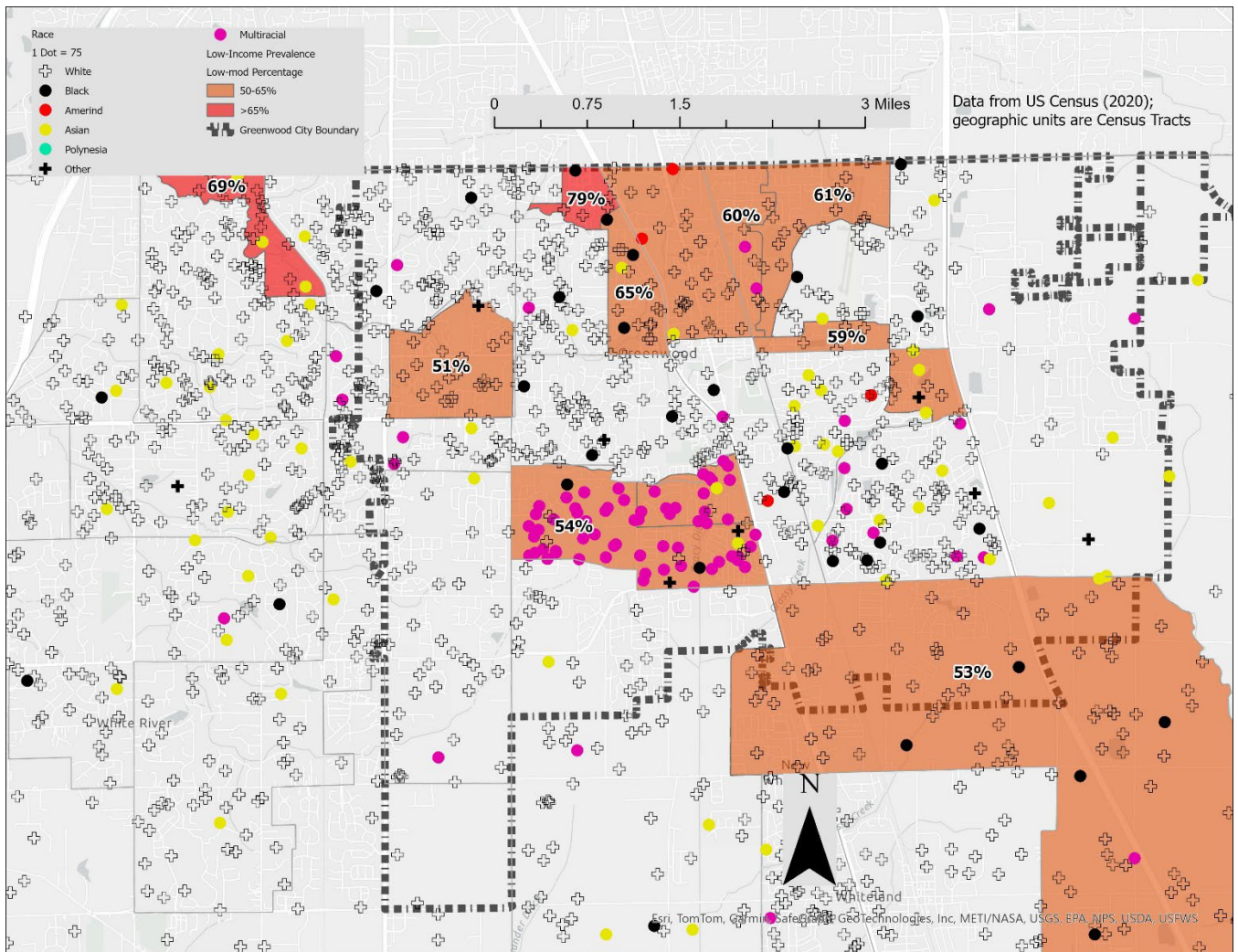


Figure 6: Racial Distribution of Greenwood

The only ethnic category currently recognized by the U.S. Census Bureau is Hispanic. Hispanics can be of any race (white, black, multiracial, etc.). Figure 7 shows the distribution of the Hispanic population in Greenwood.

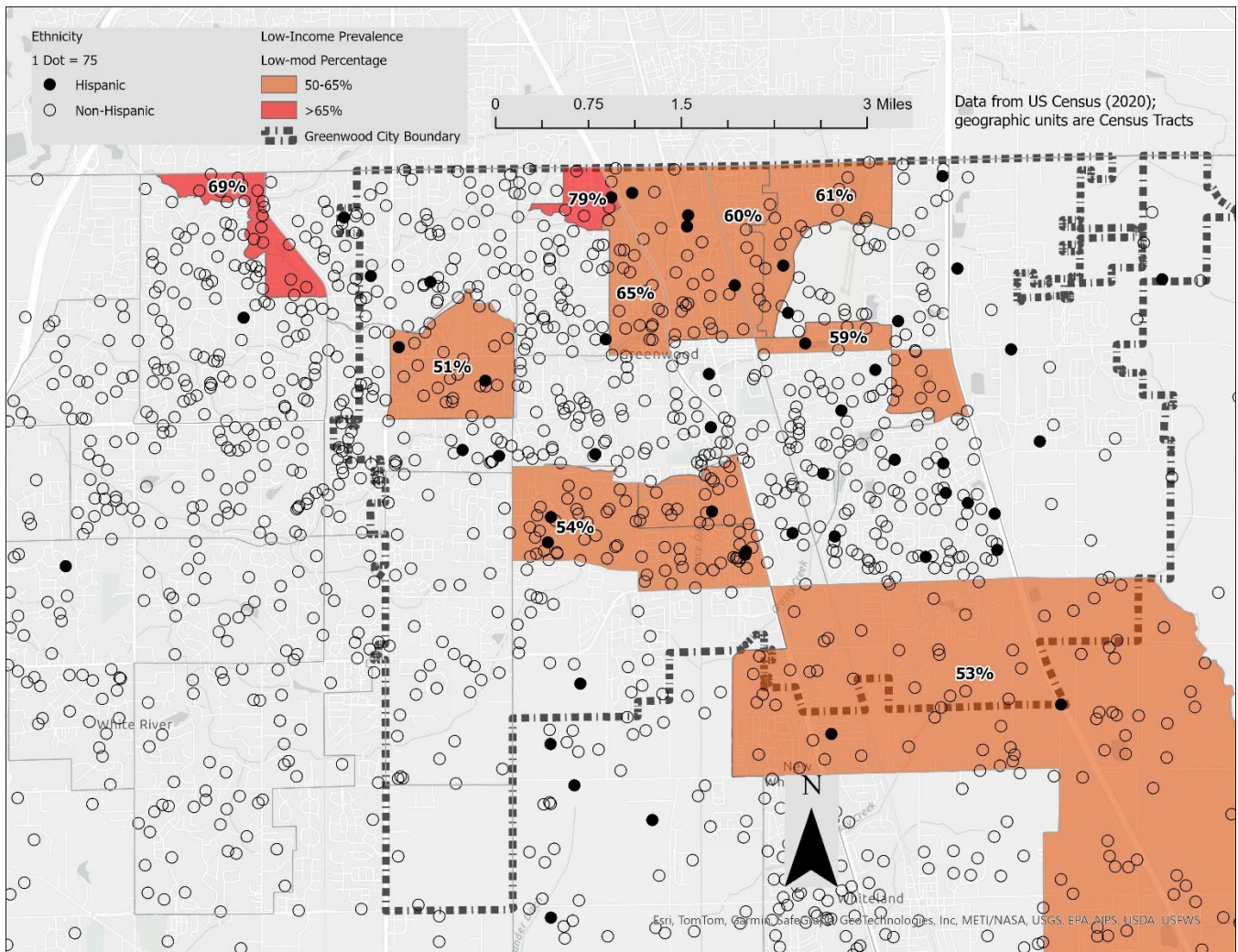


Figure 7: Hispanic Distribution of Greenwood

Income

Examining low-income neighborhoods is critical in assessing fair housing in Greenwood because these areas often exhibit concentrated disadvantages that can hinder residents' access to quality housing and essential services. Low-income neighborhoods may face higher rates of housing discrimination, substandard housing conditions, limited access to transportation, and fewer economic opportunities. These factors can perpetuate cycles of poverty and segregation, disproportionately affecting marginalized groups and exacerbating social inequities. Figure 8 shows the relative concentrations of households that are considered low-income (below 50% of the area median) or moderate-income (below 80% of the area median). These statistics are essentially the same as they were when the prior analysis was developed in 2019. Note that the boundaries of the Census Block Groups can lead to misleading impressions, particularly on the southeastern developing fringe of the community. There, as with the other low-mod concentrations, a tendency towards the older urban areas of Greenwood is evident.

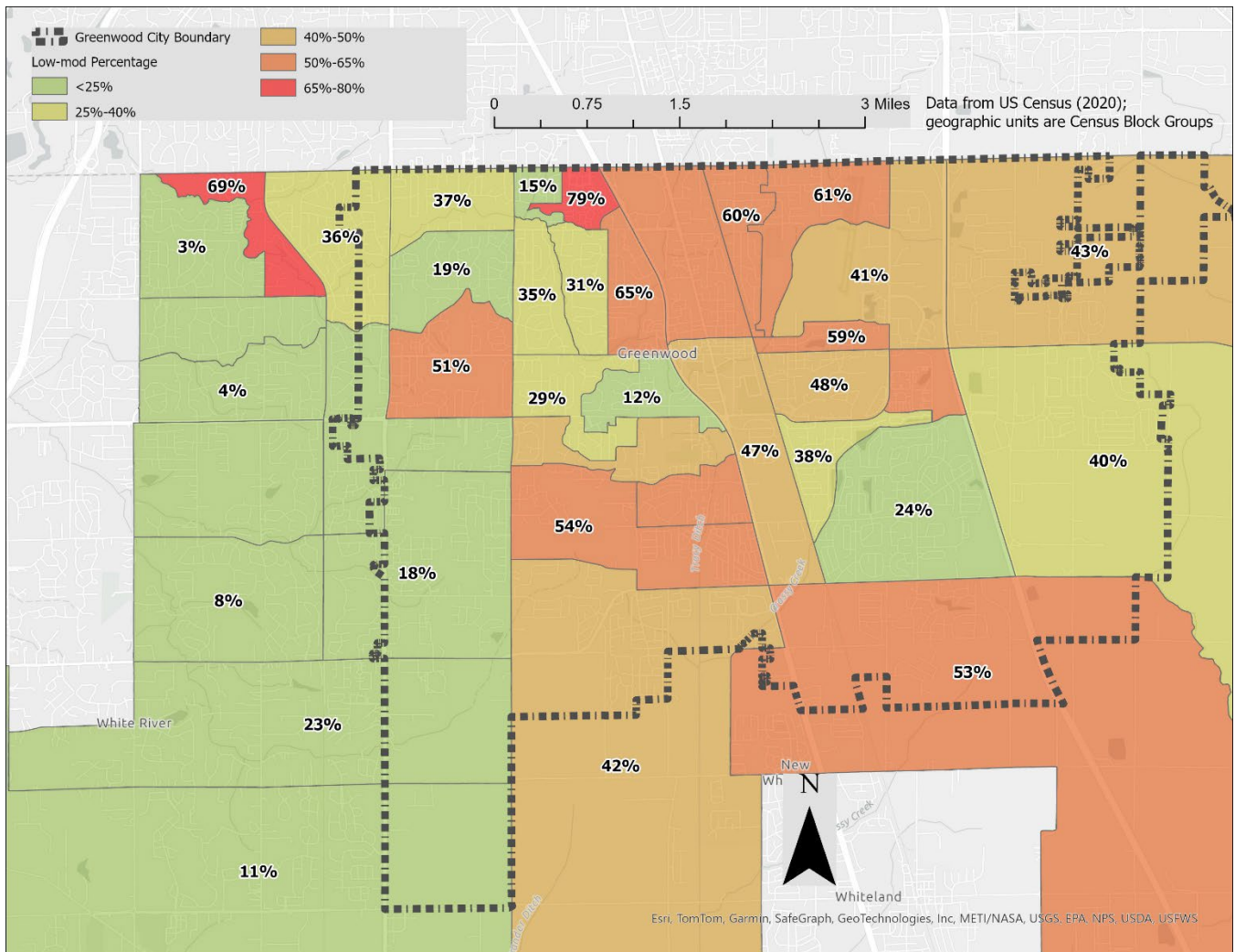


Figure 8: Low- to Moderate-Income Areas

Household Size and Characteristics

Examining household size and characteristics is essential in assessing fair housing in Greenwood because these factors significantly influence housing needs and preferences. Different household sizes and compositions—such as single-person households, large families, multigenerational households, and households with children or elderly members—require varying types and sizes of housing units. Understanding the distribution and characteristics of households helps identify gaps in the housing market, such as shortages of larger affordable units for families or accessible housing for elderly and disabled residents.

Figure 8b shows the general distribution of household sizes within the City of Greenwood.

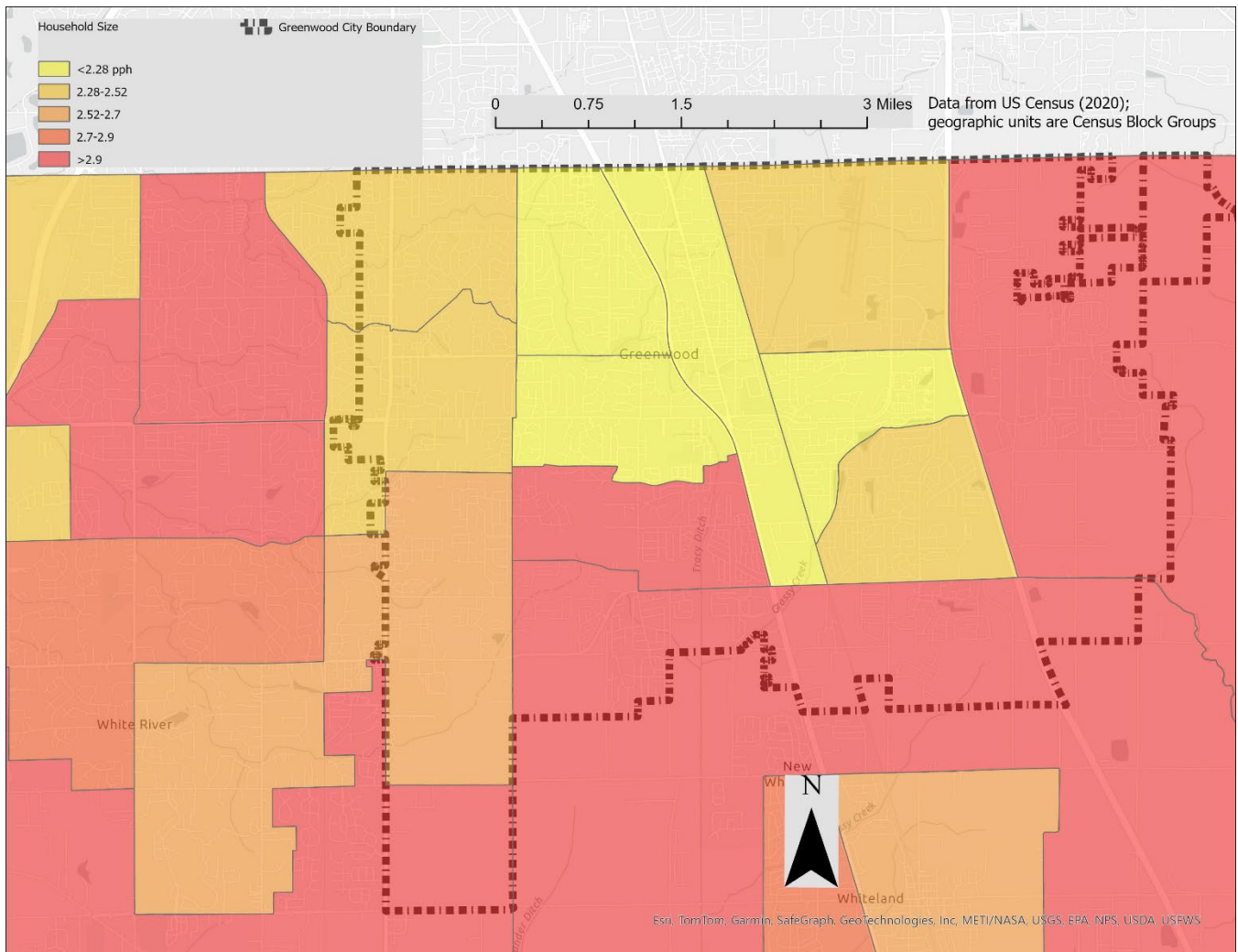


Figure 8b: Average Household Size

Female-headed Households

Examining female-headed households is essential in assessing fair housing in Greenwood because these households often face unique socioeconomic challenges that can impact their access to safe and affordable housing. Female-headed households, particularly those with children, are more likely to experience higher rates of poverty, wage disparities, and limited access to economic opportunities. These factors can result in increased vulnerability to housing instability, discrimination, and substandard living conditions. Figure 9 shows the distribution of female-headed households in the City of Greenwood. There appears to be a very slight relationship to the low- to moderate income areas noted in Figure 8.

Figure 9: Female-Headed Households

Disability

Examining hearing and vision difficulties is crucial in assessing fair housing in Greenwood because individuals with these disabilities often face unique challenges in accessing and maintaining suitable housing. These challenges include the need for specific accommodations such as visual fire alarms, amplified doorbells, and other adaptive technologies that are essential for their safety and comfort. Understanding the prevalence and

distribution of residents with hearing and vision difficulties helps identify potential gaps in housing accessibility and availability. It also highlights the necessity for inclusive housing policies and practices that ensure compliance with the Fair Housing Act and the Americans with Disabilities Act (ADA). Figure 10 shows the prevalence of different types of disabilities present within the City of Greenwood.

Figure 10: Persons with disabilities

Examining group quarters populations is essential in assessing fair housing in Greenwood because these populations often include some of the most vulnerable and marginalized individuals in the community, such as those living in nursing homes, group homes for individuals with disabilities, and correctional facilities. Understanding the distribution and conditions of group quarters can reveal potential disparities in access to quality housing and services, highlighting areas where additional support and resources may be needed. Figure 11 shows the prevalence of the group quarters population in the City, comparing those areas to previously-denoted low-income areas. There appears to be a reasonably strong relationship between the two. Not all of these group quarters populations can be considered to have special needs.

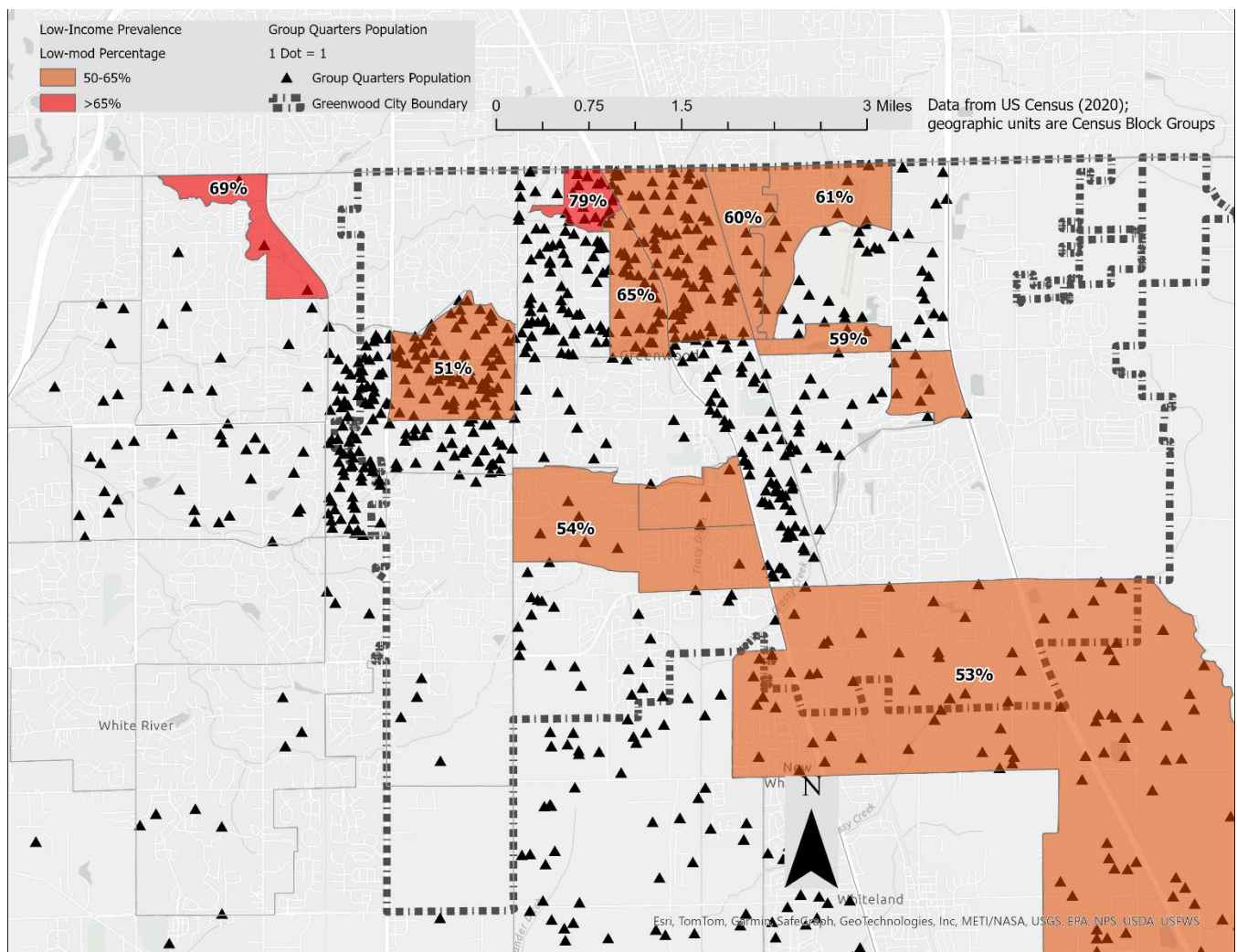


Figure 11: Group Quarters Population

Economic Status and Income Distribution

The Ball State University Center for Business and Economic Research (CBER) publishes reports on the economic outlook for Indiana and its regions. The last time Central Indiana, the region that contains Greenwood, was published was during the waning days of the COVID-19 Pandemic in 2021¹. The findings of this report are summarized as follows:

- The Greater Indianapolis area continues to capture nearly all the population and more than 100% of the state's job growth
- Urbanization will continue after the pandemic, perhaps expanding the metro area beyond its current borders
- While Indy will continue to be a travel/Tourism hub, there will be permanent job losses in the sector as automation sweeps the service sector
- Pandemic tax effects will be especially difficult in the Innkeepers, Food & Beverage and Casino tax instruments
- Indy will be mostly recovered by year's end, leading the state in rebounding GDP

These findings have mixed implications for fair housing in Central Indiana. Increased regional population and employment is likely to put pressure on the existing housing market, leading to higher prices and rents, which can affect housing affordability. Permanent job losses in the travel, tourism, and service sectors due to automation may disproportionately affect lower-income and minority communities; these groups are often overrepresented in these sectors and may face greater challenges in securing stable housing without adequate employment. However, as the Indianapolis area, including Greenwood, leads the state in rebounding GDP, there may be a stabilization or increase in the housing market, which in turn heightens the need for market changes to be inclusive to ensure that all residents benefit from the growth.

Employment and Commuting

Figure 12 shows the commuting flows for the City in 2021. With a workforce of about 29,000 employed residents and an employment base of about 34,500 jobs, only about 4,250 (12.5 percent) of the workforce works locally. Greenwood relies on workers coming from elsewhere in the metropolitan area to fill its job base. The largest proportion (44 percent) of out-commuters are bound for Indianapolis. The findings suggest that transportation costs must be considered when assessing the ability of low- and moderate-income residents to sustain living in the community.

¹ <https://projects.cberdata.org/reports/Forecast2021-Indianapolis.pdf>

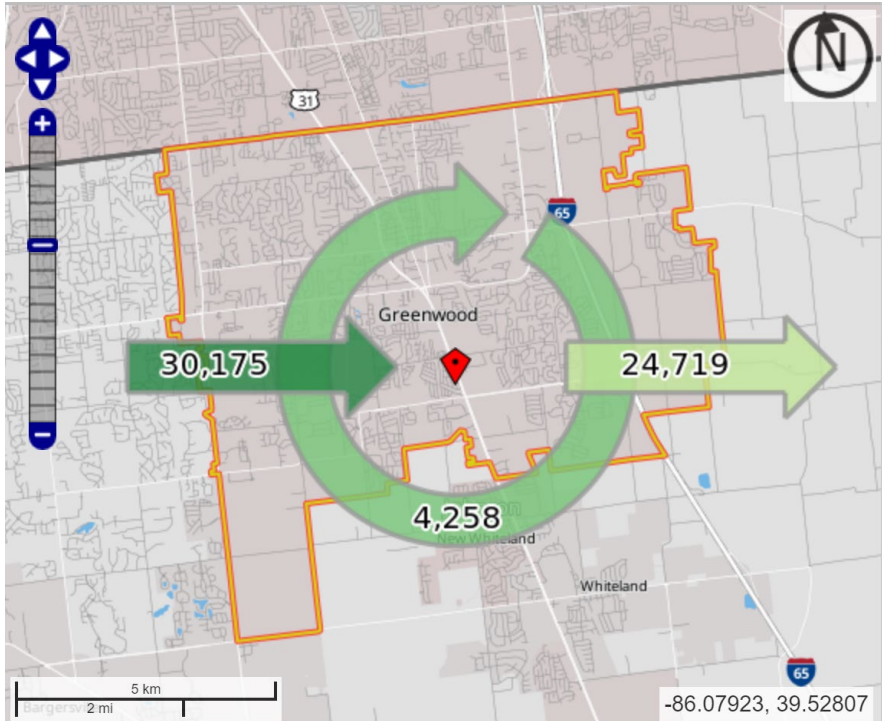


Figure 12: Commuting Flows for the City of Greenwood (2021 Census OnTheMap)

Median Household Income

Figure 13 shows the changes in median income for the City over time. Greenwood showed a slight dip in real income from 2000 to 2015, a downward trend that was overcome by economic growth in the last half of the last decade.

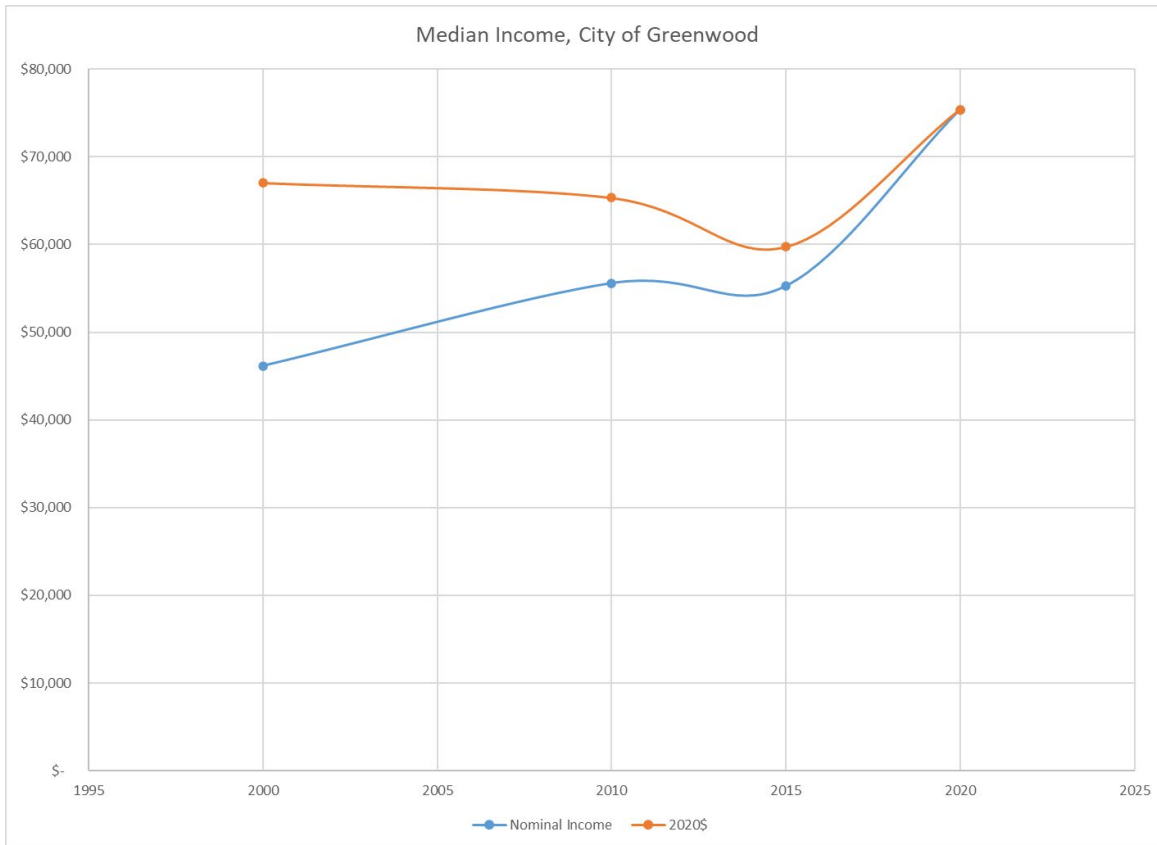


Figure 13: Median Household Income, Nominal and Deflated (2020\$); Source: U.S. Census, Bureau of Economic Analysis

Workforce and Wages

Wage information is typically not available at the municipal or even County level, so we must rely upon metropolitan statistics. Most of the nonskilled labor categories earn considerably less than their “gold-collar” counterparts.

Table 1 Number and Mean Wage by Occupation Type for Indianapolis-Carmel-Anderson MSA (2023)

Occupation	Employees	Median Annual Wage
All Occupations	1,083,730	47,080
Management Occupations	63,770	105,620
Business and Financial Operations Occupations	65,600	74,760
Computer and Mathematical Occupations	32,950	87,810
Architecture and Engineering Occupations	14,440	82,440
Life, Physical, and Social Science Occupations	8,940	69,060
Community and Social Service Occupations	17,190	48,660
Legal Occupations	8,580	89,530
Educational Instruction and Library Occupations	48,200	50,990
Arts, Design, Entertainment, Sports, and Media Occupations	14,540	46,870
Healthcare Practitioners and Technical Occupations	78,050	78,280

Healthcare Support Occupations	41,090	36,310
Protective Service Occupations	24,380	47,900
Food Preparation and Serving Related Occupations	92,210	29,280
Building and Grounds Cleaning and Maintenance Occupations	29,740	35,760
Personal Care and Service Occupations	18,930	30,330
Sales and Related Occupations	93,770	36,230
Office and Administrative Support Occupations	131,470	43,100
Farming, Fishing, and Forestry Occupations	630	39,090
Construction and Extraction Occupations	43,520	59,520
Installation, Maintenance, and Repair Occupations	42,920	54,560
Production Occupations	67,320	44,200
Transportation and Material Moving Occupations	145,510	40,830

Main Findings

The information in the community profile section is summarized below.

- Demographic and Socioeconomic Overview:** The analysis reveals that Greenwood has experienced significant population growth, increasing by over 28% from 2010 to 2020, now totaling 63,830 residents. This growth has been accompanied by substantial demographic shifts, with a notable increase in non-White populations. While White residents still constitute the majority at 78%, their proportion has decreased from 90% in 2010. Concurrently, the Asian population has risen to 9%, and the African American population to 4%. Hispanic residents, identified as an ethnicity rather than a race by the U.S. Census, make up 5.4% of the population.
- Urbanization and Housing Development:** Greenwood’s expansion has been characterized by a mix of older urban areas and newly suburbanizing neighborhoods. The city's development is heavily influenced by its proximity to Indianapolis, leading to a unique configuration where older housing units are predominantly located towards the north end and along US 31. The city's area has also increased by about 3.6% due to recent annexations.
- Income and Economic Disparities:** Income disparities are evident, with low-income neighborhoods often facing concentrated disadvantages, including substandard housing conditions and limited access to essential services. The analysis shows that the prevalence of low- to moderate-income households remains consistent with previous reports, indicating persistent socioeconomic challenges.
- Household Characteristics and Vulnerable Populations:** Understanding household size and characteristics is crucial for identifying housing needs. Greenwood’s housing market must accommodate a variety of household types, from single-person households to large, multigenerational families. Female-headed households, in particular, face higher rates of poverty and economic instability, increasing their vulnerability to housing discrimination and instability. Additionally, the distribution of residents with hearing and vision difficulties highlights the need for accessible housing options.
- Group Quarters Populations:** Group quarters populations, including individuals in nursing homes and group homes for those with disabilities, represent some of the most vulnerable residents. These

populations often reside in low-income areas, necessitating targeted support and resources to ensure equitable housing opportunities.

- **Economic Outlook and Employment Trends**: The Ball State University Center for Business and Economic Research (CBER) report indicates that the Greater Indianapolis area, including Greenwood, captures nearly all of the state's population and job growth. However, permanent job losses in the travel, tourism, and service sectors due to automation could disproportionately affect lower-income and minority communities. This underscores the importance of inclusive economic recovery efforts to stabilize the housing market and ensure that growth benefits all residents.
- **Workforce and Wage Distribution**: Table 6 highlights significant wage disparities across occupation types in the Indianapolis-Carmel-Anderson MSA. Higher-paying occupations are predominantly in management, legal, and technical fields, while lower-wage jobs are common in food preparation, personal care, and service occupations. These disparities impact residents' ability to afford housing, emphasizing the need for affordable housing options for low-wage workers.
- **Commuting Patterns**: With a significant portion of Greenwood's workforce commuting to other areas, particularly Indianapolis, transportation costs are a critical factor in assessing housing affordability. Ensuring accessible and affordable transportation options is vital for sustaining low- and moderate-income residents in the community.

The findings underscore the need for a comprehensive approach to fair housing in Greenwood. The city's rapid population growth and demographic shifts necessitate policies that promote diverse and inclusive housing options. Addressing income disparities and ensuring accessible, affordable housing for all residents, including vulnerable populations, is critical. The economic outlook and wage distribution further highlight the importance of targeted interventions to support low-wage workers and stabilize the housing market.

III: Housing Profile

This section of the Analysis of Impediments to Fair Housing Choice (AI) analyzes the housing unit profile for the City of Greenwood and evaluates the public policies regarding land use and planning to determine the result in any impediments to fair housing choice.

Housing Tenure

Figure 14 shows the tenure of Greenwood's housing stock in 2020 and compares it to 2017 ACS figures reported in the prior AI.

The number of owner-occupied housing units increased significantly from 12,305 in 2017 to 15,600 in 2020, reflecting a growth of 3,295 units or approximately 26.8%. This suggests a strong demand for homeownership and potentially an increase in housing affordability or availability for buyers during this period. The number of renter-occupied housing units also saw a substantial increase, rising from 9,066 in 2017 to 10,020 in 2020, indicating an increase of 954 units or around 10.5%. This growth highlights a continued demand for rental properties, which may be driven by various factors such as population growth, economic conditions, or changes in housing preferences.

The most striking change is the dramatic increase in vacant housing units, which jumped from 46 in 2017 to 1,595 in 2020. This represents an increase of 1,549 vacant units, a dramatic rise that could be indicative of several underlying issues. High vacancy rates could indicate issues with housing affordability, market saturation, or economic conditions affecting residents' ability to occupy these homes.

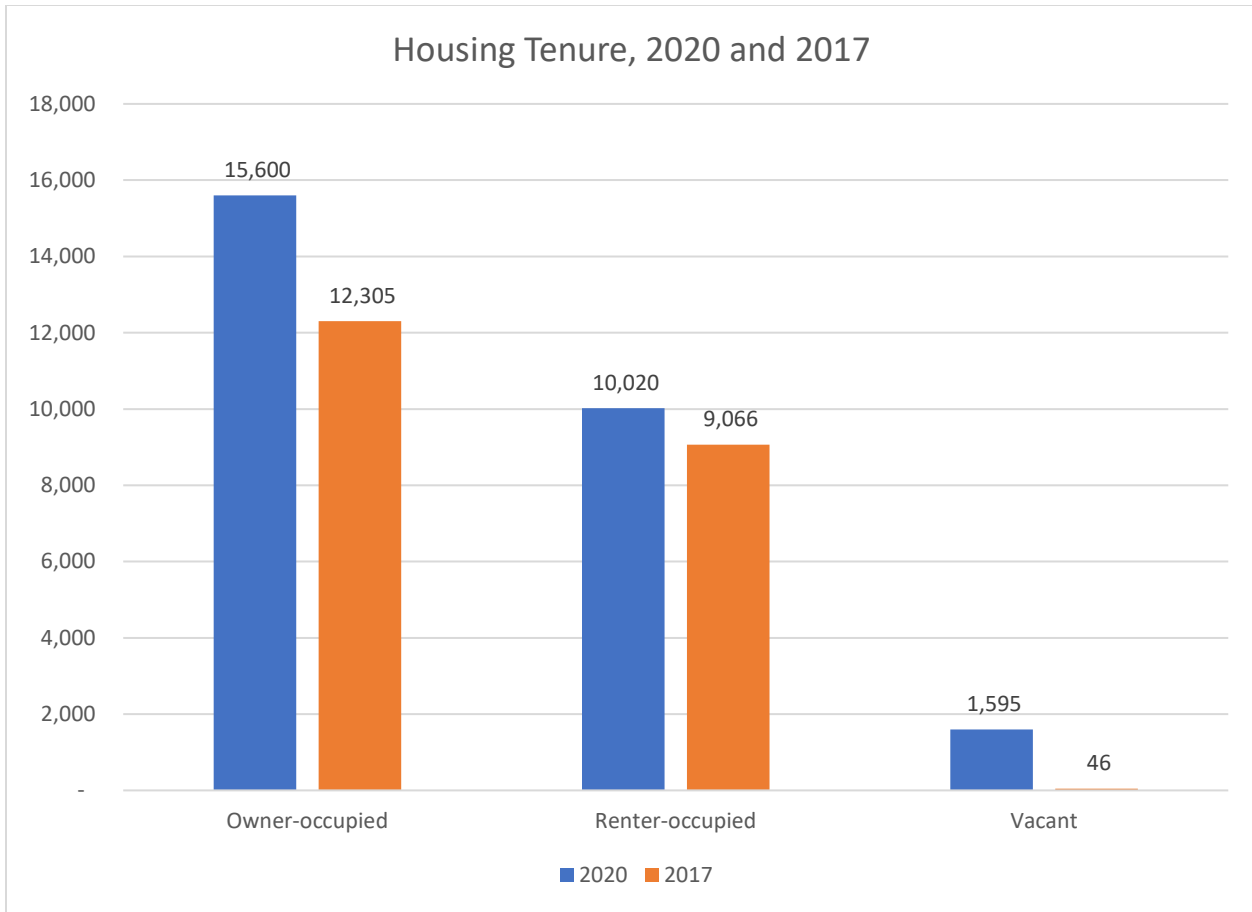


Figure 14: Housing Tenure, 2020 and 2017. Source: U.S. Census

Figure 15 shows the distribution of units by tenure within the City. Renter units and vacancies are generally evident in the northern and western parts of the City, corresponding to the older and more dense areas of the community, although the trend is not overly strong. Many rental units are single-household.



Figure 15: Housing Tenure 2020.

Figure 16 shows the incidence of overcrowding for units within Greenwood. For purposes of this analysis, “overcrowded” means between 1 and 1.5 persons per room, while “severe overcrowding” means more than 1.5 persons per room. Note that these areas generally correspond to low- to moderate income areas found in Figure 8, suggesting that families are responding to higher rents by “packing” larger households (or multiple households) into smaller units.

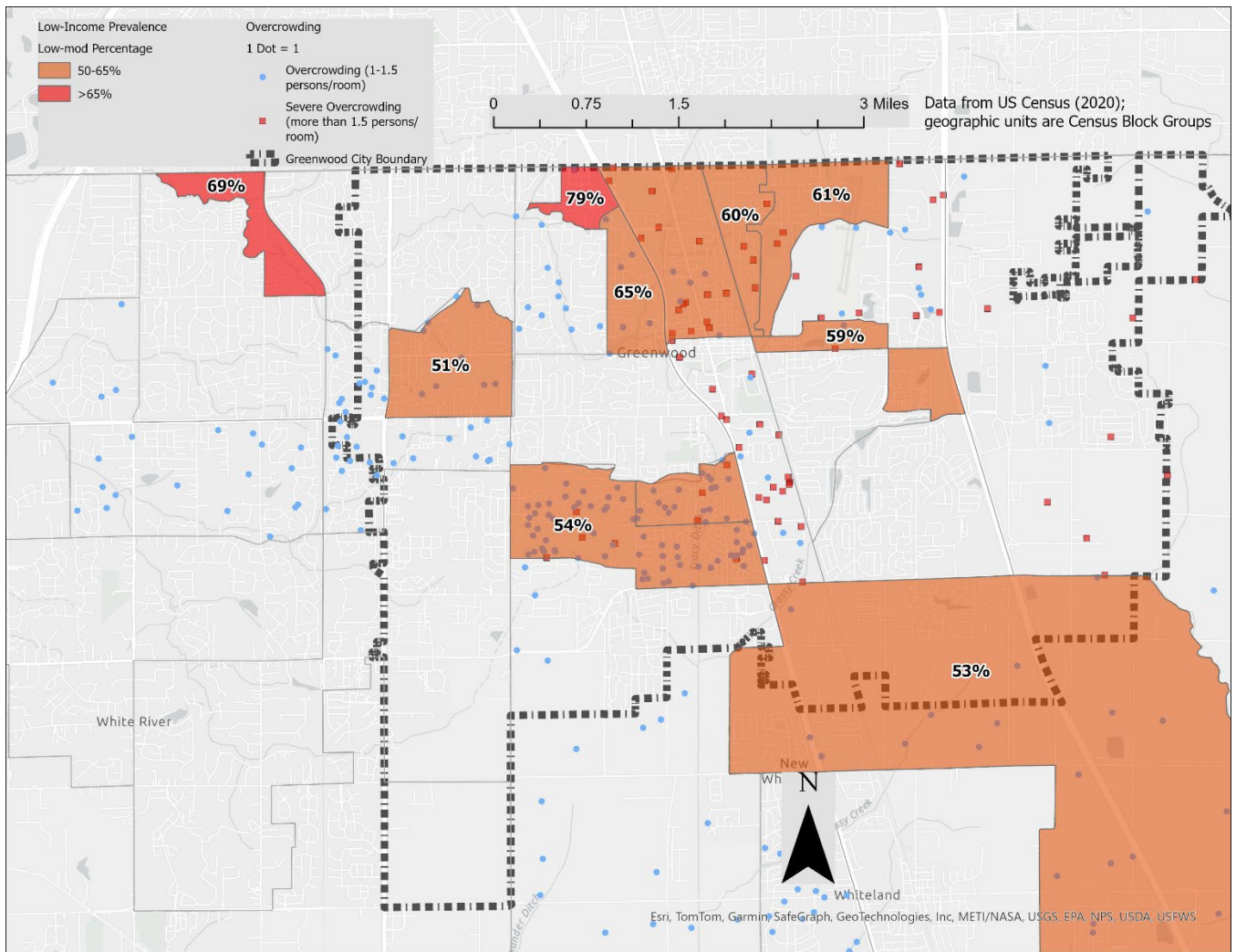


Figure 16: Overcrowding and Severe Overcrowding

Figure 17 shows the variation of median rents across the community. Generally, rents increase to the south and to the east. In contrast to the 2019 Fair Housing Analysis, which found the central part of the City having by far the highest median rents, this area today has the lowest median rent, at \$809 per month.

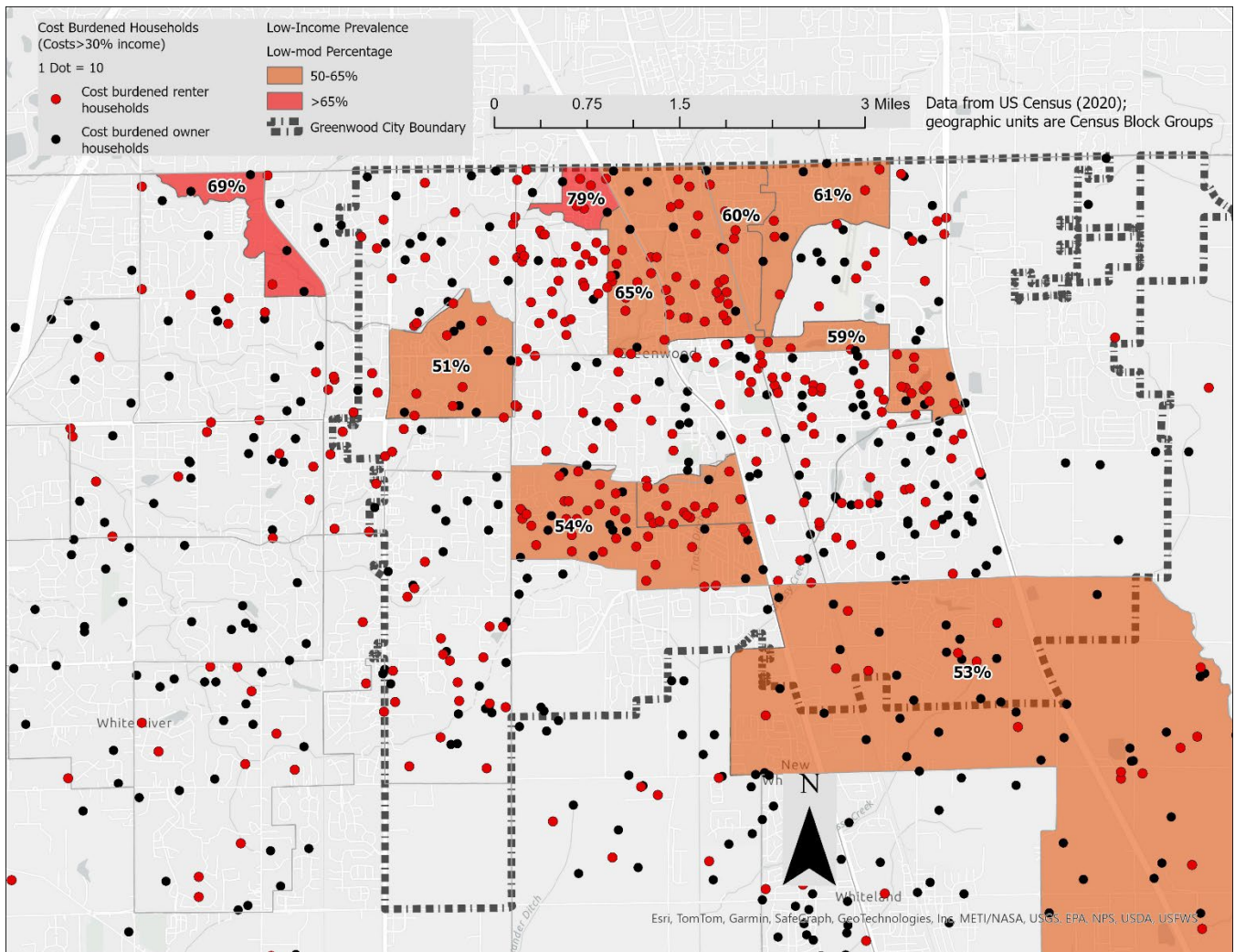


Figure 18: Cost burdened and severely cost-burdened owner- and renter-occupied units

Living Wage

Recent debate has taken place on the need to increase the minimum wage to a living wage. While there are two sides of the debate with many people on each side, it brings to light that the minimum wage is different from a living wage. The National Low Income Housing Coalition conducts an annual study called Out of Reach, a study that looks at what an hourly wage needs to be for a household to afford a place to rent without working more than the standard 40-hour workweek. At the time of publication of this document, the 2024 update to the study was being released so the information contained in the narrative below and on this next page is from 2023².

The study largely bases a living wage on a household affording a two-bedroom unit, assuming that the household has multiple persons and need multiple bedrooms. The study evaluates wages to afford fair market rents. Fair market rents are the 40th percentile of gross rents for typical, non-substandard rental units occupied by recent movers in a local housing market. HUD estimates fair market rents each year for the implementation and oversight of its many programs.

There are two zip codes in Greenwood (46413 and 46142), although boundaries of those zip codes do not match that of the City. The zip code 46142 has a higher concentration of affordable housing as noted in Figure 6 and a higher concentration of low to moderate income areas as noted in Figure 8. The living wage for that zip code is \$19.42 per hour. The living wage in 46143 is \$22.12. The living wage for all of Johnson County is \$19.00 per hour to afford a two-bedroom rent, or roughly an income of \$39,526 per year. The living wage drops to \$15.60 per hour to afford a one-bedroom unit in Johnson County.

HMDA Analysis

Information contained in the following tables comes from the online reports available from the Federal Financial Institutions Examination Council (FFIEC). The FFIEC is responsible for the collection and administration of the Home Mortgage Disclosure Act (HMDA) reporting data that financial institutions are required to submit. The most recent data available comes from the 2022 calendar year, and is shown below in Table 7. Data is summarized here for tractability and is reported at the County level.

Table 2 - Summary of HMDA Analysis (2022 data)

	Applications	Denials	Denial%
Whites	7,376	1,118	15.16%
Non-Whites	1,540	284	18.44%
<i>Total</i>	<i>8,916</i>	<i>1,402</i>	<i>15.72%</i>

Table 2 shows that relative denial percentages for whites and non-whites are slightly different, reflecting national trends that show a 2.9 percent increase in denials for blacks over whites. The increase suggests that 50 additional non-whites were denied mortgages than would have been the case if the rates were even. (<https://www.minneapolisfed.org/-/media/assets/papers/community-development-working-papers/2023/the-role-of-race-in-mortgage-application-denials.pdf>).

IV: Land Use Profile

Existing Land Uses

The existing land use classifications for the City’s planning jurisdiction can be found in its prior 2007 Comprehensive Plan. A map of existing land uses, copied from that document, follows below in Figure 19. As noted below, this plan is currently in the process of being updated, and during that process has reassessed the existing land uses.

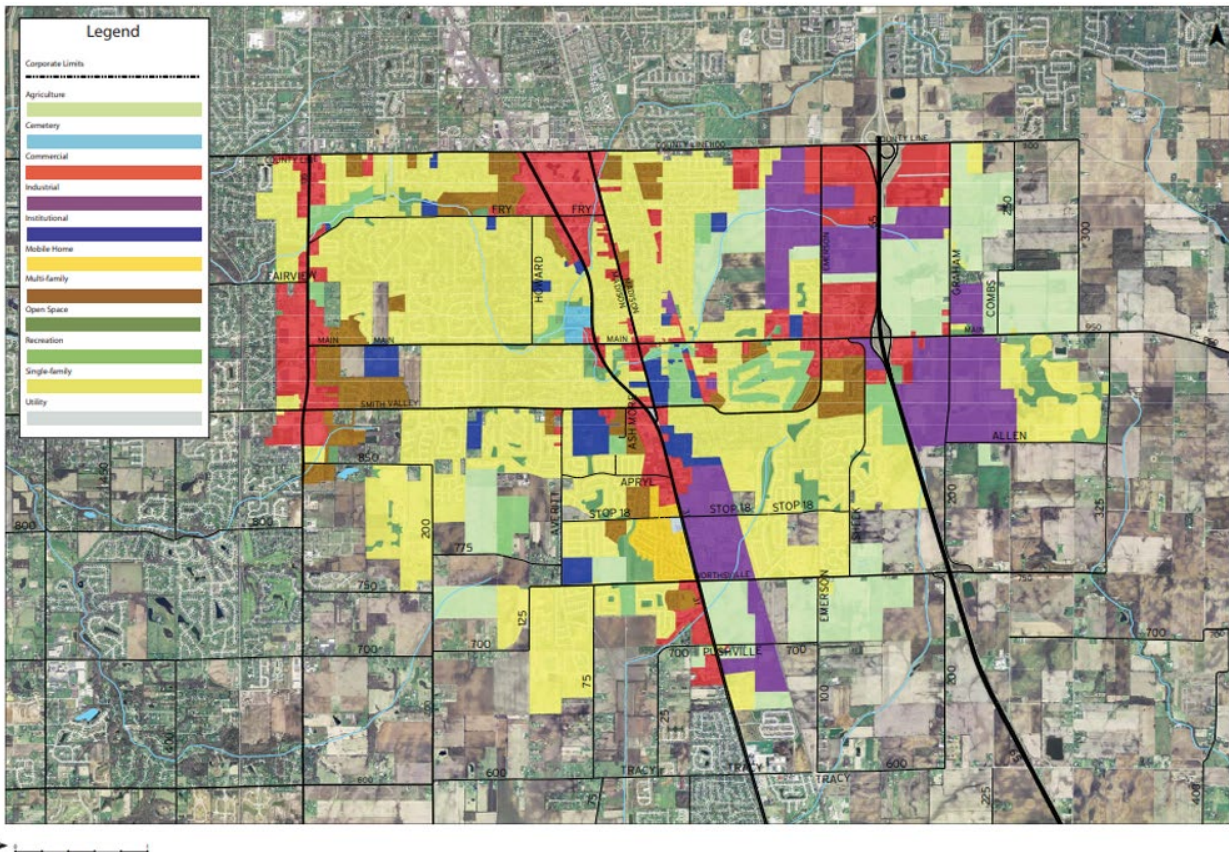


Figure 19: Land Use

Zoning Regulations

A map of the zoning classifications was used to identify major land use patterns. These districts are summarized by major categories in “Figure 20: Zoning Districts.” It is anticipated that following the completion of the Comprehensive Plan (see below), the zoning regulations will be revisited to ensure their consistency.

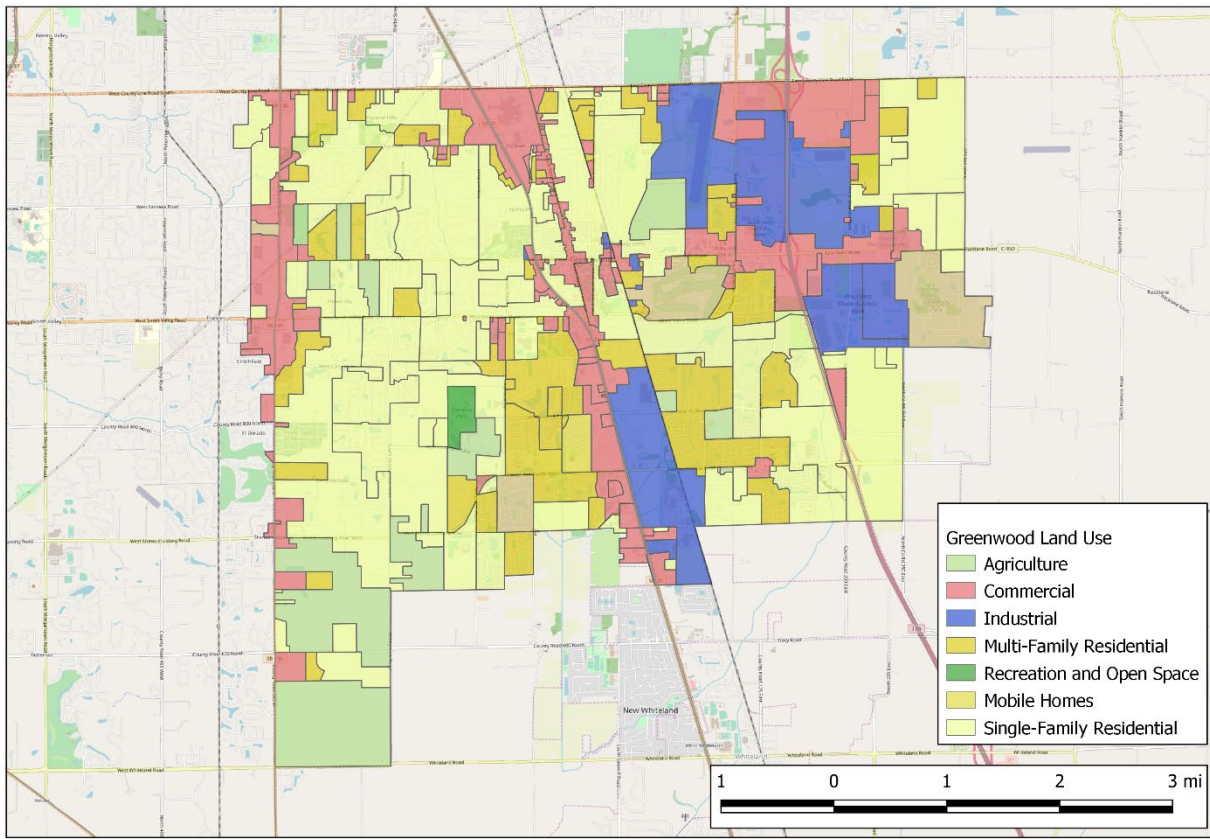


Figure 20: Zoning Districts

Comprehensive Plan

The City’s Comprehensive Plan is currently in the process of being updated, so all conclusions in this section are provisional and will need to be updated following the adoption of that plan, which is anticipated in late Summer to early Fall of 2024. The last update was in 2007; that document listed the following as a land use goal (p 38): Provide for the housing needs of Greenwood’s present and future residents – Provide for a mix of housing, varying in type, size, location, and quality to meet the housing needs of the community. (Goal #4). The overwhelming focus of the current 2007 plan is on single-family residential development; the update is reportedly accommodating more housing options.

Planning and Recording Fees

Fees listed below do not include sign costs for required public notices.

- Single-family residential use variance: \$300
- All other use variances: \$700
- Single-family residential dimensional variance: \$150 plus \$50 for each additional variance.
- All other dimensional variances: \$250 plus \$150 for each additional variance.
- Zoning Map Change: \$800
- Planned Unit Development Concept Plan: \$200 (Master Plan & Zoning: \$1,000)
- Special exception: \$400
- Platting Changes or Vacations: \$250

- Primary and Secondary Plats (each): \$1,000 plus \$5 per lot.
- Residential Site Plan: \$1,000 plus \$10 an acre

Single-family residential uses receive preferential treatment in many of these categories, with the associated fees being substantially less than their non-single-family counterparts (including multi-family residential).

Building, Occupancy and Health and Safety Codes

The City’s Building Commissioner’s Office levies the following permit and impact fees on construction of new residential units:

Table 3 - City of Greenwood Fees

FEES DUE AT TIME OF PERMIT ISSUANCE		
Building Permit Fee	Single-Family Two-Family	\$350 base fee plus \$0.02 per square foot \$450 base fee plus \$0.02 per square foot
Park Impact Fee	Single-Family Two-Family	\$1,716.00 \$1,630.00 per unit = \$3,260.00
Sewer Connection Permit Fee	Single-Family Two-Family	\$835 (based on either a ¾” or 5/8” water meter) \$1,670 (based on either a ¾” or 5/8” water meter per side)
Sewer Availability Fee	Single-Family Two-Family	Varies - To be figured upon application.
Erosion and Sediment Control Permit Fee	CURRENTLY NO CHARGE	

These fees appear to be reasonably balanced, with permit and impact fees being somewhat less per multi-family unit than for single-family units. Remodeling fees for multi-family units are somewhat higher at about \$500 per petition; single-family remodeling fees are \$100.

The City has adopted Residential Architectural Design Standards for new residential development. There are two sets of standards, one for single/two-family units, and another for multi-family (3 or more) units. The standards use a point system, where new units must have a minimum number of design elements from a pre-specified list. While design standards have the effect of raising the cost of construction, it is not clear whether these standards bias residential development towards or away from single-family units. However, if these standards are triggered when affordable housing is being developed, they can raise the transactional costs incurred by a homeowner or landlord.

Public Transportation

The City is served by two (2) public transportation systems, as shown in “Figure 25: Public Transit.” Access Johnson County (AJC), operated by the not-for-profit Gateway Services, Inc., operates three deviated fixed-route routes – two which serve the west and east ends of the City, respectively, and a third that connects into the City of Franklin to the south. The second system is the Indianapolis Public Transportation System, a.k.a. “IndyGo”; the system’s primary service area is Marion County to the north, but several routes extend to activity centers in Greenwood and connect residents to City of Indianapolis activity centers. IndyGo has also implemented the “Red Line” Bus Rapid Transit (BRT) alignment extends from the Indianapolis Central Business District south to the University of Indianapolis, about five (5) miles north of Greenwood’s northern boundary. It is conceivable in the future that the system could extend further south into the City of Greenwood proper, but currently no discussions on the topic are underway.

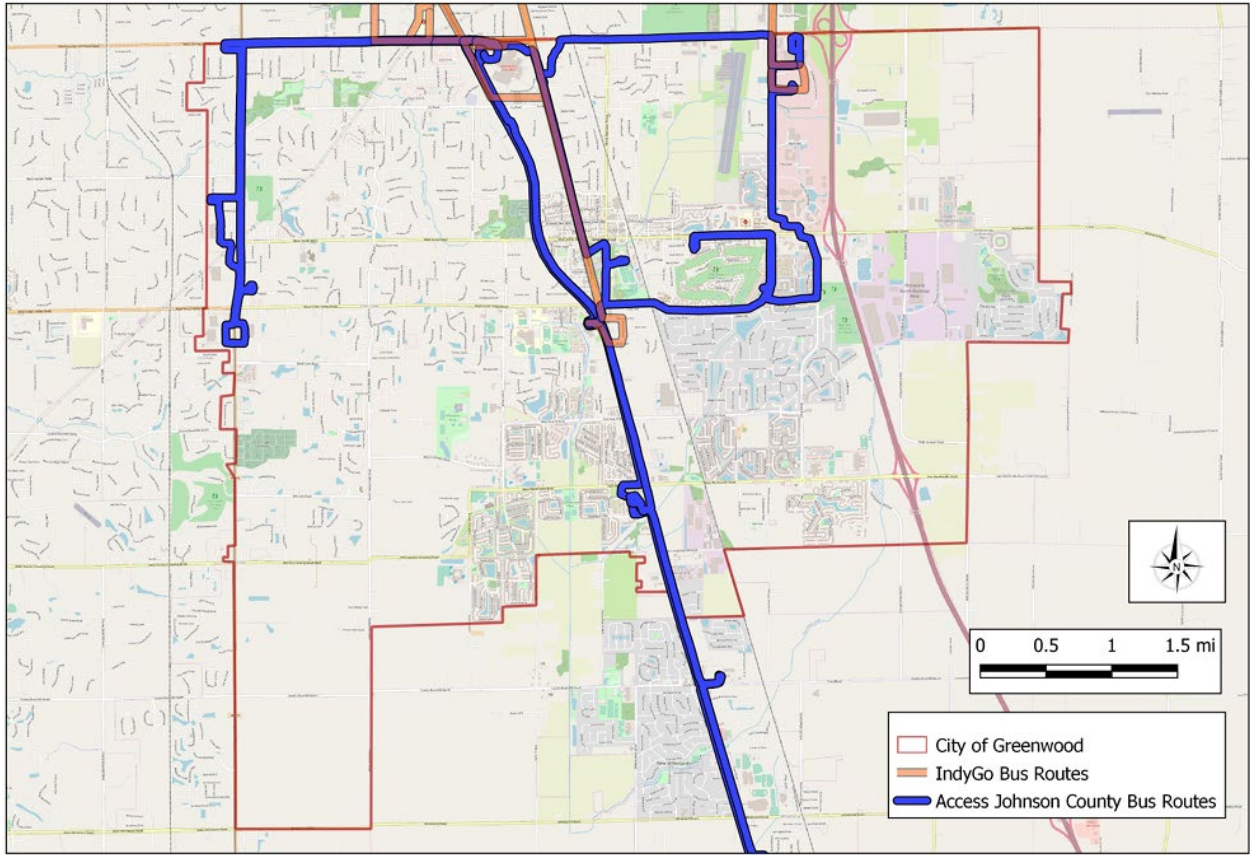


Figure 21: Public Transportation

V: Compliance Data

Current Cases

As was the case with the prior edition of the Analysis of Impediments, there are no known active fair housing cases in the City of Greenwood. Note that there is no active testing program, either. The most recent known case involving the City of Greenwood was in 2014, when the Fair Housing Center of Central Indiana filed “FHCCI v. Friedman Integrated/Clearview Apartments” with HUD-Chicago as a systemic investigation. The complaint alleged discrimination by the Greenwood property due to disability in the Respondent’s requirement to pay “pet fees” for a needed animal for a person with a disability. A resolution was reached in July 2014 with the Respondents agreeing to changes in rules and policy, participation in fair housing training, reimbursement of the FHCCI’s costs, and other affirmative relief.

Property Taxes

In Johnson County, there are 12 different taxing districts that overlap with the City of Greenwood’s Corporate Boundaries, including the following:

- CENTER GROVE COMMUNITY SCHOOL CORP
- CLARK TOWNSHIP
- CLARK-PLEASANT COMMUNITY SCHOOL CORP
- GREENWOOD CIVIL CITY
- GREENWOOD COMMUNITY SCHOOL CORPORATION
- GREENWOOD PUBLIC LIBRARY
- JOHNSON COUNTY
- JOHNSON COUNTY PUBLIC LIBRARY
- JOHNSON COUNTY SOLID WASTE
- PLEASANT TOWNSHIP
- WHITE RIVER TOWNSHIP
- WHITE RIVER TOWNSHIP FIRE SERVICE

According to the 2023 payable 2024 tax rates available on the Indiana Department of Local Government Finance web page, not every district taxes every property the same and the rates vary by location. Some properties are taxed at a rate as low as 1.84 percent while others are taxed at a rate of 3.53 percent. For a property valued at \$100,000, the variance could equal as much as \$1,700 annually dependent on the location of the property.

Government Programs and Education

The Indiana Civil Rights Commission (ICRC) serves as the primary investigative and resolution agency for fair housing complaints for the State of Indiana. The ICRC is contracted by the U.S. Department of Housing and Urban Development (HUD) to investigate fair housing discrimination. The ICRC has substantial equivalence certification, meaning they enforce a fair housing law that provide substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the Fair Housing Act. HUD may refer complaints of housing discrimination to the ICRC as the nearest federal fair housing office is located in Chicago, IL.

Complaints may follow an eight-step process; however, most complaints are resolved within the first three steps. Figure 26 demonstrates the complaint and resolution process, while Figure 27 outlines the Fair Housing Complaint Process.

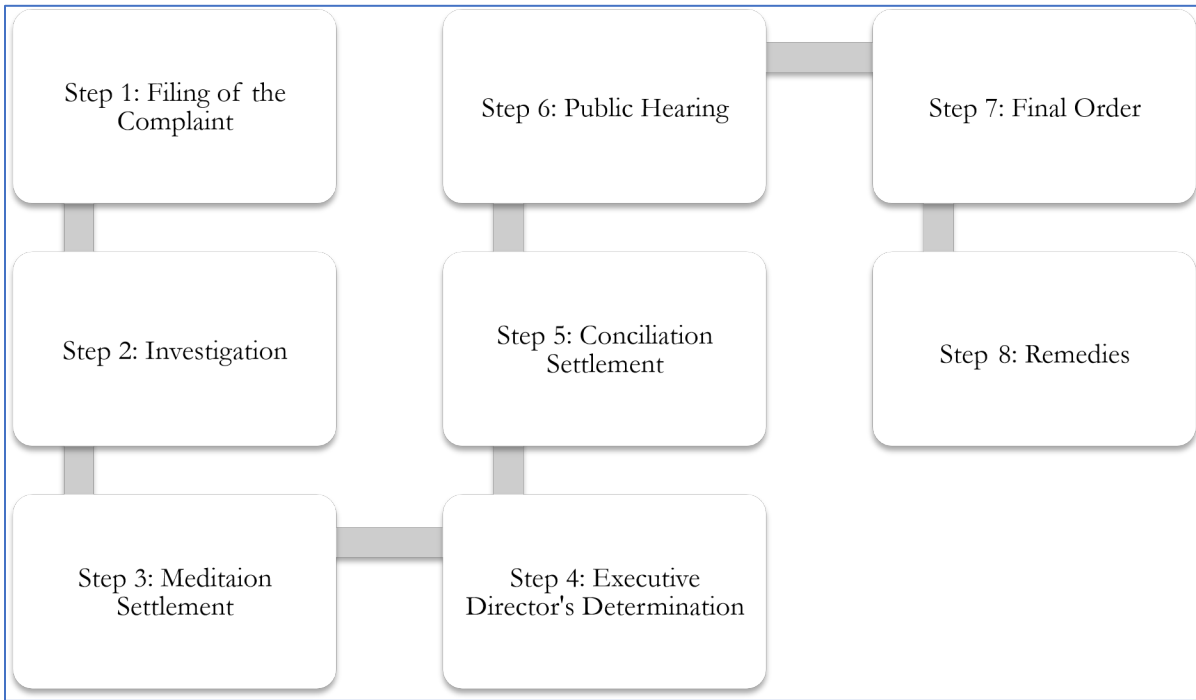


Figure 22: Complaint Process for the Indiana Civil Rights Commission

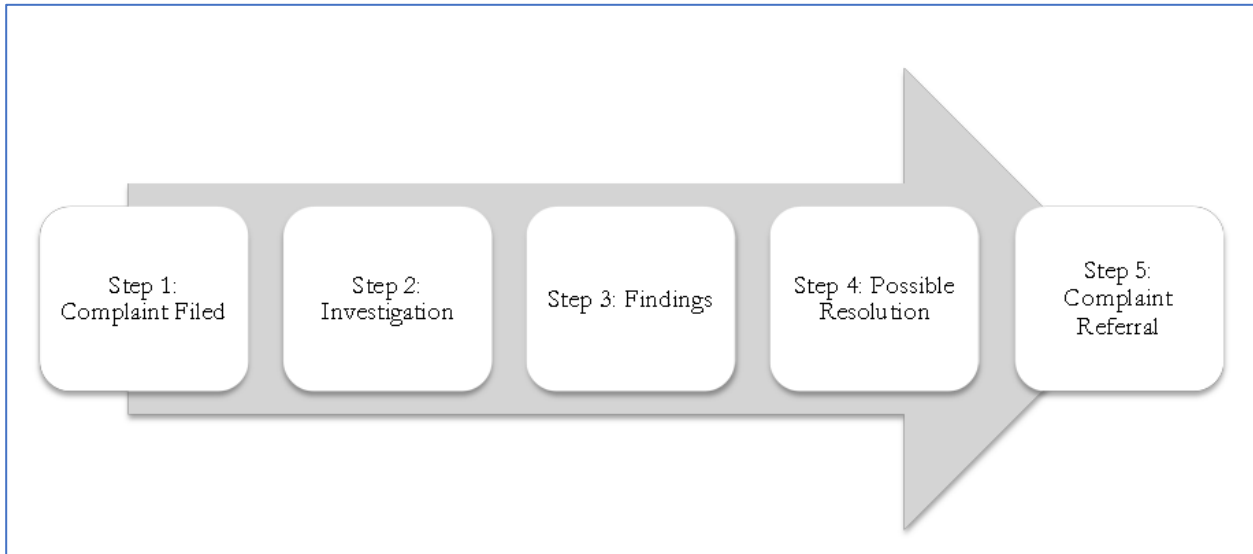


Figure 23: Fair Housing Complaint Process

Advocacy

The Fair Housing Center of Central Indiana, incorporated in April 2011, is a non-profit organization with a mission to eliminate housing discrimination through advocacy, education, enforcement and outreach. The Fair Housing Center of Central Indiana serves thirteen counties in Central Indiana: Boone, Clinton, Delaware, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Monroe, Morgan, Rush, and Shelby. Other areas of Indiana may be served as budgets allow.

The Center publishes regular reports on the state of fair housing in Central Indiana. Three of the reports in particular are pertinent for our examination of fair housing in Greenwood. Note that data are typically reported at the County level, so where available, conclusions for Johnson County are made.

[FHCCI State of Fair Housing Report – A Review of Fair Housing Complaints 2019 - 2023 \(April 3, 2024\)](#)

This report discusses demographic shifts in the Central Indiana region (and elsewhere), noting an overall increase in population and a significant rise in racial and ethnic diversity. Despite these gains, there has been a noticeable decline in families with children, aligning with state trends, except for modest increases in the Indianapolis and Fort Wayne metropolitan statistical areas (MSAs).

From 2019 to 2023, Johnson County saw a total of 15 fair housing allegations. These included 2 allegations based on race, 1 on sex, 9 on disability, and 3 on familial status. The predominance of disability-related complaints indicates that residents with disabilities face substantial barriers in accessing fair housing. Additionally, the presence of race and familial status complaints highlights persistent discrimination issues affecting specific demographic groups within the county and the City of Greenwood.

The report's findings underscore the urgent need for Johnson County and Greenwood to address these fair housing challenges proactively. The significant number of disability-related complaints suggests a critical need for targeted interventions to ensure compliance with the Fair Housing Act and the Americans with Disabilities Act (ADA). Measures to prevent discrimination based on race and familial status must also be prioritized, requiring increased awareness, education, and strict enforcement of fair housing laws.

To effectively address these issues, Johnson County and the City of Greenwood should develop a strategy that includes educational and outreach programs to inform residents and housing providers about fair housing rights and responsibilities. Regular testing for discriminatory practices to identify and address any ongoing issues promptly would be ideal.

Additionally, a robust complaint resolution process is essential to ensure that all residents have equal access to housing opportunities. By improving the processes for filing and resolving complaints, the county and city can enhance residents' trust in the system and ensure that fair housing laws are upheld. This process should include clear guidelines, transparency, and support for complainants throughout the resolution process.

[The State of Fair Housing in Indiana Report – Unstable Land: The Fair Housing Challenges for Manufactured Housing Residents \(June 4, 2024\)](#)

This report examines the deepening housing affordability crisis in Indiana, focusing on the specific challenges faced by residents of mobile-manufactured home communities. Historically, mobile-manufactured housing has provided a more affordable path to homeownership compared to site-built homes, with lower lot rents than single-family or multi-family units. However, this report highlights that these hallmarks of affordability are rapidly diminishing, exacerbated by persistent stigmas and systemic barriers that hinder residents' ability to thrive.

Key findings indicate that in 2022, mobile-manufactured homes comprised about 4.5% of all occupied housing units in Indiana, compared to 5.8% nationally. Approximately 265,053 people, or nearly 4% of Indiana's population, reside in these 131,400 units. The Indiana Department of Health reported around 1,066 registered mobile home communities in 2023, with an estimated 89,110 housing lots, 69% owner-occupied and 31% renter-occupied. Despite their lower costs, with the median value of an existing mobile-manufactured home in Indiana at \$35,000 versus the national median of \$59,200, new manufactured homes are significantly cheaper than site-built homes.

The report reveals that 59% of new manufactured homes nationwide were placed within communities rather than private lots in 2022. Occupancy rates in Indiana's largest land-leased communities are high, with all-age communities at 90% and 55+ communities at 94%. However, health code violations in Marion County mobile-manufactured home communities surged by 223% from 2020 to 2023. Rent increases have also become prevalent, with 82 of the 100 largest communities implementing increases, ranging from \$5 to \$187 per month.

In Johnson County, the report notes that four of the 100 largest manufactured/mobile home parks are located here, with a combined total of 1,674 units. This indicates a significant presence of mobile-manufactured housing within the county, reflecting the broader trends and challenges identified in the report. The high concentration of such units underscores the need for local policies that address the unique needs of these communities.

Another critical issue identified is the increasing consolidation of ownership within the mobile-manufactured home sector. The top ten community owners in Indiana now control about 12% of all communities and 35% of all lots, generating an estimated \$68,755,632 in annual lot rent income. This consolidation trend, up from controlling only 3% of communities in 2014, reflects a disturbing pattern where corporate investors are possibly maximizing profits at the expense of residents with limited relocation options.

The report underscores the potential vulnerability of mobile-manufactured home residents to corporate investors, who exploit steady rents and fees from these communities. This exploitation is particularly detrimental to residents who own their homes but lease the land, leaving them with few alternatives if rent increases or conditions become untenable. The findings emphasize the urgent need for policy interventions and protective measures to ensure fair housing practices and safeguard the rights and well-being of mobile-manufactured home residents in Indiana, particularly in areas like Johnson County with a significant concentration of these communities.

[The State of Fair Housing in Indiana Report – No Way Home: Tenant Screening Barriers to Housing \(May 31, 2023\)](#)

As Johnson County continues to grow and develop, understanding the tenant screening barriers faced in adjacent Marion County is crucial for preempting similar issues locally. Rising rents and stringent tenant screening policies in Marion County exacerbate barriers for renters, particularly those in protected classes, and these issues could easily spill over into Johnson County.

Housing providers and tenant screening companies in Marion County often deny rental applicants based on systemic issues such as credit scores, past evictions, and criminal records. Incorrect information on screening reports, including mismatched names and expunged records, makes the denial process burdensome for renters. Such practices could also affect renters in Johnson County if local housing providers adopt similar policies, potentially leading to unfair housing denials and increased housing insecurity.

In Marion County, reliance on factors like bad credit, flawed rental history, or criminal records disproportionately impacts Black individuals, people with disabilities, immigrants, families with children, and survivors of domestic violence. Given the close proximity and socioeconomic ties between Marion and Johnson Counties, there is a risk that these discriminatory screening practices could become prevalent in Johnson County, leading to systemic exclusion of vulnerable populations from the housing market. Additionally, high eviction rates and the use of eviction filings to deny housing further exacerbate these issues.

Tenant screening barriers also result in heightened costs and prolonged housing searches for renters. Application fees averaging \$50 per adult and repeated denials lead to significant financial burdens. Renters who eventually secure housing face prohibitive moving costs, making them vulnerable to unlivable conditions and rights violations. Housing providers in Johnson County must be vigilant to avoid adopting such opaque and discriminatory screening practices, ensuring fair access to housing for all residents.

Intentional discrimination remains a significant issue, with FHCCI testing in Marion County revealing numerous instances of housing providers lying to renters with criminal backgrounds or overriding screening report recommendations to deny applications. Such practices, if adopted in Johnson County, could drive renters with background marks into substandard housing or homelessness, disproportionately affecting Black renters, immigrants, families with children, people with disabilities, and domestic violence survivors.

In conclusion, the report underscores the importance of addressing tenant screening barriers to ensure fair housing access in Johnson County. By learning from the challenges faced in Marion County, housing providers and policymakers in Johnson County can implement proactive measures to prevent similar issues. This includes reforming tenant screening practices, increasing transparency, and ensuring compliance with fair housing laws to create a more equitable and inclusive rental market for all residents.

Self-Evaluation

The City of Greenwood sent a number of goals and actions to further fair housing and address impediments to fair housing as part of its 2019-2023 Analysis of Impediments to Fair Housing. Many of the ideas and goals remain unaccomplished or were not accomplished in the last five-year period. Table 4 does include the efforts made to goals in the last five years.

Table 4: Findings and Recommendations

Impediment/Challenge	Resolution/Outcome	Date to be Accomplished	Accomplishment
Housing problems localized in areas of low to moderate income households.	Fund the development of affordable housing at a greater rate.	Annually for the next five years.	Funded Habitat for Humanity Owner Occupied Repair program, and assisted one household.
Housing problems localized in areas of low to moderate income households.	Advocate for housing vouchers and landlords to accept housing vouchers to be used outside of low to moderate income areas.	Annually for the next five years.	Remains Unaccomplished.

Higher rates of denials exist in census tracts with higher concentrations of racial minorities.	Fund further research of the data to determine if there is a strong correlation for loan denials in areas of color.	Complete by the end of fiscal year 2022.	The Fair Housing Center of Central Indiana has completed a study.
It is unknown whether multi-family housing is being constructed in accordance with accessibility requirements in the Indiana Fair Housing Act.	Undertake an analysis of the accessibility of multi-family units in the City, and ensure that accessibility requirements are included in the zoning and subdivision regulations.	Complete by the end of fiscal year 2021.	Pending Comprehensive Plan update.
Lack of affordable housing affects housing choice and may adversely affect the protected classes.	Will work with not for profit developers to seek additional funding for the development of affordable housing in the City of Greenwood.	Complete by the end of fiscal year 2021	Remains Unaccomplished.
Lack of affordable housing affects housing choice and may adversely affect the protected classes.	Advocate on behalf of affordable housing developers in the community to bring state and federal resources to the City of Greenwood. <ul style="list-style-type: none"> • Publish articles on local work in affordable housing via the paper, web or Facebook • Host monthly or quarterly provider meetings to help with advocacy 	Annually for the next three years.	Remains Unaccomplished.
Lack of affordable housing affects housing choice and may adversely affect the protected classes.	Require replacement of housing stock removed for transportation with housing of similar value or cost to ensure affordable housing is not decreased.	Annually for the next five years.	Remains Unaccomplished.
Lack of affordable housing affects housing choice and may adversely affect the protected classes	Encourage local units of government to create and complete a rental housing unit registry and annual inspection process to ensure all units for all	Complete by the end of fiscal year 2021.	Remains Unaccomplished.

	families are safe and decent places to live.		
Lack of affordable housing affects housing choice and may adversely affect the protected classes	Publish a listing of rental properties that will accept housing choice vouchers and other housing assistance to help households locate affordable housing in the City of Greenwood	Complete by the end of fiscal year 2020. Maintain annually.	Remains Unaccomplished.
Lack of local fair housing ordinance.	The City of Greenwood will work towards establishing a local fair housing ordinance.	Complete by the end of fiscal year 2022.	Remains Unaccomplished.
Lack of knowledge of fair housing laws and their impact on advertising.	Provide educational programming for landlords and homebuilders on advertising requirements of the Fair Housing Act.	Annually for the next three years.	The City has promoted local fair housing education opportunities to community partners every year over the last five years.
Knowledge of fair housing laws and where to report vary in the community.	Begin a testing program of multi-family communities to ensure property managers are following fair housing laws.	One test before 2021. A second test before the completion of the Consolidated Planning period of 2023.	Remains Unaccomplished.
Knowledge of fair housing laws and where to report vary in the community.	Provide educational programming for public officials, particularly who are newly elected, on fair housing issues.	Annually for the next three years.	The City has promoted local fair housing education opportunities to community partners every year over the last five years.
Knowledge of fair housing laws and where to report vary in the community.	Provide educational programming to increase awareness in the community.	Annually for the next five years.	The City includes fair housing training as part of its annual CDBG training.
Knowledge of fair housing laws and where to report vary in the community.	Establish a website, linked to the main City of Greenwood home page, that will promote fair housing and connect	Fiscal Year 2019.	Remains Unaccomplished.

	<p>residents to places of advocacy and investigative knowledge. This web page should include direct links to the U.S Department of Housing and Urban Development’s Fair Housing website, as well as the Indiana Civil Rights Commission and the Fair Housing Center of Central Indiana.</p>		
<p>Institutional and regional coordination of enforcement and advocacy needs to improve.</p>	<p>Will work with not for profit developers to seek additional funding for fair housing programs and increase the capacity of staff to affirmatively further fair housing, including increasing education, greater communication with other enforcement agencies, outreach to members of the protected classes, development of affordable housing in a meaningful way.</p>	<p>Seek and apply for a resource by 2021</p>	<p>Remains Unaccomplished.</p>
<p>Institutional and regional coordination of enforcement and advocacy needs to improve.</p>	<p>Coordinate efforts in the City of Greenwood with neighboring entitlement communities, such as Anderson, Indianapolis, Muncie and the State of Indiana.</p>	<p>Annually over the next five years.</p>	<p>Remains Unaccomplished.</p>
<p>Institutional and regional coordination of enforcement and advocacy needs to improve.</p>	<p>The City should clarify its anti-discrimination policy fair housing ordinance that includes all the usual protected classes as well as sexual orientation and gender identity and veteran military status.</p>	<p>Complete by the end of fiscal year 2020.</p>	<p>Remains Unaccomplished.</p>

<p>Institutional and regional coordination of enforcement and advocacy needs to improve.</p>	<p>Work with partners to actively promote fair housing testing within the Greenwood rental housing community.</p>	<p>Complete by the end of fiscal year 2020.</p>	<p>Remains Unaccomplished.</p>
<p>Institutional structure and regulation promote housing design but may increase the cost of development of housing.</p>	<p>Participate in review of zoning documents for growing cities to ensure the documents encourage all types of housing development, including housing at all price points yet keep quality standards.</p>	<p>Implement during the City's next regular update/review of its Comprehensive Plan and zoning/subdivision ordinances.</p>	<p>The CDBG staff have participating in the update to the City's Comprehensive Plan, under development at the time of the publication of this document.</p>

VI: Community Input

This section of the Fair Housing analysis discusses the feedback and input the City received from the community around the topics of fair housing, community development and affordable housing. The City considers community development and affordable housing concerns to also be fair housing concerns, as the availability and accessibility of the community around housing impacts the choices households make when it comes to finding housing that suits their needs.

Community Stakeholders

Greenwood's consultations included listening sessions, digital engagement, interactions with local providers, and engagement with City staff. Greenwood e-mailed invitations to 43 stakeholders to attend one of three listening sessions. Each of the listening sessions was held on different days and times to allow for flexibility in the attendance of invitees. Of those invited to participate, 20 organizations declined to participate in the planning process. Stakeholders who could not make one of the listening sessions were provided with e-mail questionnaires and a link to a community development survey to ensure that as many viewpoints as possible were included. A list of the stakeholder organizations contacted is include in Appendix A of this document.

Note: At the time of the publication of this document, the City had several outstanding invitations/conversations with community and regional stakeholders that were still underway.

Comments from stakeholders include:

- Increase in demand for housing at all levels due to low supply, high cost, increased competition. Need for grocery and services out east.
- LMI have difficulty finding affordable rental.
- Home prices are 350,000 and up, not affordable to LMI buyers.
- Supply of older homes too small to meet LMI needs.
- Lack of transportation options. Traditional zoning laws not flexible. Need more dedicated pedestrian trails.
- City enforces building restrictions in floodways/plains. City purchased home of people who can't afford flood insurance with FEMA mitigation grants. No specific plan to prevent affordable housing from being in floodplains.
- Helpline calls up 10%, rent increases, landlord not renewing lease with minimal notice.
 - Female headed households with children being hit hardest
 - DV is root cause of entry
 - 30% increased cost for services,
 - social stigma / pride prevents people from seeking help,
 - household emergency reserves depleted due to high costs - more at risk for homelessness after an emergency,
 - workforce housing might be beneficial, no services offering housing, only rent assistance, need legal services to prevent evictions,
 - Johnson County does not want emergency housing in their backyard,

- People with pending disability cases are having more issues paying for housing during the period where their disability develops and the time they are awarded SSI, which often takes years.
- Supported/praised single family housing and did not notice additional need for services. However, single, female headed households with children need housing the most, housing and construction costs up significantly.
- Housing difficult for low-income seniors in Johnson County to find. Decreased number of housing related calls but the calls they do receive have few options. Transportation very difficult, especially to providers in Marion County.
- Services are necessary for DV and trafficking victims. Important that providers use trauma-informed care. Lack of secure shelter facilities keeps people in DV situations longer.
- Agency noticed students living out of their cars, students kicked out of their homes (for various reasons), and students couch surfing. It seems to be up a little more than we have noticed previously.
- More students are dealing with mental health issues actually.
- Many students who might qualify for an internship cannot experience one due to the lack of funds needed to pay for a car and insurance.
- The gap between the haves and have nots does seem to be widening.
- The cost of housing in Greenwood and surrounding areas is skyrocketing and does not look to slow down.
- Young people and people who are trying to own or rent a decent home are finding it difficult to afford it.
- The Immigrant Welcome Center uses private version of findhelp.org, 17% (13) of total searches from Greenwood were for housing, search terms include "Help pay for housing, help pay for utilities, temporary shelter, housing vouchers, rent, short term housing."
- Participant rosters down due to clients leaving the County for other, more affordable areas.
- DV victims have issues finding housing, this leads them to stay longer in DV situations longer especially if they have children. Larger focus on affordable rental housing with 3+ bedrooms is necessary.
- Current fragmented trail network is a safety concern. Pedestrians and vehicle conflict is present due to the fragmentation of the current trail network.
- ADA Transition Plan completed in 2013, regular updates in the last ten years identifies ADA barriers in City owned facilities and infrastructure and provides a high level timeline and costs necessary to address these concerns.
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Community Survey Results

The City posted a community survey, made available from March 1, 2024 until May 31, 2024. The City received 130 responses from persons who lived or worked within the City of Greenwood. A copy of the survey and the full results are included in Appendix B of this document. Of the top three services needed in the community, over half the respondents stated that homelessness prevention services were needed. The survey asked specifically about housing activities the City should address in the community. Nearly 70% of the respondents stated that rent assistance or mortgage assistance is the number one need to be addressed with nearly 67% stated helping homeowners with needed repairs shortly behind. The City sees these issues as a need to help current residents stabilize their housing, either through direct assistance or stabilization of the housing unit itself via repairs/renovation.

VII: Fair Housing Impediments, Recommendations and Action Plan

This section of the Fair Housing analysis lists recommendations to further fair housing in the City of Greenwood over the next five years. Given the goals from the previous fair housing document were largely unattained, the City has crafted new strategies with responsible parties for the work. Each resolution has a date to be accomplished and a responsible entity for accomplishing the goal.

Table 5 - Goals and Strategies to Further Fair Housing - 2024-2028

Impediment/Challenge	Resolution/Outcome	Responsible Department or Division	Date to be Accomplished
Lack of affordable housing affects housing choice and may adversely affect the protected classes.	Fund or support the development of affordable housing at a greater rate.	Community Development	Annually for the next five years.
Lack of affordable housing affects housing choice and may adversely affect the protected classes.	The City should establish partnerships with the State of Indiana and local grass roots organizations to start a Community Housing Development Organization or another type of affordable housing provider.	Community Development	Program Year 2027
Lack of affordable housing affects housing choice and may adversely affect the protected classes.	The City should encourage the building and development designs that accommodate flexibility and rental housing as the housing market shifts away from solely single family housing.	Planning	Annually for the next five years.
Lack of affordable housing affects housing choice and may adversely affect the protected classes.	The City should encourage the inclusion of a wider variety of unit sizes in new multifamily developments, especially including three-bedroom options in affordable housing projects. Incentives should be considered as an option to encourage such units, such as a density bonus or cash contribution to compensate for the loss of smaller units.	Planning	Annually for the next five years.

Impediment/Challenge	Resolution/Outcome	Responsible Department or Division	Date to be Accomplished
Lack of affordable housing affects housing choice and may adversely affect the protected classes.	The City should continue to encourage the inclusion of affordable units in development and redevelopment plans in all parts of the City, at least including units deemed affordable to low income (80% of County Median Income) and very low income (50% of County Median Income) residents.	Planning	Annually for the next five years.
Areas of affordable housing are concentrated in areas of racial concentration, as well persons living with disabilities and other vulnerable populations.	Fund and support improvements to amenities, such as transportation/infrastructure and neighborhood improvements such as parks in areas of concentrated affordable housing.	Community Development, Planning and Engineering	Every other year for the next five years.
Areas of affordable housing are concentrated in areas of racial concentration, as well persons living with disabilities and other vulnerable populations.	The City should encourage the inclusion of affordable housing development in new neighborhood developments to deconcentrate affordable housing across the community.	Planning	Annually for the next five years.
Knowledge of fair housing laws and where to report vary in the community.	Encourage and fund training opportunities for elected and appointed officials in charge of making decisions on zoning and other development.	Community Development	Annually for the next five years.
Knowledge of fair housing laws and where to report vary in the community.	Establish a website, linked to the main City of Greenwood home page, that will promote fair housing and connect residents to places of advocacy and investigative knowledge.	Community Development	End of Program Year 2025.
Institutional and regional coordination of enforcement and advocacy needs to improve.	Coordinate efforts for affordable housing in Johnson County, including local cities, unincorporated areas and other Entitlement jurisdictions, such as Franklin, Indianapolis, the State of Indiana.	Community Development	Annually for the next five years.

