

VAPAC Review and Response to the 2025 County Housing Study

11-24-25

VAPAC applauds the County for taking an important first step in developing a comprehensive housing plan to address the documented housing needs and barriers residents face in attaining affordable, hazard-free, and accessible housing in Cuyahoga County through conducting the Cuyahoga County Housing Study. VAPAC has reviewed the recommendations embedded in the report, and within our scope of expertise, we have the following suggestions and recommendations. However, we know there are many other organizations and residents that have a stake in the future of housing in Cuyahoga County, who also can provide important insights and recommendations. We would encourage engaging with a broad array of organizations, advocacy groups, and conducting a robust public engagement process to develop a comprehensive housing plan, with an emphasis on centering the lived experiences and needs of those most impacted by the current housing crisis. Lastly, VAPAC encourages the County to develop a comprehensive housing plan addressing the housing affordability and stability needs identified in the report, as well as any other needs not identified in the report, and incorporating a clear set of goals, actors, funding mechanisms, and resources to ensure residents can attain affordable, hazard-free, and accessible housing in Cuyahoga County.

The Cuyahoga County Housing Study has 9 major recommendations. VAPAC has reviewed these recommendations and supports the development of a County Housing Plan. VAPAC offers the following suggestions based upon the study and its recommendations. The study identifies the fact that the County has housing programs and policies in effect across many County departments and recommends a more consolidated and coordinated effort. VAPAC applauds this recommendation particularly in light of future funding challenges and increasing affordable housing needs within all of the communities in Cuyahoga County.

VAPAC also found that the data sections of the study provide a very compelling picture of four of the most significant housing needs. However, we are concerned that these are not adequately reflected in the recommendations. Those four are:

- **Property Tax Delinquency:** The study finds that there are over 52,000 properties with a delinquency of \$311,347,718 and the delinquency is growing. VAPAC has worked closely with the County on this issue and applauds the efforts made by the Treasurer's office and other departments but clearly more work needs to be done. Homeowners need assistance to avoid delinquency and a particular area of concern is an aging population that wants to remain in their homes but has limited resources.
- **Housing cost burden:** The study documents that 44% of renters have a housing cost burden and 23% have a severe cost burden - paying over 50% of their income for rent. This is a major concern since over 42% are renters living in 221,000 units. With increasing rents and utility costs, this translates into family housing instability leading to evictions, changing of schools and potential homelessness, which will require allocating more resources and funding towards social services. Significantly more emphasis must be placed on rent burden in a County Housing Plan.
- **Vacant structures:** The study documents that presently there are 17,866 vacant structures and that 30% of the housing stock in East Cleveland is vacant. VAPAC was originally organized to address the vacant property problem and while considerable progress has been made, clearly this is an issue that still needs to be addressed. Vacant properties present significant challenges to property value and reinvestment

but also could provide opportunities for affordable housing. The County has made significant investments in demolition of condemned properties and should continue those efforts were still needed. Vacant structures that can be rehabilitated should be a priority for providing affordable housing.

- Homeownership rates: In Table 2 the study shows that in every community the homeownership rate for Hispanic and Black households is significantly less than for white households. It points out that in Bedford Heights white homeownership is 68%, while Black homeownership is 36%. This is a pattern across the County. The study recommends that future bank agreements should address the issue of home repair loans but there is clearly a need to also address as the study says “the ongoing disparities in housing access”.

The Nine Housing Study Recommendations with VAPAC Comment (*italics*):

1. County Funded Housing Department: Present Housing Department has no budget. Recommend direct funding to the new department so it can accomplish its mission.

VAPAC comments:

VAPAC supports the recommendation for funding of the Housing Department and clarification of its role in housing and community development through the development of a mission statement that identifies the role the County itself will play as well as how it will assist local jurisdictions. Rather than developing a set of programs or initiatives, the County should develop a clear housing plan with specific goals and measurable outcomes.

The question of funding for the department to carry out its mission is vitally important. In 2010 Cuyahoga County created the Cuyahoga Housing Trust Fund and since then housing and community development advocates have expressed concern that it has never had dedicated funding. When the County issued its 2016 “Housing Study” the County Housing Policy Stakeholders group, and VAPAC, each submitted recommendations for funding the County Housing Trust Fund. VAPAC again urges the County to ensure dedicated funding for the Trust Fund. (See also VAPAC’s comment (c) below under Recommendation 6.)

The press release on July 11, 2025 announcing the County Housing Study also referenced a “County Housing Fund” from which \$1 million would be used to establish a low interest loan program for affordable single-family homes in the inner ring suburbs. While this would be a worthwhile objective, further clarification is needed. How is the County Housing Fund different from the County Housing Trust Fund? What is the source of funding for the County Housing Fund? The County Housing Trust Fund created in 2010 was established to meet specific housing needs. What are the objectives for the County Housing Fund? How much beyond the \$1 million is presently in the fund and are the other programs described in the Press Release also being funded from the Housing Fund? How were these programs selected for funding and what will be the process for determining initiatives to be funded from the Housing Fund?

2. Information Resource and Data Monitoring and Tracking: Take a leadership role in providing more data and housing information.
 - a. Create a user-friendly portal to access data and reporting transparency
 - b. Assist municipalities to develop housing plans since a majority do not have a current plan to ensure communities have a strong understanding and direction for housing
 - c. Create a one-stop shop section of the portal on housing programs, agency contacts, funding availability and other pertinent housing-related information.

VAPAC comments:

VAPAC has benefitted from the availability of housing data at NEO-CANDO/NST to monitor trends and identify issues. VAPAC supports the idea of greater transparency and access to data as well as support for the maintenance and expansion of the data including support for NEO-CANDO/NST. VAPAC also endorses creating greater transparency, accessibility, and uniform reporting across the various housing court and municipal court systems to better track and monitor eviction cases and outcomes across the County. Creating a one-stop data portal for citizens to have access to information about programs and funding available is an important recommendation but there also needs to be a strategy to inform residents similar to the efforts of the Treasurer's Department on delinquent taxes.

3. Policy, Advocacy and Statewide Leadership: The County has been absent from statewide discussions and it is recommended that the County take a strong leadership position around housing locally and at the state level. The County should work with other counties across the state.
 - a. In addition, the Housing Department should create an Advisory Committee to convene all the County departments that have housing programs, with the initial purpose to assess the dollars currently allocated in each department in order to create a baseline of funding, and then on-going tracking of programs and funding to identify gaps or respond to program changes brought about by funding changes.
 - b. Establish mechanisms for communities to work together on housing related projects and award extra points in scoring proposals that include multi-city collaborations
 - c. Establish internal referrals for County programs to increase efficiency and timely delivery of services and access to programs.

VAPAC comments:

VAPAC strongly endorses the recommendation for the creation of an Advisory Committee of all County Departments and funded Boards (e.g. ADAMS Board, City County Office of Homeless Services, etc.) to coordinate program activities and enhance the impact of County programs. VAPAC would also like to see the County take a statewide leadership role in cooperation with other Counties and municipalities to have a stronger voice on state policy impacting affordable housing. Property tax reform Provides an opportunity for this type of engagement.

4. Create Model Legislation and Ordinance Templates: In partnership with the Cuyahoga County Planning Commission develop a suite of template ordinances across a number of housing issues to assist communities in addressing most pressing challenges.

- a. Explore creating a template to limit the number of out-of-state and foreign organizations purchasing properties.

VAPAC comments:

VAPAC has been closely monitoring the impact of out-of-state and foreign investor activity on the real estate market and has been concerned about the increasing percentage of properties owned by these entities. However, the issues with these organizations goes beyond just trying to limit them. There is a need to hold them responsible for the condition of their properties and have requirements to disclose ownership and identify a responsible person. VAPAC supports the recommendation to create templates to assist communities, however, this may be an area where the County needs to take action as well as providing a comprehensive set of templates that go beyond just limiting these organizations.

Additionally, VAPAC strongly endorses the County explore developing and creating a set of ordinances that expand tenant rights, create additional anti-discrimination protections, ensure housing security for renters, and incentivize the development of more affordable housing in the multi-unit and single home ownership markets through zoning changes. Some examples include, but are not limited to:

- *Developing a County tenant bill of rights emulating the National Tenant Bill of Rights constructed by the National Housing Law Project.*
- *Expanding protected classes under the County's Anti-Discrimination Ordinances, including Source of Income protections and Fair Chance Housing legislation.*
- *Developing model legislation to provide for the creation of municipal funds for security deposit guarantees and expanding consumer protections in rental application and criminal background fees.*
- *Expanding housing security through passing Legislation providing for longer notice periods for rent increases or adverse action on a lease, and developing a Just Cause Eviction ordinance.*
- *Developing legislation to ensure unclaimed funds would escheat to the County and be used for future affordable housing and housing security efforts.*
- *Exploring a variety of zoning legislation that increases the availability of affordable housing and transit-oriented development in the region.*

5. Lending and Banking Environment: County should bring its influence in renewing its depository agreements to contain enforcement clauses as well as requirements for the creation of programs that provide small dollar loans, rehabilitation loans, and down payment assistance programs as part of their agreements.
 - a. Support the expansion of rehab and repair programs County-wide to address aging homes and an aging population.
 - b. Work with the handful of organizations and programs that have successfully operated repair and rehab services to leverage and expand these programs to create a County-wide repair and rehab fund, utilizing grant programs and focusing efforts on keeping residents safe in their homes.

VAPAC comments:

At a time when Federal agencies previously relied upon to protect consumers and borrowers are being de-funded, de-staffed or threatened with outright elimination, it is more important than ever that local governments consider how they can leverage their power and resources to protect citizens and their communities. VAPAC strongly endorses the County use of its banking agreements to contain enforcement clauses for meeting target goals for lending in underserved communities. VAPAC also recommends that financial institutions be required to provide lending data specifically as to loan activity in Cuyahoga County and not as aggregate data for their entire multi-county service area. Such data is necessary for transparency and tracking of bank lending for home purchase, home repair and rehab loans as well as equitably meeting the lending needs of Black and Hispanic borrowers. Finally, consistent with VAPAC's October 22, 2024 recommendations on this topic, VAPAC recommends that a citizen advisory board be established, similar to the County Council Reinvestment Advisory Subcommittee (CRAS) that previously provided community monitoring and input into County banking and lending agreements.

The Eastside of Cleveland and the East Inner Ring suburbs have seen the greatest disinvestment and greatest difficulty obtaining mortgages. This is the case for both home purchase mortgage loans, particularly on properties selling for under \$100,00, as well as for home repair mortgage loans. These challenges, combined with a substantial increase in LLCs and other investors, are undercutting homeownership opportunities and restricting owners' ability to maintain property. Initiatives to address these problems are necessary for a vibrant housing market.

VAPAC strongly endorses the County exploring a variety of ways to ensure more small dollar home purchase loans and home repair loans are accessible to Cuyahoga County Residents. The County should explore the following opportunities to expand access to both types of loans through:

- Developing Special Purpose Credit Programs.*
- Designating more dollars for fair housing enforcement and monitoring lending trends.*
- Support financial education, both homebuyer education, but especially financial coaching for those not on a home buying track.*
- Encourage housing services providers to collaborate with resources such as HFLA and BankOn.*

6. Housing Affordability: Expansion of the total number of units and the diversification of their location throughout the County is seen as a priority for the Department.
 - a. Properties that are affordable for a wide range of incomes should be spread across communities and located near job centers and transportation routes.
 - b. Create and support affordability by building new types of housing throughout the County, including current modular home construction and multi-generational home construction.
 - c. Addressing this can include monitoring and reporting on investor owner properties, focused attention on repair and rehabilitation in middle neighborhoods, programs that

support elderly or fixed-income residents' ability to stay in their homes and expanded programs for first time homebuyers.

VAPAC comments:

VAPAC supports the recommendation that affordable housing should be defined and further suggests that priorities be established for addressing those in greatest need of affordable housing based on the data provided in the report. VAPAC also supports the recommendation that affordable housing be spread across communities and located near job centers and transportation. Affordability often is defined as the percent of income one needs to rent or purchase, but given the older housing stock and particularly the issues of lead and mold, support for housing must also include addressing housing conditions. VAPAC's discussion of this recommendation also highlighted the need for some community agreement on the balance between homeownership and rental and particularly as the recommendation states "programs that support elderly or fixed income and expanded programs for first time homebuyers." Current housing conditions and data should drive this discussion.

VAPAC is concerned that not enough attention is given to the problem of rent burden and the availability of affordable housing. VAPAC recommends the following:

- a) Require that landlord recipients of repair and rehabilitation funding commit to accepting HCV and restrictions on rent increases.*
- b) Create a shallow subsidy program in conjunction with rehab funding to increase the supply of affordable housing.*
- c) Investigate potential on-going resources to fund the County Housing Trust Fund for demonstration projects 1) to increase the supply of affordable housing for those under 30% of AMI and 2) to address homelessness.*
- d) Recognize the nexus between affordability and accessible housing. There is a lack of affordable and accessible units to meet the needs of individuals with disabilities. The Housing Study fails to adequately describe and capture the need for accessible units, particular for renters with disabilities and renters aging in place. VAPAC recommends that the County identify the need for accessible rental housing and accessibility improvements for rental housing. Given that so much of the County's housing stock is older and was built without even minimum accessibility features, and because it predates the implementation of the Fair Housing Act Accessibility Guidelines or is otherwise exempt from them, it is critical that the County incentivize the development of accessible housing and ensure compliance with the Fair Housing Act Accessibility Guidelines.*
- e) Explore innovative programs to retain homeownership opportunities which are being taken away by LLC purchases. For example, VAPAC recommends reviewing what the Cincinnati Port did in purchasing an investment property portfolio in Hamilton County and how Rising Tides Partners operates in Pittsburgh PA.*
- f) Explore changes to the on-line Sherriff Sale process that presently leads to problem properties.*

g) Explore innovative programs such as a County LIHTC or set-aside of affordable units in new market rate developments that receive County support.

7. Rental: Create a County-wide rental registry that can act as a database to assist residents in securing healthy housing and help the County to track management of rental properties and assist in the placement of displaced persons, veterans and their families.
 - a. Allow tenants to notify and report code violations to the County so that the County can assist municipalities in correcting the violations by offering access to County-certified contractors.
 - b. Use the County property tax system to add the cost of remedying code violations to create a financial consequence for the landlord's failure to maintain the property
 - c. Support and advocate for a tenant's bill of rights from the Ohio Legislature.

VAPAC comments:

VAPAC supports the recommendation to create a County-wide registry since property owners and particularly LLC's operate across municipal boundaries. Concern was raised about duplication and potential confusion since some communities already have a rental registry. Implementation of such a registry would require coordination and sharing information among these registries. VAPAC suggests municipalities report their rental registries to the County and to not have landlords report directly to the County aside from their one-time rental disclosure required by State Law.

VAPAC is concerned about the recommendation to allow tenants to report code violations to the County. Code violations are enforced at the municipal level and reporting to the County has the potential to take the complaint further from resolution. VAPAC recommends the County refer tenants to their local municipal complaint reporting system. For example, Cleveland residents should call 311 or 216-664-2000, or visit clevelandohio.gov/311 to report code violations.

VAPAC members are very interested in the idea of the County using its property tax system to address a landlord's failure to maintain property and would want to learn more about how this could be implemented.

VAPAC supports the concept of a tenant's bill of rights. While state-wide legislation would be the best, the County could take a leadership role by creating a Bill of Rights for tenants as well as a Homeless Bill of Rights in Cuyahoga County which could be a model for state adoption.

VAPAC supports the expansion of Rapid Rehousing Programs and developing a mechanism to fund a shallow subsidies program for ongoing rental assistance programs.

8. Lead Programs: There needs to be a proactive approach to testing housing for lead and providing the resources similar to the City of Cleveland Lead Safe Coalition for remediation as part of a lead safe certification program. The program should be expanded to homeowners to initiate lead repairs before a they cause harmful health issues.

VAPAC comments:

VAPAC has supported programs to address lead hazards because of the nexus between the conditions of a housing unit and the potential for unabated and unviable properties leading to abandonment and loss of affordable units. Expansion to all habitable properties makes sense given the costs incurred by health and social service organizations that respond to lead poisoned children.

VAPAC recommends that all County programs as well as County funded programs require that the property be lead safe. For example, Foster Children should not be placed in any property that does not meet lead safe requirements

9. Leverage the network of Non-profit Housing Programs and Organizations that exist in the community: Continue the support of the network of housing counselling organizations that provide comprehensive support to residents and homeowners and broaden the reach of these organizations.

VAPAC comments:

VAPAC strongly endorses this recommendation. VAPAC recognizes and commends the County for its on-going support for these housing counselling agencies and has raised concerns when there have been delays in contracting and disbursement problems that undercut the stability of these organizations. VAPAC supports on-going and reliable funding for these housing counselling agencies and supports the recommendation of the expansion of services to broaden the reach of these important organizations. The study identifies the problems of tax delinquency, housing cost burden and seniors wanting to age in place and these organizations can be important partners with the County in addressing these issues.

In conclusion, VAPAC is impressed that in establishing a new department to address housing issues, the County decided to “examine the existing housing program and policies currently in affect across the County, identifying the housing needs and challenges of municipalities, and housing related recommendations.” This study of the problem, along with the data assembled and information gathered from the community, provides an important starting point for the development of a housing plan that incorporates all of the County programs and departments that touch housing into a cohesive, comprehensive and coordinated plan. VAPAC encourages incorporating broad community involvement in developing the plan as well as in reviewing the plan prior to adoption. VAPAC further encourages that any future plan include reference and pull recommendations from Cuyahoga County Office of Reentry’s *Eight Point Plan for Housing Justice in Cuyahoga County*. VAPAC’s hope is that our response to the recommendations and our suggestions will help further community dialogue in the development of a County Housing Plan that is more than a collection of programs but a comprehensive approach to marshal all of the County resources to address the housing needs of this community.

For further information contact Vacant and Abandoned Property Action Council (VAPAC)

fford@thehousingcenter.org

1-216-407-4156