



DRAFT REPORT

2020 Analysis of Impediments to Fair Housing Choice

City of Cumberland, Maryland



Cumberland
Maryland

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Executive Summary

Our nation faces some of the greatest challenges in its history—the COVID-19 pandemic, economic recession, and civil unrest. This time period is not unlike 1968 as the country was roiling from Vietnam War protests and the assassination of Dr. Martin Luther King. President Lyndon B. Johnson established the National Advisory Commission on Civil Disorders, also known as the Kerner Commission, in response to the civil unrest beginning with the Watts Riots in 1965. On February 29, 1968, only one month before the assassination of Dr. Martin Luther King, the Kerner Commission warned that “[o]ur nation is moving toward two societies, one black, one white—separate and unequal.” More unrest followed the assassination of Dr. King and it was during this time that Congress passed the Fair Housing Act of 1968. While much progress has been made since 1968, we have lost traction in other key indicators.

While overt discrimination is less likely today than it was in 1968, other signs of inequality and racial segregation persist today. Today, the nation has lost gains in homeownership and exhibits a wider wealth gap and higher income inequality. These patterns can be found in Cumberland, where communities of color are disproportionately affected by substandard housing conditions, housing cost burden, and higher mortgage denial rates. Other vulnerable groups such as seniors, the disabled, and single-headed households also face housing challenges and lack access to opportunities that would improve their economic, education, and health outcomes.

While the Fair Housing Act specifically outlaws the refusal to sell or rent to a person or family because of their race, color, religion, national origin, sex, family status and disability status. The second part of the Fair Housing Act directs that “all executive departments and agencies shall administer their programs and activities relating to housing and urban development (including any Federal agency having regulatory or supervisory authority over financial institutions) in a manner affirmatively to further the purposes of” the Fair Housing Act. This is why the law’s directive to affirmatively further fair housing is delegated as requirement to local jurisdictions receiving HUD funds. Senator Walter F. Mondale, the Senate sponsor of the Fair Housing Act, noted that the law’s intent was to replace “segregated ghettos” with “truly integrated and balanced living patterns.”

HUD requires that all states and jurisdictions that receive funding from the U.S. Department of Housing and Urban Development (HUD) submit an AI prior to the submission of a Consolidated Plan for FY2021-2025. The Consolidated Plan guides the use of Community Development Block Grant (CDBG), HOME, and Emergency Solutions Grant (ESG). The City of Cumberland is an entitlement jurisdiction, meaning that the City receives its own allocation of CDBG funds, and therefore the City is preparing this AI to meet HUD’s requirements.

The AI evaluates patterns of residential location, housing availability, and impacts of public and private sector actions in light of the 1968 Fair Housing Act. This document reviews past progress on fair housing goals and objectives that have been defined in prior AIs, specifically the 2005 Analysis of Impediments to Fair Housing and the City of Cumberland’s Fair Housing Action

Plan Update (2011). This AI provides a comprehensive analysis of disparities in access to opportunity among protected classes and identifies factors that have contributed to disparate access in the City of Cumberland. In addition, this AI outlines specific goals and action steps for the City of Cumberland to advance fair housing, expand housing choices, mitigate economic and racial segregation, and target investments in communities most in need.

Unlike prior AI reports, this AI is organized to follow the structure for the Assessment of Fair Housing (AFH) that was proposed under the Affirmatively Furthering Fair Housing (AFFH) rule. The content is designed to include all of the elements of an AFH and the report sections follow the structure outlined in the AFFH Rule Guidebook, published on December 31, 2015. By following this structure, the City of Cumberland will present the fair housing analysis and goals in a way that is consistent with the AFFH rule.

As part of the AFFH rule, HUD began making data and maps available in 2015 via an online tool and encouraged communities to use that tool to complete their AFH. Some of those resources are used for this AI. However, much of the AFFH data has not been updated. In those cases, more recent data from the U.S. Census Bureau, the State of Maryland, and other sources has been used instead.

Assessment of Past Goals and Actions

This section provides a review of the *2005 Analysis of Impediments to Fair Housing*, the *2006-2011 Fair Housing Action Plan*, and updates through 2019. Some highlights include:

- The City of Cumberland has made some progress increasing accessibility for persons with disabilities by funding sidewalk improvements, the rehabilitation of facilities, and the rehabilitation of units for disabled. However, more progress needs to be made in increasing the number of available and accessible units for disabled persons.
- The City’s Human Relations Commission has provided training to landlords and tenants on what constitutes “reasonable accommodation.” Given the lack of knowledge on behalf tenants and landlord, more work needs to be done.
- Progress has been made regarding information on availability of rental units. The City and its partnership through Bridges to Opportunity is working to increase the number of listed units.
- The City of Cumberland has instituted inspections of all housing units upon turnover. While this is a significant step, a large number of substandard housing conditions and units are still reported.
- The Cumberland Economic Development Corporation (CEDC) has developed a shopping center, which has increased retail and services for low-income neighborhoods and the community as a whole.

- While public agencies provide transportation vouchers for low-income individuals, Allegany County's public transportation's limited service and reach continues to pose a major challenge for those without an automobile seeking job opportunities and housing.
- Cumberland is making some progress in adding new housing options in the City. The CEDC is exploring various sites for the construction of new housing while the Housing Authority is improving existing properties through HUD's Rental Assistance Demonstration program.
- Despite the loss of Baltimore Neighborhoods, Inc., a key partner in fair housing education and outreach, Cumberland's Human Relations Commission has partnered with the Maryland Commission on Civil Rights and other organizations to increase fair housing education.

Analysis of Fair Housing Issues

Demographics

The AI includes an analysis of demographic, economic, and housing information for the City of Cumberland. The demographic analysis is designed to describe the underlying conditions that shape housing market behavior and access to housing opportunities in the City of Cumberland. This analysis is also intended to help the City plan for future housing needs.

Among the key findings from the demographic analysis:

Population Characteristics

- The City of Cumberland was home to an estimated 19,480 people in 2018. Between 2010 and 2018, the City's population declined by nearly 1,500 people, or declining by about 0.8% annually.
- The populations of both the City of Cumberland and Allegany County are significantly less racially and ethnically diverse than the overall State of Maryland. In 2017, nearly nine out of 10 Cumberland residents (88.0%) were non-Hispanic White. However, the non-White population has increased faster than the White population since 2000.
- Black residents comprise the largest share of non-White residents in Cumberland; the share of Black residents was 6.5% in 2017. While Hispanic residents make up a very small share of Cumberland's population, the number of Hispanic residents has increased significantly faster than other racial and ethnic groups.

- Less than one percent of the City of Cumberland’s residents age five and older are limited English proficient.
- An estimated 54.2% of households in the City of Cumberland are family households, with a higher share of single-parent families and a lower share of married couple families without children than in the County overall.
- In 2017, there were an estimated 4,500 Cumberland residents with a disability, comprising nearly a quarter (23.1%) of the City’s population. The share of the City’s population with a disability has increased over time and remains higher than in the County overall.

Income and Poverty

- The median household income in the City of Cumberland was \$32,825. The City’s median income is lower than the County median, and significantly lower than for the State.
- According to data from the U.S. Census Bureau, Black households in Cumberland have a median household income of \$23,698 and Hispanic households have a median household income of \$33,222.
- Nearly one-quarter (24.4%) of Cumberland residents have incomes below the poverty line. Poverty rates are significantly higher for Black residents in Cumberland, where nearly half of Black residents live in poverty.

Employment

- In 2017, there were an estimated 11,418 jobs located in the City of Cumberland accounting for 44% of all of the jobs located in Allegany County.
- Between 2010 and 2017, the City lost about 1,500 jobs, or about 11.2% of the employment base. Despite the overall decline in jobs, the City added jobs in both 2015 and 2016 at a much faster rate than the County overall.

Housing Market

- In 2017, there were an estimated 8,437 housing units in the City of Cumberland. The City’s housing stock actually by around 800 units over the past decade, through demolition and a lack of replacement construction.
- About 52.0% of occupied housing units in Cumberland are owner-occupied, while 48.0% of units are renter-occupied.

- Rents are increasing in Cumberland. While the City added 366 rental units between 2010 and 2017, there was a net loss of 341 rental units with rents below \$600 (affordable to households earning \$24,000 or less per year). At the same time, there were 660 more rental units with rents of \$600 or more in 2017 than there were in 2010.

Segregation/Integration

- Racial segregation can be measured by a dissimilarity index. The Black/White dissimilarity index in the City of Cumberland was 38.2 in 2017, higher than the 19.6 Black/White dissimilarity index in the City in 2010. This means that 38.2% of Black residents in the City of Cumberland would have to change Census tracts within the City in order for Blacks and Whites to be equally distributed throughout Cumberland.
- Hispanic residents are more highly segregated than are Black residents in the City of Cumberland. For both Blacks and Hispanics, there are higher levels of segregation in Allegany County than within the City limits.

Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs)

HUD has defined racially and ethnically concentrated areas of poverty (R/ECAPs) as Census tracts where more than half of the population is non-White and 40% or more of the population is in poverty or where the poverty rate is greater than three times the average poverty rate in the area, whichever is lower. Based on this definition, there are R/ECAPS in the City of Cumberland, primarily because of the relatively small non-White populations in the community.

Segregation is not in and of itself a primary challenge in Cumberland. Rather, the combination of a slow growing population, high rates of poverty, and years of deferred investment in homes and neighborhoods limits opportunities for members of protected classes in the City. In addition, differences in access to opportunity within the City and in the broader County continue to be a challenge.

Disparities in Access to Opportunity

There is a broad set of research that has documented the important links between health, education, and economic outcomes of individuals and families and the quality of the neighborhoods in which they live. Access to a wide range of education, employment, transportation, and health services and amenities is critical for ensuring successful outcomes for families and children. When segments of the population do not have access to these opportunities, then the entire community is negatively impacted.

This AI examines access to various types of opportunities, including education, employment, transportation, low-poverty neighborhoods, and environmentally healthy neighborhoods. The analysis includes a synthesis of the barriers faced by members of protected classes in accessing opportunities in the City of Cumberland.

Education

Access to high-quality education is critical for ensuring opportunities for economic mobility and success. There are indicators that patterns of residential segregation in the City of Cumberland have left some individuals, children, and families with a lack of access to high-quality education, while others benefit from better educational opportunities.

- The South Penn Elementary School in South Cumberland has the lowest school rating according to GreatSchools.org, with a score of four out of 10; only 28% of students are proficient in English and only 24% of students are proficient in math.
- Elementary schools outside of the City but in Allegany County have higher ratings and test scores, which means that families and children living outside of the City boundaries often have better access to high-quality public education opportunities.

Employment

When individuals have good access to jobs, there is a wide range of beneficial outcomes, including family and housing stability, dismantling of intergenerational poverty, and opportunities for upward economic mobility.

- Between 2010 and 2017, the City lost about 11.2% of the employment base. However, the City added jobs in both 2015 and 2016, at a much faster rate than the County overall.
- About one in five jobs located in the City of Cumberland and in Allegany County have annual wages of less than \$15,000 and about 40% of jobs in Cumberland pay between \$15,000 and \$39,999.

Transportation

Disparate access to transportation options can often be a major impediment to economic mobility. In fact, a comprehensive study of economic mobility found that “the relationship between transportation and social mobility is stronger than that between mobility and several other factors, like crime, elementary-school test scores, or the percentage of two-parent families in a community.”¹

- Nearly 30% of Black workers commute either by public transportation, walk or bike to work, while only 11.7% of White workers do not drive alone or carpool to work. Hispanic workers are much more likely than White or Black workers to carpool to work.
- The most frequently mentioned barrier to opportunity in surveys and interviews is transportation. Allegany County’s bus systems has limited service hours, limited frequency, and limited routes making it unreliable for employment and medical appointments.

¹ Axel-Lute, Miriam. 2015. Transportation More Important than Schools, Crime, in Escaping Poverty. Shelterforce. May 27.

Low-Poverty Exposure

Researchers, advocates, educators, health care professionals, and others all know how neighborhood environments—particularly the presence of poverty—has long-lasting impacts on children’s eventual success in adulthood.

- Black residents in Cumberland are much less likely to live in low-poverty neighborhoods (i.e. poverty rate less than 10%) than are White residents (5.5% versus 13.4%).

Environmentally Healthy Neighborhoods

Environmentally healthy neighborhoods are defined as places with healthy physical environments, free from pollutants, with limited exposure to crime, and availability of healthy options. However, lower-income families, persons of color, and disabled individuals are often disproportionately negatively impacted by unhealthy neighborhoods. Research has demonstrated important links between environmentally healthy environments and individual health outcomes. One study found that exposure to health hazards accounts for up to 60% of racial disparities in intergenerational inequality.²

- Compared to the rest of Maryland, residents of Allegany County have lower health outcomes on many measures. City residents include a higher share of adults who smoke, have less access to healthy food, and have higher rates of diabetes.
- The biggest concern shared by residents, advocates, and community leaders is lead paint exposure. The Maryland Department of Health and Mental Hygiene categorizes Allegany County as “high risk” for lead paint exposure to children.

Disproportionate Housing Needs

This AI includes assessments of housing challenges in the City of Cumberland, including housing cost burden, homelessness, and housing vacancies, which are important issues to evaluate, particularly as members of protected classes are routinely more severely impacted by these challenges. In addition, this evaluation includes an analysis of homeownership and access to home mortgages. Finally, this section also includes a description and analysis of the characteristics of residents of publicly-subsidized housing.

Housing Cost Burden

- In Cumberland, about a third of renter households and more than a quarter of homeowners are housing cost burdened, spending 30% or more of their income each month on housing. Fifteen percent of renters and 10.9% of homeowners are severely cost burdened, spending half or more of their income each month on housing.
- Lower income households are significantly more likely to be housing cost burdened. More than 80% of renters with incomes below \$20,000 are cost burdened.

² Bloome, Deidre. 2014. Racial Inequality Trends and the Intergenerational Persistence of Income and Family Structure. *American Sociological Review* 79(6): 1196-1225.

- About one out of five Black residents live in a neighborhood where 75% or more of the households are cost burdened renters, compared with just 8.9% of White residents.

Blight

- In a 2020 survey, 15.1% of Cumberland residents say that several homes in their neighborhood appear to have “major structural issues and seem uninhabitable.” An additional 25.8% of residents say that several homes “appear to be in need of major repair (e.g. new roof, siding, or windows).”
- More than 43% of Cumberland residents say that vacant properties are a problem in their neighborhood.
- A 2018 study by West Virginia University (WVU) and Downstream Strategies identified more than 500 dilapidated and/or vacant buildings in the City of Cumberland.
- Substandard housing is a critical issue in the City of Cumberland. While blight is an issue in neighborhoods throughout Cumberland, problem properties are concentrated in the Decatur Heights, Rolling Mill, and Chappel Hill-Virginia Avenue neighborhoods.

Homelessness

- In 2019, there were 145 homeless individuals in the County. There has been an 84% increase in the number of homeless individuals between 2018 and 2019. A disproportionate number of homeless individuals are non-White (18%) and a high share suffer mental illness or domestic violence.

Publicly-Subsidized Housing

- HRDC’s Office of Rental Assistance administers 638 Housing Choice Vouchers. Service providers and advocates report that vouchers are difficult to use, as not all landlord accept housing choice vouchers. Many landlords in Cumberland do not participate in the voucher program, which limits housing choice.

Homeownership

- The gap in homeownership rates between White and non-White households appears to have widened significantly between 2010 and 2017. In the City of Cumberland, while 54.5% of White households are homeowners, the homeownership rate is just 15.8% for Black households and 16.0% for Hispanic households.

Mortgage Lending Practices

Data on home mortgage applications, originals and denials are reported to the Federal Reserve Bank under the terms of the Home Mortgage Disclosure Act (HMDA) and are analyzed for this AI. This data is useful in helping to identify potentially discriminatory lending practices and patterns in a community.

- More than one in five (20.2%) of home purchase loan applications were denied. Black applicants were disproportionately more likely to be denied a loan, as many as 56.3% of Black mortgage applicants were denied.

Fair Housing Complaints

- According to HUD data, only one fair housing complaint was filed between 2006 and 2016. However, a 2020 survey estimated that 5.7% of Cumberland residents say that they or someone they know have experienced housing discrimination. The most common types of discrimination are based on race or ethnicity and was most often a landlord or property manager discriminating against prospective tenants.

Disability and Access

Among the Cumberland residents with the most underserved needs are the needs of disabled persons based on the data, interviews, and focus groups.

- In 2017, there were an estimated 4,538 Cumberland residents with a physical or cognitive disability. Approximately 60% of disabled residents between 20 and 64 years of age live in poverty.
- About 12% of disabled residents live in neighborhoods where 75% are more of the households are cost burdened renters.
- Disabled persons have difficulty finding housing units either because they are walk-ups that are not accessible to some disabled persons or they are units where landlords refuse to make modifications.

Summary of Fair Housing Goals and Strategies

This report identified the following top fair housing issues based on the Analysis of Fair Housing Issues, Disparities in Access to Opportunity, and Disproportionate Housing Needs:

1. Inadequate fair housing enforcement and education
2. Limited housing choices for persons with disabilities
3. Hispanic residents face housing challenges
4. Lack of affordable rental housing
5. Lack of homeownership opportunities
6. Inadequate public transportation and access to areas of opportunity

In order to address the fair housing issues and their related contributing factors, this AI recommends the following goals and actions steps for the City of Cumberland:

Goal 1: Increase Fair Housing Outreach, Education and Enforcement

Action 1: Augment the number of fair housing education and trainings per year.

Action 2: Work with new partners.

Action 3: Greater code enforcement.

Goal 2: Improve Housing Opportunities for Persons with Disabilities

Action 1: Require training for landlords on what constitutes “reasonable accommodation.”

Action 2: Grow the list of accessible units.

Action 3: Provide more funding for modification programs.

Action 4: Continue funding sidewalk and road improvements.

Goal 3: Provide Greater Language Access

Action 1: Adopt the City’s draft Limited English Proficiency Plan (LEP).

Action 2: Translate more materials to Spanish.

Goal 4: Increase Affordable Housing Supply

Action 1: Support the Cumberland Housing Group’s (CHG) mission to develop new affordable housing.

Action 2: Provide funding for local landlords to rehab their homes and units.

Goal 5: Provide more Homeownership Opportunities

Action 1: . Scale the Bridges to Opportunity program.

Action 2: Increase housing counseling.

Action 3: Redevelop city-owned property.

Goal 6: Improve Access to Transportation and Neighborhoods of Opportunity

Action 1: Increased funding for Allegany Transit.

Action 2: Connect transportation to land use.

Action 3: Increased access to broadband.

I. Background

The U.S. Department of Housing and Urban Development (HUD) Analysis of Impediments to Fair Housing Choice (AI) is a requirement of all states, counties and jurisdictions that receive Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), and Emergency Solutions Grant (ESG) funding from the HUD. Each entitlement jurisdiction must submit an AI before the five-year Consolidated Plan for FY2021 to 2025 that guides the use of those federal funds.

Because HUD funds are limited, a key purpose of the AI is to help the states, counties and cities prioritize federal funding for populations that are experiencing barriers to housing choice. The Fair Housing Act (24 CFR 5.518) specifically outlaws the refusal to sell or rent to a person or family because of their race, color, religion, national origin, sex, familial status, or disability. The second part of the Fair Housing Act states, “all executive departments and agencies shall administer their programs and activities relating to housing and urban development (including any Federal agency having regulatory or supervisory authority over financial institutions) in a manner affirmatively to further the purposes of the Fair Housing Act. The law’s directive to *affirmatively further fair housing* is delegated as a requirement of all jurisdictions receiving HUD funds.

HUD requires that jurisdictions take *meaningful action* to reduce barriers to housing for *protected classes* under the Fair Housing Act, ameliorate the effects of segregation, and increase access to areas of opportunity. The AI provides specific goals and action steps that the City of Cumberland will take to advance fair housing, expand housing choices, mitigate economic and racial segregation, and target investments in communities most in need.

Overview of the Fair Housing Act

The Fair Housing Act was enacted into law in 1968 and prohibited discrimination in the housing market based on race, color, religion, and national origin. In 1974, sex was added as a protected class, and in 1988, the Act was further amended to prohibit discrimination based on disability and familial status.

The Federal Fair Housing Act covers most housing. The Act explicitly prohibits discrimination in the sale or renting of housing, as well as in mortgage lending.

Figure I-1. Prohibitions Outlined in the Federal Fair Housing Act

Sale or Rental of Housing	Mortgage Lending
<p>No one may take any of the following actions based on race, color, religion, sex, disability, familial status or national origin:</p> <ul style="list-style-type: none">• Refuse to rent or sell housing• Refuse to negotiate for housing• Make housing unavailable• Deny a dwelling• Set different terms, conditions or privileges for the sale or rental of a dwelling• Provide different housing services or facilities• Falsely deny that housing is available for inspection, sale, or rental• For profit, persuade owners to sell or rent (“blockbusting”)• Deny anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing• Advertise or make any statement that indicates a limitation or preference based on race, color, religion, sex, disability, familial status, or national origin. (This prohibition against discriminatory advertising applies to single family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.)	<p>No one may take any of the following actions based on race, color, religion, sex, disability, familial status or national origin:</p> <ul style="list-style-type: none">• Refuse to make a mortgage loan• Refuse to provide information regarding loans• Impose different terms or conditions on a loan, such as different interest rates, points, or fees• Discriminate in appraising property• Refuse to purchase a loan, or• Set different terms or conditions for purchasing a loan.

There are additional protections under the Fair Housing Act for *people with disabilities*. If a person has a physical or mental disability (including hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex, and mental challenges) that substantially limits one or more major life activities, or has a record of a disability, or is regarded as having a disability, a landlord may not:

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

The Fair Housing Act also offers protections to *families with children and pregnant women*. Unless a building or community qualifies as age-restricted housing for older adults, it may not discriminate based on familial status, presence of children, or the presence of a pregnant woman. Housing for older adults is exempt from the prohibition against familial status discrimination only if HUD has determined that it is specifically designed for and occupied by elderly persons under a federal, state or local government program, it is occupied solely by persons who are 62

or older, or it houses at least one person who is 55 or older in at least 80% of the occupied units and adheres to a policy that demonstrates the intent to house persons who are 55 or older. The Fair Housing Act states that it is illegal to threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right.

Affirmatively furthering fair housing has always been a provision of the Fair Housing Act, directing “all executive departments and agencies shall administer their programs and activities relating to housing and urban development (including any Federal agency having regulatory or supervisory authority over financial institutions) in a manner affirmatively to further the purposes of” the Fair Housing Act. The law also requires the Secretary of HUD to administer all HUD programs in a manner that affirmatively furthers fair housing. More specifically, affirmatively furthering fair housing has been understood to refer to taking *meaningful* actions to address significant disparities in housing needs and access to opportunity, to reduce and ultimately eliminate racial and economic segregation, and to transform racially and ethnically concentrated areas of poverty into areas of opportunity.

Despite being part of the Fair Housing Act since its inception, there was little in the way of administration or enforcement. In 2015, however, during the Obama administration, an effort was made to increase the guidance on the implementation of the affirmatively furthering fair housing provisions. On July 16, 2015, the US Department of Housing & Urban Development (HUD) issued a new regulation to implement the affirmatively furthering fair housing requirements of the Fair Housing Act. The Affirmatively Furthering Fair Housing rule was designed to provide program participants (i.e. states, counties, municipalities, and public housing agencies) with more explicitly and effective means and tools to further the purposes and policies of the Fair Housing Act.

Under the administration of President Trump, the 2015 Affirmatively Furthering Fair Housing (AFFH) rule was put on hold by allowing local communities until October 31, 2020 to comply with the new Assessment of Fair Housing (AFH) reporting requirements outlined in the AFFH rule. Hundreds of local communities were in the process of completing an AFH, which was intended to replace the AI reporting requirements. The postponement of implementing the AFFH rule created confusion, with some communities going forward with their AFH, while others decided to complete an AI as they had done in the past. The City of Cumberland has chosen to complete an AI with some features from the AFH.

On January 14, 2020, HUD published a proposed rule that changes notably the definition of “affirmatively furthering fair housing,”³ with a goal of using the rule more as a platform for local deregulation as a means to promote housing affordability, rather than a way to reduce segregation and promote access to housing and opportunity. HUD, under the Trump administration, is pushing for more flexibility in assessing housing issues, recognizing that localities are in the best position to understand their housing needs and available resources. However, there have been concerns raised that the proposed changes delink the AFFH rule from the statute’s focus on racial and economic segregation and could result in local policies that

³ Affirmatively Furthering Fair Housing, A Proposed Rule by the Housing and Urban Development Department on 01/14/2020, <https://www.federalregister.gov/documents/2020/01/14/2020-00234/affirmatively-furthering-fair-housing>

ultimately make it hard for vulnerable populations to access housing in areas of opportunity.⁴ The City’s 2020 AI attempts to address some of these issues.

State and Local Fair Housing-Related Regulations

State of Maryland Commission on Civil Rights

Individuals and families have greater protections under section §20-702, Annotated Code of Maryland (Maryland’s Human Relations Act), which adds marital status and sexual orientation to the set of protected classes, specifies additional prohibited activities, and provides additional details about actions that are prohibited. Specifically, under Maryland’s Human Relations Act, the following activities are prohibited:

Figure I-2. Prohibitions Under Maryland’s Human Relations Act

<p>No one may take any of the following actions based on race, color, religion, sex, disability, familial status, marital status, national origin and sexual orientation:</p> <ul style="list-style-type: none"> • Refusing to negotiate, sell or rent a dwelling to any qualified buyer or renter; • Using discriminatory terms and conditions in selling or renting; • Communicating that a dwelling is not available for inspection, sale or rent, when in fact it is available; • Attempting to steer persons into or away from neighborhoods or apartment complexes that are racially segregated; • Setting terms and conditions of home loans in such a way as to discriminate; • Restricting membership or participation in a multi-listing service or similar organization related to the business of selling and renting real estate; • Using discriminatory notices or advertisements indicating any preference or discriminatory limitation; • Treating a person differently from someone else because of their race, disability, familial status, religion, sex, marital status, national origin or sexual orientation; • Committing acts of prejudice, violence, harassment, intimidation, or abuse directed against families or individuals or their residential property; • Perpetuating segregated housing patterns. 	<p>If an individual has a disability, it is further illegal to:</p> <ul style="list-style-type: none"> • Refuse to permit, or at the expense of the renter, reasonable house modifications that are necessary for the daily life of a person with a mental or physical disability; • Refuse to reasonably accommodate or adjust rules, policies, services or practices that hamper the use of an apartment, condominium, or house by a person with a physical or mental disability; • Have multifamily housing that is not accessible to people with disabilities. Multifamily housing is required to have accessible units and access routes (wide doors and hallways), accessible public and common areas, and management must provide for effective communication as needed by a disabled person.
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Harassment on the basis of a protected class, retaliation for filing a complaint or being involved in the investigation are both prohibited under law and enforced by the Maryland Commission on Civil Rights.

⁴ 2020 Proposed AFFH Rule Revision, Poverty & Race Research Action Council, <https://prrac.org/affirmatively-furthering-fair-housing/>

City of Cumberland

The City of Cumberland has in place the protections specified by the Maryland Human Relations Act.

Figure I-3. Protected Classes Under Federal, State and Local Statutes

	Federal Fair Housing Act	Maryland Human Relations Act	City of Cumberland
Race	•	•	•
Color	•	•	•
National Origin	•	•	•
Religion	•	•	•
Sex	•	•	•
Familial Status	•	•	•
Disability	•	•	•
Marital Status		•	•
Sexual Orientation		•	•
Age			
Occupation			
Political Opinion		•	•
Personal Appearance		•	•
Source of Income		•	•

Assessing Fair Housing

This AI describes disparities in access to opportunity among protected classes and identifies factors that have contributed to disparate access in the City of Cumberland. In addition, this AI outlines specific goals and action steps for the City of Cumberland to advance fair housing, expand housing choices, mitigate economic and racial segregation, and target investments in communities most in need.

While not required by HUD, this AI is organized to follow the structure proposed for the Assessment of Fair Housing (AFH) that was proposed under the AFFH rule. Therefore, the content is designed to include all of the elements of an AFH and the report sections follow the structure outlined in the AFFH Rule Guidebook, published on December 31, 2015.

In 2015, as part of the AFFH rule, HUD began making data and maps available via an online tool and encouraged communities to use that tool to complete their AFH. Some of those resources are used for this AI. However, much of the AFFH data has not been updated. In those cases, more recent, though consistent, data from the U.S. Census Bureau, Allegany County, State of Maryland, and other sources has been used in this AI.

Concurrent to this AI, the City of Cumberland is preparing its five-year Consolidated Plan (Con Plan). Completion of a Con Plan is required of all communities that receive grant funding from HUD, including the Community Development Block Grant (CDBG) Program, HOME Investment Partnerships (HOME) Program, Housing Trust Fund (HTF) Program, Emergency Solutions Grant (ESG) Program, and Housing Opportunities for Persons with AIDS (HOPWA) Program. The Con Plan serves as a framework for a community-wide dialogue to identify housing and community development priorities for federal funding. Results from this AI will help to inform the establishment of the goals, priorities and strategies developed for the City's five-year Consolidated Plan and One-Year Action Plans.

Analysis of Impediments Methodology

This analysis includes an evaluation of both quantitative and qualitative data to document overarching local and regional housing markets and demographic trends, assess patterns of segregation/integration, identify areas of concerns in terms of access to housing opportunity, evaluate prior fair housing efforts, and identify promising solutions for removing impediments to fair housing choice in the City of Cumberland.

Data sources for the quantitative analysis include the following:

- U.S. Census Bureau’s American Community Survey and decennial Census
- Jobs proximity and school proficiency indices from HUD
- U.S. Bureau of Labor Statistics
- Maryland State Data Center
- Maryland State Department of Health
- Home sale transactions data from BrightMLS, the regional Multiple Listing Service (MLS) provider
- Financial lending institution data from the Home Mortgage Disclosure Act (HMDA) database;
- Other local data made available by City and County departments and agencies (e.g., locations and characteristics of publicly-subsidized housing and residents of that housing, new construction data, code enforcement data, public transportation routes, etc.)

In addition to the quantitative analysis, City programs and policy documents were reviewed and input was solicited from a range of stakeholders in the community to better understand factors contributing to limited housing choice and to assess potential solutions for expanding fair housing choice. This examination included review of the following documents and research:

- Historical and current legislation, rules, ordinances, and laws governing the location and type of real estate development in the County
- Program regulations and allocation procedures for County resources (including federal passthrough funding) for affordable housing and community development;
- Policy and programmatic efforts to combat predatory lending practices in the County, including housing counseling availability/content and an examination of fair housing/lending complaints and responses
- County and City planning and policy documents, Consolidated Plans, Annual Plans, and CAPERs; prior Analysis of Impediments to Fair Housing Choice reports.

In addition to the review of local documents and research, external research on fair housing and housing opportunities was reviewed, including studies by the Urban Institute, Center for Responsible Lending, Poverty and Race Research Action Council, National Community Investment Coalition and other organizations.

Agency and Program Descriptions

Part of the Analysis of Impediments includes a review of agency programs and an evaluation of how they impact fair housing choice. The following is a description and review of programs that offer housing solutions to underserved communities and protected classes for the City of Cumberland, Allegany County, and the State of Maryland. Many of these programs also serve very-low income households and individuals who have disproportionate housing needs. Many of these households and individuals live in communities of color or experience homelessness, or are elderly or disabled. The programs described in this section summarize existing programs that are proposed for funding in FY 2020, but do not necessarily fund all the housing needs of protected classes.

Local Programs

CDBG Program

The CDBG Program is one of the longest-running programs of the U.S. Department of Housing and Urban Development used to fund local community development activities, notably affordable housing, economic development, public facilities and infrastructure, public services, and planning and administration.

The CDBG program operates on a reimbursement basis only. If an application is approved for funding and the agency receives its fully executed Operating Agreement (contract), the agency must spend its own funds first. Reimbursements will be issued only for encumbrances or commitments that occurred after the effective date of the Operating Agreement.

In order to be eligible for funding, every CDBG-funded activity must qualify as meeting one of the three national objectives of the program: benefitting low- and moderate-income persons, preventing or eliminating slums or blight, or urgent needs. Cumberland's high priority populations include: youth, low income, homeless, elderly, veterans, disabled persons, and persons with HIV/AIDs.

The City expended \$949,366 in CDBG funds in 2018 in a number of categories including Public Services (\$107,238) and Public Facilities and Infrastructure (\$738,005). In Public Services, the City of Cumberland spent \$10,000 on fair housing education and outreach as well as on health services, transportation, and parenting education and support. The City also provides funding to programs that prevent homelessness, increase accessibility for the disabled, and assist first-time homebuyers. In 2018, five households received closing cost assistance grants to purchase their first home. CDBG also funds the Allegany County Human Resources Development Commission's Emergency Assistance Housing program for homelessness prevention. Infrastructure improvement projects were also funded with CDBG funds to improve accessibility to the Amtrak Station to Mechanic Street connecting to the Great Allegany Passage Bike and Walking Trail, as well as sidewalks in Bellevue and Cumberland Streets.

Section 108 Program

Section 108 Program is a loan guarantee component of the CDBG program. It provides communities with a source of financing for economic development, housing rehabilitation, public facilities, and large-scale physical development projects. The City of Cumberland most recently used Section 108 to finance improvement to Cumberland's Administration Building, a LEED-certified public facility located at 125 Virginia Avenue.

Emergency Solutions Grant

The Emergency Solutions Grant (ESG) program is administered by the regional Continuum of Care (CoC) of which Allegany County is a member. Services are provided by contract with non-profit agencies for emergency shelters to households experiencing a temporary crisis. It also links homeless individuals and families to transitional housing and permanent supportive housing options. ESG funding is targeted to improve the quality of existing shelters, make

additional shelters available, meet operating costs, and provide social services to homeless individuals. This formula-funded program requires that the jurisdiction provide a match of not less than 100% of the ESG funds.

Funding priorities for services are determined using several factors: priority areas identified in the Continuum of Care's Ten (10) Year Plan to Prevent and End Homelessness, alignment with Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (Pub. L. 111-22) (HEARTH Act) and ESG regulations; level of need documented in Homeless Management Information System (HMIS) (annual CAPER report); and funds currently available for similarly situated activities.

According to Allegany County's HMIS system, Cumberland has an emergency shelter with 88 years round beds and 19 overflow beds; three transitional housing facilities with 14 beds for adults with children and 36 beds for adults only; and 29 scattered site permanent supportive housing beds in two sites that also provide services for the chronically homeless. Some of the programs funded include Laura's Anchor, a transitional homeless shelter; Family Crisis Resource Center shelter's case management, crisis hotline, and homeless services; YMCA's comprehensive services to homeless that include a transitional shelter, case management, and food to single men, single women, and families; and Union Rescue Mission's food and case management services including a shelter for men and families. In FY 19, the State of Maryland received \$1.21 million in ESG funds.

Homeless Services

Allegany County's manages the Continuum of Care. As part of the County's efforts, the Human Resources Development Commission's (HRDC) Office of Housing Opportunities administers programs for individuals and families who are homeless or in danger of becoming homeless. Services currently offered include Laura's Anchor, a transitional housing facility which provides shelter to single women and families with children who need rent assistance, security deposits, rental arrears, utility payments, and food assistance. Case management services are provided to all program participants in the Housing Opportunities programs.

In addition, the Rental Allowance Program (RAP) provides a detailed assessment and self-sufficiency plan that includes housing, financial education, employment assistance, education, job training, physical/mental health, nutrition, personal support services, transportation and childcare.

Finally, though Allegany County manages the Continuum of Care, HRDC's Office of Housing Opportunities provides several services including transition shelters for homeless women and children, supportive housing for chronically homeless individuals, and rapid re-housing. For example, the Cumberland YMCA provides Single Room Occupancy (SRO) units for men, family transitional housing, and permanent supportive housing for the disabled. In Cumberland, there are: 88 Emergency Shelter (ES) beds; 83 Permanent Supportive Housing (PSH) beds; 36 Transition Housing (TH) bed; and 19 Rapid Re-Housing (RH) beds. To better serve the homeless needs of the community, the current Allegany/Cumberland Continuum of Care has

voted to join the Balance of States CoC that includes Cecil County, Washington County, and Southern Maryland (Charles County, Calvert County, and St. Mary's County).

Housing Opportunities for Persons With AIDS

The Housing Opportunities for Persons with AIDS (HOPWA) is administered by the Continuum of Care on behalf of Allegany County. Funds are distributed using a statutory formula that relies on AIDS statistics from the Centers for Disease Control. Three quarters of HOPWA formula funding is awarded to qualified states and metropolitan areas with the highest number of AIDS cases. One quarter of the formula funding is awarded to metropolitan areas that have a higher than average per capita incidence of AIDS.

HOPWA housing and services are provided as an "as-needed" service, providing a housing voucher to persons living with HIV/AIDS. The State of Maryland Department of Social Services reports there are 19 HOPWA slots for Western Maryland, which includes Allegany, Washington, and Garrett Counties. Three are currently held by Allegany County-Cumberland and two slots are available to Allegany County clients.

Public Housing

The Housing Authority of the City of Cumberland (Housing Authority) manages 499 units of public housing in 41 buildings in 8 developments. The buildings and units are in above average condition, according to HUD standards. The developments are called Jane Frazier Village (125 units), Fort Cumberland Homes (80 units), John F. Kennedy (100 units), Queen City Tower (95 units), Banneker Gardens (25 units), Willow Valley (34 units), and Grande View (35 units), and there are five scattered site homes.

The Housing Authority has also been approved for \$5.93 million in repairs and capital improvements in its five-year year plan. The Housing Authority of Cumberland seeks conversion of six of its 8 developments for the Rental Assistance Demonstration (RAD) program. HUD has approved the conversion of Fort Cumberland Homes and John F. Kennedy under the RAD program, with an additional four developments possible as the feasibility studies and approvals are completed. The Housing Authority is a HUD High-Performing PHA with an average score of 93% over the past ten years.

Housing Choice Voucher

Allegany County's Human Resources Development Commission provides rents subsidies to very low-income individuals, including veterans and the disabled. An additional seven vouchers serve individuals diagnosed and living with HIV/AIDs. HRDC provided 77 Housing Choice Vouchers in 2019 in partnership with the Housing Authority and the City of Cumberland since 2009.

Family Unification Program (FUP)

The Family Unification Program (FUP) provides Housing Choice Voucher rental assistance to reunite families when children are placed in foster care or when parents are in imminent danger of separation from their children due to a lack of adequate housing. Clients are accepted on a

referral basis from the Department of Human Services. In 2019, the Department of Human Services provided 13 family unification vouchers.

Veterans Affairs Supportive Housing (VASH)

The VASH Program is a tenant-based federal rental assistance for military veterans. This Program is administered by local public housing agencies (PHAs) that have partnered with local Veterans Affairs Medical Center (VAMC). This program pairs the Housing Choice Voucher with case management and clinical services provided by the Department of Veterans Affairs (VA). Veterans must be VA health eligible veterans and must also meet the definition of homeless as defined in the McKinney Homeless Assistance Act. The VAMC screens all families for eligibility and makes a written referral to the Housing Authority. Allegany County's HRDC manages the VASH voucher program for any veteran who needs one. In 2019, 23 veterans received a VASH voucher in Allegany County.

Supportive Housing for the Elderly (Section 202)

The Section 202 grant is federally funded grant designed to expand the supply of affordable housing with supportive services for seniors. It provides capital to finance construction, rehabilitation or acquisition of housing for very low-income seniors. HUD provides interest-free capital advances to private, non-profit sponsors to finance the acquisition, construction, and rehabilitation, of supportive housing for seniors. The capital advances do not have to be paid as long as the project serves very low-income seniors for 40 years. Project-based rental assistance is also available to cover costs not covered by the HUD-approved operating costs and the tenant's contribution for three years and are available for renewal based on the availability of the funds. Currently, 1800 Bedford in the City of Cumberland is a six-unit building funded in part by Section 202.

Violence Against Women Act (VAWA)

The VAWA Program provides federal rental assistance for victims of domestic violence who are faced with imminent homelessness and for whom rental assistance will help place them in a safe environment. Clients are accepted on a referral basis from the Human Resources Development Commission, the Department Human Services, Laura's Anchor, and the Family Crisis Resource Center.

Bridges to Opportunity

The Bridges to Opportunity program is a collaborative approach based on an internationally successful model that enhances and grows existing resources. Bridges to Opportunity's mission is to move more individuals from poverty to self-sufficiency; reduce social costs related to crime, poor health, and welfare; strengthen educational attainment and job skills; and enhance economic development and revitalize neighborhoods. Coordination helps improve services by also addressing and advocating for system-wide changes at a federal, state and local level. A steering committee leads the effort and includes City and County government, police and court representatives, the Allegany County Human Resources Commission, Cumberland Economic Development Corporation, and the Western Maryland Health System. The Getting Ahead

program includes a cohort model where providers help coordinate services that includes job training and workforce development to address the issues of unemployment, low wages, and high rent cost burden that prevent many families from escaping the cycle of poverty. Other services provided include childcare and transportation, which are important elements in helping individuals and families succeed. The group is also studying housing solutions, such as home sharing for seniors and tiny homes for transitional housing and workforce development.

Closing Cost Assistance Grants

Funded by the City's CDBG program, the Cumberland Neighborhood Housing Services provides qualified first-time homebuyers a grant to assist with up to \$1,250 in closing costs for the purchase of a home within the City of Cumberland. Eligible candidates must have income of 80% AMI or below. Grants are awarded on a first-come, first-serve basis until funds are exhausted. Available funds vary from year to year. Homebuyers must participate in an eight-hour, first-time homebuyer education training offered several times a year.

Cumberland Housing Revitalization Program (CHiRP)

The CHiRP is a program of the Cumberland Housing Alliance (CHA) and the Cumberland Neighborhood Housing Services, Inc. (CNHS) to address the large number of blighted properties in the City of Cumberland. The program targets blighted and uninhabitable properties for demolition and replaces them with new affordable housing. Properties are donated from the City, County, State, or financial institutions. The City of Cumberland receives property through unpaid taxes and donations and turns them over to the CHA for redevelopment. The CNHS awarded a \$500,000 grant to the CHA to use as the revolving fund for all expenses of the CHiRP program.

Historic Preservation Programs

The City of Cumberland offers a 10% tax credit to the City's annual property tax for qualified and approved renovations. A minimum of \$5,000 of renovations must be reviewed and approved by the City's Historic Preservation Commission. The credit can be used for up to five years if the amount of credit is greater than the amount of annual taxes due. The tax credit can be used in conjunction with the state and federal historic tax credits, which require separate reviews. Additionally, a City property assessment freeze is available for up to ten years if the property is located in designated historic districts.

NAILS Mission Project

NAILS is a volunteer home repair program that collects donations of supplies and funds, along with volunteer labor, to repair homes for low-income families. The program targets mobility-impaired individuals and families in owner-occupied units with health and safety issues. NAILS works with local contractors, local organizations, and a combination of local and national volunteers. Work scope is limited to minor and moderate repairs and excludes roof repairs, roof replacement, window replacement, or extensive plumbing or electrical work.

Weatherization Assistance Program (WAP)

The Weatherization Assistance Program (WAP) is a program operated by Allegany County's Department of Housing and Community Development for eligible low-income households to install energy conservation materials in their homes to reduce consumption and energy costs. Eligible projects include: attic, floor and wall insulation; weather stripping and caulking to reduce air leaks; installation of hot water heater jackets; cleaning and maintenance performed on gas, kerosene and/or oil furnaces; window and door repair; and attic venting. Funding is provided by the U.S. Department of Energy (DOE) and the EmPower Maryland Program. Eligible applicants are owner-occupied households who have income at or below 200% of the poverty threshold. Rental units are eligible with the agreement of the landlord. Priority is given to those who are elderly, disabled, have families with children and/or have the highest energy consumption. On average, the program has helped residents reduce energy costs by 10% to 25%.

State Programs

The State of Maryland (through the Department of Housing and Community Development) provides resources for the development and preservation of affordable rental housing.

Community Legacy Program

The Community Legacy program provides local governments and community development organizations with funding for business retention and attraction, homeownership, and commercial revitalization activities. Local governments must be certified as Sustainable Communities and must complete a Sustainable Communities Action Plan. Only state-designated Priority Funding Areas may apply for the designation. Cumberland is designated as a Priority Funding Area and completed its Sustainable Communities Plan in 2017. Sustainable Communities must demonstrate a need for reinvestment and identify Community Legacy projects that aim to stabilize a community; reverse social, economic or physical decline; or encourage sustainable growth. Typical eligible projects include: mixed-use development consisting of residential, commercial and/or open space; business retention, expansion and attraction initiatives; streetscape improvements; increasing homeownership and home rehabilitation; residential and commercial façade improvement programs; real estate acquisition including land banking, and strategic demolition.

HOME Investment Partnership (HOME)

The HOME program is intended to assist states and Participating Jurisdictions (local governments that receive a direct allocation) in expanding the supply of decent, affordable housing for low and very low-income families. The City of Cumberland is not a Participating Jurisdiction but can receive HOME funding through the State's Department of Housing and Community Development. The program encourages developers to create housing for first-time homebuyers, households of limited income, and special populations. The financial assistance

given to projects is determined project by project. Funded activities include reconstruction, rehabilitation, homebuyer assistance, and tenant-based rental assistance. Local government are required to provide a 25% match. The State will combine HOME funds with their single-family and multi-family housing programs, including the Low-Income Housing Tax Credit program, other state funds, and bond funds. Homebuyers may be further assisted through the Maryland Mortgage Program which assists first-time homebuyers with down-payment and closing costs.

The HOME Program is the largest program for state and local governments designed to create affordable housing for low-and-moderate income households, expand the capacity of non-profit housing providers, strengthen the ability of state and local governments to provide housing, and leverage private sector participation in housing projects. HOME dollars are often a key subsidy that make affordable housing development financially feasible. During FY 2019, Maryland received \$5,762,762 in HOME funds. In Cumberland, the Old Town Manor, a 138-unit development, received HOME funds in 2014. No projects in Cumberland have received HOME funding since 2014.

Low-Income Housing Tax Credit (LIHTC) Program

The LIHTC program is a federally-funded, state-administered program, and is the primary source of public funding for affordable rental housing development and rehabilitation. LIHTC resources are allocated to projects according to policies enumerated in the state's Qualified Allocation Plan (QAP) and Multifamily Rental Financing Program Guide. The program has two types of tax credits that are available to developers of affordable housing: one is the 9% credit that is generally reserved for new construction and the the 4% credit that is typically used for rehabilitation projects and new construction usually financed with tax-exempt bonds. Typically, the 9% tax credit is a very competitive process while the 4% credit, which is less lucrative, is normally not competitive. To compete for the 9% credit program, applicants for LIHTC funding submit projects which are evaluated and receive points based on the criteria outlined in the QAP. Maryland's QAP was last updated in February 2019. Changes for the 2020 allocation rounds have been proposed, but as of the time of this writing have not yet been ratified.

State priorities for allocating LIHTC are as follows:

1. Family Housing in Communities of Opportunity
2. Housing in Community Revitalization and Investment Areas
3. Integrated Permanent Supportive Housing Opportunities
4. Preservation of Existing Affordable Housing
5. Elderly Housing in Rural Areas of the State Outside Communities of Opportunity
6. Permanent Supportive Housing for Veterans and Persons Experiencing Homelessness

Several provisions for allocating these resources have a nexus with furthering fair housing goals:

- Applicants must certify that they will develop and implement an Affirmatively Furthering Fair Housing Plan. In addition to baseline HUD regulations to that effect, the state adds requirements to enable greater use of Housing Choice

Vouchers in LIHTC properties, eliminating local preferences, and remove barriers to persons with disabilities or special needs, among others.

- Applicants must not have previously committed violations of the Fair Housing Act, Civil Rights Act, or any other state/federal anti-discrimination laws.
- Accessibility, marketing and occupancy to promote housing opportunities for persons with disabilities.
- The state allows income averaging (i.e. higher rents/income limits in a portion of units in exchange for deeper targeting in others), which allows development sponsors to meet the joint goals of reaching higher-need households and providing mixed-income communities.
- The state awards 16 points to developers applying for 9% LIHTC allocations for “Community Context.” Those points may be awarded if the developer falls into any of the following categories:
 - Community Impact: the development contributes to a concerted community revitalization plan. The Guide establishes specific criteria for such plans related to geography, intended outcomes, strategies, local government involvement, stakeholder engagement, and other investments.
 - Communities of Opportunity: the development meets one of several criteria intended to provide housing choice in high-opportunity neighborhoods, defined by indicators related to health, economic opportunity, and educational opportunity.
- Family developments receiving 9% LIHTC allocations can receive additional credits (also known as a basis boost) if located within a state-designated, official “Community of Opportunity.” Four census tracts within the City of Cumberland are considered to be “In a Community of Opportunity.”
- The state provides exemptions to acquisition cost limits and site control requirements for certain projects providing family housing in Communities of Opportunity.
- The state requires certain developments outside of Communities of Opportunity to be part of a larger, multifaceted “community revitalization plan.”
- The state provides additional point-based incentives to developments that provide robust transit access serve persons with disabilities or special needs populations, and provide tenant services.
- In 2019, the QAP includes additional points for LIHTC projects in Opportunity Zones, Communities of Opportunity, Sustainable Communities, and Priority Funding Areas. These additional points provide priority funding for transit-oriented development, distressed communities, and other areas to foster the creation of “communities of choice.”

The federal Low-Income Housing Tax Credit Program (LIHTC) is the principal funding source for the construction and rehabilitation of affordable rental homes. Currently, there are 13 LIHTC-funded projects in Allegany County with a total of 703 units. Of those, 8 developments, with 407 units, are located within the City of Cumberland.

Maryland Historic Homeowner Tax Credit

A program of the Maryland Historical Trust (MHT), the Maryland Historic Homeowner Tax Credit provides homeowners with a state income tax credit equal to 20% of qualified rehabilitation expenditures. The credit is capped at \$50,000 in a 24-month period and must have a minimum of \$5,000 of eligible expenses to qualify. The state homeowner tax credit may be used with local historic tax credits, although MHT review is independent of local review and may not be waived or substituted for local approval. To qualify, buildings must be listed on the National Register of Historic Places, a contributing resource in a National Register Historic District, locally designated structure, or contributing local structure to a local district that is potentially eligible as National Register Historic District.

Maryland Mortgage Assistance Program

The Maryland Mortgage Assistance Program (MMAP) includes a variety of loan products for first-time homebuyers. Mortgages include government guaranteed loans from HUD Federal Housing Administration (FHA), the Department of Veterans Affairs (VA), and the US Department of Agriculture (USDA). Loan products include a 30-year fixed rate mortgage (First Time Advantage), 30-year mortgages with closing costs and down-payment assistance (Flex Loans), and no-interest, deferred loans for down-payment assistance matched by employers funds (Partner Match).

Opportunity Zones

A large portion of City of Cumberland has been designated an Opportunity Zone. Created in 2017 by the federal Tax Cuts and Jobs Acts as a tax incentive for rural and low-income urban areas that have experience disinvestment, the Opportunity Zones program has a ten-year window that provides incentives and tax forgiveness of capital gains for qualified investments in targeted zones. The Maryland governor has made available additional State incentives, including \$20 million for building and renovating affordable housing and \$3.5 million for the acquisition and demolition of derelict and vacant buildings in Opportunity Zones. The State has also added State tax credits for job creation, including the Job Creation Tax Credit and the One Maryland Tax Credit. The State has set aside \$3 million for job training, along with other programs to provide workforce training programs. These enhancements can be further leveraged with locally available funds, including federal HOME and CDBG funds.

Strategic Demolition Fund

A fund available for state designated Sustainable Communities such as Cumberland for the demolition of derelict non-contributing structures; site acquisition and assembly; site development; and construction design and engineering. The Strategic Demolition Fund seeks to catalyze economic development and job creation by assisting communities in redevelopment through demolition. Funds are awarded on a competitive basis to projects that can prove a high economic and revitalization impact.

Other Related Programs

Limited English Proficiency Plan

Although less than 1% of Cumberland’s residents have limited English proficiency, HUD requires that communities complete a Limited English Proficiency (LEP) plan as required under Title VI for recipients of federal assistance. Recipients have a responsibility to take reasonable steps to provide individuals with Limited English Proficiency with meaningful access to programs and activities. Title VI and accompanying regulations and statutes, such as fair housing, prohibit discrimination on the basis of race, color, or national origin among other protected groups. Discrimination on the basis of national origin may occur if a recipient is limited in accessing programs and services because of their limited English. Therefore, in certain circumstances, an agency or service provider may limit access to federally assisted program and services without sufficient language assistance.

Jurisdictions receiving CDBG and other HUD assistance are required to complete an LEP plan using a four-factor analysis as outlined by Department of Justice guidance. This includes: the number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee; the frequency with which LEP individuals come in contact with the program and/or services; the nature and importance of the program, activity, or service provided by the City of Cumberland to the LEP community; and the resources available to the City of Cumberland and overall cost. Cumberland has completed its LEP plan, but it has not been adopted by the Mayor and City Council. The Human Relations Commission has identified the adoption of the LEP plan as a priority in 2020.

Planning and Zoning

The following section is a review of the plans, zoning ordinance, and housing code that impacts housing quality and housing choice within the City of Cumberland.

Comprehensive Plan

The City of Cumberland adopted a new Comprehensive Plan in 2013 that guides land use, neighborhood development, location of public facilities, economic development, revitalization, and municipal growth. The Comprehensive Plan consists of two elements: a City-Wide Element (adopted in 2013) and a Neighborhood Element (adopted in 2012). The City-Wide Element was later updated in 2015. The Neighborhood Element was the primary document for public input for residents to identify primary issues and concerns in their community. The Neighborhood Element also includes demographic, historical, and cultural information for each neighborhood. The City-Wide element includes concerns and issues that transcends particular neighborhoods as well other city-wide critical issue and concerns. The city coordinated with planners from Allegany County and the State of Maryland. The Comprehensive Plan guides future development and redevelopment through the year 2033.

The three goals identified in the Housing chapter of the Comprehensive Plan include: foster public/private residential housing investment to meet the housing needs of Cumberland residents; work to eliminate blighted properties and encourage housing revitalization,

rehabilitation, and redevelopment options; and encourage infill housing development. Selected Action Items from the Housing chapter include:

- Work with private and non-profit housing organizations to establish long-term housing acquisition and rehabilitation program based on the Habitat for Humanity model,
- Salvage deteriorating but historically significant older homes and bring them up to code,
- Create affordable housing opportunities by rehabbing vacant homes and returning them to private ownership,
- Establish a local land bank,
- Targeted neighborhood revitalization effort,
- Aggressively pursue demolition of severely deteriorated property,
- And, adopt additional zoning incentives to encourage promotion of infill housing.

Blight Study

In 2018, a survey of 11,000 blighted and vacant buildings was conducted in the City of Cumberland. The study was completed by West Virginia University College of Law (WVU) and Downstream Strategies. Surveyors conducted a “windshield survey” using handheld devices for the survey. Surveyors evaluated the condition of the primary structure’s roofing, windows, doors, exterior walls, porch/stairs/deck/ramps, foundation, and storefront/signage using a ranking scheme of “poor,” “fair,” “good,” and “excellent.” Maps produced by the City of Cumberland Engineering & GIS department showed census tracts that corresponded with neighborhoods with the highest number of vacant and abandoned buildings in the city including McNamee-Shriver/Rolling Mill (101), Eastside-Willowbrook (100), Chappell Hill/Virginia Avenue (90). Johnson Heights-Mapleside has over 72 vacant and blighted buildings. Several of these neighborhoods correspond to low-income neighborhoods with higher concentrations of Blacks and Latinos as discussed elsewhere in the AI.

The City had several goals in tackling blight in the City, including increasing safety for those living or working near dilapidated structures, reducing crime, improving the overall appearance of Cumberland, encouraging overall pride and property upkeep, improving the quality of life, attracting new development, and “right-sizing” the City to match the housing stock to the size of the City’s declining population.

The consultant team created a Blight Action Plan with recommendations to the City along with an inventory of dilapidated and abandoned buildings in an electronic format. Some of the highlights of the Blight Action Plan recommendations include:

- Utilize the building inventory to prioritize enforcement.
- Consider prioritizing properties with shared walls.
- Develop an inventory of blighted properties and develop a vacant property registry
- Collaborate with lenders
- Include public input during redevelopment discussions
- Consider expanding the capacity of the City Code Enforcement Office.

Sustainable Communities Plan

The Maryland Sustainable Communities Act of 2010 established a framework for reinvestment in the revitalization of Maryland's existing communities creating a single, locally designated geographic focus area that targets resources from multiple state agencies. Designated Sustainable Communities must be renewed every five years. Designation allows Cumberland to apply for the Community Legacy Program and the Strategic Demolition Fund (see above).

The City of Cumberland renewed its application as a Sustainable Community in 2017. The City's renewal application included plans for expansion to portions of Bedford/Frederick Street to include the Commerce Center Business Park. Currently, the designated areas include most of the central business district and surrounding neighborhoods, as well as Willowbrook Road Corridor. The Sustainable Communities Plan includes an action plan in several areas, including the environment, economy, transportation, housing, quality of life, and local planning and land use. Some housing-related goals include: development of residential units in the Central Business District; continuing the update of the Maryland Inventory of Historic Properties; seeking opportunities to increase new housing construction for either single family homes or multi-unit construction to add to the housing stock; providing accessibility improvements to residential properties to enable the elderly and physically disabled individuals to remain in their homes or have access to affordable housing; and increasing affordability of utility bills to decrease energy consumption.

Zoning

The City of Cumberland adopted its Zoning Ordinance (as amended) in 1998 as authorized under the State of Maryland under Article 66B that empowers local jurisdictions to enact, administer, and enforce a Zoning Ordinance. The Zoning Ordinance established a Planning and Zoning Commission to recommend, establish, and enforce regulations concerning planning and zoning to promote the health, safety, and general welfare of the community by regulating and restricting the size of buildings, the number of structures on a lot, lot size, the percentage of a building to a lot (floor area ratio), the size of yards and other spaces, the use of buildings, the location of signs, and building use for residential, business, industry, and other uses. The City of Cumberland's Zoning Ordinance and Subdivision Regulations establishes minimum standards for single-family attached and detached as well as multi-family buildings. A zoning district map indicates zones and building uses throughout the city.

In 2014, the City of Cumberland started the process to update its Zoning Ordinance in order to implement the 2013 Comprehensive Plan. Planning staff has proposed a new zoning map and Zoning Ordinance in 2014, followed by proposed Subdivision Regulation updates in 2015. The Mayor and City Council have not adopted the proposed changes to date. For more information on the city's Zoning Ordinance, visit the City of Cumberland's website at www.cumberlandmd.gov.

Housing Code

The Housing Code of the City of Cumberland was established to set minimum standards governing the use, operation, occupancy, and maintenance of dwellings and other structures to ensure they provide decent, safe, and sanitary housing. The Housing Code assigns

responsibilities and duties to owners, agents, operators, and occupants of housing. The code also provides licensing procedures, inspections, procedures for the correction of violations, and the condemnation of housing units. The Director of Community Development has the authority to inspect units, make citations of violations, and may request a warrant from the Circuit of District Court of Allegany County. All owners of property and agents must register by July 1st each year. In addition, every housing unit or dwelling must be inspected on an occupancy basis and upon transfer.

II. Community Participation Process

The U.S. Department of Housing and Urban Development's (HUD) requires "meaningful community participation" for the development of the City of Cumberland's Analysis of Impediments (24 CFR 5.518). This means "a solicitation of views and recommendations from members of the community and other interested parties, a consideration of the views and recommendations received, and a process for incorporating such views and recommendations into decisions and outcomes." The AI is an important step prior to the preparation of the City's Con Plan, which defines how the City will utilize HUD grant funds, specifically Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) funds. In order to provide a robust and meaningful community engagement, several different and complementary processes were used to engage with a broad range of community members. These activities included an online survey, public meetings, an advisory group, interviews, focus groups, and traditional and social media.

Survey

A short online survey was created on Survey Monkey to ask City residents about housing and community development needs, issues, and priorities in preparation for the City's 2020-2024 Consolidated Plan. The survey also included six questions related to fair housing such as experiences with discrimination, limitations on fair housing choice, and knowledge on reporting discrimination. The survey was available in English and Spanish and was also made available in paper form upon request. The survey link was distributed via official City communication using social media directly to citizens, as well as nonprofit organizations, housing counseling organizations, CDCs, and other community organizations. Organizations were asked to distribute the survey to their clients and networks. A total of 622 responses (416 Cumberland residents) were received by the survey between January and April 2020. A copy of the survey is included in the Appendix.

Outreach Events

Through the AI process, the Department of Community Development ensured that outreach for public meetings was conducted through area non-profits and service organizations. The Department distributed the full public meetings schedule along with reminders for upcoming events. Organizations were asked to distribute flyers to stakeholders and clients. Existing events are efficient because they have a built-in marketing component from established and trusted community organizations. Priority was given to meetings of nonprofit, housing and community development organizations, neighborhood organizations, and churches for community. All organizations were encouraged to distribute materials at offices, events, and community gathering spaces, such as coffee shops, grocery stores, and other civic spaces. However, due to the COVID-19 pandemic, all outdoor outreach events were canceled, and meetings were either canceled outright or rescheduled on-line via Zoom or other meeting platforms. These restrictions affected some outreach efforts. Nevertheless, turnout for events was similar to previous efforts pre-COVID-19.

Public Meetings

Four public meetings were originally planned as part of the AI process that followed HUD regulations on notifications and accessibility. Each public meeting was planned to be located in an accessible location near public transportation, to comply with Americans for Disabilities Act (ADA) requirements, and to offer translation services for those with limited English proficiency. However, due to COVID-19, the four meetings were reduced to two while both these meetings were moved on-line using the City of Cumberland's Zoom account.

The first public meeting was held on May 28th via Zoom. The public meeting offered participants an opportunity to learn about the fair housing planning process and view data, facts, and maps from the City of Cumberland. Attendees were asked to participate in one of three small group discussion tables that were organized around the following topics—discrimination in housing, barriers to housing opportunity, and discrimination and barriers to persons with disabilities. Since approximately 15 participants participated in the Zoom meeting, there were no break-out groups, so all the questions were covered by the entire group.

Highlights from the discussion included:

- The need for more information on fair housing rights and enforcement,
- A discussion on the state's new source of income protection law,
- Landlord-tenant relations regarding condition of housing unit,
- Increasing rent burden and the lack of quality affordable housing choice,
- Limited choice of housing units for persons with disabilities
- And, a need for more holistic approach to housing.

Participants had a good discussion on the new source of income protection, perceptions of affordable housing residents, and the reticence of landlords to lease to lower-income residents because of the perception that these residents do not take good care of property. The group discussed some possible solutions, including landlord and tenant education and a small insurance fund for landlords to recover damages for participating in the Housing Choice Voucher program.

An additional public meeting will be held on July 22nd, to gather additional comments on the draft AI from the public. The meeting will be used to discuss the impediments to fair housing identified in the AI, as well as the recommended fair housing goals and actions.

Public Hearings

The Analysis of Impediments must be adopted by resolution by the City of Cumberland. The Department of Community Development will schedule time with Mayor and Council for questions on the draft AI and review the draft plan prior to scheduling the draft plan and the final version for adoption.

The first public hearing with the Mayor and City Council was held on June 2nd via Zoom. City staff and the consultant team presented updated data and maps and provided additional opportunity for discussion. There were no questions from Mayor and Council or the public at the

meeting. However, several councilmembers were interested in the data findings and were interested in following up with the consultant team.

The draft AI will be published for a 30-day comment period on June 26th. A second public hearing will be held on July 21st with a presentation on the identified impediments to fair housing and fair housing goals as well as an opportunity to review written comments to date and provide for additional public comment. The official comment period ends on July 27th followed by review and final adoption by Mayor and Council on August 4th.

Interviews and Group Meetings

The consultant team conducted six interviews/focus groups with 12 stakeholders in the Cumberland community. The interviews provided an opportunity to do a deep dive into issues related to housing discrimination and limits to fair housing choice. The goal of the interviews and focus groups was to get a broad range of input on a particular topic, such as housing affordability, homelessness, special needs housing, education, environmental justice, health, planning, public health, transportation, and community economic development in the City of Cumberland. The interviews and group meetings provided an opportunity to learn how these factors contribute to or impede access to fair housing choice in the community.

Group meetings and interviews were conducted with members of the following stakeholder groups:

- Fair housing organizations, including the Maryland Commission on Civil Rights.
- Private housing industry;
- Government sector;
- Non-profit advocacy sector;
- Local, regional and national stakeholders in the legal and research sectors;
- And, individuals and/or groups representing members of protected classes (race, color, national origin, sex, familial status, religion, and disability) in Allegany County and the City.

These interviews also included a cross sector of elected officials, as well as County and City staff. The consulting team also drew information from the concurrent Consolidated Plan process, as well as information from the Cumberland Economic Development Corporation advisory group that includes members from the stakeholder groups mentioned above.

Organizations and agencies interviewed included:

Allegany County Board of Education
Allegany County Department of Community & Economic Development
Allegany County Department of Human Services
Allegany County Health Department
Allegany County Human Resources Development Commission
Allegany County Library System
City of Cumberland Community Development
Cumberland Public Housing Authority

Maryland Commission on Civil Rights
Maryland Department of Human Resources
UPMC/Western Maryland
Western Maryland Advisory Council

In addition, members of the Cumberland Economic Development Corporation Advisory Board were also consulted as part of this AI.

III. Assessment of Past Goals and Actions

The City of Cumberland affirmatively further fair housing as required by the Housing and Community Development Act of 1974, as amended. The City's *Analysis of Impediments (AI) to Fair Housing*, as adopted under City Council Resolution is a review of impediments to fair housing choice in the public and private sector. Impediments to fair housing choice consist of any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin. A policy, practice, or procedure that appears neutral on its face, but which operates to deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status, or national origin may constitute such an impediment.

Cumberland completed its last complete Analysis of Impediments in 2005. Due to staff capacity and a shortage of funds, the City was unable to complete an AI in 2010 or 2015. However, the City did report on fair housing activities in their CAPER every year. In 2018, Cumberland spent \$10,000 on fair housing outreach, enforcement, and education. This section provides a review of the Analysis of Impediments and updates in the City's CAPER in subsequent years.

Barriers Defined in 2005

The 2005 AI identified nine barriers or impediments to fair housing:

1. Shortage of accessible housing units for persons with disabilities. Residents and service providers identified limited to no available accessible units for persons with disabilities including units on a single-level or elevator accessible units.
2. Lack of education on rights for persons with disabilities. Both landlords and tenants were unfamiliar with fair housing rights and responsibilities. Some landlords were unaware of obligations to reasonably accommodate persons with disabilities. At the same time, persons with disabilities were unaware of their rights under the Fair Housing Act or the Americans with Disabilities Act.
3. Lack of financial resources to modify units for persons with disabilities. For persons with disabilities, the burden often falls on them to modify units while at the same time, landlords may not have the financial means to modify units especially landlords with less than four units.
4. Lack of quality affordable rental units. Residents, advocates, and service providers identified lack of quality rental affordable housing as a major barrier partly due to a large number of substandard or dated units.
5. Lack of retail and services in low-income neighborhoods. Residents and service providers identified a lack of retail, grocery stores, and other services adjacent to low-income neighborhoods.

6. Limited job access due to lack of transportation. Residents and advocates do not have access to reliable public transportation to job centers especially in Allegany County.
7. Lack of available land for development of new housing. The City of Cumberland is primarily built out. Demolition and land assembly are necessary to provide opportunities for new housing development at all income levels.
8. Lack of education on fair housing rights and responsibilities. Residents and advocates identified an overall lack of education and lack of knowledge on how to report fair housing violations.
9. Predatory lenders limit access to housing affordability or improved credit. Residents, advocates, and service providers identified predatory lending, check cashing, and other predatory practices were identified as a barrier to protected classes seeking better rental housing opportunities or eligibility for homeownership.

Progress to Date

In 2019, the Department of Community Development, in partnership with the Cumberland Economic Development Corporation (CEDC), published a Request for Proposal for the completion of the Analysis of Impediments to Fair Housing in conjunction with the 2020-2025 Consolidated Plan. The City of Cumberland hired LSA Associates to complete both the AI and the Consolidated Plan. Previously, efforts were completed by City staff. Below are progress updates from the City's 2018 CAPER submitted to HUD. Actions in the CAPER were identified as part of the City's 2006-2011 Fair Housing Action Plan.

Shortage of accessible housing units for persons with disabilities

- The Human Resources Commission (HRC) and the Department of Community Development continue to advocate for an increase in the number of affordable and accessible units for persons with disabilities.
- The City continues to collaborate with Friend's Aware, Inc. on the rehabilitation of the Life Enrichment Center for developmentally disabled individuals.
- CDBG funds were provided for Independence's Home Choice program and DORS to rehabilitate and make accessible units for persons with disabilities.
- CDBG funds were allocated to make curb cuts and other improvements to sidewalks in keeping with American with Disabilities Act recommendations in Jane Frazier Village in South Cumberland, as well as in downtown Cumberland.

Lack of education on rights for persons with disabilities

- The Maryland Commission on Civil Rights (MCCR) and the City provided training to landlords and tenants regarding their rights on what constitutes "reasonable accommodation."

- In 2019, two free public seminars were organized by the City’s Human Relations Commission members in collaboration with MCCR, the Legal Aid Bureau, Bridges to Opportunity, Allegany County Library system, and the Maryland Department of Housing and Community Development with participation from HUD.
- Other events include a Civil Rights mini-seminar in August 2018. The HRC provided education materials at the National Night Out Event in South Cumberland in August 2019. HRC organizes multiple events during Fair Housing Month in April including a day-long Fair Housing event and free interactive workshops in May 2019.

Lack of financial resources to modify units for persons with disabilities

- Bridges to Opportunity Housing Committee and the Homelessness Board meet six times a year to discuss housing issues and barriers to affordable housing, including the lack of financial resources for individuals and families with disabilities.
- To improve overall housing conditions, the City of Cumberland now provides an inspection of every unit upon turnover, providing an opportunity to identify modification needs as well as provide a lead paint inspection for each new tenant.
- Three organizations—Resources for Independence, NAILS, and DORS—provide programs to assist individuals in funding modifications necessary to make homes more accessible.
- In 2019, 94 NAILS volunteers provided property improvements at a cost of \$12,104 for 12 homeowners. The HRC and Housing Committees also circulate a housing resources list to all agencies and service providers throughout Cumberland.

Lack of quality affordable rental units

- Bridges to Opportunity has an initiative to educate the public and support the City's rental licensing program by developing a registry of available and inspected units.

Lack of retail and services in low-income neighborhoods

- The Cumberland Economic Development Corporation has developed a shopping center with a grocery store, retail, and restaurants providing services to an underserved area. [The CEDC has undertaken several projects within the City’s urban core including the installation of a downtown fiber optic loop, the complete renovation of Baltimore Street (the City’s traditional commercial and retail center), and the repurposing of an area adjacent to I-68 for a retail and commercial development.

Limited job access due to lack of transportation

- Founded in 2016, the Bridges to Opportunity Transportation Committee includes key community stakeholders as well as the HRC, Allegany Transit, med Trans, and Mobility Management. The committee advocates for additional bus routes that serve low-income communities as well as education and outreach on transportation services. Additionally, several public service agencies provide transportation vouchers for low-income clients funded in part by CDBG funds. The Committee also coordinates with the Allegany County Transportation Task Force on regional transportation needs.

Lack of available land for development of new housing

- The Cumberland Housing Group's mission is to develop new affordable housing and has land-banked some property in South Cumberland as well as purchased blighted property around Virginia Avenue corridor to build new housing.
- The Housing Authority is redeveloping various sites under HUD's Rental Assistance Demonstration program beginning with Fort Cumberland Homes.
- CEDC is studying three properties for redevelopment potential that would include new housing.

Lack of education on fair housing rights and responsibilities

- The Department of Community Development and the Human Relations Commission (HRC) provides literature and information on resources for landlords, tenant rights, fair housing laws, and Maryland lead paint requirements. Since 2018, the City's Code Enforcement Office provides information in its office at City Hall and the Department of Community Development mails information annually to the rental licensing mailing list as well as makes the information available on the City's website and social media outlets.
- The City's discrimination complaint process has been updated and the Senior Community Development Specialist is the fair housing contact person citywide.
- The HRC collaborates with the MCCR on outreach events, education, and evaluating and reporting fair housing complaints. The City is also a member of the Maryland Association of Human Relations/Human Rights Agencies which also provides resources and information on fair housing. Public service radio announcements still play over the radio to educate consumers on their rights.
- One setback is the loss of Baltimore Neighborhoods, Inc., an active fair housing organization throughout the state of Maryland which provided many seminars, workshops, and investigated fair housing violations. Since 2018, the HRC has partnered with the Legal Aid Bureau and Allegany Law on fair housing trainings and workshops. However, in November 2019, various consumer advocacy and legal rights organizations organized to create the Fair Housing Action Center of Maryland.

Predatory lenders limit access to housing affordability or improved credit

- Bridges to Opportunity has conducted research related to predatory lenders and check cashing entities in Cumberland. Efforts are underway to increase education and outreach as well as making these practices more difficult in the community.

IV. Analysis of Fair Housing Issues

Demographic Summary

This section presents demographic, economic, and housing information for the City of Cumberland, along with comparisons with the surrounding region. Data for this section are primarily drawn from decennial Census data and American Community Survey data, along with supplemental, publicly available data. These data were used to analyze a broad range of socio-economic characteristics, including population growth, race, ethnicity, age, disability status, employment, income, poverty, and housing market trends.

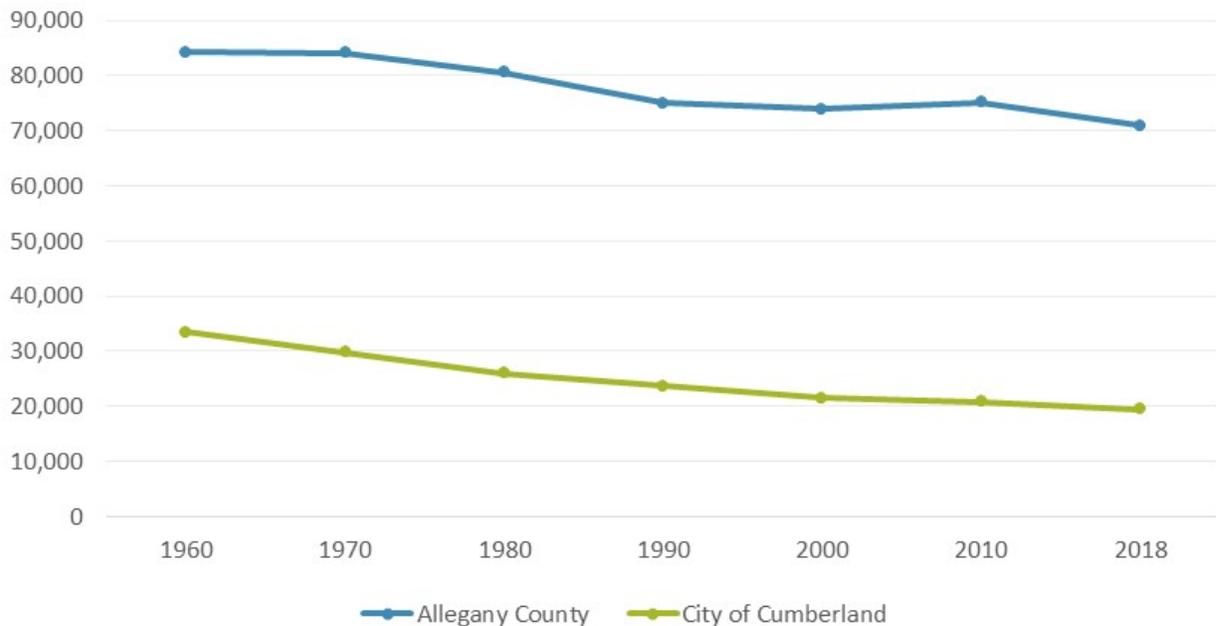
The data and analyses presented in this section are designed to describe the underlying conditions that shape housing market behavior and access to housing opportunities in the City of Cumberland. Detailed tables are available in the Appendix.

Population Trends

The City of Cumberland was home to an estimated 19,480 people in 2018. Between 2010 and 2018, the City’s population declined by nearly 1,500 people, or declining by about 0.8% annually. The City’s population has been on the decline for decades, from its peak in 1960 when the population was 33,415. The City’s current population is now less than 60% of what it was in 1960.

The population of Allegany County has also declined since 1960, though the population drop has not been as dramatic. The current County population is now about 84% of the 1960 population.

Figure IV-1. Population, 1960 – 2018



Source: U.S. Census Bureau

Race/Ethnicity

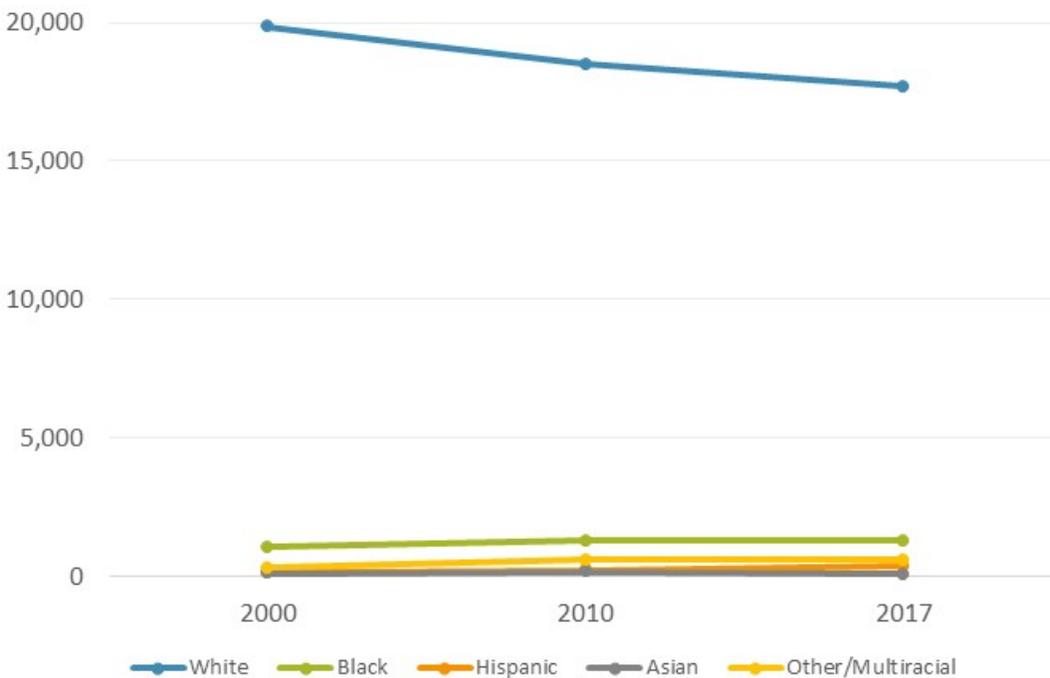
The populations of both the City of Cumberland and Allegany County are significantly less racially and ethnically diverse than the overall State of Maryland. In 2017, nearly nine out of 10 Cumberland residents (88.0%) were non-Hispanic White. A similar share (87.3%) of Allegany County residents are non-Hispanic White. In the State of Maryland, an estimated 51.9% of residents are non-Hispanic White.

Over the past 20 years, the share of the City’s population that is White has declined. Between 2000 and 2017, the City’s White population has declined by more than 2,100 people. In 2000, Whites comprised 92.2% of the City’s population.

Black residents comprise the largest share of non-White residents in Cumberland; the share of Black residents was 6.5% in 2017. By contrast, Black residents made up nearly 30% of State of Maryland residents. The Black population in the City of Cumberland has been steadily on the rise since 2000.

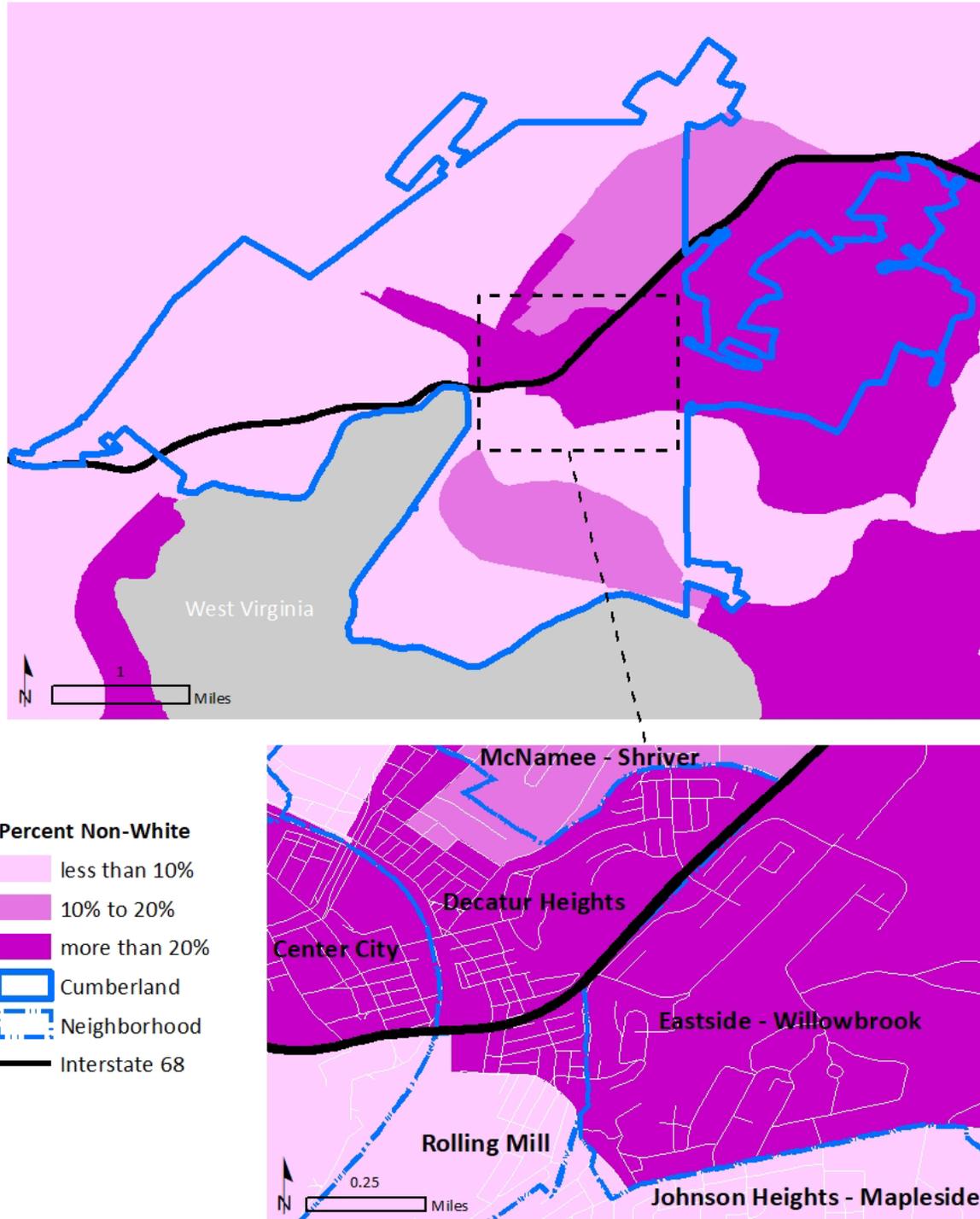
While Hispanic residents make up a very small share of Cumberland’s population, the number of Hispanic residents has increased significantly faster than other racial and ethnic groups. In 2017, only 2.0% of the City’s population was Hispanic; however, the number of Hispanic residents has increased by 164% between 2000 and 2017 (an estimated 246 new residents).

Figure IV-2. Population by Race/Ethnicity, 2000 – 2017
City of Cumberland



Source: U.S. Census Bureau, American Community Survey 5-year estimates, decennial Census

Map IV-1. Percentage Non-White Population by Census Block Group (2017)



Source: U.S. Census Bureau, 5-Year American Community Survey, City of Cumberland

The City's non-white population is concentrated in the Center City, Decatur Heights, and Eastside-Willowbrook neighborhoods. Some neighborhoods, particularly west of Interstate 68, have very low shares of non-white residents.

Nativity

Very few Cumberland and Allegany County residents are foreign-born. In 2017, approximately two percent of the City's and County's populations were foreign-born, compared to about 15% of the statewide population. The City's foreign-born population has increased over the past decades, but the rate of increase has been slowed in the City of Cumberland compared both to rate in the State of Maryland as well the rate in Allegany County. Between 2000 and 2017, the foreign-born population in the City of Cumberland increased by 44.5%, compared to an increase of 79.0% in Allegany County and 72.6% in the State of Maryland.

The largest share of Cumberland's foreign-born population is from Guatemala. One out of five foreign-born residents in Cumberland is from Guatemala, a far greater share than in Allegany County. The City's other foreign-born residents come from a range of other countries, including the Philippines, China, the Czech Republic, Jamaica and England.

Limited English Proficiency (LEP)

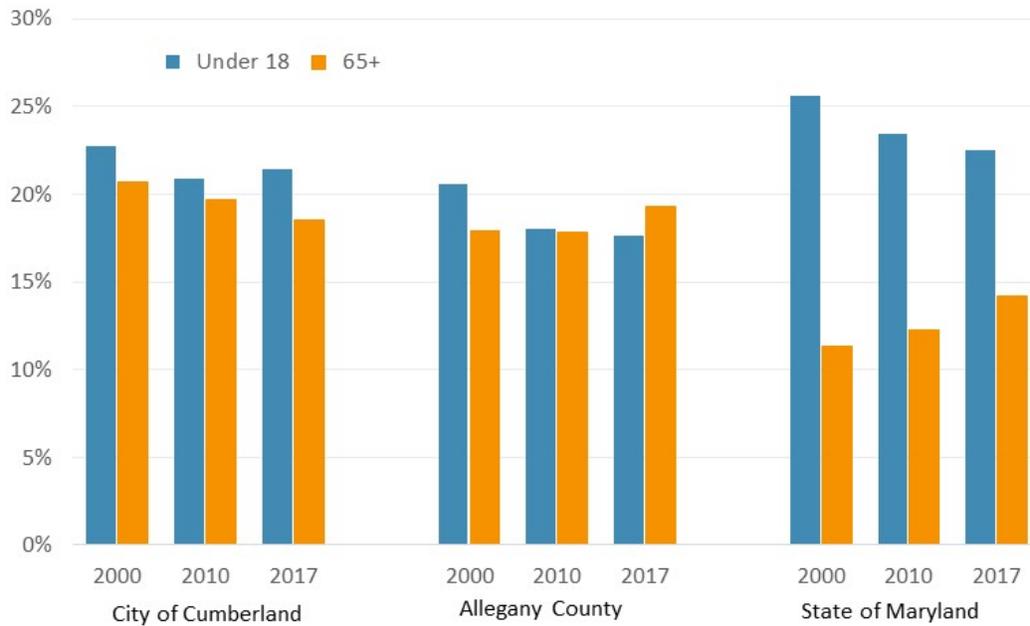
Less than one percent of the City of Cumberland's residents age five and older are limited English proficient—that is, speak English less than “very well.” The share of LEP residents in Allegany County is about the same, at 1.1%. By comparison, 6.7% of State of Maryland residents are limited English speakers.

While small in number, the number of non-English speakers has increased by 33.9% since 2000. In Allegany County, the number of LEP residents increased by 31.7% and the number of LEP residents in the State of Maryland increased by 52.5%.

Age

About one in five City of Cumberland residents are children under age 18. By comparison, 17.6% of Allegany County residents and 22.5% of State of Maryland residents are under age 18. While the number of children living in the City of Cumberland has declined, the share of the population that is children has remained relatively stable since 2000. By comparison, the under 18 population has also declined in both Allegany County, across the state, and also as an overall share of the population.

Figure IV-3. Under 18 and 65+ Populations as a Share of Total Population, 2000 – 2017



Source: U.S. Census Bureau, American Community Survey 5-year estimates, decennial Census

Seniors (age 65 and older) comprise about 18.5% of the City of Cumberland’s population. Unlike Allegany County, the State of Maryland, and most other communities around the country, the senior population has been declining as a share of the City’s total population.

Families

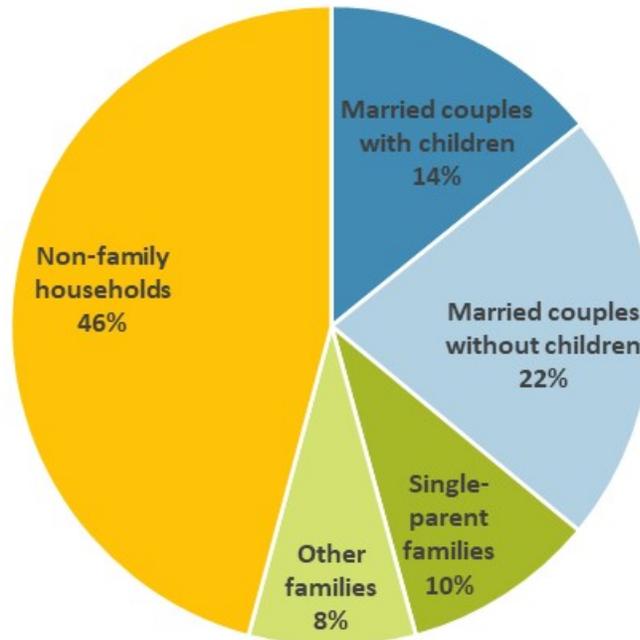
In 2017, an estimated 54.2% of households in the City of Cumberland are family households.⁵ A higher share of both County and State households are family households, at 61.7% and 66.9%, respectively. Both the City of Cumberland and Allegany County have a lower share of married couples with children households (about 14%) compared to Maryland, where 19.7% of all households were married couples with children.

In the City of Cumberland, approximately one in 10 households is a single-parent family. In 2017, 9.8% of Cumberland households were single-parent households, compared to 7.5% of Allegany County households and 9.2% of households statewide in Maryland.

Cumberland also has a higher share of non-family households, primary single-person, senior households, compared to Allegany County and the State of Maryland. In 2017, nearly half of all households in the City of Cumberland (45.8%) were non-family households, compared to 38.3% of Allegany County households and 33.1% of State of Maryland households.

⁵ Family households are defined as households that include two or more members related by birth, marriage, or adoption.

Figure IV-4. Household Type, 2017
City of Cumberland



Source: U.S. Census Bureau, 2017 American Community Survey 5-year estimates

Persons with Disabilities

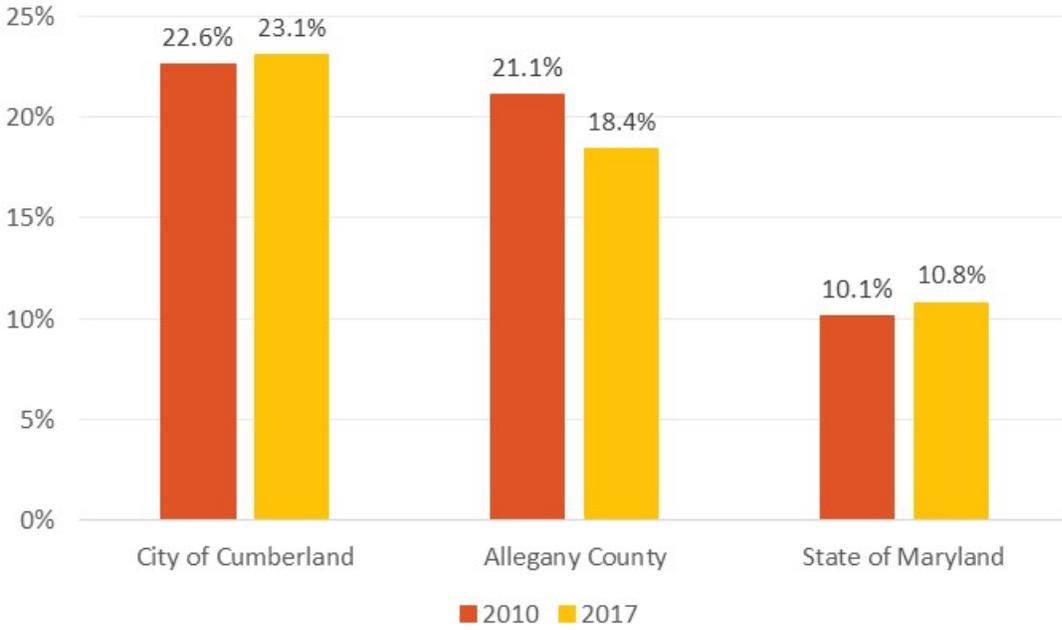
The City of Cumberland has a significantly higher share of disabled residents than either Allegany County or the State of Maryland. In 2017, there were an estimated 4,500 Cumberland residents with a disability, comprising nearly a quarter (23.1%) of the City’s population. By comparison, 18.4% of Allegany County residents and just 10.8% of State of Maryland residents. Individuals can report multiple disabilities. More than half of Cumberland residents with a disability report having an “ambulatory difficulty” (56.5%).⁶ This is a similar trend in the County, as well as statewide.

The second largest group of individuals report a cognitive difficulty (46.3%) and/or an independent living difficulty (36.1%). These patterns hold roughly for Allegany County and the State of Maryland.

Between 2010 and 2017, both the numbers and shares of residents with a disability have increased in the County and the City. A primary driver of the increase in the number of persons with disabilities is the growth in the older adult population, as older residents are significantly more likely than younger residents to have a disability.

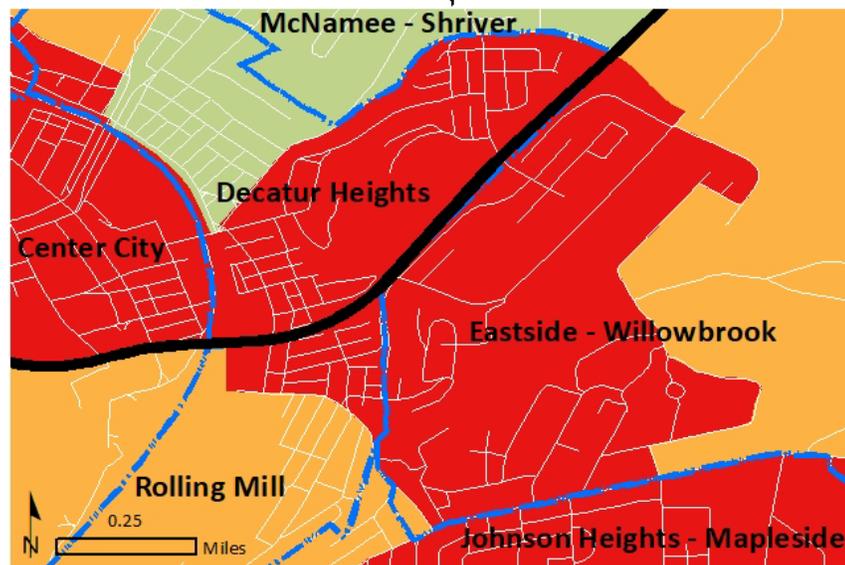
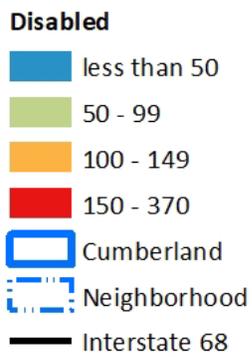
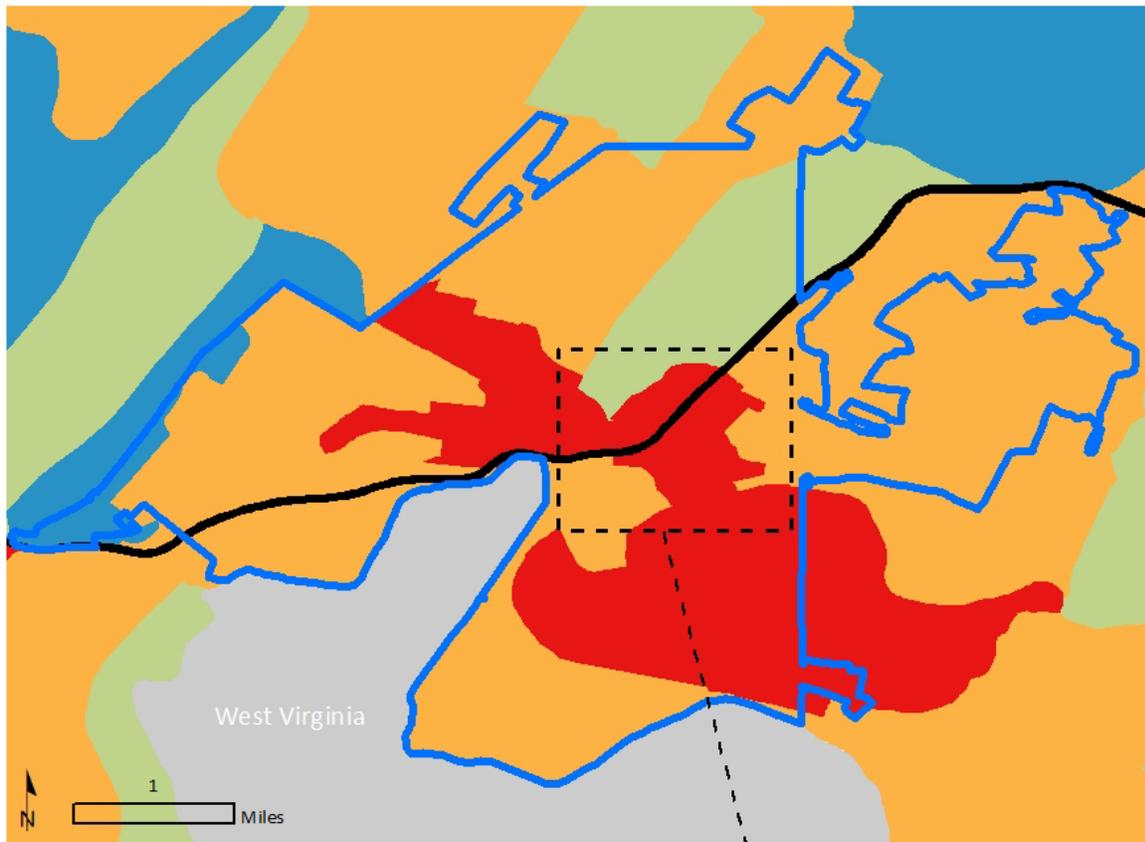
⁶ The U.S. Census Bureau defines disabilities as follows: Hearing difficulty - Deaf or having serious difficulty hearing; Vision difficulty - Blind or having serious difficulty seeing, even when wearing glasses; Cognitive difficulty - Because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions; Ambulatory difficulty - Having serious difficulty walking or climbing stairs; Self-care difficulty - Having difficulty bathing or dressing; and Independent living difficulty - Because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor’s office or shopping.

Figure IV-5. Share of Non-Institutionalized Population with a Disability, 2010 – 2017



Source: U.S. Census Bureau, American Community Survey 5-Year estimates

Map IV-2. Disabled Population by Census Block Group (2017)



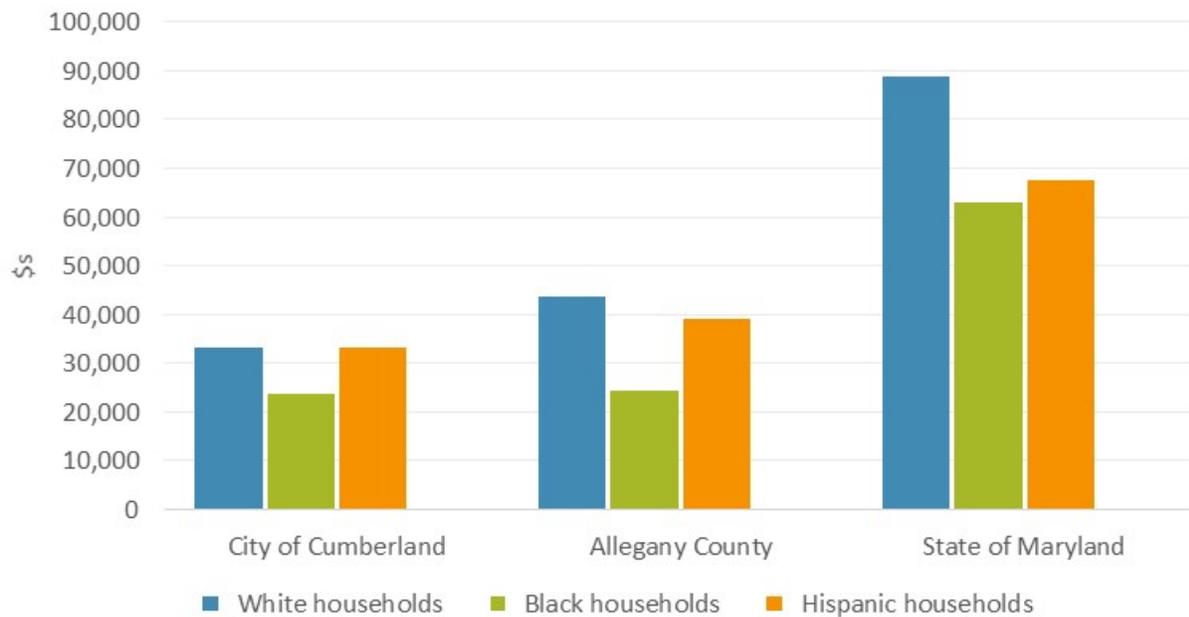
Source: U.S. Census Bureau, 5-Year American Community Survey, City of Cumberland

Household Income

In 2017, according to the Census Bureau’s ACS data, the median household income in the City of Cumberland was \$32,825. The City’s median is lower than the County median, and significantly lower than that for the State overall.

The Black and Hispanic populations are very small shares of the overall City and County populations. Based on ACS data, Black households in Cumberland have a median household income of \$23,698 and Hispanic households have a median household income of \$33,222. Black households tend to have lower incomes than White households in Allegany County and the State of Maryland. In Cumberland, the Black median household income is about 71% of the White median household income, which is the same share statewide. In Allegany County, median Black household income is 89% of median White household income.

Figure IV-6. Median Household Income by Race/Ethnicity (current \$s), 2017



Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year estimates.

Poverty

Poverty rates in the City of Cumberland are higher than rates in both Allegany County and the state as a whole. Overall, nearly one-quarter (24.4%) of Cumberland residents have incomes below the poverty line. By comparison, the poverty rate is 16.8% in Allegany County and just 9.7% in the State of Maryland.

Poverty rates are significantly higher for Black residents in both Cumberland and in Allegany County. In Cumberland, it is estimated that nearly half of Black residents live in poverty. In Allegany County, 43.1% of Black residents live in poverty. While Black poverty statewide is higher than overall poverty rates, it is far below what is seen in Cumberland and Allegany County.

According to data from the U.S. Census Bureau, poverty has become a growing challenge in the City of Cumberland since 2010. While poverty rates have increased in the County and the State, the increase has been greater in Cumberland.

In 2010, 19.1% of Cumberland residents lived in poverty; that rate increased to 24.4% in 2017. The Black poverty rate in Cumberland increased from 35.2% in 2010 to 49.6% in 2017.

Figure IV-7. Poverty Rates (%), 2000-2017

	City of Cumberland			Allegany County			State of Maryland		
	2000	2010	2017	2000	2010	2017	2000	2010	2017
All residents	19.8	19.1	24.4	14.8	14.5	16.8	8.5	8.6	9.7
White residents	19.3	17.5	22.0	14.3	13.8	15.7	5.3	5.8	6.6
Black residents	23.4	35.2	49.6	32.6	34.9	43.1	14.9	13.2	14.1
Hispanic residents	23.7	37.7	36.5	17.2	15.7	24.9	12.5	12.2	13.8
Asian residents	3.9	12.9	30.3	6.8	14.0	33.3	8.3	7.0	7.9

Source: U.S. Census Bureau, 2000 and 2010 decennial Census; 2006-2010 and 2013-2017 American Community Survey 5-Year estimates.

Employment and Wages

This section describes “at-place” employment—that is, jobs located within the City of Cumberland and Allegany County. Comparisons are also made with the nearby cities of Frederick and Hagerstown, Maryland, and the City of Winchester, Virginia. The City’s economy was largely built upon a manufacturing base that established the City of Cumberland as the second largest city in Maryland. Starting in the second half of the 20th century the city’s economy experienced a fundamental transformation as global economic patterns shifted and caused traditional manufacturing-based economies throughout the U.S. to see their foundations altered.⁷

Employment

In 2017, there were an estimated 11,418 jobs located in the City of Cumberland. About 44% of all of the jobs located in Allegany County are located within the City of Cumberland. Cumberland has accounted for about 45% of the County’s total jobs between 2010 and 2017. Between 2010 and 2017, the City lost about 1,500 jobs, or about 11.2% of the employment base. Despite the overall decline in jobs, the City added jobs in both 2015 and 2016 at a much faster rate than the County overall.

Over the 2010 to 2017 period, both the City of Frederick, Maryland and the City of Winchester, Virginia economies grew at a fairly substantial rate. By contrast, nearby Hagerstown saw the number of jobs declined by nearly 30% over that period.

Health care is the most important sector in the City of Cumberland economy, making up a larger share of at-place employment than nearby communities. In 2017, there were an estimated 4,450 jobs in the Health Care sector in Cumberland, accounting for 39% of all jobs in the City. By comparison, 22% of Allegany County jobs overall are in the Health Care sector. The largest employer in the City is the Western Maryland Health System, which employees an estimated 2,300 employees in the City.⁸

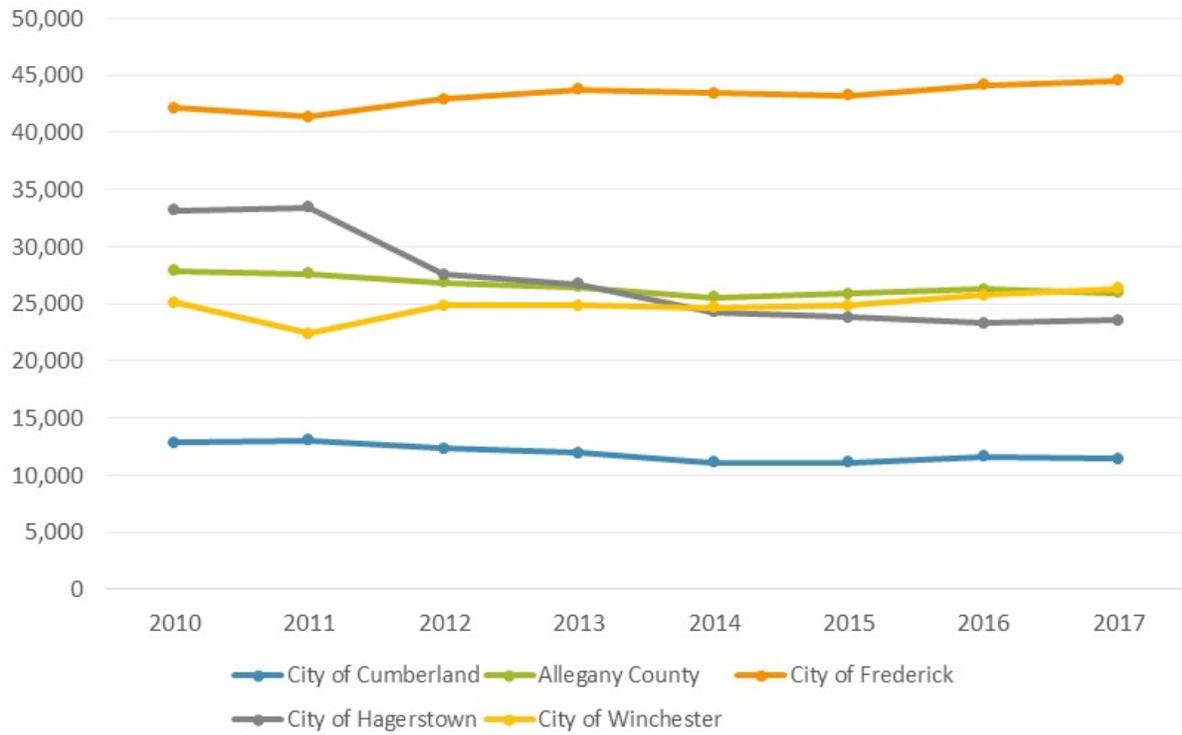
About one in 10 jobs in Cumberland was in the Education Services sector, and another one in 10 are in the Public Administration sector. The City has a slightly smaller share of jobs in Retail Trade and Accommodation and Food Services sectors compared to places like Frederick, Hagerstown and Winchester.

Only three percent of jobs located both in Cumberland the overall County were in the Professional and Technical Services sector. This share is comparable to both Hagerstown and Winchester, though the City of Frederick, Maryland has a significantly higher-share of Professional and Technical Service sector jobs.

⁷ Strategic Economic Development Plan, City of Cumberland, Maryland, p. 1-1.

⁸ <https://www.wmhs.com/careers/current-opportunities/>

Figure IV-8. At-Place Employment, 2010-2017



Source: U.S. Census Bureau, On The Map.

Figure IV-9. Employment by Industry

Industry	City of Cumberland		Allegany County		City of Frederick		City of Hagerstown		City of Winchester	
	No.	Pct.	No.	Pct.	No.	Pct.	No.	Pct.	No.	Pct.
Construction	296	3%	852	3%	2,058	5%	646	3%	386	1%
Manufacturing	177	2%	2,543	10%	1,334	3%	1,265	5%	1,811	7%
Wholesale Trade	149	1%	661	3%	1,141	3%	703	3%	460	2%
Retail Trade	957	8%	3,069	12%	4,745	11%	3,592	15%	3,551	14%
Transportation and Warehousing	218	2%	566	2%	321	1%	625	3%	313	1%
Information	291	3%	334	1%	476	1%	619	3%	217	1%
Finance and Insurance	423	4%	651	3%	3,355	8%	2,764	12%	627	2%
Real Estate and Rental and Leasing	76	1%	231	1%	447	1%	228	1%	334	1%
Professional, Scientific, and Technical Services	357	3%	863	3%	4,855	11%	887	4%	927	4%
Management of Companies and Enterprises	215	2%	222	1%	147	0%	32	0%	971	4%
Administration & Support, Waste Management and Remediation	178	2%	864	3%	2,023	5%	1,445	6%	1,408	5%
Educational Services	1,209	11%	3,253	13%	5,977	13%	1,620	7%	4,326	16%
Health Care and Social Assistance	4,450	39%	5,754	22%	8,107	18%	3,839	16%	6,608	25%
Arts, Entertainment, and Recreation	113	1%	198	1%	627	1%	407	2%	362	1%
Accommodation and Food Services	852	7%	2,850	11%	3,651	8%	2,046	9%	2,494	9%
Other Services (excluding Public Administration)	386	3%	724	3%	1,791	4%	637	3%	589	2%
Public Administration	1,031	9%	2,153	8%	3,299	7%	2,115	9%	786	3%
Total	11,418	100%	25,914	100%	44,549	100%	23,555	100%	26,303	100%

Source: U.S. Census Bureau, On The Map

Wages

About one in five jobs located in the City of Cumberland and in Allegany County have annual wages of less than \$15,000. This share is comparable to the shares in both the City of Hagerstown and the City of Winchester, reflecting lower-paying health care jobs (e.g. home health aides, nursing assistant, orderly), as well as other service jobs.

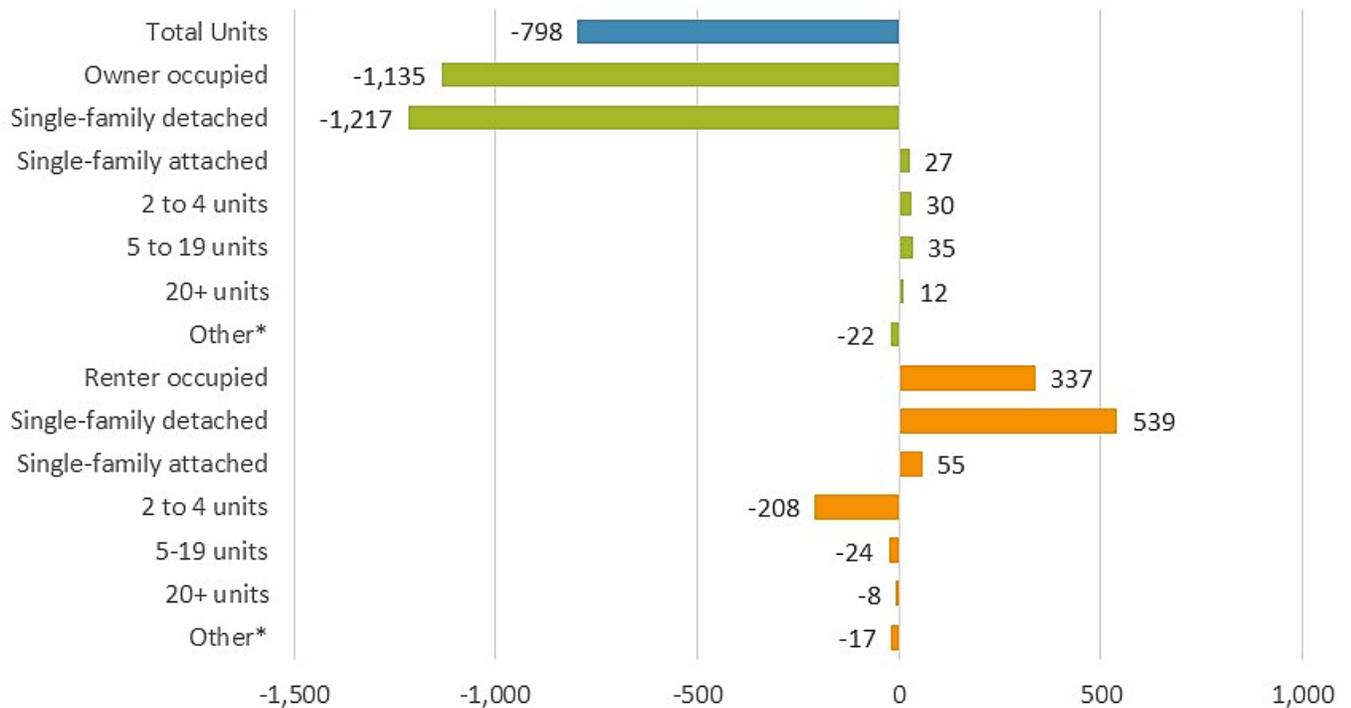
About 40% of jobs in Cumberland pay between \$15,000 and \$39,999, and another 40% have annual salaries of \$40,000 or more. These wage distributions are roughly comparable to other nearby communities, with the exception of the City of Frederick, where there are somewhat higher paying jobs.

Housing Market

In 2017, there was an estimated 8,437 housing units in the City of Cumberland. Nearly six out of 10 of housing units in the City of Cumberland (57.2%) are single-family detached units. About 12% of units in the City are townhomes and another 12% are units in buildings with two to four units (i.e. duplexes, triplexes and fourplexes). About 10% of units in the City are units in small multifamily buildings, with fewer than 20 units in the building. Another 9.2% of units are in buildings with 20 or more units.

According to data from the U.S. Census Bureau, the City of Cumberland’s housing stock actually declined by nearly 800 units, through demolition and a lack of replacement construction. There was also a shift in tenure from owner-occupied to renter-occupied units. The City lost an estimated 1,217 single-family, owner-occupied units. At the same time, there was an increase in the number of single-family rentals in the City, which at least partially reflects that shift in tenure from owner-occupied to renter-occupied units. The City also lost an estimated 208 rental units in small buildings with two to four units.

Figure IV-9. Housing Units by Type, 2010 and 2018
City of Cumberland



*Other includes mobile homes, RVs, and boats

Source: U.S. Census Bureau, American Community Survey 5-year files

Homeownership

In the City of Cumberland in 2018, 52.0% of occupied housing units were owner-occupied, while 48.0% of units were renter-occupied. The homeownership rate in the City of Cumberland is lower than the countywide homeownership rate. Furthermore, the number of homeowners living in Cumberland has declined over the past decade. In 2010, the City's homeownership rate was 59.9% and there were an estimated 5,483 homeowners. By contrast, in 2018 the City only had 4,348 homeowners, a drop of 1,135 homeowners. Some of these homeowners became renters through foreclosure or other economic hardship, while other homeowners left the city or passed away.

The owner-occupied housing stock in the City of Cumberland, like the rental housing stock, is relatively old compared to the County. More than a quarter of the owner-occupied homes in Cumberland was built before 1940 and nearly half (48.2%) was built before 1980. Home values are relatively modest in Cumberland, reflecting market conditions but also the age and condition of the homes. About 14% of all owner-occupied homes are valued at under \$50,000 and 56.4% are valued under \$100,000.

There is a lot of variability in home sales prices in Cumberland, largely due to the relatively small housing market. However, home prices in Cumberland recent years have not returned to the levels prior to the housing downturn. In May 2020, the median list price was \$109,000, about \$10,000 lower than the median list price a decade ago.

On average, homes in Cumberland sell after 75 days on the market. The trend for average days on market in Cumberland, MD has gone down since last month, and slightly down since last year.

Figure IV-10. Median List Price, All Homes for Sale, 2010 – 2020 (May)

City of Cumberland

Year	Median List Price	Pct. Change from Prior Year
2010	\$119,300	
2011	\$110,000	-7.8%
2012	\$119,500	8.6%
2013	\$100,000	-16.3%
2014	\$105,000	5.0%
2015	\$94,900	-9.6%
2016	\$105,000	10.6%
2017	\$88,500	-15.7%
2018	\$109,000	23.2%
2019	\$105,000	-3.7%
2020	\$109,000	3.8%

Source: zillow.com (2010-2019); realtor.com (2020)

As of the third week of June, there was a total of 196 home listed for sale in the City of Cumberland. The vast majority of homes for sale—171 homes—are single-family detached homes. The remaining homes are townhomes and condominium units that are part of single-family homes and duplexes. More than half of the homes for sales were built before 1940. Current list prices range from \$20,000 for a home being sold “as is” needing serious home repairs, potentially needed to be demolished altogether.



919 Maryland Avenue
List price: \$20,000



420 Fayette Street
List price: \$65,999

About half of all single-family homes for sale in Cumberland are priced between \$20,000 and \$100,000. A typical home is a single-family detached brick home built in the early part of the 20th century. In some cases, homes have updated systems or interiors; however, the majority have not had significant upgrades or improvements. Only two homes currently listed for

sale were built in 2010 or later. One home is a home that has income restrictions on buyers. The other is a 6,700 square foot, \$699,000 home on Marz Lane.

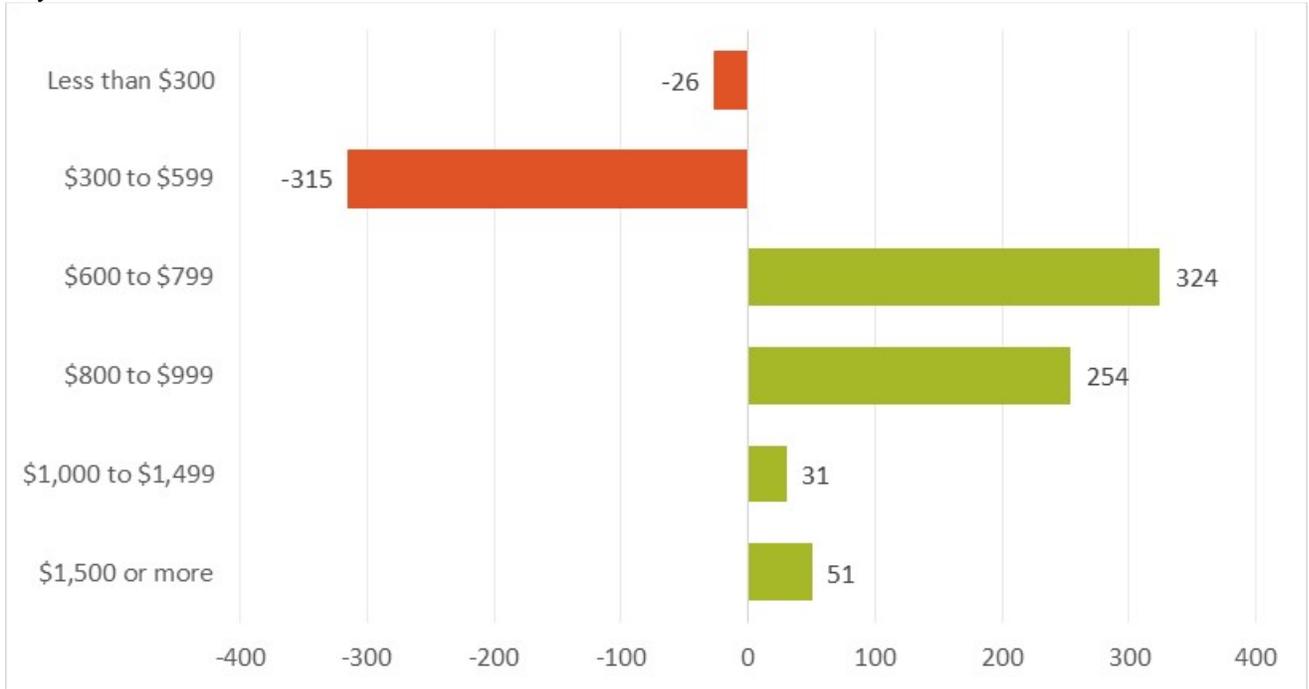
Rental Housing

According to the U.S. Census Bureau’s American Community Survey, the City of Cumberland added 337 rental units between 2010 and 2018, with all of the new rental stock in the form of single-family attached or detached homes.

In 2017, about 14.7% of the rental units in the City rent for less than \$300 per month. Using the 30% rule of thumb, a unit renting for \$300 per month is affordable to an individual or household with an annual income of \$12,000. An individual receiving Supplemental Security Income (SSI) in Maryland receives \$9,000 per year. An annual income of \$12,000 is also approximately equivalent to an individual earning the Maryland minimum wage (\$10.10 per hour) year-round at between 20 and 25 hours per week.

Over the past decade or so, the City has lost lower-rent units - not only through rent increases but also through demolition. While the City added 366 rental units between 2010 and 2017, there was a net loss of 341 rental units with rents below \$600 (affordable to households earning \$24,000 or less per year). At the same time, there were 660 more rental units with rents of \$600 or more in 2017 than there were in 2010.

Figure IV-11. Change in Rental Units by Rent Level, 2010 – 2017
City of Cumberland



Source: U.S. Census Bureau, American Community Survey 5-Year estimates

Segregation/Integration

Race/Ethnicity

The non-White populations in the City of Cumberland and in Allegany County are relatively small, but growing, shares of the total City and County populations. One measure of racial and ethnic segregation is the “dissimilarity index.” The dissimilarity index quantifies the geographic distribution of different racial groups across a geographic area (e.g. a county or city), typically using Census tract data. The index is interpreted as the percentage of a certain group’s population that would have to move to a different Census tract in order to be evenly distributed within a jurisdiction, relative to another group. The dissimilarity index ranges from 0 to 100, where 0 indicates complete racial integration across the jurisdiction and 100 indicates complete segregation across the jurisdiction. Therefore, the higher the dissimilarity index, the more racial segregation there is in a community. As an example, if a Black/White dissimilarity index is 50, then 50% of Black residents would need to move in order for Blacks and Whites to be evenly distributed across the County. A dissimilarity index of less than 40 generally means there is low racial segregation, an index of between 40 and 55 is moderate segregation, and an index over 55 indicates a high level of racial segregation.

The Black/White and Hispanic/White dissimilarity indices in the City of Cumberland was 38.2 in 2017, higher than the 19.6 Black/White dissimilarity index in the City in 2010. This means that 38.2% of Black residents in the City of Cumberland would have to change Census tracts within the City in order for Blacks and Whites to be equally distributed throughout Cumberland.⁹

In Allegany County overall, there remain very high levels of Black-White residential segregation, based on this segregation dissimilarity index. In addition, levels of Black-White segregation in the County has increased since 2010. In 2017, the Black/White dissimilarity index in the County was 64.4, increasing from 54.5 from 2010. This measure indicates a persistently high level of Black/White segregation in Allegany County.

Hispanic residents are more highly segregated than are Black residents in the City of Cumberland, though by this measure of segregation, White/Hispanic segregation is relatively low in the City. In 2017, the White/Hispanic dissimilarity index in the City of Cumberland was 32.4, down slightly from 34.9 in 2010. In Allegany County, the White/Hispanic dissimilarity index was 37.3 in 2017, down from 40.1 in 2010. The modest decline in Hispanic segregation occurs at the same time the Hispanic population increased significantly in both the City and the County.

Figure IV-12. Racial/Ethnic Dissimilarity Indices, 2010-2017

	City of Cumberland		Allegany County	
	2010	2017	2010	2017
<i>Black/White</i>	19.6	38.2	54.5	64.4
<i>Hispanic/White</i>	34.9	32.4	40.1	37.3
<i>Nonwhite/White</i>	14.5	27.5	42.2	50.1

Source: U.S. Census Bureau, 2010 and 2017 American Community Survey Census tract-level data.

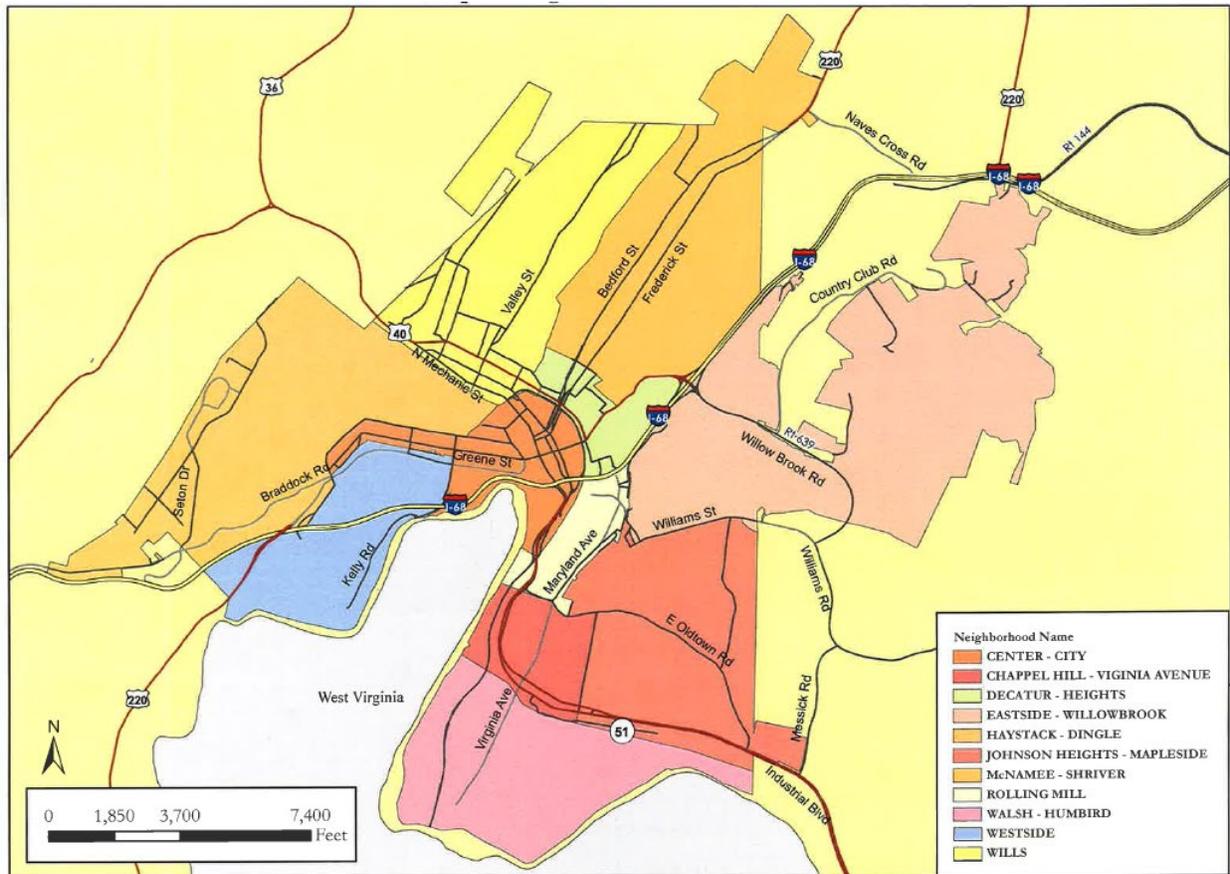
⁹ There are only seven Census tracts entirely or partially within the City of Cumberland. There are 23 Census tracts in Allegany County. The particular dissimilarity index provide a better picture of segregation in places with more, rather than fewer, Census tracts. This is one reason that segregation is much higher in the County based on this dissimilarity index measure.

There are no majority non-White Census tracts within the City of Cumberland where the population is majority non-White. There is just one Census tract in Allegany County with a majority non-White population. (Census tract 13 has a population that is 50.3% non-White.) Census Tract 5 in the City of Cumberland has the highest non-White population; about a third of this Tract's population is non-White (31.5%). Black residents comprise the largest number of non-White residents in this Tract. Aside from Tract 5, there is no Census tract in the City of Cumberland with a population that is more than 8.8% Black. Census Tract 10 has the largest share of Hispanic residents, at 4.1%.

Because of Cumberland's relatively small size and few Census tracts, it can be more informative to analyze the residential locations of non-white residents by Census block group¹⁰ and neighborhood. The highest shares of Black residents in Cumberland (10% or more of the block group population) are in the Center City and Wills neighborhoods. The greatest concentrations of Cumberland's small Hispanic population live in the Chappel Hill – Virginia Avenue neighborhood, where 7% or more of the block group's population is Hispanic.

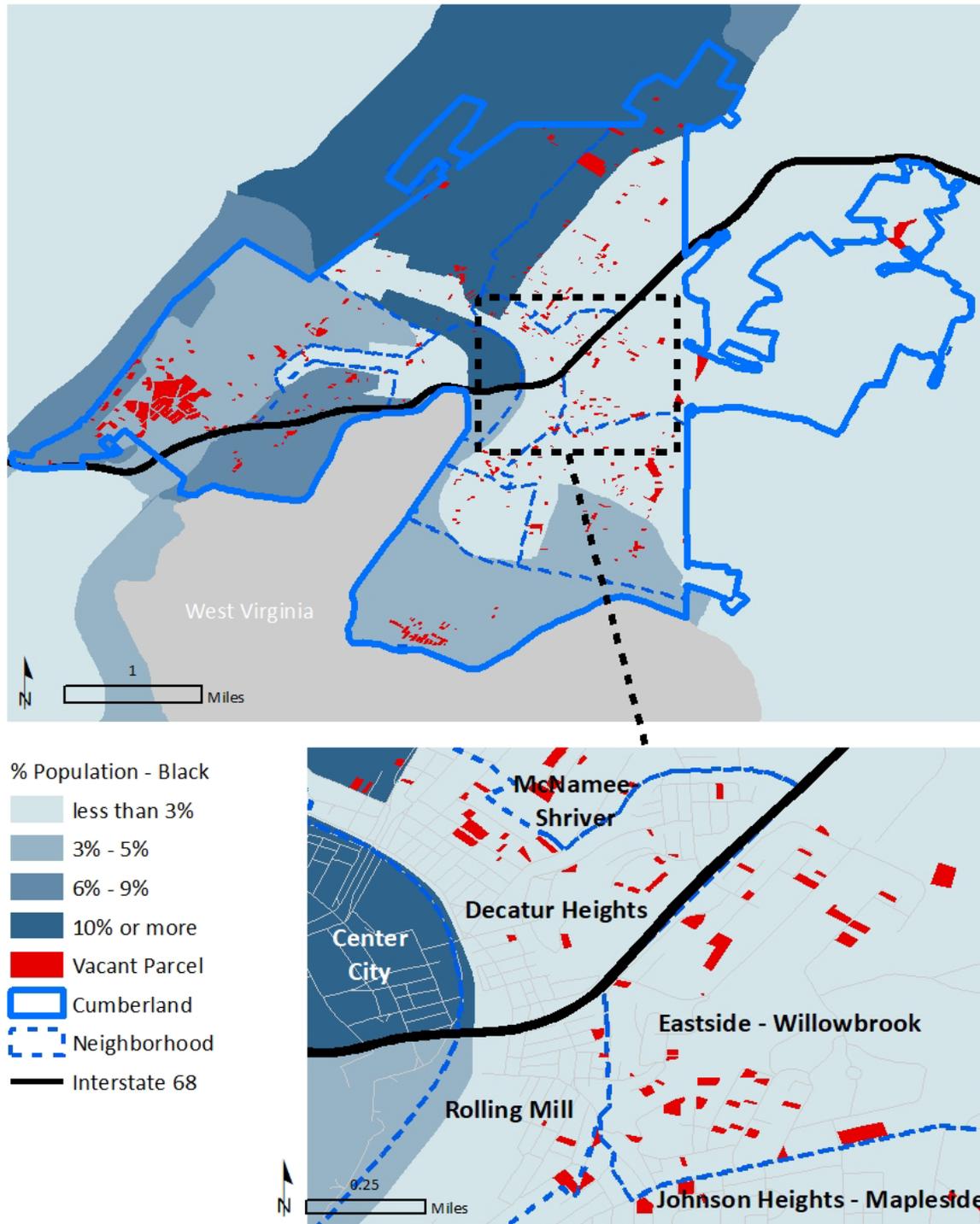
¹⁰ Census block groups are statistical divisions of Census tracts, covering a contiguous area, and generally are defined to contain between 600 and 3,000 people.

Map IV-3. City of Cumberland Neighborhoods



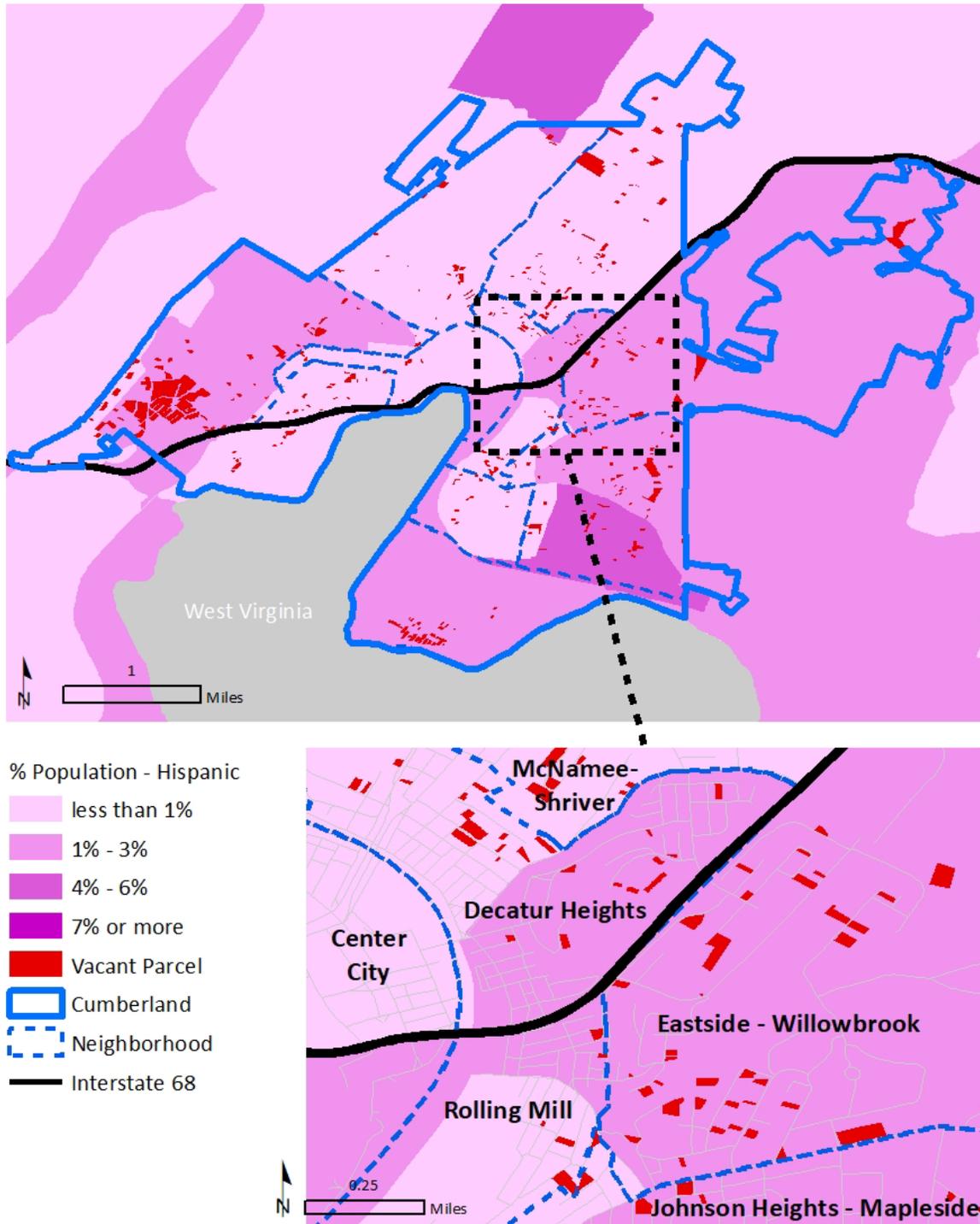
Source: City of Cumberland

Map IV-4. Percentage Black by Block Group (2017)



Source: U.S. Census Bureau, 5-Year American Community Survey, City of Cumberland

Map IV-5. Percentage Hispanic Population by Block Group (2017)



Source: U.S. Census Bureau, 5-Year American Community Survey, City of Cumberland

Persons with Disabilities

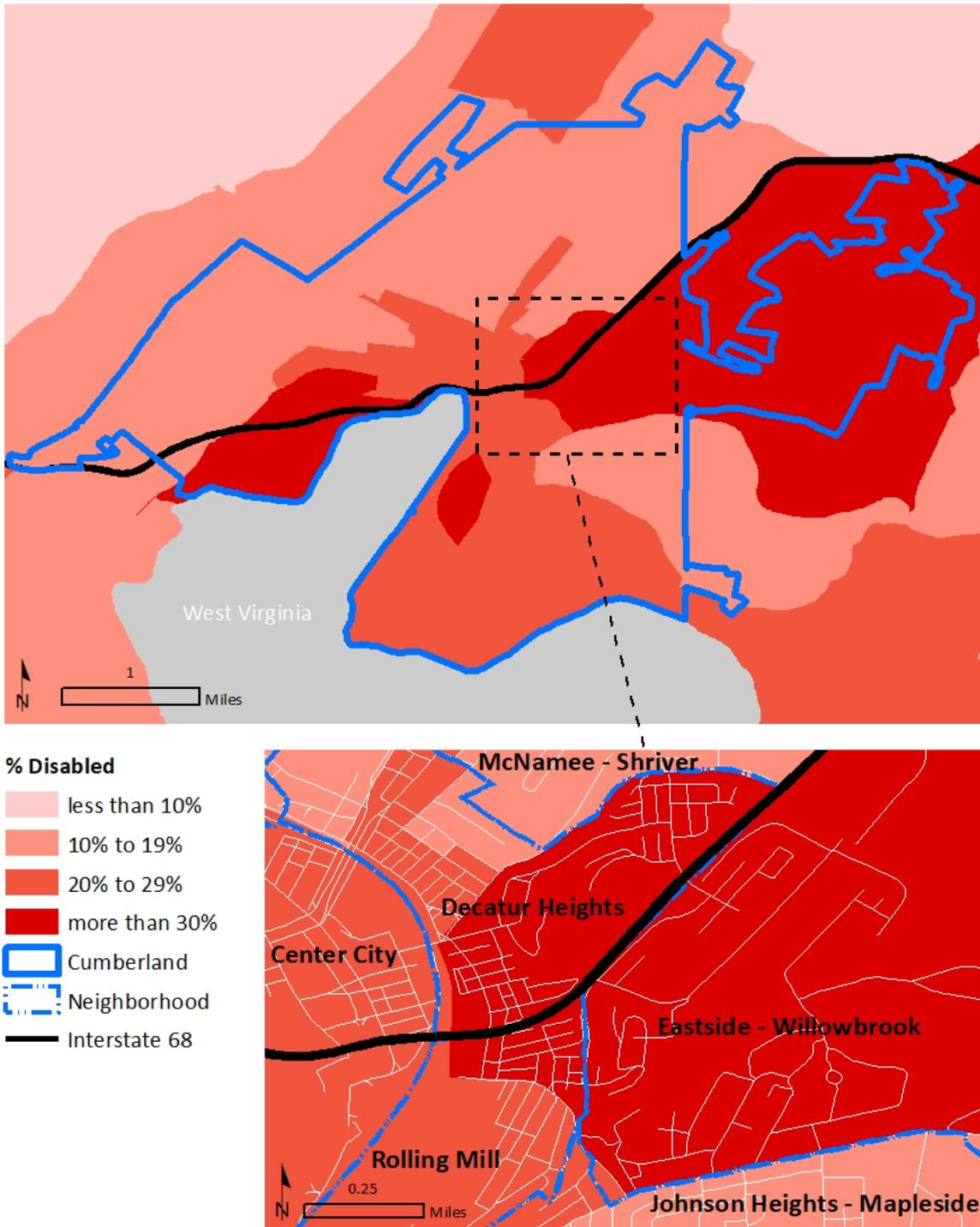
There are an estimated 4,500 Cumberland residents with a disability. Compared to the surrounding County, the City of Cumberland has a higher share of residents with a disability. Individuals with disabilities are less likely to be in the labor force and are more likely to have challenges finding affordable, accessible housing compared to the non-disabled population. In Cumberland, the greatest concentrations of disabled residents are in the Decatur Heights, Eastside-Willowbrook, and Westside neighborhoods.

Poverty

Nearly one quarter of City of Cumberland residents live in poverty¹¹, a rate significantly higher than in the surrounding County. There are several neighborhoods where concentrated poverty is a serious challenge. The Census Bureau has defined concentrated poverty as neighborhoods where more than 40% of residents have incomes below the poverty thresholds. In Cumberland, parts of the Decatur Heights, Eastside-Willowbrook and Chappel Hill-Virginia Avenue neighborhoods are areas of concentrated poverty.

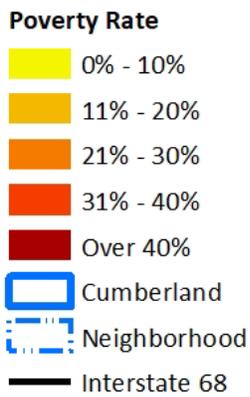
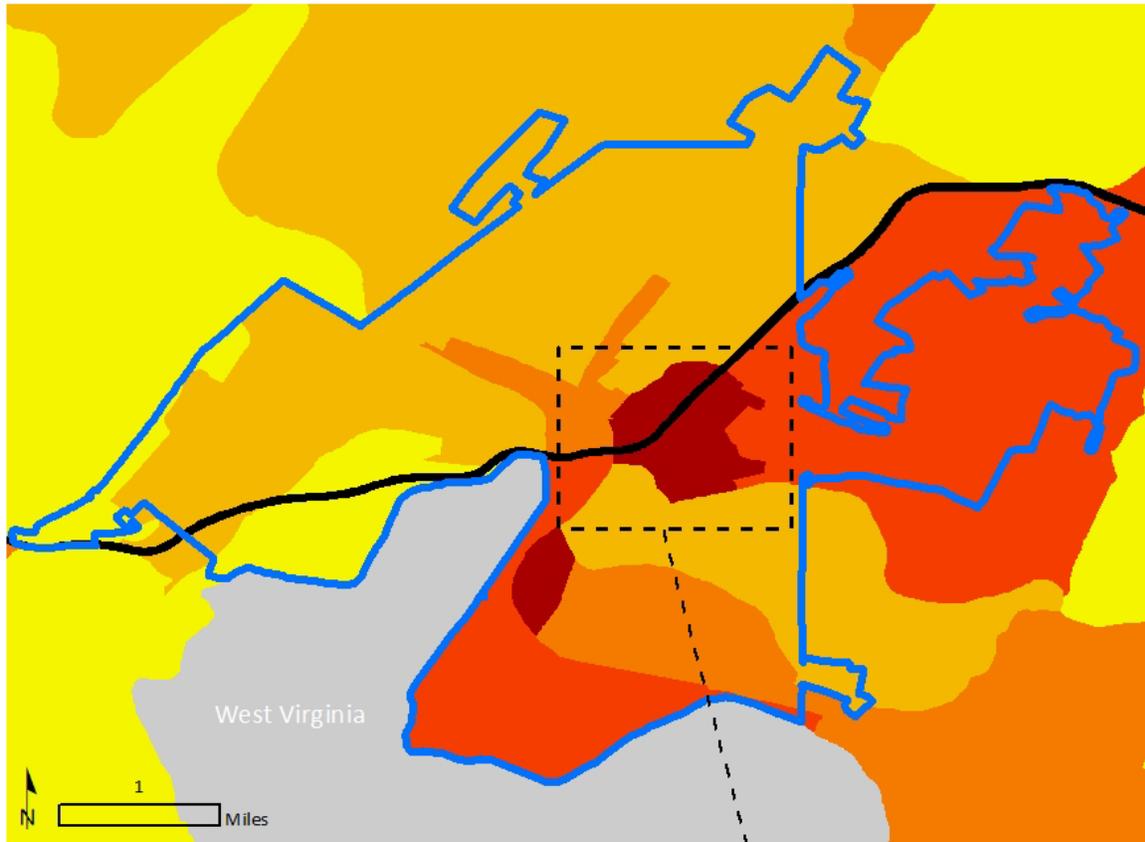
¹¹ Poverty rates are calculated by comparing household incomes to thresholds that vary by household size and composition. These poverty thresholds do not vary by geography. In 2018, a single person (under age 65) with an income below \$13,064 is defined as living in poverty. A four-person family with two children with an income below \$25,465 is defined as living in poverty. The full set of poverty thresholds is available from the U.S. Census Bureau: <https://www.census.gov/data/tables/time-series/demo/income-poverty/historical-poverty-thresholds.html>

Map IV-6. Percentage Disabled Population by Block Group (2017)



Source: U.S. Census Bureau, 5-Year American Community Survey, City of Cumberland

Map IV-7. Poverty Rate by Block Group (2017)



Allegany County
Overall Poverty Rate:
16.7%



Source: U.S. Census Bureau, 5-Year American Community Survey, City of Cumberland

R/ECAPs

Racially and ethnically concentrated areas of poverty (R/ECAPs) have been defined by HUD as Census tracts where more than half of the population is non-White and 40% or more of the population is in poverty OR where the poverty rate is greater than three times the average poverty rate in the area, whichever is lower.¹²

There are no R/ECAPs located within the City of Cumberland simply because there are no Census tracts where more than half of the population is non-White. There is only one majority-non-White Tract in Allegany County but the poverty rate is below the threshold used to define a R/ECAP; therefore, there are no R/ECAPs within Allegany County either.

However, there are pockets of concentrated poverty in the Decatur Heights, Eastside-Willowbrook and Chappel Hill-Virginia Avenue neighborhoods.

Summary of Demographic and Segregation/Integration Analysis

The City of Cumberland has seen its population decline steadily over the past six decades, reflecting the changing economic structure in the region as well as challenges attracting and retaining residents in the City. While the City's population has become somewhat more racially and ethnically diverse, the City is comprised by mostly White residents.

Using traditional measures of segregation is challenging because the City's non-white population is so small. However, the data and maps show that the City's small Black and Hispanic populations do tend to be concentrated in a handful of Census block groups throughout the City. Furthermore, there is evidence that poverty rates, while high in Cumberland, are significantly higher among the City's Black and Hispanic residents.

Cumberland has a relatively high share of residents with a disability, and this share has been on the rise over the past decade. Compared with non-disabled residents, individuals with disabilities face greater challenges of poverty and housing access. In Cumberland, the greatest numbers of residents with disabilities are in the neighborhoods just outside of the Center City neighborhood. Segregation is not in and of itself a primary challenge in Cumberland. Rather, the combination of a slow growing population, high rates of poverty, and years of deferred investment in homes and neighborhoods limits opportunities for members of protected classes in the City.

¹² U.S. Department of Housing and Urban Development, HUD Open Data for R/ECAP Tract Current and Historic, https://egis-hud.opendata.arcgis.com/datasets/320b8ab5d0304daaa7f1b8c03ff01256_0

V. Disparities in Access to Opportunity

There is a significant and growing body of research that has linked health, education, and economic outcomes of individuals and families to the quality of their neighborhoods in which they live. Even more than personal and family characteristics, the quality of the place people live predicts future well-being. Access to a wide range of education, employment, transportation, and health services and amenities is critical to ensuring successful outcomes for families and children. When segments of the population, particularly those defined as protected classes by the Fair Housing Act, do not have access to these opportunities, then the entire community is negatively impacted.

Education Opportunities

Access to education opportunities is critical for ensuring opportunities for economic mobility and success.¹³ For this AI, the School Proficiency Index compiled by HUD is used to measure access to high-quality schools.¹⁴ The School Proficiency Index (SPI) uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower-performing elementary schools. The SPI is a function of the percent of 4th grade students proficient in reading and math on state test scores for up to three schools within 1.5 miles of each Census block-group centroid. According to this data, children in the Chappel Hill – Virginia Avenue, Center City, and Wills neighborhoods live in areas with the lowest SPI, while children in most of the eastern part of the City and in the Haystack-Dingle neighborhood have access to higher-quality elementary schools. South Penn Elementary School has the lowest school rating according to GreatSchools.org, with a score of four out of 10, only 28% of students proficient in English and only 24% of student proficient in math. Students at this school are making less academic progress from one grade to the next compared to students at other schools in the state.

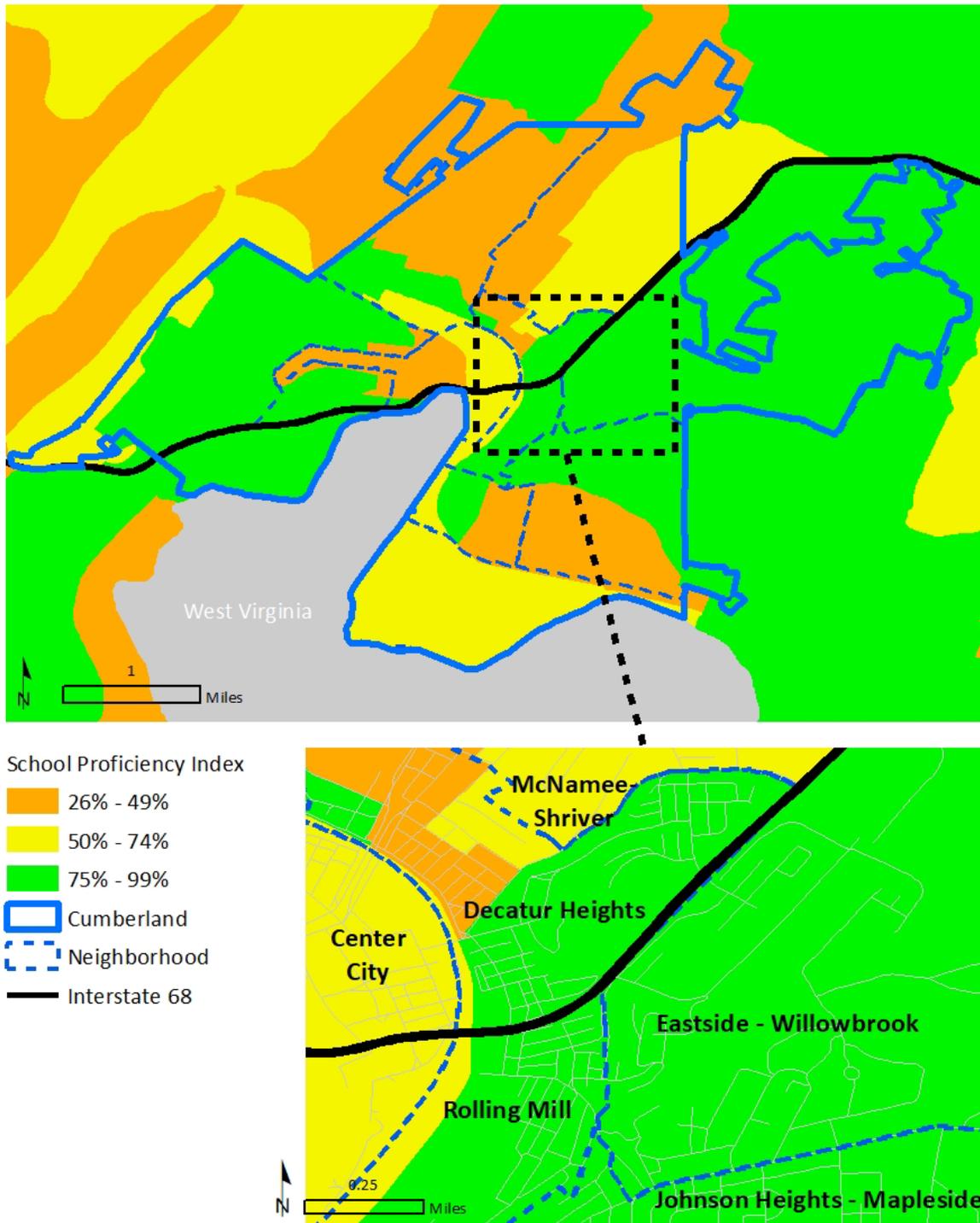
Elementary schools outside of the City but in Allegany County have higher ratings and test scores, which means that families and children living outside of the City boundaries have better access to high-quality public education opportunities.

To help bridge the gap, the Allegany County Board of Education is working with the Allegany County Library System to improve early childhood literacy by loaning the services of children's librarians at elementary schools. County librarians are also working with young adults. Four children's librarians served 12,000 children inside the library program and 13,000 children in schools, daycares, and community centers.

¹³ Nathan Grawe. Education and Economic Mobility. Economic Mobility Project. Undated.

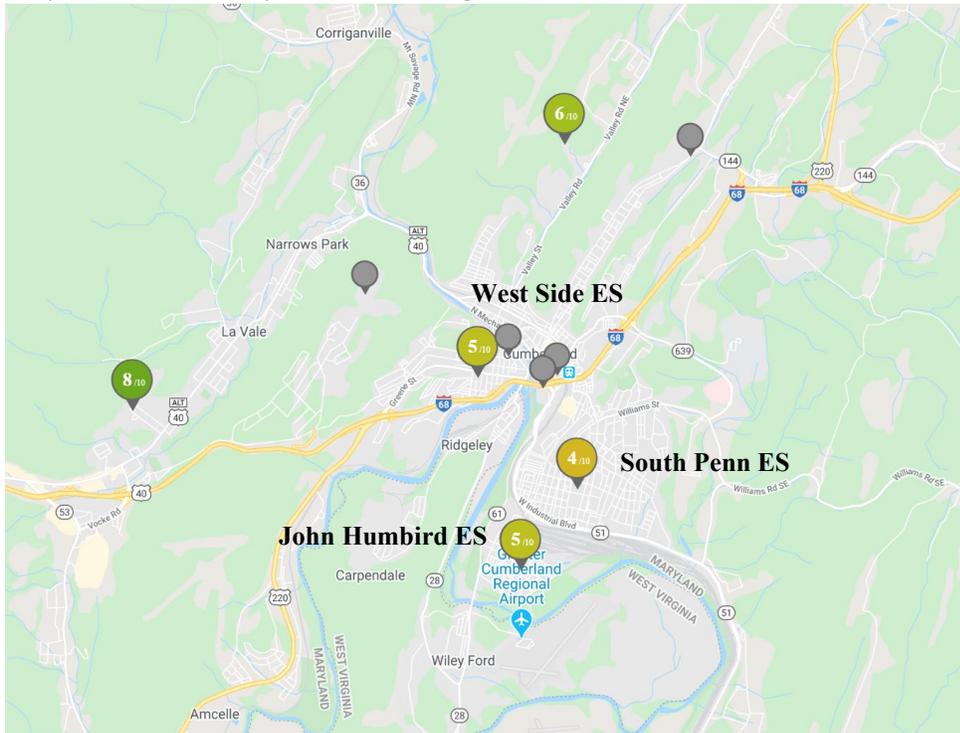
¹⁴ U.S. Department of Housing and Urban Development. School Proficiency Index. <http://hudgis-hud.opendata.arcgis.com/datasets/school-proficiency-index>

Map V-1. School Proficiency Index by Block Group (2018)



Source: U.S. Census Bureau, U.S. Department of Housing and Urban Development, City of Cumberland

Map V-2. Elementary School Rankings in and around Cumberland



Source: GreatSchools.org. Note: schools in gray are private schools.

Post-High School Education

A college education increasingly has been a key determinant of economic prosperity. Adults who have degrees from two-year or four-year colleges have significantly higher family incomes than do adults who have only a high school degree or who did not complete high school.¹⁵ In addition, research findings have demonstrated that adult children from poor and low-income families who graduate from college are much more likely to move up the income ladder than are those without a degree. Adult children from families in the bottom fifth of the income distribution, for example, are four times as likely to reach the top fifth if they graduate with a four-year college degree.¹⁶

More than 90% of White Cumberland residents are high school graduates, compared with about 86% of Black residents. However, White Cumberland residents are significantly more likely than Black residents to have a bachelor's degree or higher. Hispanic residents living in Cumberland are also less likely than White residents to have a college degree.

¹⁵ Haskins, Ron, Harry J. Holzer and Robert Lerman. 2009. Promoting Economic Mobility by Increasing Postsecondary Education. Washington DC: Brookings Institution.

¹⁶ Ibid.

Figure V-1. Educational Attainment by Race/Ethnicity, Population Age 25+, 2018

	White		Black		Hispanic	
	No.	Pct.	No.	Pct.	No.	Pct.
Total	12,083	100.0%	588	100.0%	226	100.0%
Less than high school diploma	1,105	9.1%	82	13.9%	18	8.0%
High school graduate (includes GED)	4,898	40.5%	319	54.3%	122	54.0%
Some college or associate's degree	3,707	30.7%	161	27.4%	56	24.8%
Bachelor's degree or higher	2,373	19.6%	26	4.4%	30	13.3%

Source: U.S. Census Bureau, 2018 American Community Survey

Analysis of Barriers to Educational Opportunities

Access to high-quality educational opportunities varies across Cumberland neighborhoods, as represented by the School Proficiency Index. However, the biggest disparity appears to be between the quality of public schools opportunities within the City limits and outside in the rest of the County. Families with children who live in Allegany County but outside of the City of Cumberland have access to higher-quality public schools.

Furthermore, there are disparities in access to college opportunities among Cumberland residents. White Cumberland residents are significantly more likely to graduate from a four-year college than are non-White City residents.

The COVID-19 pandemic has also revealed the disparities that exist in the community. Interviews revealed that more than 4,000 students did not have access to broadband or a computer, requiring students to pick-up paper packets of their school assignments. Because of lack of broadband access, the Allegany County Board of Education, County, and City agencies worked together to provide wifi hotspots that extend into the parking lots of schools, fire stations, libraries, and other facilities.

Employment Opportunities

Access to a range of jobs is another important factor for helping to ensure that all residents of Cumberland have the opportunity for upward economic mobility. Job growth in the Cumberland region has been relatively weak in recent years, but access to jobs can vary for City residents from different socioeconomic backgrounds and for those living in different parts of the City. HUD makes available a Jobs Proximity Index (JPI), which quantifies the accessibility of a given neighborhood as a function of its distance to all job locations within a metropolitan area, with larger employment centers weighted more heavily. Specifically, a gravity model is used, where the accessibility of a given Census block group is a summary description of the distance to all job locations, with the distance from any single job location positively weighted by the size of employment (job opportunities) at that location and inversely weighted by the labor supply (competition) to that location.

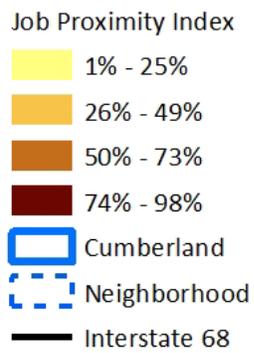
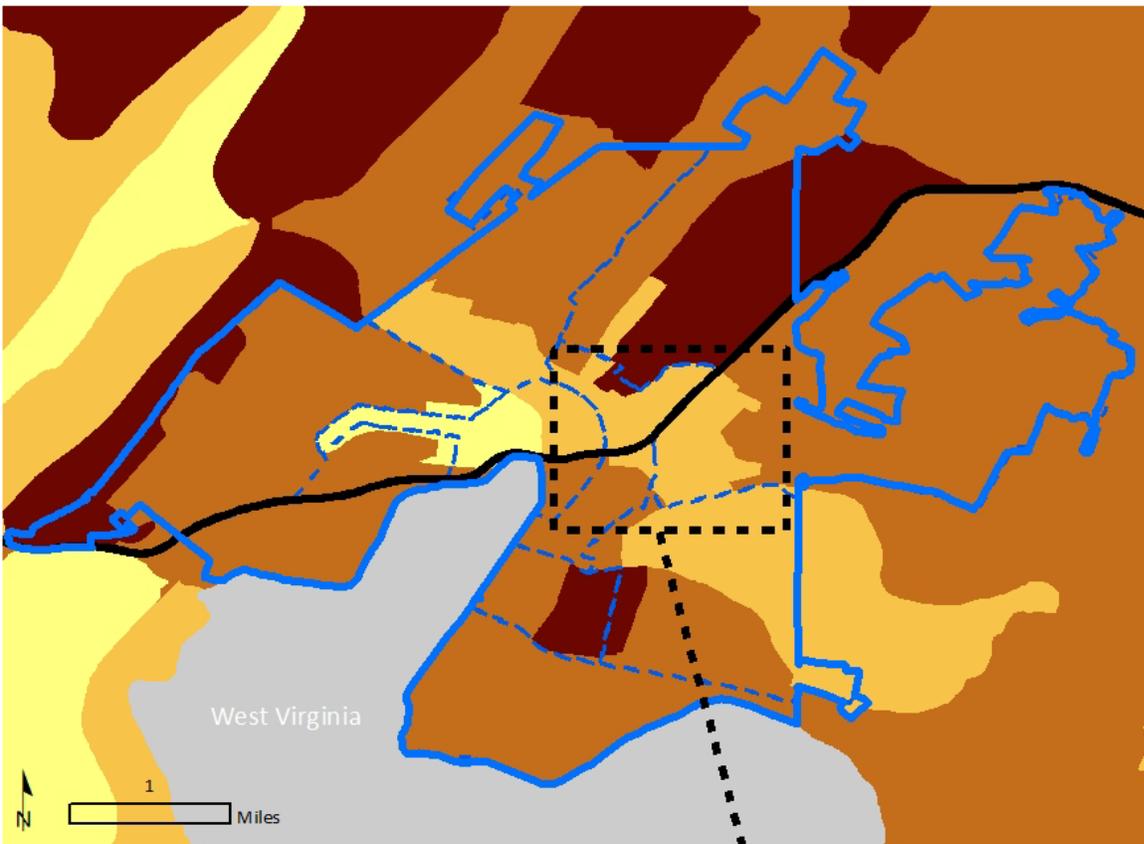
Data for the JPI are from the 2014 Longitudinal Employer-Household Dynamics (LEHD) dataset, meaning that the data are somewhat outdated and do not reflect recent regional job growth and expansion of local employment centers. However, the JPI data are the best data available for this AI.

JPI values are percentile ranked with values ranging from 0 to 100. The higher the index value, the better the access to employment opportunities for residents in a neighborhood. The data are available at the block group level.

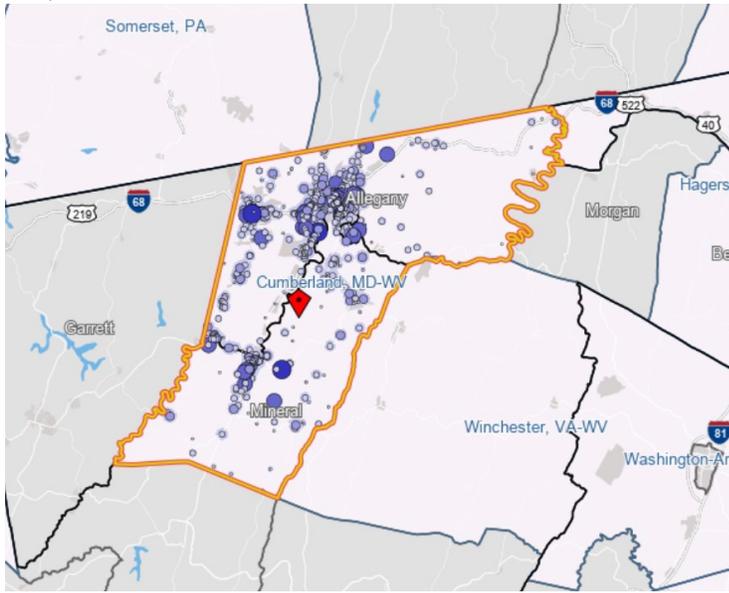
According to this JPI index, access to job opportunities varies throughout the City of Cumberland. Generally, households west of Interstate 68 have better access to regional job options. The presence of UPMC Western Maryland within the City also increases jobs access to workers living in that part of the City.

Looking at the locations of jobs in the Cumberland metropolitan statistical area (which encompasses the City of Cumberland, as well as Allegany County, Maryland and Mineral County, West Virginia), it is clear that employment opportunities are concentrated in the northwest part of the region. In addition, although the City of Cumberland is adjacent to the Winchester metropolitan area, jobs in that region are highly concentrated in the eastern end of Frederick County. As a result, residents of Cumberland's eastern neighborhoods have somewhat less access to jobs than do other City residents.

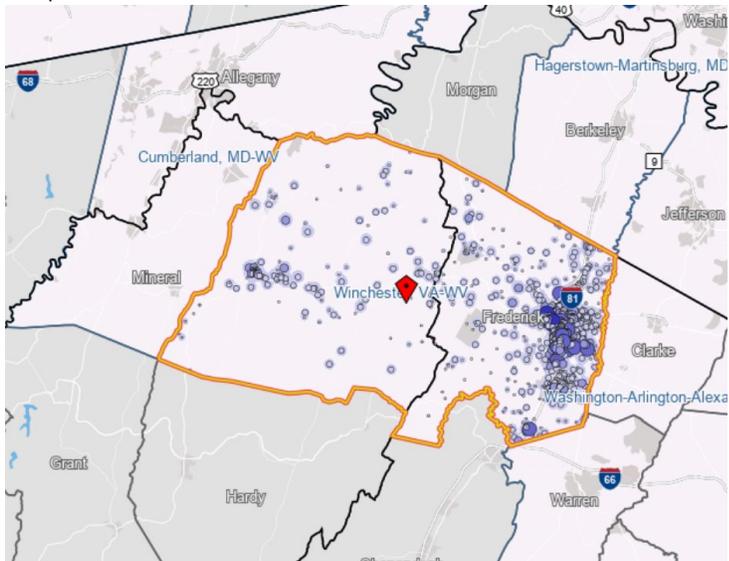
Map V-3. Job Proximity Index by Block Group (2014)



Map V-4. Concentration of Jobs in the Cumberland Metropolitan Area (2017)



Map V-5. Concentration of Jobs in the Winchester Metropolitan Area (2017)



Analysis of Barriers to Employment Opportunities

While job growth has been relatively slow in the Cumberland region over the past several decades, access to employment opportunities varies based on geography. In particular, employment opportunities are concentrated in the northwest part of the region, meaning that residents in the City's eastern neighborhoods have fewer opportunities to access regional employment centers.

Interviews and focus groups named several additional issues that serve as barriers to opportunities for employment. Although 90% of Cumberland residents have a high school diploma, a large number of positions can not be filled because of previous drug convictions or a criminal record that prevent certain people from being hired. The City of Cumberland, Allegany County, social service agencies, the Allegany College of Maryland, and employers are working to improve job training and workforce development through the Bridges to Opportunity Getting Ahead program. The goal is to improve and expand opportunities for Cumberland residents that includes access to livable wage job, education and training. The challenge is to connect residents with the training and skills for the jobs of the future.

Transportation Opportunities

Disparate access to transportation options can often be a major impediment to economic mobility. In fact, a comprehensive study of economic mobility found that “the relationship between transportation and social mobility is stronger than that between mobility and several other factors, like crime, elementary-school test scores or the percentage of two-parent families in a community.”¹⁷

Additional findings from research on the link between transportation access and economic opportunity and well-being include the following:

- Longer commutes in a given county leads to decreased chances that low-income families are able to move up the economic ladder.¹⁸
- Residents with some, but insufficient, access to transportation have the highest rates of unemployment.¹⁹
- While there has been a rise of new types of transportation (e.g. bike share), non-White residents are disproportionately more likely to rely on traditional public transportation (e.g. bus and subway).²⁰

The vast majority of workers in Cumberland drive alone to work. Public transportation options in Cumberland and Allegany County are very limited, which primarily drives the commuting patterns. However, Black workers are significantly more likely than White workers to take public transportation to work. Nearly 30% of Black workers commute either by public transportation (e.g. Allegany Transit service) or walked or biked to work. By contrast, only 11.7% of White workers did not drive alone or carpool to work. And Hispanic workers living in Cumberland are much more likely than White or Black workers to carpool to work.

Figure V-2. Mode Of Commute by Race/Ethnicity, 2018

	White		Black		Hispanic	
	No.	Pct.	No.	Pct.	No.	Pct.
<i>Total</i>	7,105	100.0%	336	100.0%	195	100.0%
<i>Drove alone</i>	5,422	76.3%	228	67.9%	93	47.9%
<i>Carpooled</i>	854	12.0%	11	3.3%	91	46.8%
<i>Other (public transportation, walk/bike, work from home)</i>	829	11.7%	97	28.8%	10	5.3%

Source: U.S. Census Bureau, American Community Survey Five-Year file

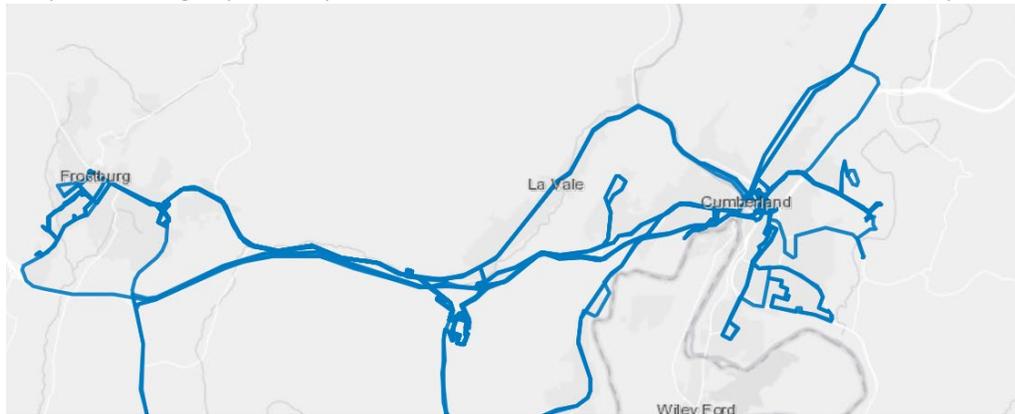
¹⁷ Bouchard, Mikayla. 2015. Transportation Emerges as Crucial to Escaping Poverty. The New York Times, May 7.

¹⁸ Chetty, Raj and Nathaniel Hendren. 2015. The Impacts of Neighborhoods on Intergenerational Mobility: Childhood Exposure Effects and County-Level Estimates. April.

¹⁹ Bouchard (2015).

²⁰ White, Gillian B. 2015. Stranded: How America's Failing Public Transportation Increases Inequality. The Atlantic, May 16.

Map V-6. Allegany County Transit – Fixed Bus Route in and around the City of Cumberland



There is a public transportation option in Cumberland, though service is relatively limited. In general, bus service is available Monday through Friday from 7:30 am to 4:30 pm in the County, with selected service running earlier (silver line morning service beginning at 5:55 am) and running later (yellow line evening service running into 8:00 pm). There is no weekend service and no late evening/nighttime service.

Limited public transportation options and the locations of key job centers in the region means that transportation accounts for a significant share of Cumberland households' budgets. Transportation is typically a household's second largest expense, after housing. When workers cannot find housing they can afford near their jobs, they often look for options further away. However, the savings associated with lower-cost housing can sometimes be offset by the increased transportation costs households incurred (e.g., greater fuel and maintenance costs). A rule of thumb is that households should not spend more than 45% of income on combined housing plus transportation costs.

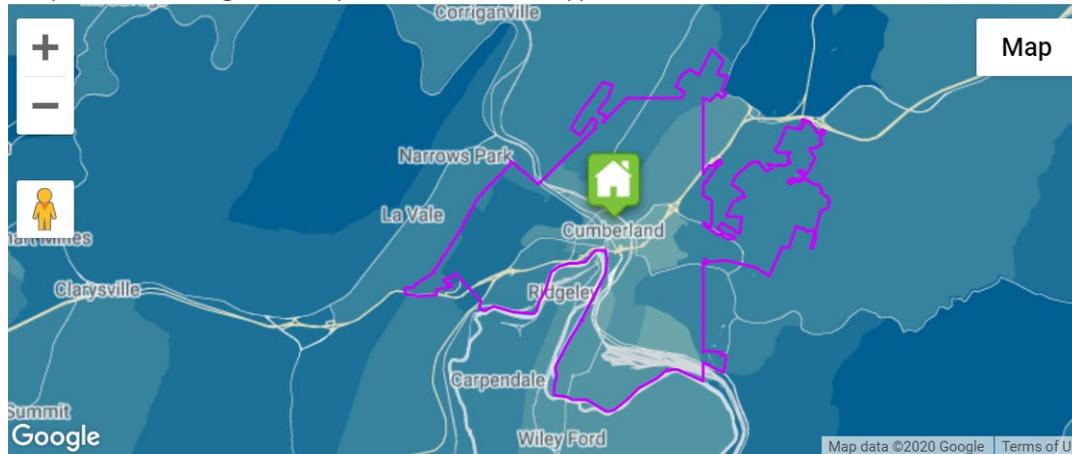
Places that are compact, close to jobs and services, with a variety of transportation choices, allow people to spend less time, energy, and money on transportation. According to the H+T Index, there are no neighborhoods within the City of Cumberland that meet the definition of a location-efficient neighborhood and most residents are dependent on car travel for commuting on other trips. As a result, transportation costs are higher in the City of Cumberland than in some other communities in Maryland.

Residents travel an average of 17,477 miles each year and spend an average of \$9,952 each year on transportation. The average household in Cumberland has 1.42 vehicles.

The typical household with the median household income spends 51% of their income on housing plus transportation costs, including 25% on transportation and 26% on housing. H+T costs are higher for moderate-income households; the typical moderate-income household in Cumberland spends 60% of their income on H+T costs, including 29% on transportation and 31% on housing.

Despite being a more urban place within the County, Cumberland does not appear to offer significant advantages in terms of reducing transportation costs compared with other places in Allegany County.

Map V-7. Housing + Transportation Index, Typical Moderate Income Household in Cumberland



Housing + Transportation Costs % Income

< 24% 24-36% 36-45% 45-54% 54-66% 66-78% 78-87% 87%+

Source: H+T Affordability Index, <https://htaindex.cnt.org/map/>

Analysis of Barriers to Transportation Opportunities

Public transportation options are relatively limited in Allegany County and City of Cumberland. The lack of options disproportionately impacts non-White residents in Cumberland, as Black and Hispanic residents are much more likely to rely on public transportation than are White residents. Furthermore, access to public transportation is challenging for individuals with disabilities living in Cumberland.

In addition, transportation makes up a higher share of the income of Cumberland residents that it does of residents of other parts of the County and the State. The need for a private automobile—and the costs associated—add costs to households’ budget in the City.

The most often mentioned barrier to opportunity in interviews and focus groups is transportation. In addition to limited service hours, frequency, and routes, the county’s bus system is not reliable transportation for job access or personal needs such as medical appointments. Buses do not operate in inclement weather creating further limitations in reliability. In some cases walking or biking is not an option for some residents due to Cumberland’s steep slopes and topography.

Low-Poverty Exposure Opportunities

Researchers, advocates, educators, health care professionals, and others all know how neighborhood environments—particularly the presence of poverty—has long-lasting impacts on children’s eventual success in adulthood. Some of the key findings from research include:

- Children who grow up poor are more likely than non-poor children to experience poverty as adults. Furthermore, the likelihood of being poor in adulthood increases with the number of years spent in poverty as a child.²¹
- Moving to a lower-poverty neighborhood significantly improves college attendance rates and earnings for children who were young (below age 13) when their families moved.²²
- Adults who grew up in poverty have a more difficult time performing emotional regulation tasks compared to those growing up in lower-poverty neighborhoods.²³

Poverty rates are high across Cumberland relative to the rest of the County and the state. Living in concentrated poverty (e.g. neighborhoods where 40% or more of residents living in poverty) is a particularly acute problem for Cumberland’s Black and Hispanic residents. Overall, 10.9% of Cumberland’s residents live in a high-poverty neighborhood, compared to 16.6% of Black residents. In addition, Black residents in Cumberland are much less likely to live in low-poverty neighborhoods (i.e. poverty rate less than 10%) than are White residents (5.5% versus 13.4%).

Figure V-3. Neighborhood Poverty Rates by Race/Ethnicity, 2017

Neighborhood (Block Group) Poverty Rate	Share of Population			
	Total	White	Black	Hispanic
All neighborhoods	100.0%	100.0%	100.0%	100.0%
Poverty rate < 10%	12.6%	13.4%	5.5%	11.7%
Poverty rate 10% to 25%	51.2%	53.6%	27.7%	33.1%
Poverty rate 26% to 40%	25.3%	23.3%	50.1%	45.7%
Poverty rate 40% or higher	10.9%	9.8%	16.6%	9.5%

Source: U.S. Census Bureau, American Community Survey Five-Year file

Figure V-4. Neighborhood Poverty Rates by Disability Status, 2017

Neighborhood (Block Group) Poverty Rate	Share of Population		
	Total	Disabled	Non-Disabled
All neighborhoods	100.0%	100.0%	100.0%
Poverty rate < 10%	12.6%	9.5%	13.1%
Poverty rate 10% to 25%	51.2%	42.6%	52.4%
Poverty rate 26% to 40%	25.3%	27.8%	25.0%
Poverty rate 40% or higher	10.9%	20.2%	9.6%

Source: U.S. Census Bureau, American Community Survey Five-Year file

²¹ Wagmiller, Robert Lee and Robert M. Adelman. 2009. Childhood and Intergenerational Poverty: The Long-Term Consequences of Growing Up Poor. National Center for Child Poverty.

²² Chetty, Raj, Nathaniel Hendren, and Lawrence F. Katz. 2015. The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Experiment. Harvard University and NBER.

²³ Chang, Alexandra. Damaging Effects of Poverty on Children. Cornell Research.

Cumberland residents with disabilities are significantly more likely than non-disabled residents to live in high-poverty neighborhoods. An estimated one out of five (20.2%) disabled individuals living in Cumberland live in a neighborhood with a poverty rate of 40% or greater. Only 9.5% live in a low-poverty neighborhood, compared to 13.1% of the non-disabled population.

Analysis of Barriers to Low-Poverty Neighborhoods

Poverty rates are high across Cumberland relative to the rest of the County and the state. Concentrated poverty (e.g. neighborhoods where 40% or more of residents living in poverty) is a particularly acute problem in the City. Black and Hispanic residents, as well as individuals with disabilities, are much more likely to live in poverty and to live in neighborhoods with high concentrations of poverty.

Interviews and focus groups commented on the large number of blighted neighborhoods with vacant and abandoned housing with little to no activity to renovate or rehabilitate housing other than demolition. Neighborhoods such as South Cumberland, Rolling Mill, Downtown, Eastside-Willowbrook, Wills, McNamee-Shriver and Decatur Heights continue to exhibit higher rates of poverty and blight. Many of these residents are limited by their educational attainment, access to higher wage jobs, and limited transportation choices contributing to limited access to low-poverty neighborhoods.

At the same time, the City of Cumberland has very little development. In 2019, the City had only one building permit for construction. Without rehabilitation of blighted housing and no new affordable housing development, residents in high poverty neighborhoods have little chance to move to a low poverty neighborhood.

Environmentally Healthy Neighborhoods Opportunities

Environmentally healthy neighborhoods are defined as places with healthy physical environments, free from pollutants. However, lower-income families, persons of color, and disabled individuals are often disproportionately negatively impacted by unhealthy neighborhoods. Research has demonstrated important links between environmentally healthy environments and individual health outcomes:

- Health can be adversely affected by poor air and water quality or proximity to facilities that produce or store hazardous substances.²⁴
- Substandard housing conditions exposing residents to lead paint, mold, dust, or pest infestation can lead to poor health outcomes.²⁵
- Access to fast food outlets and liquor stores has been associated with poor health outcomes.²⁶
- Growing up in neighborhoods with concentrated violence, incarceration, and lead exposure, also typically associated with high-poverty neighborhoods, is associated with lower intergenerational income mobility and higher adult incarceration of poor Black males.²⁷
- Exposure to health hazards accounts for a substantial proportion (between 20 and 60%) of racial disparities in intergenerational inequality.²⁸

There is limited health data specifically for the City of Cumberland; most data reported by the State of Maryland is at the county level. Therefore, this section primarily summarizes data for Allegany County. Allegany County scores lower than the state overall on several health indicators. The biggest disparities related to the rates of unintentional intoxication deaths, both from drugs and alcohol. The age-adjusted mortality rates for total unintentional intoxication deaths is 23.8 for Maryland and 38.1 for Allegany County, the 3rd highest in the state after the City of Baltimore and Cecil County.

According to more recent data from UPMC Western Maryland, there were 253 non-fatal drug overdoses reported in Allegany County in 2019, and 60% of those were opioid-related. The number of overdoses in the County is down from 2017 and 2018, when there were 413 and 347, respectively.²⁹

Compared to the rest of Maryland, residents of Allegany County have lower health outcomes on other measures, according to data analyzed in the *Allegany County Community Health Needs Assessment*. There is a higher share of adults who smoke in Allegany County compared to the rest of the state. Less than half of the residents of the County have access to healthy food, which is measured by residents' proximity to full-service grocery stores and farmers' markets. The rate of diabetes among adults is 50% higher in Allegany County compared to the State of Maryland.

²⁴ Where We Live Matters for Our Health. 2008. Robert Wood Johnson Foundation Commission to Build a Healthier America.

²⁵ Ibid.

²⁶ Ibid.

²⁷ Manduca, Robert and Robert J. Sampson. 2019. Punishing and toxic neighborhood environments independently predict the intergenerational social mobility of black and white children. PNAS 116(16).

²⁸ Ibid.

²⁹ Prescribe Change Allegany County, <https://www.prescribechangeallegany.org/state-and-local-stats.html>

One in five Allegany County residents report that they are in “fair” or “poor” health compared to 13% of residents statewide.

Figure V-5. Selected Health Indicators(2018)

<i>Indicator</i>	<i>Allegany County</i>	<i>Maryland</i>
<i>Life expectancy at birth</i>	76.3	79.2
<i>% mothers receiving prenatal care</i>	74.4	66.6
<i>Infant mortality rate (2014-2018)</i>	7.0	6.4
<i>% low birth weight</i>	9.2	8.9
<i>Total number of intoxication deaths (2018)</i>	39	2,406
<i>Total number of heroin-related deaths (2018)</i>	15	830
<i>Total number of opioid-related deaths (2018)</i>	38	2,522
<i>Total number of prescription fentanyl-related deaths (2018)</i>	29	1,888
<i>Overall death rate*</i>	1,223.0	838.5

*Rate per 100,000 residents

Source: Maryland Department of Health

Figure V-6. Selected Health Indicators(2011)

<i>Indicator</i>	<i>Allegany County</i>	<i>Maryland</i>
<i>% adults smoking</i>	26	18
<i>% population with access to healthy food</i>	46	62
<i>% adults diagnosed with diabetes</i>	12.3	8.6
<i>% adults reporting “fair” or “poor” health</i>	20	13
<i>% uninsured</i>	15	13(a)

Source: Allegany County Community Health Needs Assessment (2011)

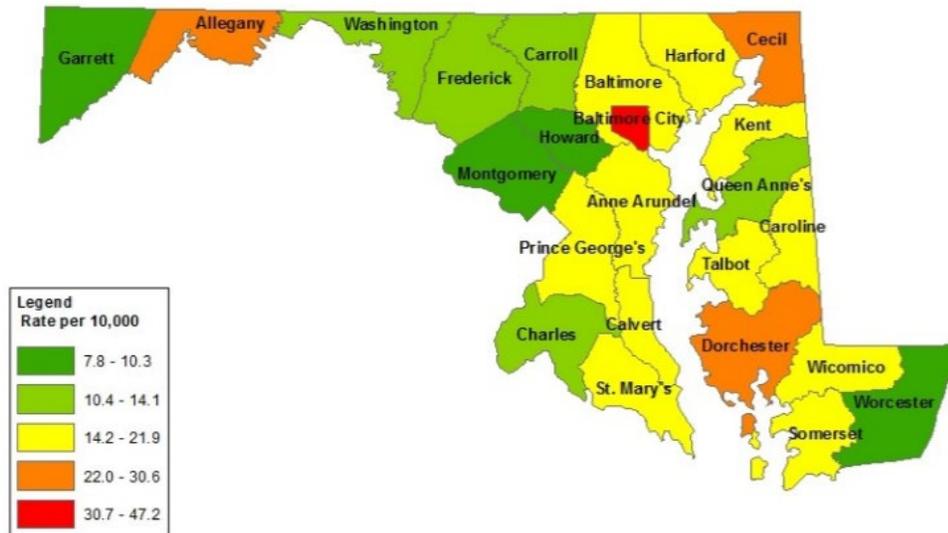
(a) U.S. rate

Asthma

Substandard housing has been linked to greater asthma hospitalizations and mortality among low-income children.³⁰ There is evidence that asthma-related hospitalizations are a greater challenge among Allegany County residents than for residents in other parts of western Maryland.

³⁰ Pacheco, Christina et al. 2014. Homes of low-income minority families with asthmatic children have increased condition issues. *Allergy and Asthma Proceedings* 35(6): 467-474.

Map V-8. Asthma Hospitalization Rates (2009)



Source: State of Maryland

Lead Exposure

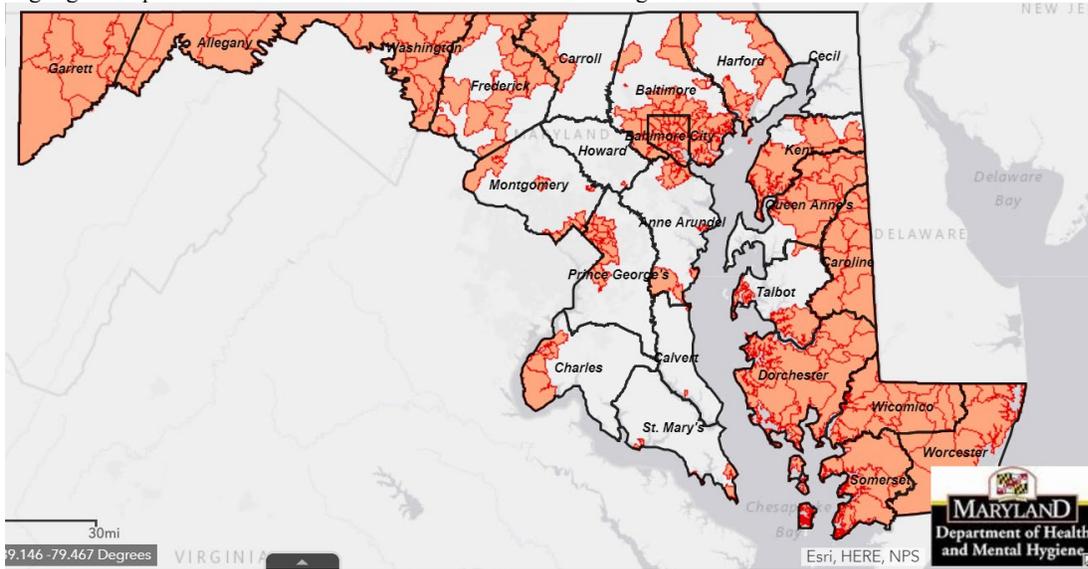
Exposure to lead remains the most significant and widespread environmental hazard for children in Maryland, although substantial reductions in lead exposure and lead poisoning have been achieved in recent years.³¹ Children are most vulnerable to the adverse effects of lead exposure before age six, when neurological systems are developing and when they are more likely to ingest lead-containing material. Exposure to lead can cause permanent neurological damage that may be associated with learning disabilities, decreased intelligence, and behavioral problems. Exposure to lead in paint chips and lead-contaminated dust from deteriorated painted surfaces is the primary cause of elevated blood lead levels in young children. Older housing stock, such as Cumberland's, is a risk factor for exposure to lead and lead poisoning.

All zip codes in Allegany County were identified as "at risk" by the State of Maryland in 2015. Zip codes 21502 (Cumberland) and 21532 (Frostburg) are areas that were identified with 75% of the children at risk of being exposed to lead poisoning.

³¹ Maryland Targeting Plan for Areas At Risk for Childhood Lead Poisoning (2015).

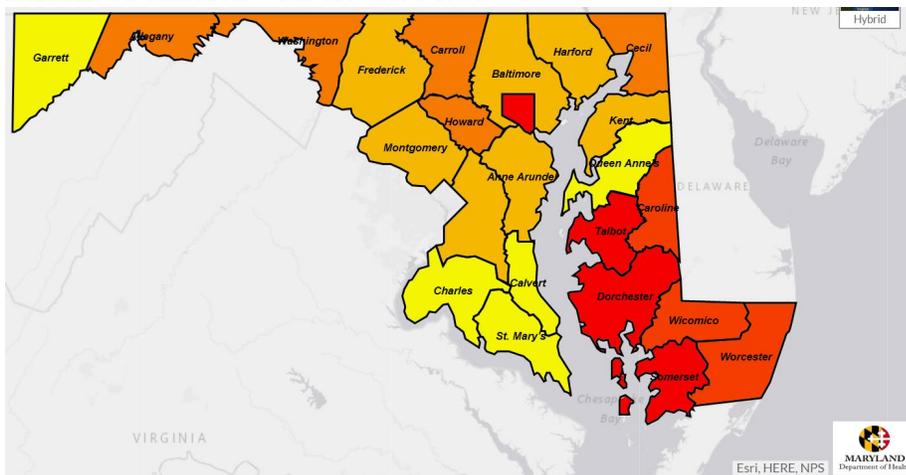
Map V-9. Lead Targeting: At-Risk Zip Codes

Highlighted zip codes indicate those where lead remains a challenge



Map V-10. Maryland Childhood Lead Poisoning Indicators

Percent of children with elevated lead

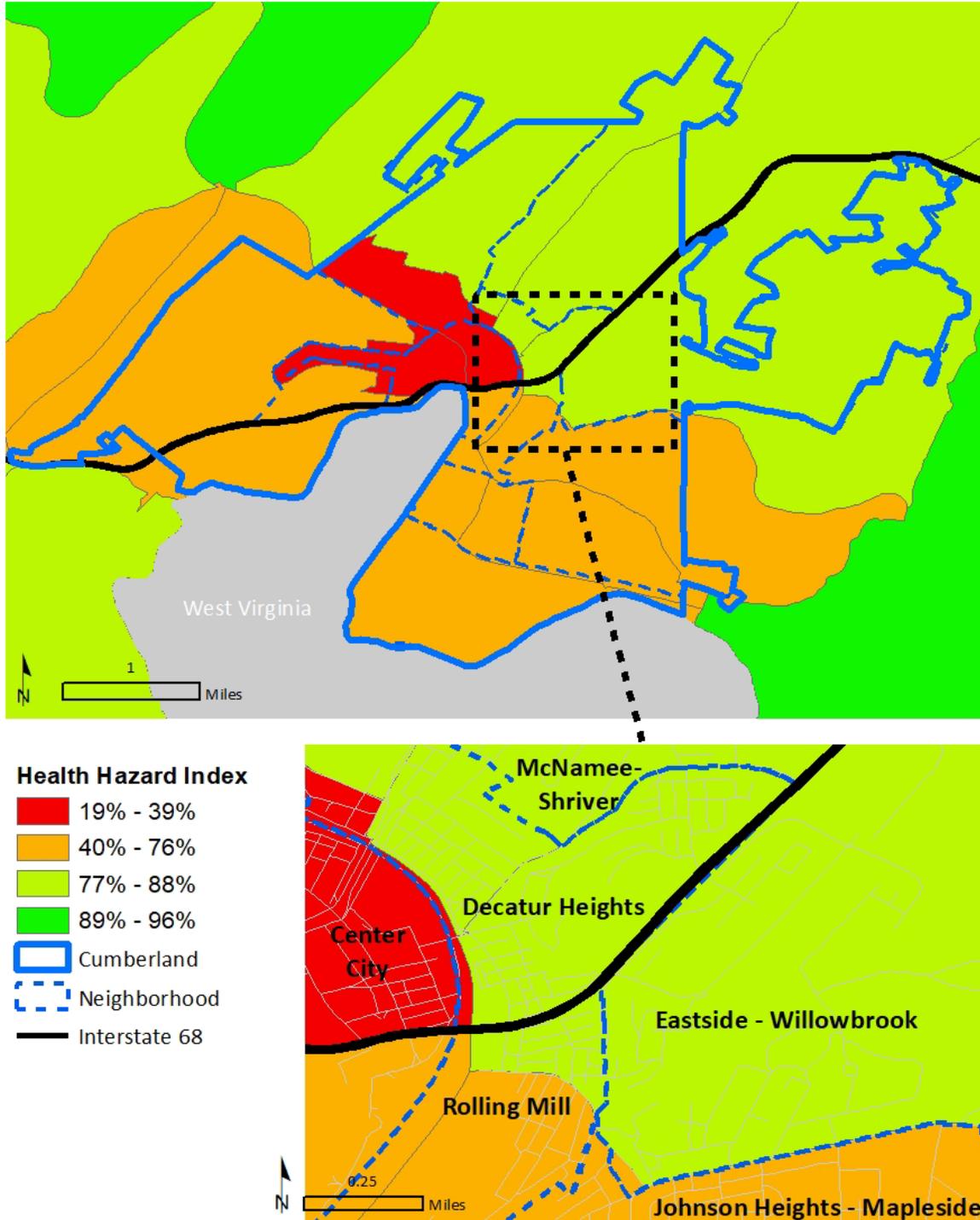


Environmental Health Hazard Index

HUD publishes data measuring environmental health hazards at the Census tract level. The Environmental Health Hazard Exposure Index (EHHEI) summarizes potential exposure to harmful toxins at a neighborhood level (i.e. Census tract) by combining standardized Environmental Protection Agency (EPA) estimates of air quality carcinogenic, respiratory, and neurological hazards. Values of the EHHEI range from 0 to 100. The *higher* the index value, the *less* exposure to toxins harmful to human health. Therefore, the higher the value, the better the environmental quality of a neighborhood. The most recent data of

environmental health hazards is from 2011; however, this is the best source of comprehensive neighborhood environmental health.

Map V-11. Environmental Health Hazard Exposure Index (EHHEI) by Block Group (2011)



Source: U.S. Census Bureau, U.S. Department of Housing and Urban Development, City of Cumberland

Analysis of Barriers to Environmentally Healthy Neighborhoods

Cumberland has been dealing with drug overdoses, particularly overdoses related to both opioids and alcohol. In addition, compared to the rest of Maryland, residents of Allegany County have lower health outcomes on other measures, from access to healthy food to prevalence of diabetes. Exposure to lead remains the most significant and widespread environmental hazard for children in Cumberland. Older housing stock, such as Cumberland's, is a risk factor for exposure to lead and lead poisoning. All zip codes in Allegany County were identified as "at risk" by the State of Maryland in 2015, and zip code 21502 (Cumberland) was defined with 75% of the children at risk of being exposed to lead poisoning.

The biggest concern shared by residents, advocates, and community leaders is lead paint exposure. Over 90% of the buildings were built before 1980 meaning that a substantial portion of buildings that are pre-1974 are likely to have lead paint. Poor housing quality and substandard housing throughout the city means that children in Cumberland are at higher risk of lead paint poisoning. Although the City of Cumberland requires a lead paint test when the property turns over, advocates remain concerned about the exposure to lead paint.

Also due to limited information, this AI found limited data related to residential exposure to air pollution and other carcinogens that may be linked to the proximity of neighborhoods to Interstate 68. Studies of children in other neighborhoods have linked higher incidence of asthma with proximity to the interstate. The Center City neighborhood shows a higher risk for health hazard as indicated by the Environmental Health Hazards Exposure Index, that might indicate higher asthma rates however, more research is needed.

VI. Disproportionate Housing Needs

The evaluation of disproportionate housing needs analyzes housing challenges such as housing cost burden, overcrowding, and housing vacancies, which are important issues to understand throughout the City of Cumberland. This analysis also examines the relationships between resident characteristics and subsidized housing programs in the City and the County. Finally, homeownership and access to housing equity is critical to wealth building, and this section examines trends in homeownership rates and in access to the mortgage market in the City of Cumberland. To the extent possible, this analysis compares the prevalence of housing challenges across racial and ethnic groups, income, and disability status.

Housing Cost Burden

Housing cost burden measures the share of households in a community that spend 30% or more of their income each month on housing costs.³² Housing is typically a household's largest expense, and when a family or individual spends a disproportionately high share of its income on housing, there can be too little left over for other necessities, such as food, health care, transportation, clothing, and education.

Housing costs and affordability are only one way to measure of access to housing. Many households may not be cost burdened—that is, they may spend less than 30% of their income on housing—but they may live in substandard and/or overcrowded housing conditions. In Cumberland, about a third of renter households (or more than 2,600 households) and more than a quarter of homeowners (or nearly 9,800 homeowners) are housing cost burdened. Fifteen percent of renters and 10.9% of homeowners are severely cost burdened, spending half or more of their income each month on housing.

Lower income households are significantly more likely to be housing cost burdened. More than 80% of renters with incomes below \$20,000 are cost burdened, compared to just 3.9% of renters with incomes of \$50,000 or more.

Data are not available on the individual or household characteristics of cost burdened households in the City of Cumberland. However, it is possible to examine the characteristics of neighborhoods where there is a high level of housing cost burden.

Race/Ethnicity

According to the assessment of Census data, Black residents in Cumberland are significantly more likely than White residents to live in neighborhoods where the majority—or even more than three-quarters—of households are cost burdened renters. About one out of five Black residents lives in a neighborhood where 75% or more of the households are cost burdened renters, compared with just 8.9% of White residents. About 26% of Black residents and 20% of

³² Housing costs include rent and utilities for renters, and mortgage payment(s), property taxes, insurance, and HOA fees for homeowners.

Hispanic residents live in neighborhoods where less than 50% of households are cost burdened renters, compared to 44.8% of White residents.

Figure VI-1. Neighborhood Poverty Rates by Race/Ethnicity, 2017

Neighborhood (Block Group) Poverty Rate	Share of Population			
	Total	White	Black	Hispanic
All neighborhoods	100.0%	100.0%	100.0%	100.0%
Share of cost burdened renters <50%	43.0%	44.8%	26.1%	20.0%
Share of cost burdened renters 50-74%	48.1%	47.3%	54.2%	66.7%
Share of cost burdened renters 75%+	8.9%	7.9%	19.7%	13.3%

Source: U.S. Census Bureau, American Community Survey Five-Year file

Persons with Disabilities

Cumberland’s disabled residents are somewhat more likely than non-disabled residents to live in neighborhoods with high shares of cost burdened renters. About 12% of disabled residents live in neighborhoods where 75% are more of the households are cost burdened renters, compared to 8.5% of non-disabled residents.

Disabled persons also have difficulty finding housing units either because they are walk-ups that are not accessible to some disabled persons or units where landlords refuse to make modifications. A lack of housing choice contributes to higher cost burden for disabled residents. In the future, disabled persons and families may have more choices as public housing undergoes transformation under the Rental Assistance Demonstration (RAD) program. Fort Cumberland is currently approved for RAD conversion while four other properties are at different stages of the conversion process. However, more accessible units are still needed in Cumberland’s housing inventory.

Figure VI-2. Neighborhood Poverty Rates by Disability Status, 2017

Neighborhood (Block Group) Poverty Rate	Share of Population		
	Total	Disabled	Non-Disabled
All neighborhoods	100.0%	100.0%	100.0%
Share of cost burdened renters <50%	43.0%	38.3%	43.7%
Share of cost burdened renters 50-74%	48.1%	49.9%	47.9%
Share of cost burdened renters 75%+	8.9%	11.8%	8.5%

Source: U.S. Census Bureau, American Community Survey Five-Year file

Blighted/Dilapidated Housing

Substandard housing is a critical issue in the City of Cumberland. In a recent survey³³, more than 70% of Cumberland residents said that “transforming abandoned and vacant properties into community assets” should be a goal of the City. The City’s most recent five-year Consolidated Plan (Con Plan) includes in its assessment that a primary housing concern in the community is vacant and dilapidated residential structures. The age of the housing stock necessitates regular upkeep and maintenance, which can be expensive for owners and landlords. Deteriorating housing conditions coupled with rising rents creates housing instability felt most acutely by extremely low-income households in the community.

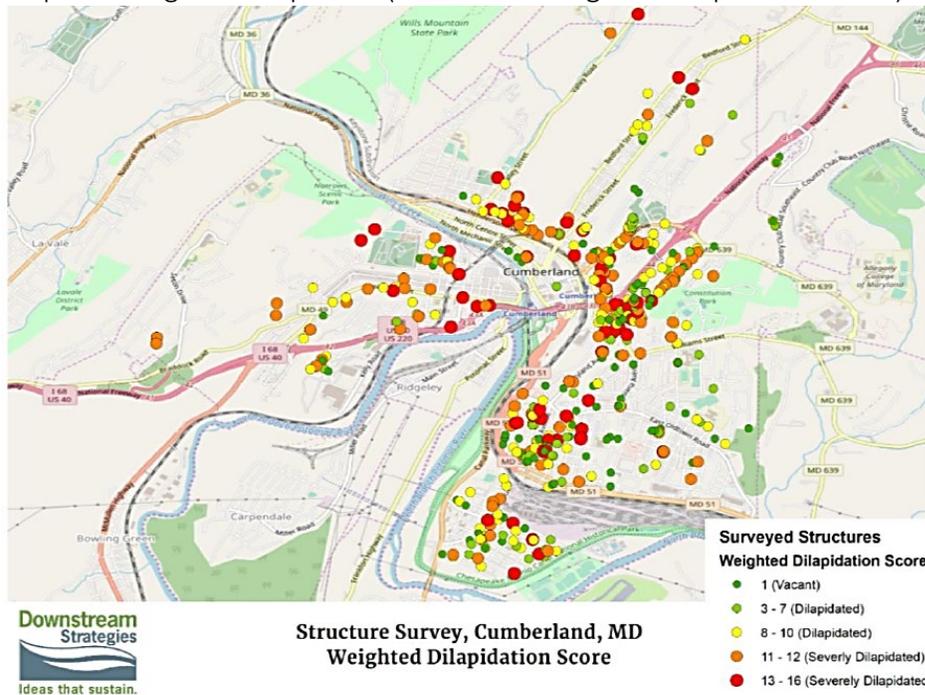
Focus groups and interviews conducted as part of the Con Plan process confirmed that the aging housing stock is one of the community’s top housing issues, along with blighted and vacant units. The Con Plan concludes that “[w]idespread blight and substandard housing contribute to the misalignment of available housing units since it is likely that a large number of units are not part of the housing inventory.”

In a 2020 survey, 15.1% of Cumberland residents say that several homes in their neighborhood appear to have “major structural issues and seem uninhabitable.” An additional 25.8% of residents say that several homes “appear to be in need of major repair (e.g. new roof, siding, or windows).” More than 43% of Cumberland residents say that vacant properties are a problem in their neighborhood.

In 2018, in collaboration with West Virginia University (WVU) and Downstream Strategies, an environmental and economic consulting firm, the City of Cumberland completed the Cumberland Blight Action Plan, which was designed to assess the dilapidated and abandon buildings in the City and create a set of recommendations to address blight within the City limits. The Blight Action Plan identified 512 dilapidated and/or vacant buildings in the City of Cumberland. The vast majority of the dilapidated and/or vacant structures in the City are single-family homes. While the survey identified dilapidated and/or vacant structures in many parts of the City, the inventory concluded that the problem properties were concentrated in the Decatur Heights, Rolling Mill, and Chappel Hill-Virginia Avenue neighborhoods.

³³ Cumberland community survey, administered January – April 2020.

Map VI-1. Blighted Properties (based on a weighted dilapidation score)



Substandard housing has a significant impact on the health and well-being of children and families. Poor housing quality has been found to be associated with an increase in emotional and behavioral problems in children and poor school performance in teens.³⁴ In addition, the presence of blighted and abandon property contributes to declining nearby property values³⁵ and is associated with increased crime.³⁶ Addressing blighted and abandon property and substandard housing is essential for helping ensure families have access to secure and quality housing and that Cumberland’s neighborhoods can be stabilized and improved.

³⁴ For low-income families, substandard housing takes toll on children. (2013). ScienceDaily.

<https://www.sciencedaily.com/releases/2013/10/131022132145.htm>

³⁵ Han, Hye-Sung. 2013. The Impact of Abandoned Properties on Nearby Property Values. *Housing Policy Debate* 24(2): 311-334.

³⁶ Bieretz, Brian and Joseph Schilling. 2019. *Pay for Success and Blighted Properties: Insights and Opportunities for Funding Vacant Property Reclamation and Neighborhood Stabilization*. Washington DC: Urban Institute.

Homelessness

In 2019, according to the homelessness Point-in-Time count conducted by the Cumberland-Allegany County Continuum of Care (CoC), there were 145 homeless individuals in the County.³⁷ There has been a tremendous increase in the number of homeless individuals between 2018 and 2019, an 84% increase.

About 57% of the County's homeless individuals are sheltered, living in emergency shelters, 17% are in transitional housing, and 26% are unsheltered. The share of the homeless population living in emergency shelters increased between 2018 and 2019, although the share (though not the actual number) living in transitional housing declined.

Figure VI-3. Homeless Count by Category, 2018 and 2019
Allegany County, Maryland

Category	2019	2018	% Change
Total homeless	145	79	84%
Sheltered-emergency shelter	83	30	177%
Sheltered-transitional housing	25	25	0%
Unsheltered	37	24	54%
Total 18-24-year old	9	5	80%
Total children under 18	27	24	13%
Veterans	3	1	200%
Substance use disorder	17	9	89%
Severe mental illness	25	5	400%
Victims of domestic violence	13	2	550%
HIV/AIDS	0	0	n/a

Source: HUD Continuum of Care Homeless Point-in-Time reports

In 2019, the homeless population in Allegany County included significantly more individuals with severe mental illness and victims of domestic violence.

Figure VI-4. Homeless Count by Race/Ethnicity, 2018 and 2019
Allegany County, Maryland

Category	2019	2018	% Change
Total homeless	145	79	84%
White	119	70	70%
Black	14	9	56%
Hispanic	0	0	-
Other	12	0	-

Source: HUD Continuum of Care Homeless Point-in-Time reports

About 18% of 2019 homeless population was non-White, which is a higher share than in 2018 (11%).

³⁷ The homeless point-in-time count is a count on a single night in January of the people in a community who are experiencing homelessness that includes both sheltered and unsheltered populations

Publicly-Subsidized Housing

The Housing Authority of the City of Cumberland (Housing Authority) has 499 public housing units. The County’s Human Resources Development Commission’s Office of Rental Assistance manages 638 Housing Choice Vouchers, including 77 project-based and 524 tenant-based vouchers. Of the 524 tenant-based vouchers, 37 are set aside for veterans, disabled, and family unification.

The average income of public housing residents is \$9,110. About 83% of public housing residents are White, 15% are Black, and less than 1% are some other race. Among voucher holders, about 87% are White, 12% African American, and less than 1% are some other race. Public housing serves about 163 disabled families and an additional 269 disabled families receive tenant-based voucher assistance. None of the voucher holders are Hispanic. Service providers and advocates report that vouchers are difficult to use as not all landlord accept housing choice vouchers. Many landlords in Cumberland do not participate in the voucher program this limiting housing choice. However, tenants will have greater choice as Cumberland implements the new source of income protection as part of Maryland’s Home Opportunities Made Equal Act passed in the 2020 legislative session. Service providers also report that available units may pass inspection, many units are still housing of low-quality necessitating repairs.

Figure VI-5. Characteristics of Public Housing Residents and Housing Choice Voucher (HCV) Holders

	Public Housing	HCV
Totals	499	638
White	416	486
Black	77	68
Other	6	4
Hispanic*	0	0
Seniors (age 62+)	81	143
Disabled families	163	269
Families requesting accessibility features	10	0

Analysis of Barriers to Affordable, Quality Rental Housing

Black residents in Cumberland are significantly more likely than White residents to live in neighborhoods where the majority—or even more than three-quarters—of households are cost burdened renters. Cumberland’s disabled residents are somewhat more likely than non-disabled residents to live in neighborhoods with high shares of cost burdened renters.

Substandard housing is a critical issue in the City of Cumberland. While blight is an issue in neighborhoods throughout Cumberland, problem properties are concentrated in the Decatur Heights, Rolling Mill, and Chappel Hill-Virginia Avenue neighborhoods.

While the City has made progress with inspection requirements for rental units that turnover, advocates and service providers report housing of poor quality that may need major repairs. Focus groups also reported many property owners do not have the financial resources to maintain

and repairs their units. Most interviews mentioned housing conditions as a serious issue contributing to cost burden and limiting housing choice. Because of limited housing choice, tenants often do not report the need for repairs or substandard housing conditions because of fear of eviction and the inability to find a better unit.

Homeownership Opportunities

Homeownership Rates

Homeownership is the primary means by which middle-class households accumulate wealth in the U.S. Black and Hispanic families often have negative net worth preventing them from purchasing a home. The average wealth for white families is ten times higher than the average wealth for African American families according to the Center for Responsible Lending. A 2018 study by Joanna Taylor and Tatjana Meschede of Brandeis University found that on average, white college-educated individuals inherit about \$140,000 versus \$40,000 among black college educated individuals. Intergenerational wealth has been found to make a big difference in saving for a down payment for a mortgage even as much as \$1,000 in studies by Pew Research. Homeownership rates in Cumberland have been consistently lower than those in Allegany County. In 2017, an estimated 52.1% of Cumberland households were homeowners, compared to 68.8% of Allegany County households. Homeownership rates have declined since 2010 in both Cumberland and in Allegany County.

Homeownership rates among Black and Hispanic households are substantially lower than they are for White households in Cumberland. The gap in homeownership rates between White and non-White households appears to have widened significantly between 2010 and 2017; however, because of the small sample sizes, it is important to interpret the data cautiously.

Figure VI-6. Homeownership Rates (%) by Race/Ethnicity, 2000-2017

	City of Cumberland			Allegany County		
	2000	2010	2017	2000	2010	2017
All households	58.0	55.6	52.1	70.2	70.5	68.8
White households	58.9	57.2	54.5	71.1	70.7	70.4
Black households*	41.9	31.5	15.8	40.8	30.2	20.1
Hispanic households*	43.2	44.9	16.0	44.2	46.2	32.9

Source: U.S. Census Bureau, 2000 and 2010 and 2017 American Community Survey five-year files.

*Figures should be interpreted cautiously as they are based on very small sample sizes.

Mortgage Lending Practices

Data on home mortgage applications, originals and denials is reported to the Federal Reserve Bank under the terms of the Home Mortgage Disclosure Act (HMDA). All lending institutions that issue at least five home mortgages must report all residential loan activity, including the race and ethnicity, sex, age, income, and credit score of the applicant, as well as information about the loan size and property location. The HMDA data is used by the Federal Reserve to help determine whether financial institutions are serving the needs of their communities. This data is also very useful in helping to identify potentially discriminatory lending practices and patterns in a community.

For this AI, the 2018 HMDA data were analyzed for the City of Cumberland³⁸, Allegany County and the State of Maryland. This analysis includes only applications for purchase loans for homes in one-to-four-unit dwellings (including both site-built and manufactured homes) and socioeconomic data for primary applicants only.

Figure VI-7. Summary Report Based on Actional Taken Mortgage Data, 2018

	City of Cumberland		Allegany County		State of Maryland	
	No.	Pct.	No.	Pct.	No.	Pct.
Applications	267	100.0%	1,162	100.0%	198,087	100.0%
Black	16	6.0%	36	3.1%	44,118	22.3%
White	249	93.3%	1,075	92.5%	80,367	40.6%
Hispanic	0	0.0%	19	1.6%	15,001	7.6%
Asian	1	0.4%	6	0.5%	13,893	7.0%
Not Provided	0	0.0%	9	0.8%	32,577	16.4%
Other*	1	0.4%	17	1.5%	12,131	6.1%
Originations	129	100.0%	519	100.0%	82,942	41.9%
Black	3	2.3%	12	2.3%	15,706	35.6%
White	124	96.1%	488	94.0%	38,348	47.7%
Hispanic	0	0.0%	4	0.8%	5,922	39.5%
Asian	1	0.8%	6	1.2%	5,772	41.5%
Not Provided	0	0.0%	2	0.4%	11,807	36.2%
Other*	1	0.8%	7	1.3%	5,387	44.4%
Denials	54	100.0%	207	100.0%	30,036	15.2%
Black	9	16.7%	12	5.8%	8,691	19.7%
White	45	83.3%	183	88.4%	9,309	11.6%
Hispanic	0	0.0%	3	1.4%	3,000	20.0%
Asian	0	0.0%	0	0.0%	2,151	15.5%
Not Provided	0	0.0%	3	1.4%	5,361	16.5%
Other*	0	0.0%	6	2.9%	1,524	12.6%

Source: 2018 Home Mortgage Disclosure Act database

*Other includes Native American/American Indian/Alaskan Native and Native Hawaiian/Other Pacific Islander, as well as two or more races.

Applications

In 2018, there were 267 loan applications in the City of Cumberland. Nearly all of the applicants (93.3%) were White and 6.0% were Black. No mortgage applicants in 2018 in the City of Cumberland were Hispanic. Non-Whites in the City of Cumberland were less likely to apply for a home purchase loan in 2018 than were White residents. While Black applicants made up 6.0% of mortgage purchase applications, they accounted for 6.5% of all residents of the City. Though Hispanic residents accounted for 2.0% of the City's residents, they did not comprise any of the loan applications in 2018 in the City of Cumberland.

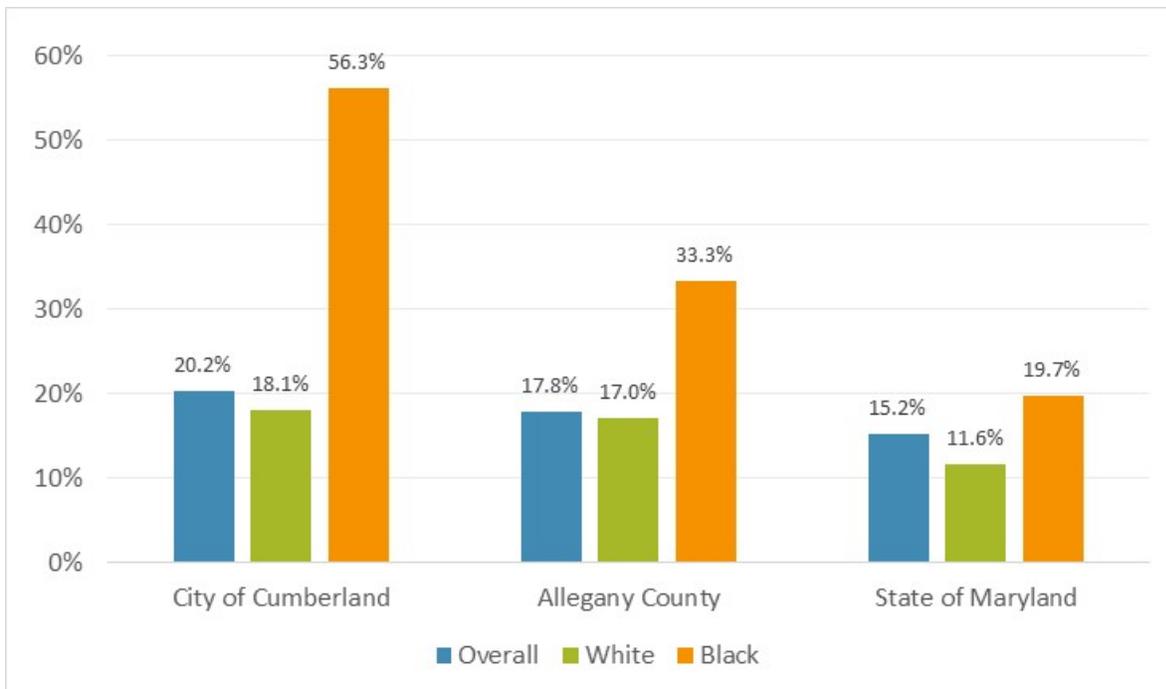
³⁸ For the purpose of this Analysis of Impediments, the City of Cumberland is defined by Census Tracts 5 – 12.

Denials

Mortgage denial rates are higher in the City of Cumberland than they are in either Allegany County or the State of Maryland overall. Overall, in the City of Cumberland, more than one in five (20.2%) of home purchase loan applications were denied.

Furthermore, denial rates are significant higher for non-White applicants. This difference is observed in both Allegany County and the City of Cumberland, but the disparity is much greater in the City of Cumberland. Among White applicants, the denial rate in 2018 was 18.1% in the City of Cumberland. By contrast, the denial rate was 56.3%, meaning more than half of all Black home loan applicants in Cumberland in 2018 were denied.

Figure VI-8. Denials by Income and Race/Ethnicity, 2018
City of Cumberland, Allegany County and State of Maryland



Source: 2018 Home Mortgage Disclosure Act database

Fair Housing Complaints

The Maryland Commission on Civil Rights (MCCR) is a certified Fair Housing Agency Program (FHAP) and reviews and investigates complaints throughout the state of Maryland on behalf of the Department of Housing and Urban Development (HUD). HUD’s Office of Fair Housing and Equal Opportunity (FHEO) collects fair housing complaints by county and not cities. Also, the FHEO database of fair housing complaints is not necessarily the universe of fair housing violations in Allegany County or Cumberland. Many individuals do not file formal complaints when they experience discrimination because they lack knowledge of their rights, may not recognize more subtle forms of discrimination, or do not know how to file a complaint.

According to the FHEO file cases data, only one fair housing complaint was filed in Allegany County between 2006 and 2016; that one case was filed on the basis of National Origin and the individual filing the complaint was Hispanic. Also, no fair housing lawsuits were filed in Cumberland.

To receive complaints and educate the public, the City of Cumberland established the Human Relations Commission (HRC) with a seven-member commission appointed by the Mayor and Council along with one representative from the City Council and the City's senior community development specialist. The City's Human Relations Commission Administrator is Lee Borrer, who is also the City's senior community development specialist. As the administrator, Ms. Borrer is the point of contact for questions regarding fair housing or receiving formal complaints. In 2019 and June of 2020, the Human Relations Commission did not receive any formal complaints. The complaint form and information regarding fair housing rights are available on the City of Cumberland's website (complaint form is found in the Appendix).

Based on results of a 2020 survey, an estimated 5.7% of Cumberland residents say that they or someone they know have experienced housing discrimination. The most common types of discrimination are based on race or ethnicity and was most often a landlord or property manager discriminating against prospective tenants. Housing discrimination was generally not reported to the authorities. Cumberland residents say that they did not report discrimination because they were afraid of retaliation or did not think it would make a difference.

Interviews with residents, service providers, and community leaders mentioned underreporting on substandard housing conditions and barriers for persons with disabilities that could represent fair housing violations. For example, tenants fear reprisals and eviction if they report substandard housing conditions. Agency directors have reported leaky roofs, mold, basement flooding, lack of electricity, water, and heat among the housing conditions that may not have been reported as fair housing violations because they were never reported. Other examples include disabled persons being dissuaded from units that were not accessible where landlords were not willing to make reasonable accommodations as required by law. The City's HRC administrator also reported similar questions and complaints in addition to questions regarding service animals.

In order to improve outreach, education, and gather more information on patterns of possible fair housing violations, the MCCR established the Western Maryland Advisory Council. The Council is a 15-member commission that includes Allegany, Garrett, and Washington counties. The first of its kind in the state, the Council first met in April 2020 and will advise the MCCR on civil rights issues in western Maryland. The MCCR hopes the advisory council will serve as a model for other regions in the state.

Disability and Access Analysis

The disabled population is severely underserved by housing opportunities. The City of Cumberland has a greater share of disabled persons than in the surrounding region and a higher percentage of households with a disabled member who live in poverty. Many disabled households can't work and receive Social Security or SSI and are in need of some of form of housing assistance.

In 2017, there was an estimated 4,538 Cumberland residents with a physical or cognitive disability. The number of individuals with disabilities in Cumberland increased between 2010 and 2017, while the disabled population declined in Allegany County over that same time period. Persons with disabilities have had disproportionate challenges finding high-quality, affordable and accessible housing in Cumberland. The disabled population is projected to grow significantly in Cumberland and Allegany County, simply as a result of the aging of the population, since older residents are much more likely than younger residents to live with a disability.

The most common type of disability is ambulatory disability whereby an individual has a serious difficulty walking or climbing stairs. The second most common disability in Cumberland is cognitive difficulties which includes having difficulty remembering, concentrating, or making decisions as a result of a physical, mental or emotional problem.

Figure VI-9. Type of Disability by Age of Persons with Disabilities, 2018

Disability Type	City of Cumberland		Allegany County	
	No.	Pct.	No.	Pct.
Total with a disability	4,538	100.0	12,399	100.0
With a hearing difficulty	1,139	25.1	3,660	29.5
With a vision difficulty	839	18.5	1,929	15.6
With a cognitive difficulty	2,102	46.3	5,101	41.1
With an ambulatory difficulty	2,566	56.5	6,385	51.5
With a self-care difficulty	895	19.7	2,000	16.1
With an independent living difficulty	1,639	36.1	4,180	33.7

Source: U.S. Census Bureau, 2013-2017 American Community Survey

There are several neighborhoods where more than 30% of residents are disabled, including parts of the Decatur Heights, Eastside-Willowbrook, and Westside neighborhoods.

Older adults are significantly more likely to be disabled. In the City of Cumberland, more than half of residents age 75 and older are disabled, compared to 26.3% of residents between the ages of 35 and 64. This rate of disabled persons under age 65 is substantially higher than in both Allegany County and the rest of the state.

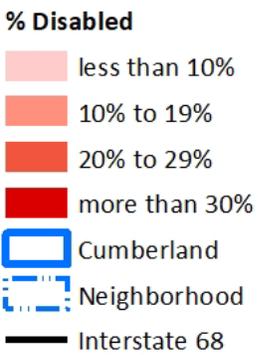
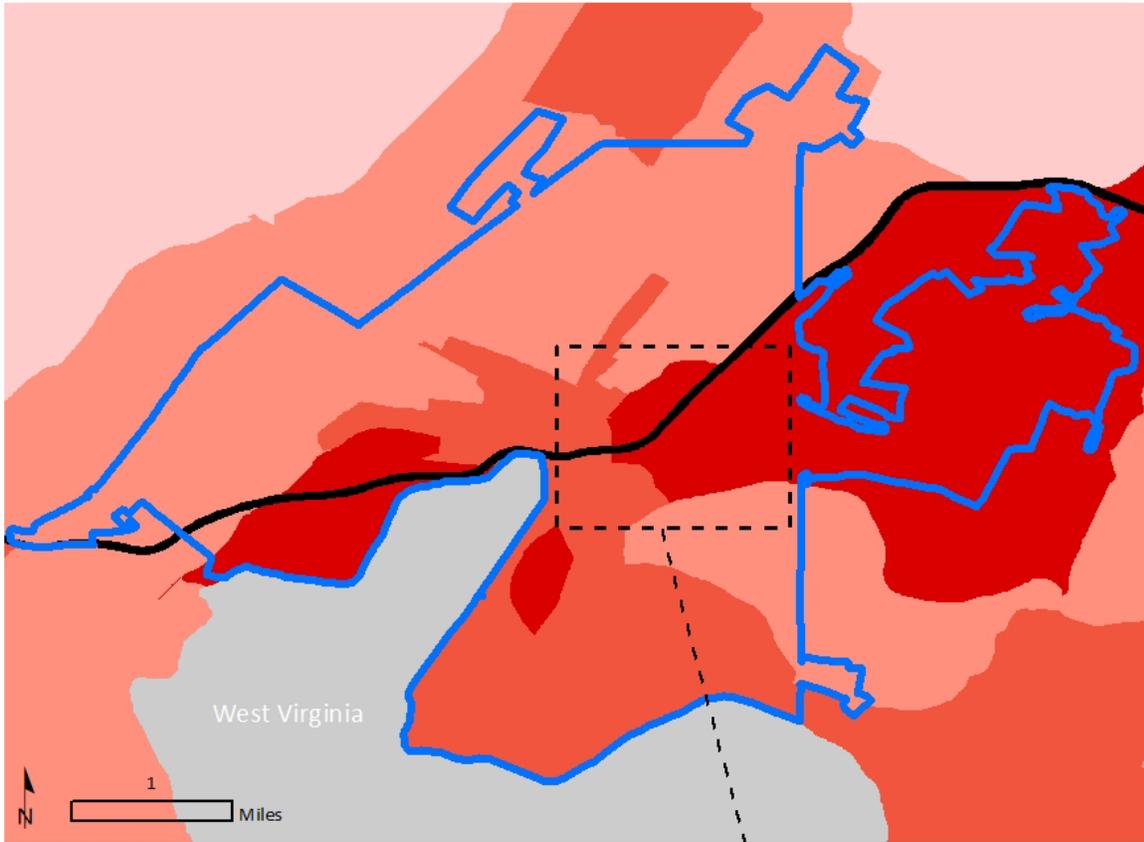
Disabled persons have different housing and service needs depending on the type of disability, and those disability types vary by age. For example, older adults (age 65 and older) are more likely than younger people to have an ambulatory difficulty, which is having serious difficulty walking or climbing stairs. Alternatively, younger disabled people are more likely than older

people to have a cognitive difficulty, which is having difficulty remembering, concentrating, or making decisions because of a physical, mental, or emotional problem.

White residents in Cumberland are more likely to be disabled than are Black or Hispanic residents. Nearly one quarter (23.5%) of White residents have a disability, compared to 15.3% of Black residents and 10.1% of Hispanic residents.

People with disabilities in Cumberland are more likely than non-disabled persons to be living in poverty. Nearly 60% of disabled individuals between the ages of 20 and 64 live in poverty in Cumberland. By contrast, only 16% of non-disabled residents between the ages of 20 and 64 have incomes below the poverty level.

Map VI-2. Percentage Disabled Population by Census Block Group (2017)



Source: U.S. Census Bureau, 5-Year American Community Survey, City of Cumberland

Analysis of Barriers to Housing Opportunities Among the Disabled Population

As units are removed from the housing stock, the available supply is reduced and rents rise. At the same time, older housing stock is difficult to convert to accessible rental housing that meets the needs of Cumberland's very low and low/mod income disabled households. Public housing serves about 163 disabled families and an additional 269 disabled families receive tenant-based voucher assistance. Accessible housing units for disabled individuals, particularly those under age 62, are limited in Cumberland, Maryland. There are currently 137 disabled families in public housing and the Housing Authority currently has 12 applications marked disabled/handicapped—all of these are single-person households.

Public housing tenants and applicants on the waiting list for accessible housing units need a housing unit with an accessible building entrance; an accessible elevator if the housing is multi-story; accessible hallways; single floor living space and common areas; door widths that are wide enough to accommodate wheelchairs; light switches, electrical outlets, thermostats, and other environmental controls in accessible locations; reinforcements in bathroom walls to allow installation of grab bars around the toilet, tub, and shower; and usable kitchen and bathrooms that allow an individual to maneuver a wheelchair in the space. Other common needs include accessible parking on-site and housing located near a fixed route bus stop due to an individual's limited mobility.

Housing accessible to persons with disabilities is a strong concern among Cumberland residents. In a 2020 community survey, major shares of residents in the community said that the following groups should be prioritized for housing: individuals living with mental illness and individuals with physical disabilities.

Summary of Fair Housing Contributing Factors

The following is a summary with selected highlights of fair housing contributing factors for the City of Cumberland:

- In Cumberland, about a third of renter households and more than a quarter of homeowners are housing cost burdened. Fifteen percent of renters and 10.9% of homeowners are severely cost burdened, spending half or more of their income each month on housing.
- Lower income households are significantly more likely to be housing cost burdened. More than 80% of renters with incomes below \$20,000 are cost burdened.
- About one out of five Black residents lives in a neighborhood where 75% or more of the households are cost burdened renters, compared with just 8.9% of White residents.
- About 12% of disabled residents live in neighborhoods where 75% are more of the households are cost burdened renters.
- Disabled persons also have difficulty finding housing units either because they are walk-ups that are not accessible to some disabled persons or units where landlords refuse to make modifications.

- In a 2020 survey, 15.1% of Cumberland residents say that several homes in their neighborhood appear to have “major structural issues and seem uninhabitable.” An additional 25.8% of residents say that several homes “appear to be in need of major repair (e.g. new roof, siding, or windows).”
- More than 43% of Cumberland residents say that vacant properties are a problem in their neighborhood.
- A 2018 study by West Virginia University (WVU) and Downstream Strategies identified more than 500 dilapidated and/or vacant buildings in the City of Cumberland.
- In 2019, there were 145 homeless individuals in the County. There has been an 84% increase in the number of homeless individuals between 2018 and 2019. A disproportionate number of homeless individuals are non-White (18%) and a higher share suffer mental illness or domestic violence.
- The HRDC’s Office of Rental Assistance administers 638 Housing Choice Vouchers. Service providers and advocates report that vouchers are difficult to use as not all landlord accept housing choice vouchers. Many landlords in Cumberland do not participate in the voucher program this limiting housing choice.
- Substandard housing is a critical issue in the City of Cumberland. While blight is an issue in neighborhoods throughout Cumberland, problem properties are concentrated in the Decatur Heights, Rolling Mill, and Chappel Hill-Virginia Avenue neighborhoods
- The gap in homeownership rates between White and non-White households appears to have widened significantly between 2010 and 2017.
- More than one in five (20.2%) of home purchase loan applications were denied. Black applicants were disproportionately more likely to be denied a loan.
- According to HUD, only one fair housing complaint was filed between 2006 and 2016. A 2020 survey estimated that 5.7% of Cumberland residents say that they or someone they know have experienced housing discrimination. The most common types of discrimination are based on race or ethnicity and was most often a landlord or property manager discriminating against prospective tenants.
- In 2017, there was an estimated 4,538 Cumberland residents with a physical or cognitive disability. Approximately 60% of disabled residents between 20 and 64 years of age live in poverty.

VII. Fair Housing Priorities and Goals

The following section identifies themes and overall issues based on the Analysis of Fair Housing, Disparities in Access to Opportunity, and Disproportionate Housing Needs. Each fair housing issue is briefly discussed followed by contributing factors.

Fair Housing Issue No. 1: Inadequate Fair Housing Enforcement and Education

In the past two years, only one fair housing violation was reported by the HUD's Office of Fair Housing and Equal Opportunity and no cases were reported by the Maryland Commission on Civil Rights. This is likely not because there are no fair housing violations in the City of Cumberland, but because there is not enough knowledge or education on fair housing rights.

The City of Cumberland has limited capacity to enforce fair housing laws because the City is not a certified HUD Fair Housing Agency Program. One staff person, who serves as the part-time Human Relations Commission (MCCR) administrator, is available to provide information, organize outreach and training events, and help residents file formal complaints. Cumberland forwards complaints to the Maryland Commission on Civil Rights, an agency that investigates fair housing and other civil rights violations across the State. Progress has been made with the newly established Western Maryland Advisory Council, which will help MCCR gather information on patterns of fair housing issues and organize outreach and educational events.

Interviews and focus groups reveal that while current efforts are laudable, many cases of substandard housing conditions are not reported because of fear of eviction or reprisals. More work needs to be done to educate tenants of their rights and landlords of their obligations. In addition, there is a pattern of source of income discrimination that has contributed to substandard housing conditions especially in the rental market. Although Maryland passed a new law to prevent source of income discrimination, much education, investigation, and enforcement must be provided in order to make headway on this issue.

- Lack of fair housing enforcement
- Lack of resources for fair housing agencies and organizations
- Private-sector discrimination
- Lack of local private fair housing outreach and enforcement
- Source of income discrimination

Fair Housing Issue No. 2: Limited Housing Choices for Persons with Disabilities

Persons with a disability in the City of Cumberland have very limited housing choices as well as a lack of information about accessible units. Although the Housing Authority of the City of Cumberland is adding units for disabled persons through the Rental Assistance Demonstration program, there are no other accessible units being built. Additionally, information on available

accessible units is severely limited and advocates for the disabled report that Cumberland’s steep slopes, walk-ups, and lack of elevators limit housing choices. Even when units are found, landlords are reluctant to make reasonable accommodations as required by law. Also, willing landlords may not have the means to make accommodations due to fiscal constraints. Some landlords were unaware of obligations to reasonably accommodate persons with disabilities. At the same time, persons with disabilities were unaware of their rights under the Fair Housing Act or the Americans with Disabilities Act.

- Inadequate supply of housing for persons with disabilities
- Lack of assistance for housing accessibility modification
- Lack of access to publicly-supported housing

Fair Housing Issue No. 3: Hispanic Residents Face Housing Challenges

While Hispanics make up only 2.0% of the City’s population, the number of Hispanic residents has increased by 164% between 2000 and 2017. About one percent of Hispanics are limited English proficient. Hispanics with limited English proficiency have difficulty reporting fair housing violations and code enforcement issues. In addition, many Spanish-speaking residents are unable to access program guidelines or receive outreach materials in Spanish or other languages and are not able to communicate with City staff. Some Hispanic residents may also be undocumented and therefore not eligible for many HUD-funded programs. Therefore, these families are more likely to live in substandard housing conditions due to limited options based on price and availability.

- Lack of local fair housing enforcement
- Lack of fair housing outreach and enforcement
- Lack of language access to program and services
- Lack of access to government facilities
- Lack of Code Enforcement

Fair Housing Issue No. 4: Lack of Affordable Rental Housing

The City of Cumberland has at least 512 vacant and abandoned buildings, yet there is not enough housing that is affordable to many of its residents. Blighted, vacant, and abandoned buildings is one of the chief concerns of Cumberland residents. In a 2020 survey, 15.1% of Cumberland residents say that several homes in their neighborhood appear to have “major structural issues and seem uninhabitable.” An additional 25.8% of residents say that several homes “appear to be in need of major repair (e.g. new roof, siding, or windows).” More than 43% of Cumberland residents say that vacant properties are a problem in their neighborhood. And yet, one in five Black households live a neighborhood where 75% of households are cost-burdened renters.

Although there are a few programs for weatherization and small repairs, funding is limited. Meanwhile, vulnerable populations, such as low-income seniors, single-parent households, and those at risk of homelessness have few options for permanent housing. The Housing Authority is converting several of its development with the RAD program beginning with Fort Cumberland, but there are no affordable housing developers outside of the Cumberland Housing Group active

in the City. There is also very little private development activity and only one new permit for new residential construction was approved in 2019.

- Lack of new housing development
- Lack of code enforcement
- Lack of affordable housing developers
- Existing programs not to scale to address the problem

Fair Housing Issue No. 5: Lack of Homeownership Opportunities

Cumberland residents face severe challenges on the road to homeownership. Despite the fact that the median home price for a home is \$109,000, many Cumberland residents are not qualified to buy a home. In 2017, more than one in five (20.2%) of home purchase loan applications were denied. Black applicants were disproportionately more likely to be denied a loan, with 56.3% of mortgage applicants made by Black households denied. First-time homebuyer programs are oversubscribed and frequently run out of funds before the program year is complete. The Human Resources Development Commission has one HUD certified housing counselor that provides first-time homebuyer education and financial education. Over a quarter of current homeowners are cost-burdened, likely meaning that existing homeowners have high debt ratios and insufficient income. These homeowners are vulnerable to foreclosure if there is job loss or if there should be a downturn in the economy

- Lending discrimination
- Low home values from neighborhoods facing disinvestment
- Current and increasing wealth disparities
- Limited public resources to invest in neighborhoods needing significant revitalization

Fair Housing Issue No. 6: Inadequate Public Transportation & Access to Areas of Opportunity

Cumberland residents without a car are severely limited in their housing choices, jobs, education, and healthcare. Although the County has public transportation, Allegany Transit, the bus system has limited routes, limited routes, and a limited schedule. The bus is unreliable for access to jobs, health care, and educational opportunities. The County and the City are working cooperatively through the Bridges to Opportunity Transportation Committee and local organizations provide transit vouchers, much work needs to be done to make the service more reliable so that those dependent on public transportation can be more mobile.

Access to broadband also is severely limited. Over 4,000 students in Allegany County did not have access to a computer or a wifi connection during the COVID-19 school closures. Lack of access to broadband limits educational and job opportunities.

- Lack of transportation
- Lack of access to jobs

- Limited access to health care
- Limited access to high quality education

Goals & Actions

The following are the fair housing goals and actions that address the fair housing issues and impediments listed above. Each goal is followed by specific actions as well as the responsible entity for completing the action and how each action aligns with existing plans.

Goal 1: Increase Fair Housing Outreach, Education and Enforcement

Action 1: Augment the number of fair housing education and trainings per year. Although the City of Cumberland has a number of activities per year, it is apparent their reach is limited. A broader public awareness campaign, as well as more targeted education to real estate agents, property managers, and small landlords, as well as seniors, Hispanics, Black and disabled tenants, in targeted neighborhoods, schools, and social service agencies. Use the City's code enforcement department mailing list to mail basic information on fair housing and lead paint. Try new locations for trainings, including community centers, schools, and libraries.

Plan Alignment: Fair Housing Action Plan, HRC Workplan

Responsible Entity: Dept. of Community Development, Human Relations Commission,
Partners: Maryland Commission on Civil Rights, Western Maryland Advisory Council,
Code Enforcement

Action 2: Work with new partners in providing increased training opportunities, programs, and outreach, including the Western Maryland Advisory Council, the NAACP, and the Fair Housing Action Center of Maryland. Progress has already been made through initial contact and collaboration. The Allegany County Library System is also a willing and able partner. Provide materials, use their facilities for training, and train librarians on the basics of fair housing and lead paint so they can direct patrons to resources and contact information. Grow and deepen these partnerships.

Plan Alignment: Fair Housing Action Plan, HRC Workplan

Responsible Entity: Dept. of Community Development, Human Relations Development
Commission

Partners: Human Resources Development Commission, NAACP, Allegany Library
System, Fair Housing Action Center of Maryland

Action 3: Greater code enforcement. The City of Cumberland has improved its code enforcement by requiring inspection when a rental unit turns over. However, many units are reportedly substandard or barely pass inspection. Consider a six-month follow-up inspection or random inspection to see if the unit has any additional problems. This will help alleviate the burden of reporting by tenants who may fear retribution or eviction if

they report housing violations.

Plan Alignment: Blight Study, 2020 Consolidated Plan, Fair Housing Action Plan

Responsible Entity: Mayor & City Council

Partners: Code Enforcement, Dept. of Community Development

Goal 2: Improve Housing Opportunities for Persons with Disabilities

Action 1: Require training for landlords on what constitutes “reasonable accommodation.” Current efforts to train landlords are limited and misinformation still exists on fair housing and American with Disabilities Act requirements. Consider in-person trainings or a short online course with a short quiz that is part of the requirement to obtain a rental license to become a landlord in Cumberland.

Plan Alignment: Fair Housing Action Plan, HRC Workplan, 2020 Consolidated Plan

Responsible Entity: Human Relations Commission

Partners: Dept. of Community Development

Action 2: Grow the list of accessible units. Currently, HRDC started developing a list of landlords who Housing Choice Vouchers and accessible units. Consider small incentives to encourage landlords to join. In addition, educate landlords on Maryland’s new source of income protection law.

Plan Alignment: Fair Housing Action Plan

Responsible Entity: Human Resources Development Commission

Partners: Dept. of Community Development, Cumberland Housing Group, Bridges to Opportunity

Action 3: Provide more funding for modification programs. Currently, three organizations – Resources for Independence, NAILS, and DORS – provide programs to assist individuals in funding modifications necessary to make units and homes more accessible. It is clear from the interviews and focus groups that more funding needs to be provided. Consider making the program more user-friendly allowing tenants to request repairs with authorization of the landlord.

Plan Alignment: 2020 Consolidated Plan

Plan Alignment: Blight Study, 2020 Consolidated Plan, Fair Housing Action Plan

Responsible Entity: Mayor & City Council, Dept. of Community Development

Partners: DORS, NAILS, Friends Aware, Resources for Independence

Action 4: Continue funding sidewalk and road improvements. The City of Cumberland has supported the redevelopment of public housing by using CDBG funds to make sidewalk and roads more accessible. The City funded improvements to Fort Cumberland and Jane Frazier Homes, so it should continue these efforts in other development as they

become converted under the RAD program.

Plan Alignment: 2020 Consolidated Plan, Sustainable Communities Plan

Responsible Entity: Mayor & City Council, Dept. of Community Development

Partners: Cumberland Housing Group/Housing Authority

Goal 3: Provide Greater Language Access

Action 1: Adopt the City’s draft Limited English Proficiency Plan (LEP). The City completed its LEP plan several years ago. The City’s Human Relations Commission (HRC) has a goal to adopt the LEP plan in 2020. It should be the goal of the HRC to have it adopted by Mayor and Council this year.

Plan Alignment: HRC Workplan

Responsible Entity: Human Relations Commission, Mayor and City Council

Partners: Dept. of Community Development

Action 2: Translate more materials to Spanish. Provide more materials in Spanish, including basic brochures on tenant rights especially the city’s Housing Code, fair housing regulations, and the fair housing complaint process. Make sure the material is distributed to churches, school, libraries, and other community locations that are considered trusted sources by the Latino community. Consider Spanish-language radio which is a popular medium for information in the Latino community.

Plan Alignment: HRC Workplan

Responsible Entity: Dept. of Administration, Dept. of Community Development

Partners: Non-profit, community action agencies, service providers, Allegany Library System

Goal 4: Increase Affordable Housing Supply

Action 1: Support the Cumberland Housing Group’s (CHG) mission to develop new affordable housing. The CHG currently receives property deeded by the City. The CHG’s could increase its capacity to finance mixed income development using the Low-Income Housing Tax credit program and other state and local incentives. The CHG might work with national intermediaries such as Enterprise Community Partners or LISC that provide assistance to organizations that wish to grow their capacity as affordable housing developers.

Plan Alignment: Blight Study, Comprehensive Plan, Sustainable Communities Plan

Responsible Entity: Cumberland Housing Group/Housing Authority

Partners: Human Resources Development Commission, LISC, Enterprise Community Partners

Action 2: Provide funding for local landlords to rehab their rental units. Cumberland has many small landlords that often do not have the resources to rehabilitate their

properties. The City should scale its grant program and work with local lenders to create a loan program to rehabilitate rental units in target neighborhoods. The City should also consider a small insurance fund for landlords that are wary of participating in the Housing Choice Voucher program. The fund could be a small demonstration program seeded with \$10,000 insuring up to five units with damages of no more than \$2000. This might be enough to increase confidence in the rental market thereby increasing supply.

Plan Alignment: Blight Study, Sustainable Communities Plan, 2020 Consolidated Plan
Responsible Entity: Dept. of Community Development

Partners: Human Resources Development Commission, Cumberland Neighborhood Housing Service

Goal 5: Provide more Homeownership Opportunities

Action 1: Grow the Bridges to Opportunity Getting Ahead program. Allegany County, the City of Cumberland, and major institutions, along with the private sector, have successfully created a collaborative that works with families and individuals in a holistic way for financial self-sufficiency. The program should have a goal to double its capacity over the next five years to graduate more participants with stable jobs to eventually prepare them for homeownership.

Plan Alignment: 2020 Consolidated Plan, Sustainable Communities Plan

Responsible Entity: County & City Council

Partners: Human Resources Development Commission, UPMC/Western Maryland, Allegany College of Maryland

Action 2: Increase housing counseling. Currently, the City has only one certified homeownership counselor. By adding one more, more first-time homebuyers may be served. Consider adding a bilingual counselor that also able to serve the Latino community. Preparing and educating first-time homebuyers takes time, up to a year or more in some cases. Many participants need to repair their credit, save money, and save for a down-payment. By pairing counseling with more resources for first-time homebuyer programs that provide down-payment assistance and closing costs, Cumberland can increase homeownership opportunities.

Plan Alignment: 2020 Consolidated Plan, Fair Housing Action Plan, Sustainable Communities Plan

Responsible Entity: Cumberland Neighborhood Housing Services

Partners: Human Resources Development Commission, Lenders

Action 3: Redevelop city-owned property. The Cumberland Economic Development Corporation (CEDC) is analyzing three properties for redevelopment for new housing. The CEDC should consider mixed-income housing with homeownership opportunities for first-time homebuyers. Currently, there is little to no opportunity for new housing for first-time homebuyers within the City of Cumberland.

Plan Alignment: Blight Study, 2020 Consolidated Plan, Sustainable Communities Plan
Responsible Entity: Cumberland Economic Development Corporation
Partners: Cumberland Housing Group, Human Resources Development Commission

Goal 6: Improve Access to Transportation and Neighborhoods of Opportunity

Action 1: Increased funding for Allegany Transit. It is clear that the bus system is underfunded and unable to provide adequate service when hours of operation do not include the weekend. The Bridges to Opportunity Transportation Committee includes key stakeholders that advocate for additional bus routes and service as well as education and outreach to transit users. The County must do more than provide vouchers for low-income clients if bus dependent users are ever going to have a chance to access better jobs, housing, or neighborhoods of opportunity.

Plan Alignment: 2020 Consolidated Plan, Sustainable Communities Plan
Responsible Entity: Allegany County Transit, County & City Council
Partners: Bridges to Opportunity

Action 2: Connect transportation to land use. Smaller transportation providers are often challenged by limited ridership. If the transit system cannot serve everywhere it is needed, new development can be tied to transit routes. Cumberland should consider revising its Comprehensive Plan to identify transit nodes near job center such as the hospital, LaVale, and Mexico Farms. Housing, schools and services can also be tied together along shorter routes that can be more easily sustained over time.

Plan Alignment: 2020 Consolidated Plan, Sustainable Communities Plan, Comprehensive Plan
Responsible Entity: Planning Department
Partners: Dept of Community Development, Bridges to Opportunity

Action 3: Increased access to broadband. For today's economy, broadband access is key. Education and job opportunities are dependent on internet access. The recent COVID-19 pandemic demonstrated the inequalities in access to quality education when 4,000 students were unable to access school assignments over the internet. Even most job applications must be completed online. Housing searches, information on fair housing rights, and complaint forms are available on-line. The City of Cumberland should continue to work with its partners at the Allegany Library System and the School Board to increase funding for broadband access to low-income students thereby benefiting the entire household with greater access to opportunity.

Plan Alignment: 2020 Consolidated Plan, Sustainable Communities Plan
Responsible Entity: Dept. of Community Development
Partners: Allegany Library System, Bridges to Opportunity

Appendix

Citizen Input Survey for Cumberland's 5-Year Consolidated Plan Update

FY2020 - FY2024

Thank you for taking a few minutes to share your thoughts! The City of Cumberland is preparing its FY2020 – FY2024 Consolidated Plan, a document that guides the use of approximately \$1 million in federal funds for meeting community development needs in Cumberland. Your responses to this survey will shape how the City prioritizes this federal funding over the next five years.

Citizen Input Survey for Cumberland's 5-Year Consolidated Plan Update

* 1. How long have you lived in the City of Cumberland? If you are not a resident, how long have you been doing business or working in the City of Cumberland?

- Less than 1 Year
- 1-5 Years
- 6-10 Years
- More than 10 Years

* 2. In which neighborhood do you live?

- Center City (Downtown Cumberland)
- Decatur Heights
- Dingle Haystack
- Eastside Willowbrook
- Mapleside Johnson Heights
- Rolling Mill
- Shriver McNamee
- Virginia Ave. Chapel Hill
- Walsh Humbird
- Westside
- Wills (North End)
- Another place in Cumberland
- I am not a resident, but I work or do business in the City of Cumberland

* 3. Which category best describes you?

- Resident - Homeowner
- Resident - Renter
- Business Owner
- Member of a non-profit, community organization, or service provider
- Government
- Other (e.g. Student, Visitor)

Citizen Input Survey for Cumberland's 5-Year Consolidated Plan Update

* 4. Are you of Hispanic or Latino Origin?

- Yes
- No
- Prefer Not to Answer

* 5. Select the racial category that best describes you.

- White
- Black or African American
- Native Hawaiian and Other Pacific Islander
- American Indian or Alaska Native
- Asian
- Some Other Race
- Two or More Races
- Prefer Not to Answer

* 6. Do you currently own your home, rent your own, or something else?

- Own my home
- Rent a room in someone else's home or apartment
- Rent a home or apartment from a private landlord
- Live with friends or families without paying rent
- Rent from the Housing Authority (Public Housing)
- Homeless
- Use a Housing Choice Voucher to rent a home or apartment
- Prefer Not to Answer
- Other (please specify)

* 7. How old are you?

- Under 25
- 55 to 64
- 25 to 34
- 65 and older
- 35 to 44
- Prefer Not to Answer
- 45 to 54

Citizen Input Survey for Cumberland's 5-Year Consolidated Plan Update

* 8. Do you believe housing costs are **affordable** in Cumberland? "Affordable" means a household spends less than 30% of its gross household income towards rent or a mortgage payment. For example, a household earning \$30,000 a year and spending less than \$750 per month on housing would have housing costs that are "affordable."

- Yes
- No
- Not sure

Citizen Input Survey for Cumberland's 5-Year Consolidated Plan Update

* 9. How would you describe the **physical condition** of the homes in your neighborhood?

- Several homes appear to have major structural issues and seem uninhabitable.
- Several homes appear in need of major repair (e.g. new roof, siding, or windows).
- Some homes may need minor repairs or general maintenance, but no significant concerns.
- Homes generally appear in good condition.
- Not sure

* 10. Do you believe **vacant properties** are a problem in your neighborhood?

- Yes
- No
- Not Sure

* 11. If yes, why are vacant properties a problem? Select all that apply.

- Vacant properties lower my property value
- There is more neighborhood turnover
- Vacant properties mean the neighborhood is in decline
- Homeless people and others use the vacant houses
- Vacant properties are not a problem in my neighborhood.
- Other (please specify)

* 12. Have you or someone you know experienced **housing discrimination** in Cumberland? (Housing discrimination is the illegal practice of discriminating against buyers or renters of dwellings based on race, color, religion, national origin, sex, family status or disability.)

- Yes, I have
- Yes, I know someone who has
- Yes, I have AND I know someone who has
- No
- Not sure

Citizen Input Survey for Cumberland's 5-Year Consolidated Plan Update

* 13. If someone discriminated against you or someone you know, what do you believe was the basis of the discrimination? Check **the ONE** answer that applies most to the situation.

- Age
- Disability
- Gender or Sexual Orientation
- Race or Ethnicity
- National Origin
- Family Status (e.g. children in household or expecting a child)
- Economic Status (e.g. TANF, unemployment)
- Other (please specify)

* 14. Who discriminated against you or the person you know?

- Landlord or Property Management
- Mortgage Lender or Bank
- Real Estate Agent
- Mortgage Insurer
- Housing Authority
- Other (please specify)

* 15. Was the incident reported to anyone (e.g. HUD, Allegany County or the City of Cumberland, the State of Maryland?)

- Yes
- No
- Not Sure

* 16. If the incident was not reported, why not?

Didn't know where to report it

Too much hassle

Afraid of retaliation or revenge

I did report the incident

Didn't think it would make any difference

Other (please specify)

Citizen Input Survey for Cumberland's 5-Year Consolidated Plan Update

* 17. Federal Community Development Block Grant funding may be spent in the City of Cumberland on capital improvements for public infrastructure, such as roads, sidewalks, and community facilities. Identify **the ONE** Public Infrastructure priority that you think would most improve the community.

- Add new sidewalks or improve accessibility of sidewalks, including for persons living with a disability
- Street and sewer reconstruction
- Improve street lighting for better walkability and/or crime reduction
- Add new parks and recreational facilities (e.g. playgrounds, green space, community gardens)
- Add new community facilities (e.g. senior centers, youth centers, libraries, or community centers)
- Improve existing facilities (e.g. making needed renovations/repairs, making facilities accessible to persons with disabilities)
- Flood control improvements
- Other (please specify)

* 18. The City of Cumberland may use Community Development Block Grants for some types of economic development activities. Tell us what your top economic development priority would be for the City. Please select **the ONE** activity that you feel is most important.

- Commercial Building Rehabilitation (facade and interior improvements)
- Small Business Loans
- Technical Assistance for Small Businesses
- Job Training/Skill improvement for Cumberland's Workforce
- Other (please specify)

Citizen Input Survey for Cumberland's 5-Year Consolidated Plan Update

* 19. The Community Development Block Grant may be spent towards housing and related services for low- and moderate-income households, including homeless individuals and families. Select **up to FOUR** areas that you think should be the priorities for the City of Cumberland.

- | | |
|---|---|
| <input type="checkbox"/> Affordable rental housing (i.e. building new affordable rental housing) | <input type="checkbox"/> Fair Housing Education/Enforcement |
| <input type="checkbox"/> Assistance purchasing a home (i.e. down payment/closing cost assistance) | <input type="checkbox"/> Environmental Hazard testing/removal (e.g. lead paint removal) |
| <input type="checkbox"/> Homebuyer counseling programs | <input type="checkbox"/> Assistance making homes more energy-efficient |
| <input type="checkbox"/> Foreclosure prevention counseling | <input type="checkbox"/> Assistance to landlords to make upgrades to address life safety or bring property up to code |
| <input type="checkbox"/> Eviction prevention counseling | <input type="checkbox"/> Housing for individuals and families experiencing homelessness |
| <input type="checkbox"/> Accessibility improvements/housing for people with physical disabilities | <input type="checkbox"/> Services for homelessness prevention |
| <input type="checkbox"/> Housing for seniors | <input type="checkbox"/> Rental payment assistance/vouchers directly to families |
| <input type="checkbox"/> Supportive Services for residents with special needs (i.e. older adults, persons living with a physical disability, mental illness, or HIV/AIDS) | |
| <input type="checkbox"/> Other (please specify) | |

Citizen Input Survey for Cumberland's 5-Year Consolidated Plan Update

* 20. Which groups of people in Cumberland do you think experience the greatest housing needs? Select **up to THREE** groups.

- | | |
|---|--|
| <input type="checkbox"/> Children (ages 0-12) | <input type="checkbox"/> Individuals living with HIV/AIDS |
| <input type="checkbox"/> Youth (ages 13-19) | <input type="checkbox"/> Individuals and/or Families Experiencing High Rents |
| <input type="checkbox"/> Victims of Domestic Violence | <input type="checkbox"/> Individuals and/or Families Experiencing Homelessness |
| <input type="checkbox"/> Senior Citizens (ages 62+) | <input type="checkbox"/> Working poor (e.g. individuals with an income less than \$12,500) |
| <input type="checkbox"/> Individuals with Physical Disabilities | <input type="checkbox"/> Unemployed Adults |
| <input type="checkbox"/> Individuals living with a Mental Illness | |
| <input type="checkbox"/> Other (please specify) | |

Citizen Input Survey for Cumberland's 5-Year Consolidated Plan Update

* 21. If you only had enough resources to accomplish **THREE** of the following goals to improve your community, what would you change?

- | | |
|--|---|
| <input type="checkbox"/> Increase the supply of affordable housing | <input type="checkbox"/> Promote energy-efficiency in housing |
| <input type="checkbox"/> Increase homeownership among low- and moderate-income households | <input type="checkbox"/> Improve/add to the community sidewalks, flood controls, lighting, and/or other street improvements |
| <input type="checkbox"/> Ensure housing stock is safe, healthy, and accessible | <input type="checkbox"/> Increase the number community facilities, such as libraries, playgrounds, or arts centers |
| <input type="checkbox"/> Prevent and end homelessness | <input type="checkbox"/> Provide assistance to small business owners |
| <input type="checkbox"/> Transform abandoned and vacant properties into community assets | <input type="checkbox"/> Revitalize downtown Cumberland |
| <input type="checkbox"/> Increase the availability of supportive service for persons with special needs, including older adults and persons with a physical disability | |

22. What other issues do you think are important for improving quality of life in Cumberland? Select all that apply.

- | | |
|---|---|
| <input type="checkbox"/> Reduce crime/make neighborhoods safer | <input type="checkbox"/> Create more public transportation options |
| <input type="checkbox"/> Improve schools/invest in schools | <input type="checkbox"/> Create more arts and entertainment options |
| <input type="checkbox"/> Attract more shops and restaurants | <input type="checkbox"/> Attract new employers |
| <input type="checkbox"/> Improve walkability of the community/expand walking paths and bike lanes | |
| <input type="checkbox"/> Other (please specify) | |

23. Does a lack of any of these amenities listed above make you think about moving out of the City of Cumberland?

- | | |
|---|-----------------------------------|
| <input type="checkbox"/> Yes, I am definitely thinking about moving out of Cumberland | <input type="checkbox"/> No |
| <input type="checkbox"/> Yes, I sometimes think about moving out of Cumberland | <input type="checkbox"/> Not Sure |
| <input type="checkbox"/> Other (please specify) | |

Citizen Input Survey for Cumberland's 5-Year Consolidated Plan Update

24. **[OPTIONAL]** Please provide any additional comments or recommendations for housing and community development needs in the City of Cumberland.

Fair Housing Discrimination Complaint Form

Your Fair Housing Rights are protected under Title VIII of the Civil Rights Act of 1968 Fair Housing Act it's Amendments, Chapter 9 Human Rights Code of Cumberland and Maryland Article 49 B.

If you feel those rights have been violated, you can file a complaint with the help of Legal Aid in Cumberland.

You may contact the Maryland Commission on Human Relations at 1 410-767-8600 or the US Department of Housing and Urban Development.

If you wish to have our complaint reviewed and mediated by the Human Relations Commission, please complete the questions that follow and attach copies of all documentation of your claims.

Your Name: _____

Your Address: _____

Phone: _____

Describe what happened, how you were discriminated against, and why you believe the actions were based upon your membership of a protected class. Include details and include a copy of the lease or information in question.

Who do you believe is responsible for this discrimination against you? Is this a landlord, bank, property owner, real estate agent, broker, company, agency or organization?

Name: _____

Address: _____

Where did the alleged act of discrimination occur? Provide address or explanation (rental unit, single family home, public or assisted housing, mobile home, agency or institution.)

Type: _____

Address: _____

When did the last act of discrimination occur? Date: _____

Is this continuous or ongoing? _____

Is this alleged action based upon (please circle):

Race, Color, National Origin, Religion, Sex, Familial status, Disabling condition, Age, Marital status, Sexual Orientation

Why do you believe the statement above?

Print Name: _____

Signature: _____ Date: _____

Return forms to City of Cumberland, Human Relations Commission, Department of
Community Development, 57 N. Liberty Street, Cumberland, Maryland 21502. Phone:
301 759-6437