

THE STATE OF FAIR HOUSING IN INDIANA REPORT

*A Review of
Fair Housing
Complaints
2019 - 2023*



DISCLAIMERS

The Fair Housing Center of Central Indiana (FHCCI) is an organization that works to be inclusive. Languages change over time, and we are still learning and improving in this capacity. We acknowledge that “labels” are a challenge as they relate to race and ethnicity. Particularly, there are significant challenges in the broad or very specific ways that public data, in particular Census data, is gathered and reported as it relates to race and ethnicity. When possible, we have tried to be inclusive while still trying to be consistent with the data as reported to not confuse the public if they gather their own data. In this report, we have used the term “Black” to be broader than “African American.” Census data uses “Black or African American” and “Hispanic or Latino.” Throughout this report, the FHCCI combined Hispanic and Latino statistics under “Hispanic” and means no disrespect in doing so. The FHCCI acknowledges the significant cultural differences between Hispanics and Latinos, as well as the preference by some of “Latinx.” The Census uses “Asian” instead of “Asian American” in referring to the broad demographics of that population. The Census most often combines “Native Hawaiian and Pacific Islander” together. They also combine “American Indian or Alaskan Native” together as well. We again mean no disrespect in using these categories to match data. There is also debate about whether to capitalize “white” when referring to that population. We have chosen to not capitalize “white” except in headings where capitalizing is needed. We also grouped white and white non-Hispanic applicants together since not all white individuals indicated their ethnicity in the data reviewed. We have tended to use “neighborhoods of color,” “communities of color,” “people of color,” or specify the predominant race(s) or ethnicities rather than utilizing the term “minority.”

The federal Fair Housing Act uses the term “handicap” instead of “disability.” The terms have the same legal meaning. See *Bragdon v. Abbott*, 524 U.S. 624, 631 (1998) (noting that the definition of “disability” in the Americans with Disabilities Act is drawn almost verbatim “from the definition of ‘handicap’ contained in the Fair Housing Amendments Act of 1988”). We use “disability” instead of “handicap” and err toward the use of people-first language when appropriate.

Unfortunately, data on the LGBTQ+ community is limited. The FHCCI used the most up-to-date data from the most reliable sources where possible.

The U.S. Department of Housing & Urban Development provided data based on their fiscal year (FY) which runs October 1 to September 30. Thus, a FY 2019 would include data from October 1, 2018-September 30, 2019.

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Alternative formats for those with disabilities available upon request. This information is not itself legal advice; for legal advice about a particular situation, contact an attorney. This report is for informational purposes only.

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www.fhcci.org

317-644-0673 info@fhcci.org

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The State of Fair Housing in Indiana

A Review of Fair Housing Complaints 2019-2023

EXECUTIVE SUMMARY

Since opening its doors in 2012, the Fair Housing Center of Central Indiana (FHCCI) has strived to provide reports to better inform the public about fair housing issues. Education and knowledge are power, and providing these reports allows the FHCCI and its constituents to understand what is happening in the housing industry across Indiana. The FHCCI releases this report, *The State of Fair Housing in Indiana – A Review of Fair Housing Complaints 2019-2023*, which focuses on fair housing administrative complaints filed in Indiana.

Some highlights from the report:

- Indiana is the nation's 17th most populous state with a 2022 population of 6,784,403, a 4.6% increase from the 2010 Census. The Indianapolis MSA saw the largest increase (11.8%) from 2010 to 2022. Other Indiana metro areas with population growth were the Chicagoland MSA (1.6%), Evansville MSA (1.1%), Fort Wayne MSA (7.6%), and South Bend MSA (2.0%).
- Indiana has seen increases in populations defining race and/or ethnicity over the last 12 years but decreases in the numbers of families with children. In addition to growing more racially diverse, Indiana's ethnic population has also grown, as shown by the growth in the Hispanic/Latino population, as well as persons born abroad. In contrast, only two Indiana MSAs saw an increase in households with persons under 18 years of age from 2010 to 2022: Indianapolis MSA (0.9%) and Fort Wayne MSA (0.4%).
- A total of 1,313 fair housing complaints were filed across the State of Indiana during HUD FY 2019-2023. The largest number of fair housing complaints were filed in 2021 with 297 complaints filed, followed by 287 in 2022 and 283 in 2023. There was an increase of 17.9% in total filed complaints from FY 2019 (240 complaints) to FY 2023 (283 complaints).
- During FY 2019-2023, Allen County had the highest number of filed complaints (305), while Marion County (224), Lake County (123), and St. Joseph County (121) followed. A total of 20 counties had no fair housing administrative complaints filed during this time. Most of those counties are considered rural areas with smaller populations.
- Over the five-year timespan, we found that most fair housing allegations were filed in the eleven counties making up the Indianapolis metro area (402 of 1,666 total allegations), while the second most allegations came from the 71 counties labeled as "Balance of State" making up the rest of the state (395 allegations) – a similar pattern to complaints filed.
- There has been a fairly steady increase in both total complaints and total allegations since FY 2000. In FY 2000, there were 159 complaints filed with 177 allegations statewide, whereas in FY 2023 there were 283 complaints containing 350 allegations. The increased rate of allegations tells us that filed fair housing complaints are also containing more allegations of different protected classes within them.
- The most frequent allegation of housing discrimination in Indiana over the reviewed FY 2019-2023 period was disability (38.3% of complaints), followed by race (29.2%), and sex (11.8%). Familial status (8.1%), retaliation (5.8%), national origin (4.8%), color (1.2%), and religion (0.8%) followed.
- When observing based on county, not metro area, from FY 2019-2023, Allen County had the most allegations (377), with Marion County (274), St. Joseph County (178), Lake County (175), and Vanderburgh County (97) following.
- Of the 1,649 complaint closures during FY 2019-2023, a total of 305 closure actions were due to conciliation or settlement, or 18.5%. During FY 2019-2023, a total of 1,001 complaints were labeled as "No Cause," which accounts for 60.7% of the total resolutions from the fiscal years analyzed. This shows the challenges for a complainant in receiving a favorable outcome. In fact, the lowest type of resolution was "Admin/Litigation/FHAP Closing – Complainant's Favor" with only 94 total closures, or 5.7% of total resolutions, during FY 2019-2023.

Fair housing laws protect all of us in multiple ways. This report helps us understand the types of fair housing complaints and allegations being filed in Indiana and their outcomes. This also allows us to learn where more outreach or changes in the fair housing enforcement process may be needed.

THE STATE OF FAIR HOUSING IN INDIANA

A REVIEW OF FAIR HOUSING COMPLAINTS 2019-2023

In January 2020, the FHCCI released its report, *The State of Fair Housing in Indiana – Fair Housing Complaint Filing 2000-2018*,¹ which focused on fair housing administrative complaints filed in Indiana during HUD Fiscal Years (FY) 2000-2018. This report builds on that previous report with updated data and new analysis.

FAIR HOUSING LAWS IN INDIANA

Fair housing laws have been enacted at the federal, state, and, in some Indiana jurisdictions, at the local level to address housing discrimination. Each of us is protected in multiple ways in our personal housing transactions. Which law’s complaint filing mechanism to use generally depends on where the alleged housing discrimination occurred.

Federal Fair Housing Act

On April 11, 1968, seven days after the assassination of Rev. Dr. Martin Luther King, Jr., Congress passed, and President Lyndon B. Johnson signed, the federal Fair Housing Act (42 U.S.C. § 3601, *et seq.*), Title VIII of the Civil Rights Act of 1968. The federal Fair Housing Act (FHA) was enacted with two broad mandates: (1) to prohibit discrimination in housing; and (2) to promote integrated housing patterns through a requirement that the federal government administer programs and activities in a manner that affirmatively furthers fair housing.² The federal FHA initially prohibited discrimination in housing due to race, color, religion, and national origin. Congress amended the FHA in 1974 to prohibit discrimination based on sex (commonly cited as gender) and in 1988 to prohibit discrimination based on familial status and disability. Table 1 identifies some of the major regulations of the FHA.

The FHA specifically defines the protected classes of familial status and disability. The term *familial status* is defined under the FHA to mean the inclusion of one or more individuals less than 18 years of age living with a parent, legal custodian, or designee of such a parent or legal custodian. This provision also protects individuals who are in the process of securing legal custody of a minor and/or someone who is pregnant. A *disability* is defined under the federal FHA as a physical or mental impairment that substantially limits one or more major life activities, a record of having such an impairment, or being regarded as having such an impairment. Major life activities may include seeing, walking, lifting, hearing, speaking, caring for oneself, learning, etc. The federal FHA prohibits discriminatory housing practices because of the disability of an individual buyer or renter, a person residing in or intending to reside in a dwelling after it is sold or rented, or of any person associated with a buyer or renter.

The FHA covers housing-related transactions or services including rental, sales, lending, appraisal, insurance, and zoning, unless specifically exempted. The FHA can be enforced by the U.S. Department of Housing and Urban Development (HUD), the U.S. Department of Justice (DOJ),

Table 1: Major Fair Housing Act Violations	
3604(a)	Refuse to sell or rent a dwelling; refuse to negotiate for the sale or rental of a dwelling; otherwise make unavailable or deny a dwelling
3604(b)	Discriminate in the terms, conditions, or privileges of the sale or rental of a dwelling; discriminate in the provision of services or facilities in connection with a dwelling
3604(c)	Make, print, or publish discriminatory advertising in connection with the sale or rental of a dwelling; make, print, or publish statements that indicate a discriminatory preference or limitation in connection with the sale or rental of a dwelling
3604(d)	Misrepresent the availability of a dwelling; state a unit is not available when it is in fact available
3604(e)	Engage in blockbusting; engage in steering
3604(f)	Refuse to permit a reasonable accommodation for a person with a disability; refuse to permit a reasonable modification for a person with a disability; fail to design and/or construct multi-family housing with certain accessibility features
3605	Discriminate in the financing of residential real estate transactions; discrimination in the provision of brokerage services
3617	Coerce, intimidate, threaten, or interfere with a person exercising their FHA rights; Retaliate against an individual for exercising their FHA rights

¹ Fair Housing Center of Central Indiana (FHCCI). *The State of Fair Housing in Indiana – Fair Housing Complaint Filing 2000-2018*. January 2020. <https://www.fhcci.org/wp-content/uploads/2020/01/2019-State-of-Fair-Housing-Report.pdf>

² See 42 U.S.C. § 3608 (HUD “shall administer their programs and activities relating to housing and urban development ... in a manner affirmatively to further the purposes of [the Fair Housing Act].”)

substantially equivalent states or localities, and through private enforcement actions or lawsuits brought by individuals or organizations that have experienced discrimination. In addition to fair housing laws, several other important laws may have specific oversight of some transactions or types of housing discrimination which this report will not cover.³

Indiana Fair Housing Act/State FHAP

In addition to the protections under the federal FHA, Indiana residents are also protected from housing discrimination under the Indiana Fair Housing Act (IC 22-9.5, *et seq.*). Of note, the Indiana Civil Rights Act includes “national origin or ancestry,” which means ancestry would apply as a protected group to housing transactions throughout the state. The state FHA has been certified by HUD as being “substantially equivalent” to the federal FHA.

The Indiana Civil Rights Commission (ICRC), a state government agency, has been certified by HUD as a “substantially equivalent” agency and is authorized to enforce the federal FHA on HUD’s behalf. The ICRC receives federal funding through HUD’s Fair Housing Assistance Program (FHAP) to investigate and attempt to resolve fair housing complaints, among other tasks.⁴ There is one caveat in this oversight due to SEA 240, which was passed by the Indiana General Assembly in 2018. SEA 240⁵ adds emotional support animal restrictions and infractions for medical professionals which was found to deviate from federal guidance. As a result, all complaints alleging disability discrimination due to the need of a reasonable accommodation for an emotional support animal will be handled by a HUD office, not a FHAP organization located in Indiana. In addition to enforcement through the ICRC, like at the federal level, the Indiana FHA may also be enforced through private lawsuits brought by individuals or organizations that have experienced discrimination.

Local Fair Housing Assistance Program (FHAP) Agencies

Indiana has six local government agencies which also participate in HUD’s FHAP program because HUD has certified that these communities have local laws which are substantially equivalent to the federal FHA. Like with the ICRC, these local government agencies receive FHAP funds for their fair housing related activities. These Indiana local agencies designated by HUD as FHAP agencies are located in Elkhart, Evansville, Fort Wayne, Gary, Hammond, and South Bend.⁶

Fair Housing Administrative Complaint Process

Under the federal FHA, individuals who have experienced housing discrimination may file an administrative complaint with HUD, a civil lawsuit in court, or both. Because the Indiana FHA and several localities have been designated by HUD to be substantially equivalent to the federal FHA, almost all administrative complaints in Indiana filed directly with HUD will likely be referred to the ICRC or to one of the six substantially equivalent local fair housing enforcement agencies for investigation and potential resolution. In addition to investigating complaints referred by HUD, the ICRC and the local substantially equivalent government agencies accept complaints of housing discrimination filed with them directly that are jurisdictional.

Once HUD, the ICRC, or one of the local government agencies (FHAP) receives a complaint of housing discrimination, the complaint will be assigned to an investigator. Throughout the investigation, the FHAP agency maintains a neutral position. The investigator may use a variety of investigative tools to determine whether there are reasonable grounds to believe housing discrimination occurred. These tools could include speaking with the parties and witnesses, conducting an on-site review, reviewing any available documentation, or other tools.

The FHAP agencies also attempt to conciliate or mediate fair housing complaints whereby all the parties attempt to find a mutually satisfactory resolution of the matter. If a conciliation or settlement is reached, the terms of the agreement will dictate final outcomes. If the agency finds there are reasonable grounds to believe that an unlawful discriminatory housing practice has occurred,

³ Several other federal statutes protect individuals from discriminatory housing practices. These statutes include: the Civil Rights Act of 1866 (42 U.S.C. § 1981 and § 1982), the Americans with Disabilities Act (ADA) (42 U.S.C. § 1201, *et seq.*), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794), Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d, *et seq.*), and the Equal Credit Opportunity Act, among others.

⁴ See 42 U.S.C. § 3610(f); 24 C.F.R. § 115.200

⁵ Senate Bill 240. Emotional support animals. <https://iga.in.gov/legislative/2018/bills/senate/240/details>

⁶ U.S. Department of Housing & Urban Development. Fair Housing Assistance Program (FHAP) Agencies – Indiana. https://www.hud.gov/program_of_fices/fair_housing_equal_opp/partners/FHAP/agencies#INn

the parties have a final chance to attempt to resolve the matter through the conciliation process. If the complaint cannot be resolved, the agency will typically issue a conciliation failure letter and then issue its decision on the complaint. If the agency does not find that a violation of law has occurred, a *No Reasonable Cause* ruling will be issued, and the complaint will typically end there. If there was reasonable cause to believe a violation of law occurred, a *Charge of Discrimination* or a *Reasonable Cause* ruling will be issued. Either party may then elect for state court, where the complaint proceeds under that process to settlement or resolution. If no election occurs, the complaint will proceed through an Administrative Hearing to settlement or resolution.

The specific procedures for claims filed with the substantially equivalent state and local agencies will vary depending on the state/local fair housing ordinance. Of note, the state and localities may also investigate any additional protected classes above and beyond federal or state laws designated under their state or local code. Typically, these additional classes would be investigated through non-FHAP funds but through a similar process as that outlined above.

DEMOGRAPHICS OF THE STATE

Federal, state, and local fair housing laws protect all people from discrimination in a variety of ways through the regulations identified under those laws. The intent of these laws, however, focuses on groups (protected classes) that have historically faced discrimination and/or are being excluded from housing transactions or services. In this section, we will share data on the populations most often discriminated against and protected under fair housing laws.

Geographic Scope Covered

This report covers the State of Indiana with a focus on five major metropolitan areas comprising 21 of Indiana’s 92 counties. The report further includes aggregate data on the remaining 71 counties, identified as “Balance of State,” which accounts for approximately 43.9% (2022) of the population made up through largely rural parts of Indiana.

Below is an overview of the demographics of Indiana, with a focus on the major metropolitan areas of Indianapolis (11 counties: Boone, Brown, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Putnam, and Shelby); Fort Wayne (three counties: Allen, Wells, and Whitley); Chicagoland (two counties: Lake and Porter); South Bend (one county: St. Joseph); and Evansville (four counties: Gibson, Posey, Vanderburgh, and Warrick) for comparison.

Total Population

Indiana is the nation’s 17th most populous state with a 2022 population of 6,784,403, a 4.6% increase from the 2010 Census (Table 2). The Indianapolis MSA saw the largest increase (+11.8%) from 2010 to 2022. Other Indiana metro areas with population growth were the Chicagoland MSA (+1.6%), Evansville MSA (+1.1%), Fort Wayne MSA (+7.6%), and South Bend MSA (+2.0%).

Table 2: State of Indiana Population Change, 2010-2022					
Location	2010		2022		2010-2022
	Population	% of Total Population	Population	% of Total Population	% Change
State of Indiana	6,483,802	100%	6,784,403	100.0%	4.6%
Chicagoland MSA	660,348	10.2%	671,037	9.9%	1.6%
Evansville MSA	298,805	4.6%	302,197	4.5%	1.1%
Fort Wayne MSA	416,257	6.4%	447,882	6.6%	7.6%
Indianapolis MSA	1,887,877	29.1%	2,109,957	31.1%	11.8%
South Bend MSA	266,931	4.1%	272,388	4.0%	2.0%
Balance of State	2,953,584	45.6%	2,980,942	43.9%	0.9%

Source: U.S. Census Bureau, 2010 Census Summary File 1, Table P1, Population; 2022 American Community Survey; 5 Year Estimates, Table DP05

Race and National Origin of Population

Table 3 shows that Indiana has had population increases and is becoming more diverse, both racially and in ethnicity, over the last 12 years. Across the State of Indiana, two populations have overall decreased: white (-0.8%) and the Native American/Alaska Native (-32.5%) population. In contrast, the Black/African American population increased by 8.3%, Asian American/Pacific Islander population increased by 63.5%, people of two or more races increased by 170.4%, and people of other races increased by 8.3%. Like other parts of the country, Indiana's metro areas tend to be more ethnically and racially diverse than the average of the state.

Table 3: Population Change by Race in Indiana, 2010-2022					
Location	2010		2022		2010-2022
	Population	% of Total Population	Population	% of Total Population	% Change
State of Indiana	6,483,802	100%	6,784,403	100.0%	4.6%
White Alone	5,467,906	84.3%	5,426,227	80.0%	-0.8%
African American/Black Alone	591,397	9.1%	640,752	9.4%	8.3%
Asian American/Pacific Islander	104,822	1.6%	171,389	2.5%	63.5%
Native American/Alaska Native	18,462	0.3%	12,465	0.2%	-32.5%
Two or more races	127,901	2.0%	345,830	5.1%	170.4%
Some Other Race Alone	173,314	2.7%	187,740	2.8%	8.3%

Source: U.S. Census Bureau, 2010 Census Summary File 1, Table P3, Race; 2022 American Community Survey; 5 Year Estimates, Table DP05

Table 4 breaks out these changes by metropolitan area. According to the Census and American Community Survey (ACS) from 2010 to 2022, Indiana's already small Native American population decreased across all MSAs. In comparison, people identifying as Asian Americans, two or more races, or other races increased across all MSA locations in Indiana.

Table 4: Percent Change of Race in Indiana, 2010-2022						
Location	Indianapolis MSA	Evansville MSA	Fort Wayne MSA	Chicagoland MSA	South Bend MSA	Balance of State
Total Population Growth	11.8%	1.1%	7.6%	1.6%	2.0%	7.7%
White Alone	4.5%	-2.2%	1.3%	-5.9%	-4.1%	1.0%
African American/Black Alone	17.7%	10.0%	4.6%	-7.6%	3.3%	8.6%
Asian American/Pacific Islander	94.1%	47.7%	82.8%	21.1%	36.2%	76.8%
Native American/Alaska Native	-26.4%	-61.7%	-38.9%	-15.4%	-19.7%	-27.4%
Two or More Races	170.4%	87.5%	141.8%	233.1%	162.1%	171.3%
Some Other Race Alone	1.5%	58.3%	15.2%	38.2%	-13.3%	13.4%

Source: U.S. Census Bureau, 2010 Census, 2022 American Community Survey, 5 Year Estimates, Table DP05

Indiana's white population increased in the Indianapolis MSA (+4.5%), Fort Wayne MSA (+1.3%), and in the Balance of State (+1.0%). Three Indiana metro areas experienced a white population decrease: Chicagoland MSA (-5.9%), Evansville MSA (-2.2%), and South Bend MSA (-4.1%). The Black/African American population had an increase across four metro areas: Indianapolis MSA (+17.7%), Evansville MSA (+10.0%), Fort Wayne MSA (+4.6%), and South Bend MSA (+3.3%). In contrast, the Chicagoland MSA's Black/African American population decreased by 7.6%.

In addition to growing more racially diverse, Indiana’s ethnic population has also grown, as shown by the growth in the Hispanic/Latino⁷ population, as well as persons born abroad. From 2010 to 2022, the Hispanic/Latino population has grown across all Indiana metro areas. More specifically, the largest increase of the Hispanic/Latino population occurred in the Evansville MSA (+40.8%). Overall, the Hispanic/Latino population across the state increased by 31.1% (Table 5).

Table 5: Hispanic/Latino Population Totals in Indiana, 2010-2022					
Location	2010		2022		2010 - 2022
	Population	% of Total Population	Population	% of Total Population	% Change
State of Indiana	389,707	100%	510,984	100.0%	31.1%
Chicagoland MSA	96,596	24.8%	119,072	23.3%	23.3%
Evansville MSA	5,508	1.4%	7,755	1.5%	40.8%
Fort Wayne MSA	24,172	6.2%	32,607	6.4%	34.9%
Indianapolis MSA	112,448	28.9%	153,286	30.0%	36.3%
South Bend MSA	19,395	5.0%	25,949	5.1%	33.8%
Balance of State	131,588	33.8%	172,315	33.7%	31.0%

Source: Race and Hispanic or Latino (of any race); 2010 Census Summary File 1, Table P4, Hispanic or Latino (of any race); 2022 American Community Survey, 5 Year Estimates, Table DP05

Table 6 displays the population change in persons born outside of the United States (foreign born) across the State of Indiana. From years 2010-2022, the State of Indiana saw an overall increase in people who are foreign born (+32.5%). The Indianapolis MSA (+52.9%) and Fort Wayne MSA (+50.8%) saw the largest increases of persons who are foreign born, whereas the smallest increase was 7.0% in the Chicagoland MSA.

Table 6: Foreign-Born Population Totals in Indiana, 2010-2022					
Location	2010		2022		2010-2022
	Population	% of Total Population	Population	% of Total Population	% Change
State of Indiana	285,300	100%	377,934	100.0%	32.5%
Chicagoland MSA	38,674	13.6%	41,394	11.0%	7.0%
Evansville MSA	6,438	2.3%	8,949	2.4%	39.0%
Fort Wayne MSA	19,672	6.9%	29,668	7.9%	50.8%
Indianapolis MSA	104,854	36.8%	160,349	42.4%	52.9%
South Bend MSA	14,898	5.2%	17,902	4.7%	20.2%
Balance of State	100,764	35.3%	119,672	31.7%	18.8%

Source: 2010 ACS 5-Year Estimates, Table DP02, Foreign Born; 2022 American Community Survey, 5 Year Estimates, Table DP02, Foreign Born

Families with Children

As previously mentioned, familial status is defined as including one or more individuals less than 18 years of age living with a parent, legal custodian, or designee of a parent or legal custodian. Familial status protection also includes pregnant persons or persons seeking custody, guardianship, or parenthood.

Only two Indiana MSAs saw an increase in households with persons under 18 years of age from 2010 to 2022: Indianapolis MSA (+0.9%) and Fort Wayne MSA (+0.4%). The Indiana state population of households with persons under 18 years of age decreased by 3.7% while the South Bend MSA saw the largest decrease of 8.1% during the same time (Table 7). There

⁷ According to the Census Bureau, “Hispanic” and “Latino” are not racial designations, and individuals may be of any race. Therefore, Hispanic and Latino individuals may have been counted in several different racial categories in the previous tables.

appears to be an overall trend where Hoosier households are having less children and/or families with minor children are leaving the state.

Table 7: Households with Individuals Under 18 Years of Age Population in Indiana, 2010-2022

Location	2010		2022		2010-2022
	Population	Percent of Households with Children	Population	Percent of Households with Children	% Change
State of Indiana	832,668	100%	801,917	100.0%	-3.7%
Chicagoland MSA	85,654	10.3%	81,136	10.1%	-5.3%
Evansville MSA	37,320	4.5%	35,517	4.4%	-4.8%
Fort Wayne MSA	55,507	6.7%	55,746	7.0%	0.4%
Indianapolis MSA	257,243	30.9%	259,609	32.4%	0.9%
South Bend MSA	33,159	4.0%	30,482	3.8%	-8.1%
Balance of State	363,785	43.7%	339,427	42.3%	-6.7%

Source: U.S. Census Bureau, 2010 Census Summary File 1, Table P20, Households by Presence of People under 18 Years; 2022 Census, Table DP02, Households with one or more people under 18 years

Persons with Disabilities

Disability is a particularly important protection since disabilities cut across all segments of the population and can affect individuals of all ages. The trends in disability status in Indiana do not follow the same patterns of distribution as any other category (i.e. urban or rural divides) and are difficult to compare over time due to the limitations of available data.

Table 8 was created using the U.S. Census Bureau’s 2012 and 2022 American Community Survey (ACS) estimates. Table 8 does not follow the same trend of using 2010 Census estimates because several Indiana’s counties did not meet the population thresholds required to make the population estimates available by county in the 2010 Census. Therefore, due to this limitation, the FHCCI is using the 2012 and 2022 ACS estimates so we can compare across geographical locations.

The ACS⁸ also breaks out the disability population by disability type throughout the state: ambulatory difficulty (7.1%), cognitive (5.7%), independent living disabilities (5.9%), vision difficulty (2.5%), and hearing difficulties (3.8%), being the most commonly reported types of disabilities.

Having better data on our state’s, and nation’s, disability population is very important, and it is the FHCCI’s hope that more detailed data will be available soon for this important demographic.

Table 8: Non-Institutionalized Population with a Disability

Location	2012	2022	% Difference
State of Indiana	12.9%	13.7%	0.8%
Chicagoland MSA	13.1%	12.8%	-0.3%
Evansville MSA	11.6%	14.4%	2.8%
Fort Wayne MSA	11.5%	12.5%	1.0%
Indianapolis MSA	11.7%	12.4%	0.7%
South Bend MSA	12.7%	13.4%	0.7%
Balance of State	13.9%	15.0%	1.1%

Source: U.S. Census Bureau, 2012 American Community Survey 1-Year Estimates, Table S1810; 2022 American Community Survey 5-Year Estimate, Table S1810, Disability Characteristics

⁸ U.S. Census. Disability Characteristics. <https://data.census.gov/table/ACSST5Y2022.S1810?t=Disability&g=040XX00US18&y=2022>

Same-Sex Relationships

While sexual orientation or gender identity are not specifically defined as federally protected classes, the FHCCI’s position is that sexual orientation, gender identity, gender expression, and being transgender are protected under the sex definition of the federal FHA and substantially equivalent state and local fair housing laws due to a Supreme Court ruling,⁹ an Executive Order,¹⁰ and issued HUD guidance.¹¹ As such, filed complaints or allegations that allege sexual orientation and/or gender identity are not specifically labeled as such, but rather, are included under the “sex” allegation category of data provided from HUD.

Like the data related to persons with a disability, in-depth data on same-sex relationships is very limited. According to the UCLA School of Law Williams Institute,¹² Indiana’s population was estimated to have 4.5% identifying as LGBT with 34% of Indiana LGBT persons having children. According to the 2022 ACS, there are an estimated 19,906 same-sex couples in Indiana. Most same-sex households (39.0%) reside in the Indianapolis MSA, followed by the Balance of State (33.3%) (Table 9).

Table 9: Same-Sex Households in Indiana, 2010-2022

Location	2010		2022		2010-2022
	Same-Sex Couple Households	Percent of IN Same-Sex Households	Same-Sex Couple Households	Percent of IN Same-Sex Households	% Change
State of Indiana	12,040	100.0%	19,906	100.0%	65.3%
Chicagoland MSA	1,011	8.4%	1,665	8.4%	64.7%
Evansville MSA	495	4.1%	1,286	6.5%	159.8%
Fort Wayne MSA	893	7.4%	1,520	7.6%	70.2%
Indianapolis MSA	4,532	37.6%	7,759	39.0%	71.2%
South Bend MSA	489	4.1%	1,053	5.3%	115.3%
Balance of State	4,620	38.4%	6,623	33.3%	43.4%

Source: U.S. Census Bureau, American Community Survey 2010 5-Year Estimate, Table B11009 Unmarried-Partner Households by Sex of Partner; U.S. Census Bureau, American Community Survey 2022 5-Year Estimate, Table B09019, Household Type (Including Living Alone) by Relationship

Data highlights substantial increases in same-sex couples across Indiana metro areas and the state overall since 2010. This could be the result of better data being collected and same-sex couples feeling more safe to identify as such. It is also important to note that same-sex couple households in the 2010 data available were unmarried households, or in other words, cohabiting same-sex couples. Whereas the 2022 data includes both married and unmarried same-sex couple households. Consequently, over the last 12 years, data on same-sex couple households has increased by 159.8% in the Evansville MSA and 115.3% in the Indianapolis MSA, the highest of the geographies reviewed. This is all to say that this data is something to be monitored as better data becomes available.

According to the LGBTQ+ Real Estate Alliance’s 2023 annual report, national estimates indicate that 49.8% of LGBTQ+ persons are homeowners compared to 70.1% non-LGBTQ+ persons, while 25% of transgender persons are homeowners compared to 58% of cisgendered persons.¹³ This shows a disparity for wealth building through homeownership with a higher number of LGBTQ persons being renters where they may experience housing discrimination.

⁹ U.S. Supreme Court. *Bostock v. Clayton County, Georgia* (No. 17–1618). https://www.supremecourt.gov/opinions/19pdf/17-1618_hfci.pdf

¹⁰ The White House. *Executive Order on Preventing and Combating Discrimination on the Basis of Gender Identity or Sexual Orientation*. January 20, 2021. <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-preventing-and-combating-discrimination-on-basis-of-gender-identity-or-sexual-orientation/>

¹¹ U.S. Department of Housing & Urban Development. *Implementation of Executive Order 13988 on the Enforcement of the Fair Housing Act*. February 11, 2021. https://www.hud.gov/sites/dfiles/PA/documents/HUD_Memo_EO13988.pdf

¹² UCLA School of Law Williams Institute. *LGBT Data & Demographics – Indiana*. <https://williamsinstitute.law.ucla.edu/visualization/lgbt-stats/?topic=LGBT&area=18#density> Note: Research only includes data related to lesbian, gay, bisexual, and transgender (LGBT) protections. Williams Institute does not include the *queer* category in its data.

¹³ LGBTQ+ Real Estate Alliance. *The LGBTQ+ Journey to Homeownership 2023*. <https://realestatealliance.org/education/#discrimination-impact-report>

FAIR HOUSING COMPLAINTS & ALLEGATIONS IN INDIANA

This report provides updated data on administrative complaint filing for the U.S. Department of Housing & Urban Development’s (HUD) fiscal years (FY) 2019-2023. The FHCCI sought data from HUD on all Indiana fair housing complaints filed administratively with HUD, or Indiana’s substantially equivalent state or local FHAP agencies, during HUD fiscal years FY 2019 to 2023. The HUD fiscal year runs from October 1st to September 30th with the data received totaling five fiscal years. Data on a total of 1,313 fair housing administrative complaints was received and analyzed, containing a total of 1,666 protected class allegations (Table 10).

We all belong to multiple protected classes and fair housing laws protect all of us in many ways in our housing transactions. One housing discrimination complaint might allege multiple protected class violations when such harm is believed to have occurred. For example, if someone feels that they were denied housing due to their race *and* disability; this person would file one complaint containing the two allegations of race and disability. This is why there is a difference between complaints filed and allegations within them. The FHCCI finds both types of data important in determining who feels they may be experiencing housing discrimination, who is accessing the complaint filing process, what types of allegations are being documented, and where additional outreach may be needed.

The National Fair Housing Alliance (NFHA) publishes an annual *Fair Housing Trends Report* which evaluates government and private fair housing complaint data across the country. In NFHA’s *2023 Fair Housing Trends Report*,¹⁴ there were 33,007 total fair housing complaints filed in 2022 across the U.S., the most recent year available. This was the highest number of complaints ever reported in a single year since NFHA began tracking fair housing complaints in 1995. Overall, complaints were 5.7% higher than in 2021.

Unfortunately, actual incidents of housing discrimination are likely extremely underreported. Fair housing complaints across our country are underreported for a variety of reasons. As noted in NFHA’s *2023 Fair Housing Trends Report*:

“The data collected for this report represents only a small portion of the **millions of incidents of illegal housing discrimination that occur each year**. Housing discrimination often goes undetected and unreported because it is difficult to identify or document. It is also common for victims of discrimination to feel that nothing can or will be done about their civil rights being violated, and the fear of retaliation by their housing provider, landlord, or even neighbors discourage many from reporting.”

Table 10: Filed Complaints and Allegations in Indiana, FY 2019-2023

Fiscal Year	Total Complaints	Total Allegations	Color	Disability	Famil-ial Status	Nation-al Origin	Race	Reli-gion	Retali-ation	Sex
2019	240	315	0	126	23	16	90	3	22	32
2020	206	256	3	107	26	8	62	1	11	38
2021	297	372	12	120	42	18	117	2	13	48
2022	287	373	4	138	26	20	115	5	24	41
2023	283	350	1	147	18	18	102	3	27	34
Total	1,313	1,666	20	638	135	80	486	14	97	193
2019-2023 Average	263	333	4	128	27	16	97	3	19	39
Percent of Total Allegations		100%	1.2%	38.3%	8.1%	4.8%	29.2%	0.8%	5.8%	11.6%

Source: FHCCI Analysis of HUD Complaint Data

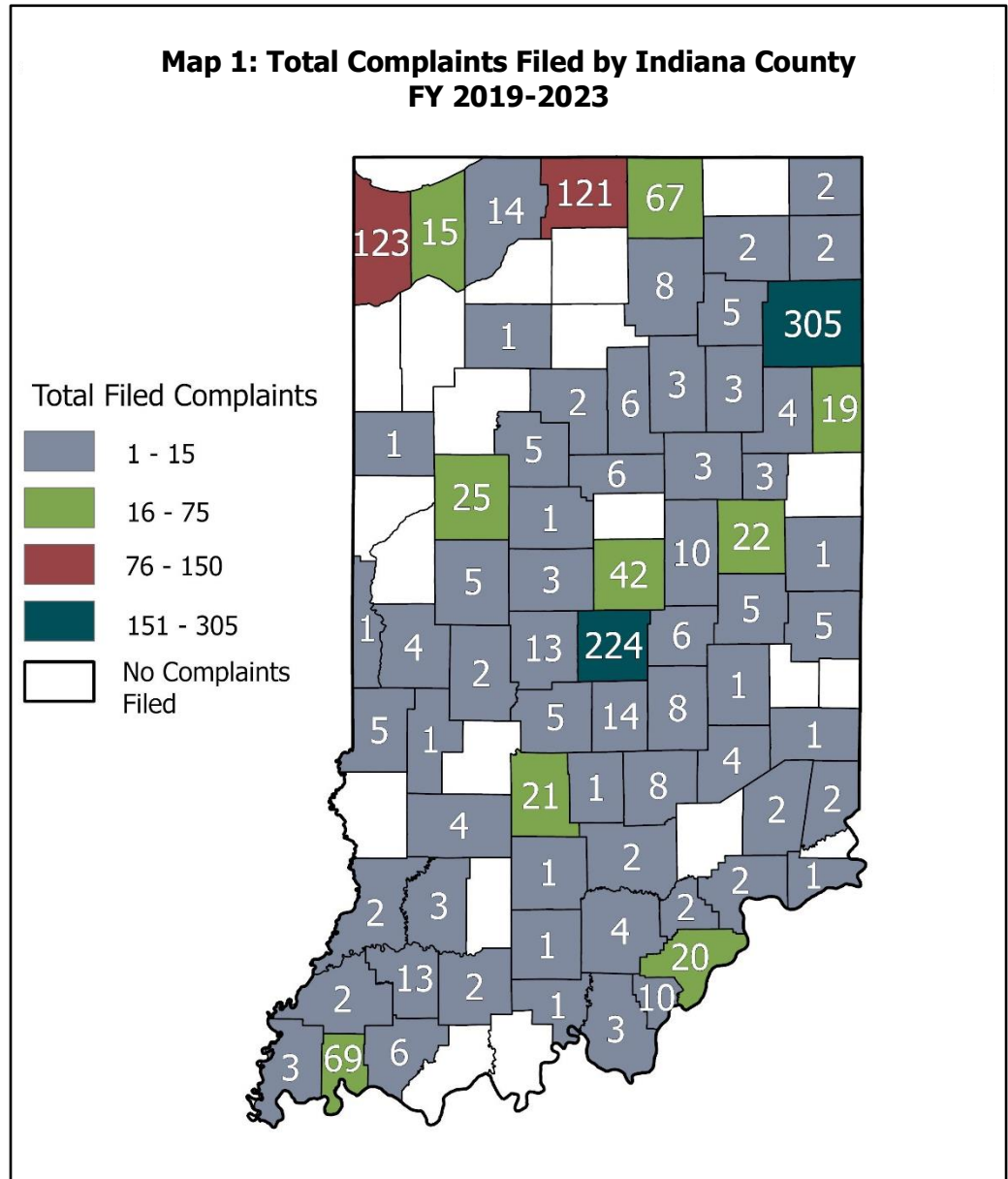
¹⁴ National Fair Housing Alliance. *2023 Fair Housing Trends Report*. <https://nationalfairhousing.org/resource/2023-fair-housing-trends-report/>

Total Fair Housing Complaints

A total of 1,313 complaints were filed across the State of Indiana during HUD FY 2019-2023. The largest number of fair housing complaints were filed in 2021 with 297 complaints filed, followed by 287 in 2022 and 283 in 2023. There was an increase of 17.9% in total filed complaints from FY 2019 (240 complaints) to FY 2023 (283 complaints).

FY 2020 contained the lowest number of filed complaints (206 complaints) of the years reviewed, a 14.2% decrease from FY 2019. However, FY 2021 contained the highest number in the analyzed fiscal years (297), a 44.2% increase in complaints filed from FY 2020. The FHCCI suspects the lower number of complaints filed in FY 2020 is due to the COVID pandemic and mandated quarantine, which stopped many Hoosiers from moving, likely decreasing their risk of experiencing housing discrimination. This report covers more COVID-related impacts later.

As shown in Map 1, Allen County had the largest number of filed complaints (305) during FY 2019-2023, while Marion County (224), Lake County (123), and St. Joseph County (121) followed. A total of 20 counties had no fair housing administrative complaints filed during this time. Most of those counties are considered rural areas with smaller populations. A specific section on rural communities will be covered later.



When reviewing Indiana’s MSA populations from 2010 to 2022, along with complaint filing data shared in our last report, we found that Chicagoland MSA’s population increased by 1.6% but the number of fair housing complaints filed *decreased* by 38.8% from FY 2010 to FY 2022. Evansville MSA’s population increased 1.1% and its number of complaints filed increased by 37.5%. Fort Wayne MSA’s population increased by 7.6%, and its number of complaints filed increased by 60.8%, while the Indianapolis MSA’s population increased by 11.8% and number of complaints filed increased by 30.8%. The South Bend MSA’s population increased by 2.0% and the number of complaints filed decreased by 86.4%. Finally, the Balance of State’s population increased by 0.9% and number of complaints filed increased by 25.0%.¹⁵

¹⁵ The FHCCI calculated these numbers by calculating total complaints filed by county in FY 2010 and FY 2022 and compared with U.S. Census Bureau data from 2010 and 2022 to determine percentage changes. The FHCCI acknowledges this is not an apples-to-apples comparison given that the data provided was based on a HUD fiscal year instead of a calendar year.

In reviewing MSAs instead of specific counties, Table 11 highlights that despite the Indianapolis MSA having the largest population of the city MSAs, the Fort Wayne MSA, with a quarter of its population, had nearly an equal number of fair housing complaints (328 v. 314).

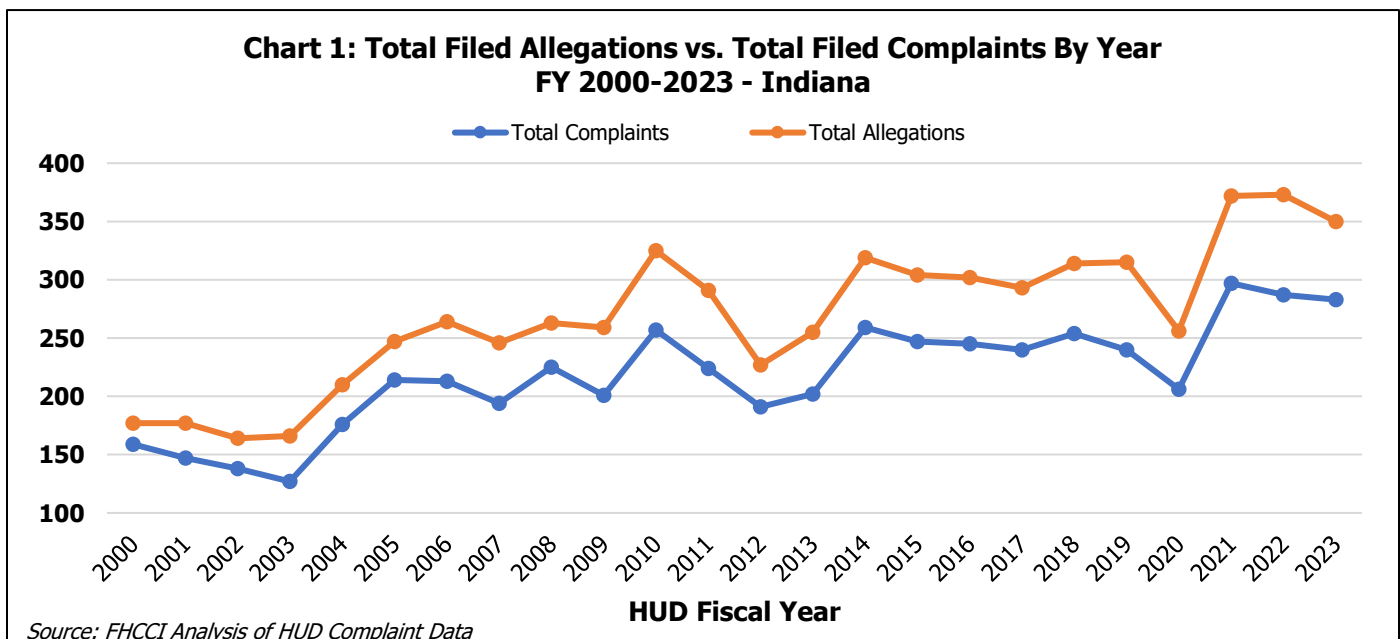
Location	2019	2020	2021	2022	2023	Total	Total Population
Indianapolis MSA	55 (22.9%)	45 (21.8%)	81 (27.3%)	68 (23.7%)	79 (27.9%)	328 (25.0%)	2,109,957
Fort Wayne MSA	57 (23.8%)	45 (21.8%)	61 (20.5%)	82 (28.6%)	69 (24.4%)	314 (23.9%)	447,882
Chicagoland MSA	30 (12.5%)	24 (11.7%)	29 (9.8%)	28 (9.8%)	27 (9.5%)	138 (10.5%)	671,037
South Bend MSA	30 (12.5%)	22 (10.7%)	25 (8.4%)	22 (7.7%)	22 (7.8%)	121 (9.2%)	272,388
Evansville	13 (5.4%)	11 (5.3%)	18 (6.1%)	22 (7.7%)	16 (5.7%)	80 (6.1%)	302,197
Balance of State	55 (22.9%)	59 (28.6%)	83 (27.9%)	65 (22.6%)	70 (24.7%)	332 (25.3%)	2,980,942
TOTAL COMPLAINTS	240	206	297	287	283	1,313	6,784,403

Source: FHCCI Analysis of HUD Complaint Data; Population; 2022 American Community Survey; 5 Year Estimates, Table DP05

There are no clear answers for these disparities. It could be that the FHAPs located in specific areas conduct more extensive outreach within their communities which results in more fair housing complaints being filed. For Fort Wayne (Allen County) to outpace the much larger Indianapolis (Marion County) is significant given both city's demographics and being home to FHAP offices. This is an area for future monitoring.

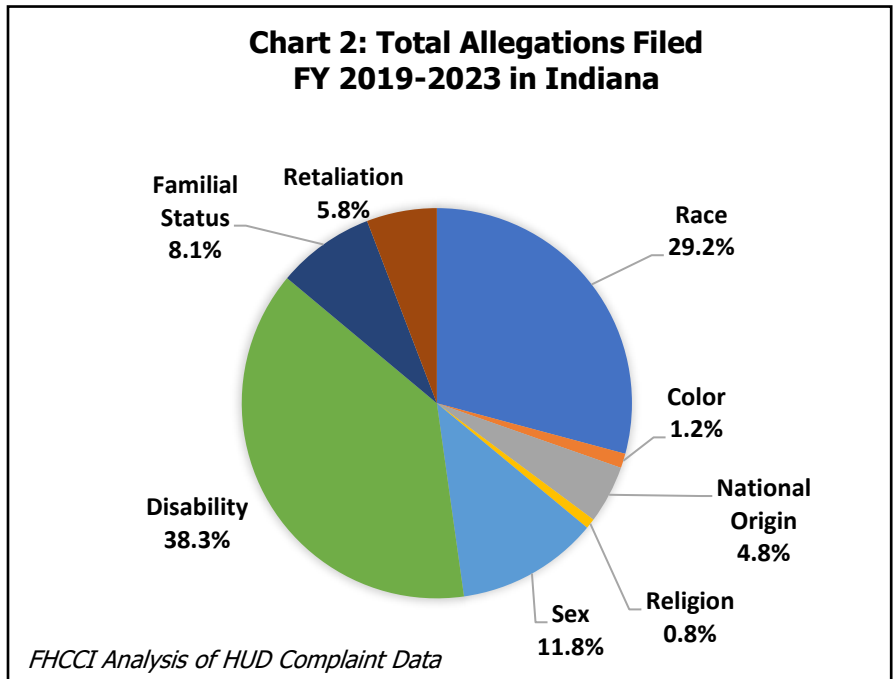
Total Fair Housing Allegations in Indiana Complaints

Due to HUD only having jurisdiction over federally protected classes, only those seven federally protected class allegations are reviewed in our analysis. (Note: In Indiana, "ancestry" is an additional state protected class that would not be available through the HUD data that the FHCCI received.) Chart 1 shows that there has been a fairly steady increase in both total complaints and total allegations since FY 2000. In FY 2000, there were 159 complaints filed with 177 allegations statewide, whereas in FY 2023 there were 283 complaints containing 350 allegations. Due to the increased rate of allegations, this also tells us that filed fair housing complaints are containing more allegations of different protected classes within them.



The data in Chart 2 identifies that the most frequent allegation of housing discrimination in Indiana over the reviewed 2019-2023 five-year fiscal period was disability (38.3% of complaints), followed by race (29.2%), and sex (11.8%). Familial status (8.1%), retaliation (5.8%), national origin (4.8%), color (1.2%), and religion (0.8%) followed.

This trend reflects the same national trends over recent years highlighted in NFHA's *Fair Housing Trends Report* in which disability is the leading protected class in complaints filed across the U.S. In our previous report that analyzed FY 2000-2018 data, race (34.0%) was the most frequently alleged protected class, followed by disability (32.7%) and sex (11.4%) over that time period. However, the more recent years reviewed of the state data (FY 2012-2018) had disability as the most commonly alleged protected class. The new FY 2019-2023 data continues the increase in disability allegations as a percentage of the total in the filed complaints we were seeing in our previous report.



The FHCCI can speculate as to why disability allegations have become the most common allegation: 1) people are living longer, and as we age, we are more likely to obtain an impairment which will qualify as a disability; 2) disability discrimination is often easier to identify for the harmed party due to the required disclosure of a disability through requests for reasonable accommodations and modifications; and 3) accessibility requirements in the design and construction of multi-family properties can be verified through documented measurements verifying the violation.¹⁶ In contrast, housing discrimination due to race is often more subtle, a person may not know they have been discriminated against, especially in more complex transactions like lending. It may also be harder to identify discrimination because evidence to prove such claims are not available to a victim when the discrimination happens, such as how rules or policies are applied.

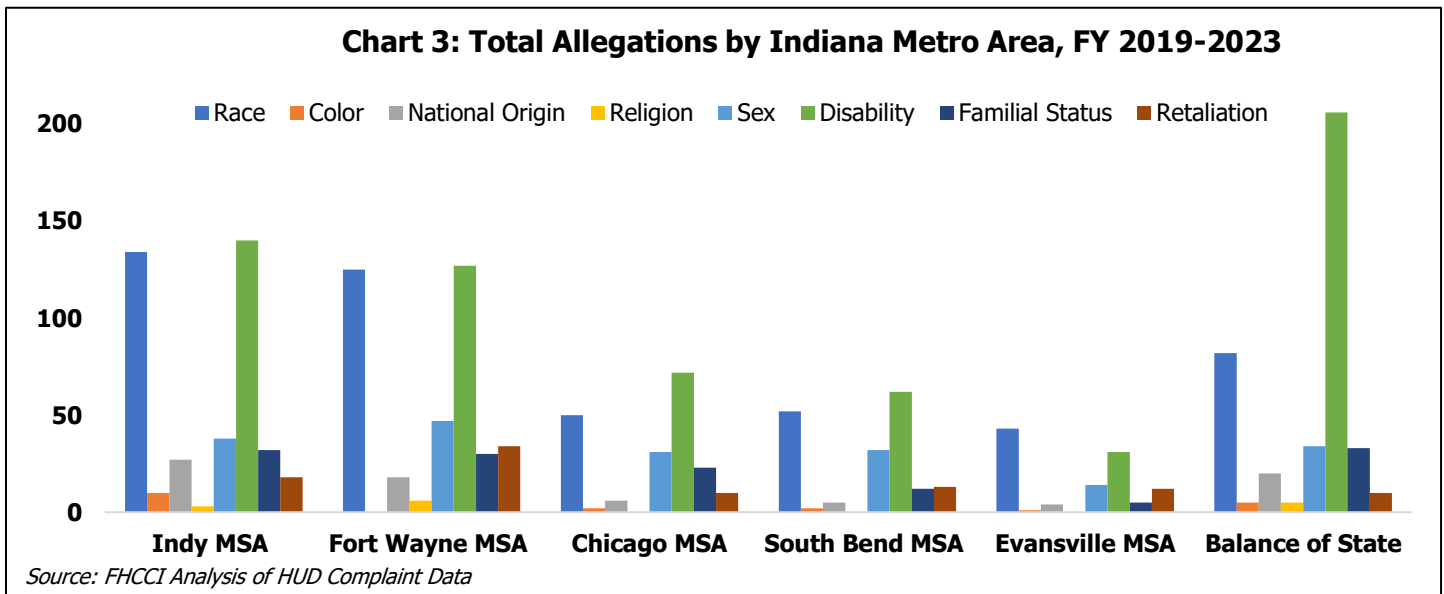
Although retaliation is not an identified protected class under the federal, state, or local fair housing laws, this report includes a separate category of retaliation since HUD distinguishes between retaliation and other allegations of housing discrimination. Examples of retaliation allegations in this context may include someone alleging retaliation due to filing a fair housing complaint and then being threatened with eviction, someone requesting a reasonable accommodation or modification and being told their lease would not be renewed as a result, or someone serving as a witness in a fair housing lawsuit who is then penalized by their landlord with additional rent or fees or the lack of needed repairs due to their participation as a witness.

Allegations in Rural Areas

In the previous section, Table 2 identified that 43.9% of Indiana residents lived outside the metro areas (identified as "Balance of State"). These areas are generally more rural and less densely populated. Regarding filed allegations in the Balance of State from FY 2019-2023, disability (206 allegations) topped the list, followed by race (82), sex (34), familial status (33), national origin (20), retaliation (10), color (5), and religion (5). The Balance of State contained the highest allegations of disability and familial status and the second highest allegations of color and religious-based housing discrimination compared to the five metro areas analyzed across Indiana. It contained the lowest allegations of retaliation (10) which was tied with the Chicago MSA. (See Appendix I for detailed county breakouts).

¹⁶ The 1988 Amendments to the federal Fair Housing Act require that multi-family properties with four or more units built for first occupancy, on or after March 13, 1991, must abide by specific fair housing design and construction accessibility requirements.

Chart 3: Total Allegations by Indiana Metro Area, FY 2019-2023



As reflected in the previous population tables, the Balance of State had a large increase in populations that identify as Two or More Races (171.3%) and Asian American/Pacific Islander (76.8%), along with a 31.0% increase among Hispanics/Latinos and an 18.8% increase in foreign-born persons from 2010-2022. This could be a reason why there are more allegations of race and national origin. As shown in Table 8, the Balance of State had the highest percentage of persons with a disability (15.0%) in 2022, which could be a reason why this area had the highest allegations of disability discrimination.

Compared to the rest of the analyzed metro areas, the Balance of State had the second highest allegations (395), following the Indianapolis MSA (402) which would be in line due to their total populations (Table 12). It is also common that when less alternative housing opportunities are available, such as in rural communities, the potential for housing discrimination increases. Appendix II has county break outs by percentage of complaints and allegations.

Allegations by Metro Area

The FHCCI also analyzed the administrative complaints based on the county, and therefore, metro area of the complaint. Over the five-year timespan, we found that most fair housing allegations were filed in the eleven counties making up the Indianapolis metro area (402 of 1,666 total allegations), while the second most allegations came from the 71 counties in labeled as “Balance of State” making up the rest of the state (395 allegations) – a similar pattern to complaints filed (Table 12). A reminder that 31.1% of the population resides in the Indianapolis MSA and 43.9% reside in the Balance of State. When observing based on county, not metro area, from FY 2019-2023, Allen County had the most allegations (377), with Marion County (274), St. Joseph County (178), Lake County (175), and Vanderburgh County (97) following. These counties all have a FHAP agency located in their borders that accepts complaints of housing discrimination.

With the Indianapolis metro area containing 31.1% of the state’s population and the highest number of allegations (402) from FY 2019-2023 (24.1%), due to its size, the Indianapolis MSA had the most allegations across protected classes except for disability, religion, sex, and retaliation allegations. The Fort Wayne metro area contains 6.6% of the state’s population but accounted for 23.2% of the allegations from the analyzed fiscal years (384), nearly as many as Indianapolis, a much larger MSA. The Indianapolis MSA had the highest numbers of race, color, and national origin allegations while Fort Wayne metro had the highest reports of religion, sex, and retaliation allegations.

The Balance of State had the highest numbers of disability and familial status allegations and also has the highest number of Hispanics while the Indianapolis MSA has the highest amounts of foreign-born persons. The Balance of State also has the highest number of households with minor children followed by the Indianapolis MSA. These demographic makeups could explain the reasons these areas contain the highest allegations of race, national origin, and familial status.

Table 12: Total Allegations by Indiana Metro Area, FY 2019-2023

Location	Race	Color	National Origin	Religion	Sex	Disability	Familial Status	Retaliation	Total
Indianapolis MSA	134 (8.0%)	10 (0.6%)	27 (1.6%)	3 (0.2%)	38 (2.3%)	140 (8.4%)	32 (1.9%)	18 (1.1%)	402 (24.1%)
Fort Wayne MSA	125 (7.5%)	0	18 (1.1%)	6 (0.4%)	47 (2.8%)	127 (7.6%)	30 (1.8%)	34 (2.0%)	384 (23.2%)
Chicago-land MSA	50 (3.0%)	2 (0.1%)	6 (0.4%)	0	31 (1.9%)	72 (4.3%)	23 (1.4%)	10 (0.6%)	194 (11.6%)
South Bend MSA	52 (3.1%)	2 (0.1%)	5 (0.3%)	0	32 (1.9%)	62 (3.7%)	12 (0.7%)	13 (0.8%)	178 (10.7%)
Evansville MSA	43 (2.6%)	1 (0.1%)	4 (0.2%)	0	14 (0.8%)	31 (1.9%)	5 (0.3%)	12 (0.7%)	110 (6.6%)
Balance of State	82 (4.9%)	5 (0.3%)	20 (1.2%)	5 (0.3%)	34 (2.0%)	206 (12.4%)	33 (2.0%)	10 (0.6%)	395 (23.7%)
Totals	486 (29.2%)	20 (1.2%)	80 (4.80%)	14 (0.8%)	196 (11.8%)	638 (38.3%)	135 (8.1%)	97 (5.8%)	1,666 (100%)

Source: FHCCI Analysis of HUD Complaint Data

The Balance of State contains the highest percentage of the state’s population (43.9%) but accounts for only 395 allegations (23.7%) from FY 2019-2023. Allegations based on disability are most numerous in the Balance of the State, representing 38.3% of the total filed disability allegations over the five-year timespan (206 allegations) versus the 10.28% of total filed disability allegations for it analyzed in our previous FY 2000-2018 report.

The Evansville MSA contained the fewest allegations across metro areas (110), even though it is Indiana’s third largest city. It had the lowest allegation count for race (43) and national origin (4), likely due to having the lowest population of Hispanics/Latinos (1.5%) across metro areas and the lowest number of foreign-born persons (2.4%). Additionally, the Evansville MSA has the second lowest number of households with minor children (4.4%) and this could explain having the lowest number of familial status allegations (5). In contrast, Evansville had the second highest rates of persons with disabilities among the MSAs (14.4%), yet, had the lowest number of disability allegations (31).

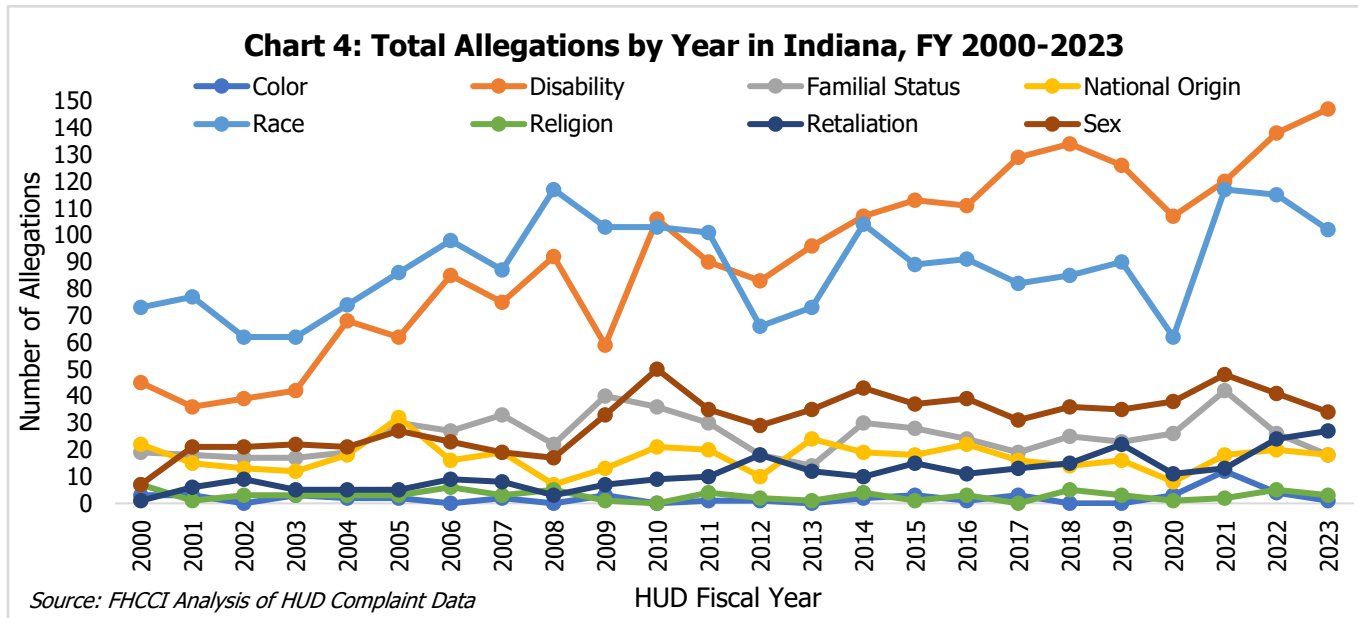
The Chicago MSA, Evansville MSA, and South Bend MSA had no allegations of religious housing discrimination while the Fort Wayne metro area had no allegations of color-based housing discrimination. Because the Fort Wayne MSA had the second highest number of race allegations (125), this could be an administrative coding issue. As it relates to sex, surprisingly, all MSAs reviewed had similar ranges or allegation counts despite their relevant populations. These sex-based claims could be the result of changes to LGBT coverage discussed previously, or, the impact of the COVID-19 pandemic where increased reports of sexual harassment are believed to have occurred.

Complaints and Allegations During the COVID-19 Pandemic

All Indiana residents were affected by the COVID-19 pandemic, which shined an important light on the necessity of housing during the mandatory lockdown. Because fewer tenants were moving, there were not as many interactions as in a typical year. Tenants, in particular, were unlikely to complain about housing discrimination because moving was not an option during the pandemic. Many people were forced to stay in their current housing situation, regardless of if it was safe or not. For example, a Black man in rural Indiana contacted the FHCCI as he was experiencing a white neighbor continuously waving confederacy memorabilia around his unit to intimidate him. Others were unable to move due to cost increases and/or job loss. Others feared retaliation if they were to stand up for their fair housing rights (even though unlawful).

In 2020, there was a substantial drop in fair housing administrative complaint filing, and with it, allegations included. However, by 2021, numbers had rebounded and have remained fairly steady in the years following. From FY 2020 to 2021,

national origin allegations increased 125%, race allegations increased 88.71%, and color allegations increased 300% across Indiana. While parents across the state were forced to become stay-at-home parents, teachers, babysitters, and every other duty required to take care of children during the lockdown and continuing pandemic, familial status allegations rose between FY 2020 and 2021 by 61.54%. Likewise, allegations of sex discrimination increased during the lockdown by 26.32%. In 2020, the FHCCI recorded an intake from an Indianapolis woman alleging that her landlord offered to forgive her rent in exchange for sexual favors because of his knowledge of her COVID-related job loss. The FHCCI assisted this client in filing a federal lawsuit, and her complaint was settled in November 2020.



Comparing the Two Decades+ of Fair Housing Allegations

For this report, the FHCCI pulled the data on complaints and allegations filed from FY 2014-2018 from our 2020 report and compared with the more recent FY 2019-2023 data reviewed in this report. Overall, there was an average of 249 complaints and 306 allegations filed per year FY 2014-2018 as compared to an average of 263 complaints and 333 allegations filed per year FY 2019-2023. This represents an approximate 5.6% increase in filed complaints and an approximate 8.8% increase in filed allegations from FY 2014-2018 to FY 2019-2023.

When analyzing changes in allegations of protected classes, the FHCCI analyzed the percentage change of the average allegations filed by protected classes from FY 2014-2018 as compared to FY 2019-2023. All but one protected class saw an increase in filed allegations: color (+122.2%); retaliation (+51.6%); race (+7.8%); religion (+7.7%); disability (+7.4%); familial status (+7.1%); and sex (+3.8%). Only national origin had a decrease of 10.1%.

Four protected class allegations increased by percentage of total allegations: color (0.6% average of allegations in FY 2014-2018 to 1.2% average of allegations in FY 2019-2023), disability (32.7% to 38.3%), retaliation (3.6% to 5.8%), and sex (11.4% to 11.6%). The remaining four allegation types saw an overall decrease in average percentage of allegations filed: race (34.0% to 29.2%), familial status (9.7% to 8.1%), national origin (6.9% to 4.8%), and religion (1.1% to 0.8%). This is not to say that these types of housing discrimination are decreasing, rather, disability, color, sex, and retaliation have seen a larger increase since the FHCCI’s previous 2020 report.

As shown in Chart 4, disability and race continue to be the highest filed allegations, with sex consistently third most filed. Allegations of disability and retaliation are at the highest rates analyzed in the past 23 HUD fiscal years. There were some decreases in the most recent year of HUD data (FY 2023) as it relates to race, sex, and familial status, however. This is something to be monitored.

COMPLAINT RESOLUTION THROUGH HUD/FHAPS

Equally important to how many complaints are being filed and the allegations contained in them, is what happens to each of these filed complaints. Did the complaint resolve outside of ruling? If a ruling was issued, was it a cause or a no cause ruling?

In the data provided by HUD, closure information was provided on 1,649 filed administrative complaints closed during HUD fiscal years FY 2019-2023. Complaints filed prior to FY 2019-2023 may be included in the closure data as a complaint can, unfortunately, take years in the administrative filing process before it reaches closure. Additionally, although more uncommon, a complaint could allege discrimination against multiple protected classes, with closure sometimes calculated separately by protected class, leading to differing numbers.¹⁷

The highest type of resolution type, by far, was a “No Cause” ruling, which means the investigating agency did not find evidence of housing discrimination or not enough evidence to believe the alleged housing discrimination occurred. See Appendix III for additional data on complaint closure broken out by county.

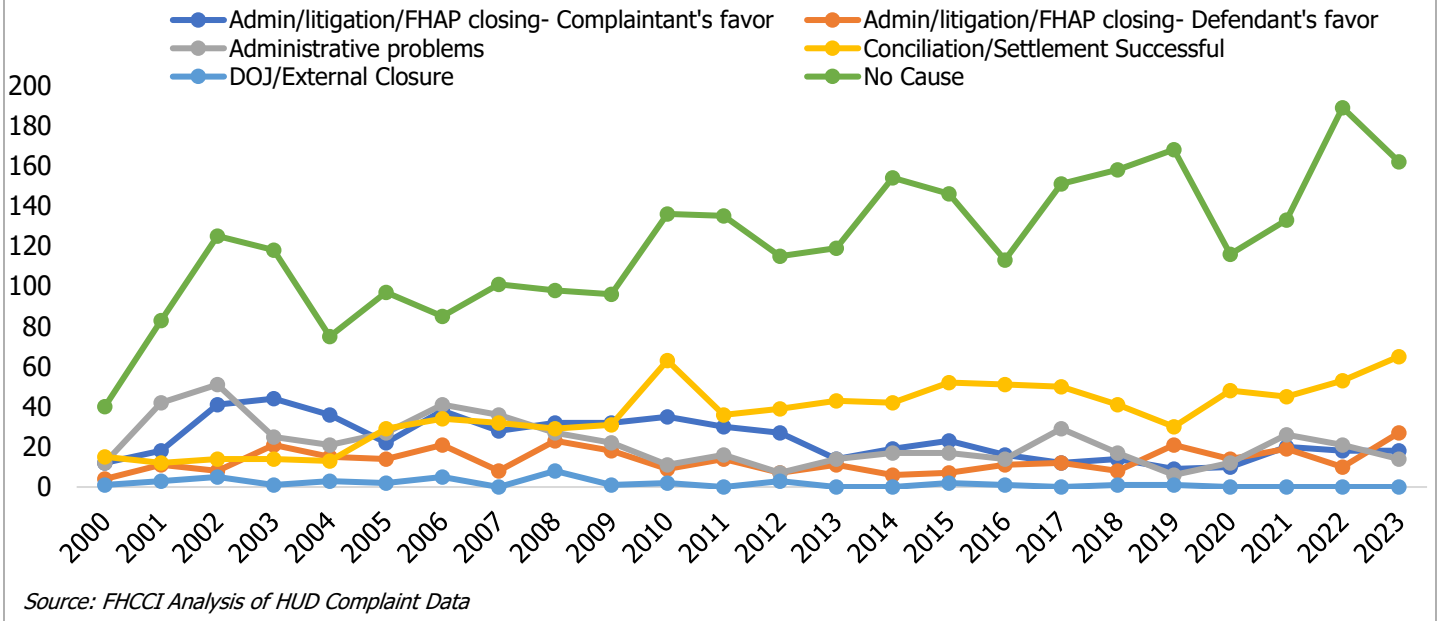
During FY 2019-2023, a total of 1,001 complaints were labeled as “No Cause,” which accounts for 60.7% of the total resolutions from the fiscal years analyzed. This shows the challenges for a complainant in receiving a favorable outcome. In fact, the lowest type of resolution was “Admin/Litigation/FHAP Closing – Complainant’s Favor” with only 94 total closures, or 5.7% of total resolutions, during FY 2019-2023 (Chart 13).

Table 13: Closed Complaints by Protected Class in Indiana, FY 2019-2023									
Closure Group	Race	Disability	Sex	National Origin	Familial Status	Retaliation	Religion	Color	Total
Admin/Litigation/FHAP Closing - Complainant's Favor	29 (6.0%)	41 (6.5%)	10 (5.2%)	2 (2.3%)	3 (2.2%)	4 (4.3%)	0	5 (35.7%)	94 (5.7%)
Admin/Litigation/FHAP Closing - Defendant's Favor	27 (5.6%)	49 (7.8%)	8 (4.2%)	5 (5.8%)	11 (8%)	2 (2.2%)	2 (11.8%)	0	104 (6.3%)
Administrative Closure	15 (3.1%)	46 (7.3%)	16 (8.3%)	6 (7%)	16 (11.7%)	4 (4.3%)	1 (5.9%)	2 (14.3%)	106 (6.4%)
Conciliation/ Settlement Successful	49 (10.1%)	164 (26.1%)	31 (16.1%)	11 (12.8%)	34 (24.8%)	13 (14.1%)	1 (5.9%)	2 (14.3%)	305 (18.5%)
DOJ/External Closure	1 (0.2%)	0	0	0	0	0	0	0	1 (0.1%)
No Closure Reason Reported	10 (2.1%)	20 (3.2%)	2 (1%)	1 (1.2%)	3 (2.2%)	2 (2.2%)	1 (5.9%)	0	39 (2.4%)
No Cause	353 (73.1%)	308 (49%)	125 (65.1%)	61 (70.9%)	70 (51.1%)	67 (72.8%)	12 (70.6%)	5 (35.7%)	1,001 (60.7%)
Total	483 (100%)	628 (100%)	192 (100%)	86 (100%)	137 (100%)	92 (100%)	17 (100%)	14 (100%)	1,649 (100%)

Source: FHCCI Analysis of HUD Complaint Data

¹⁷ This data had multiple different resolutions outcomes connected to the closed complaint cases. To analyze these outcomes, the FHCCI grouped the HUD-identified outcomes into seven broader categories: Admin/Litigation/FHAP Closing- Complainants’ favor (litigation ended- discrimination found, administrative hearing ended- discrimination found, complaint withdrawn by complainant after resolution, and FHAP judicial consent order); Admin/Litigation/FHAP Closing- Defendants favor (litigation ended- no discrimination found, FHAP judicial dismissal, administrative hearing ended- no discrimination found, and complaint withdrawn by complainant without resolution); Administrative Closure (complainant failed to cooperate, dismissed for lack of jurisdiction, unable to identify respondent, unable to locate respondent, unable to locate complainant, untimely filed); Conciliation/Settlement Successful; DOJ/External Closure (DOJ settlement); No Cause; and No Closure Reason Given.

Chart 5: Closed Indiana Complaints by Closure Group, FY 2000-2023



In regard to closures recorded as “Conciliation/Settlement Successful,” this means that a filed fair housing complaint alleging housing discrimination settled or resolved successfully with both parties coming to an agreement without a ruling having been made. Of the 1,649 closed complaints by protected class during FY 2019-2023, a total of 305 closure actions were due to conciliation or settlement, or 18.5%. Please note that obtaining data on the amounts of settlements or conciliations was not part of the data the FHCCI sought from HUD due to some FHAPs in Indiana, previously, entering into confidential agreements despite the fact that these documents are supposed to be available for public inspection. This may be something the FHCCI explores in future reports.

In reviewing “No Cause” rulings, disability and familial status allegations had the lowest rate of “No Cause” for those groups with 20 or more closures at 49% and 51.1% respectively, as compared to race which had the highest (73.1%). As mentioned previously, those filing complaints that include allegations of disability are often more likely to have evidence given that a disability very often has to be disclosed as part of a reasonable accommodation or modification process. This pattern occurs again for “Conciliation/Settlement” where disability (26.1%) and familial status (24.8%) again have the highest success rates for this positive outcome.

The remaining closure actions were “Administrative Closures” with 106 total actions (6.4%) and “Admin/Litigation/FHAP Closing – Defendant’s Favor” with 104 total actions (6.3%). A total of 39 closure actions did not contain a closure reason which the FHCCI will continue to monitor. Of interest, most of these actions related to disability allegations in the filed complaints so it is unclear as to why they were coded this way for closure.

When comparing the complaint outcomes to national averages, NFHA’s *2023 Fair Housing Trends Report* notes that of the 7,636 complaints specifically filed with HUD and FHAPs across the country in 2022, 53.6% were “No Caused” and 21.14% were conciliated or settled. This means that Indiana’s complaints are being “No Caused” at a significantly higher rate (60.7%) than the national average. Less Indiana complaints are being settled/conciliated (18.5%) as well.

Complaint Resolution Through DOJ

The federal Fair Housing Act gives the U.S. Department of Justice (DOJ) the authority to investigate fair housing issues of public importance and situations which involve a pattern or practice of discrimination. The Fair Housing Amendments Act in 1988 also gave the DOJ the authority to litigate complaints charged by HUD in which a party elected to federal court for resolution. The data that the FHCCI received from HUD details that *no* HUD administrative complaints from Indiana were

referred to the DOJ for further action. This is significantly smaller than the previously analyzed FY 2000-2018 data, which identified 19 referrals.

According to the DOJ's Housing and Civil Enforcement Cases webpage,¹⁸ there was only one enforcement action filed or resolved during FY 2019-2023 in Indiana. This case was *United States v. First Merchants Bank*, a mortgage lending case filed and settled in 2019, alleging redlining due to race (African American) in Indianapolis. This complaint was initiated in federal court by DOJ, outside the administrative complaint filing process, so not counted in this report's totals.

The only other apparent DOJ activity in Indiana was a Statement of Interest filed by DOJ in 2022 in a private lawsuit, *FHCCI, et al. v. Rainbow Realty Group, et al.*, but this was not counted in the FHCCI analysis since the DOJ was not the plaintiff and it was a private action again not involving administrative complaint filing.

Private Enforcement Action of the FHCCI

Since opening its doors in 2012, the FHCCI has been involved in several enforcement actions to address violations of fair housing law. Some of these actions have involved HUD or an Indiana FHAP-initiated administrative complaint and are thus counted in the previous sections. However, most often, the FHCCI's enforcement actions have been initiated in federal court outside of administrative action so are not counted in the complaint data provided by HUD since the complaint(s) bypassed that process.

During HUD fiscal years 2019-2023, the FHCCI filed eight federal lawsuits, containing 11 allegations: disability (3), race (2), familial status (2), color (1), gender (1), and national origin (1). During this same time period, the FHCCI reached 11 settlements or resolutions on those filed complaints or on actions previously filed. These resolutions involved 18 allegations: race (5), disability (4), national origin (3), color (3), familial status (2), and sex (1). You can learn more about each of the federal actions, including downloading filed complaints, on the FHCCI's Advocacy Page.¹⁹

Please note that others in Indiana have filed fair housing litigation directly in state or federal court thereby bypassing the HUD/FHAP administrative process. The FHCCI does not have the capacity at this time to research and evaluate how many of these enforcement actions have occurred, what was filed upon, and the results.

RECOMMENDATIONS

As the population of Indiana becomes more diverse, fair housing and civil rights laws remain important pillars of our commitment to equity, but additional steps must be taken by all to affirmatively further fair housing. Outlined below are actions that government bodies may take, or that community members may advocate for, to help accomplish fair housing goals in eliminating housing discrimination.

Strengthen Fair Housing Laws

The FHCCI supports expansion of federal and state fair housing laws to better address housing barriers for those seeking housing opportunities. The federal FHA has not been amended since 1988 despite the overwhelming need and various reports showing significant levels of housing discrimination against several groups not currently protected.

LGBTQ+: As discussed previously, the current federal government including HUD/DOJ, state and local FHAP agencies, and fair housing organizations like the Fair Housing Center of Central Indiana are following legal and administrative guidance in including sexual orientation, gender identity, gender expression, and being transgender as protected under the sex (gender) definition. Because this definition is not explicitly spelled out in the federal Fair Housing Act currently, it is important that it be done so for clarity nationwide. As of this report's publishing, 23 states, one territory, and D.C.²⁰ all prohibit housing discrimination due to sexual orientation and/or gender identity. An additional eight states interpret the sex/gender definition

¹⁸ U.S. Department of Justice. Housing and Civil Enforcement Cases. <https://www.justice.gov/crt/housing-and-civil-enforcement-cases> n

¹⁹ Fair Housing Center of Central Indiana. Advocacy Page. <https://www.fhcci.org/programs/advocacy/>

²⁰ Movement Advancement Project (MAP). LGBTQ Housing Map. https://www.lgbtmap.org/equality-maps/non_discrimination_laws

to include sexual orientation and gender identity. One additional state protects sexual orientation only. Unfortunately, Indiana is one of only 18 states that contains no explicit statewide housing protection for the LGBT population.

Source of Income/Receipt of Public Assistance: As of this report's publishing, 22 states, plus D.C., provide some form of source of income and/or receipt of public assistance protections,²¹ the majority of which specifically protect housing choice voucher holders. Over 70 major cities and counting provide some form of local protection. Unfortunately, in 2018 through HEA 1300,²² Indiana became only the second state in the nation, at that time, to preempt cities from providing such a protection under their local ordinance. Indiana has effectively endorsed this common form of housing discrimination impacting so many persons of lower incomes from finding safe, affordable housing options with their housing choice voucher. This includes veterans using vouchers specifically for them (VASH). Of note, in 2014, the FHCCI published a report identifying that those using vouchers in Indianapolis/Marion County faced denial rates of 82%. In areas that are predominantly white, home seekers with vouchers faced refusal rates of 90%.²³

Other Protections: Other states and/or cities have passed fair housing protections for age, marital status, homelessness status, military/veteran status, being a survivor of domestic violence, and for the recently incarcerated or due to previous criminal histories. All of which are groups who experience housing discrimination at higher rates and face significant challenges in finding long-term and stable housing.

Address Indiana Legislative Barriers Impacting the Ability to Affirmatively Further Fair Housing

The Indiana General Assembly has passed several laws which have directly impacted the state, and many of its cities, in being able to effectively affirmatively further fair housing, a goal of the fair housing laws. Besides HEA 1300 mentioned previously, the state has also preempted a city from mandating a landlord distribute tenant education materials, banned inclusionary zoning, and raised confusion through a state law on emotional support animals that differs from federal guidance.

SEA 148: In 2020, the Indiana General Assembly (IGA) passed SEA 148,²⁴ which was later vetoed by Governor Eric Holcomb. The veto was overridden in 2021 by the IGA putting the law into effect. Although the bill was labeled to "Prohibit a unit of local government from regulating certain aspects of a landlord-tenant relationship with respect to privately owned real property located in the unit unless the regulation is authorized by the general assembly," it was in retaliation to a local ordinance that had passed in Indianapolis in early 2020. One major provision of the ordinance required area housing providers to distribute an info sheet informing residents of (1) their right to legal advice when they had questions or were in disagreement with their housing provider and (2) their right to contact area departments, such as Public Health, on issues of habitability. Attempts to allow this language to not be preempted failed, allowing housing providers to take advantage of a tenant's lack of knowledge of their rights. Overall, there is a general lack of knowledge statewide on fair housing laws, the need to affirmatively further fair housing, and the rights and responsibilities associated under these laws. State and city government fair housing offices should work collaboratively with the FHCCI and other organizations to promote fair housing and engage in joint fair housing education campaigns to ensure strong public knowledge.

SEA 558: In 2017, the Indiana General Assembly passed SEA 558,²⁵ a preemption which restricts localities from passing inclusionary zoning ordinances to address issues such as the lack of affordable housing, a direct challenge to efforts to affirmatively further fair housing. Too often, those most in need of affordable housing are members of groups who experience high levels of housing discrimination, such as families with children, persons with disabilities, and people of color.

SEA 240: In 2019, the Indiana General Assembly passed SEA 240²⁶ which specifically targets person with disabilities who

²¹ Poverty & Race Research Action Council (PRRAC). *Appendix B: State, Local, and Federal Laws Barring Source-of-Income Discrimination*. March 2024. <http://www.prrac.org/pdf/AppendixB.pdf>

²² HEA 1300. Ordinances related to building and housing law. 2015. <https://iga.in.gov/legislative/2015/bills/house/1300#digest-heading>

²³ Fair Housing Center of Central Indiana. *Fair Housing Rental Testing Audit Report on Section 8 Denial Rates in Marion County, Indiana*. November 11, 2014. <http://www.fhcci.org/wp-content/uploads/2011/12/11-11-14-Section-8-Report.pdf>

²⁴ SEA 148. Zoning and housing matters. 2020. <http://iga.in.gov/legislative/2020/bills/senate/148>

²⁵ SEA 558. Leases and sales of real property. 2017. <https://iga.in.gov/legislative/2017/bills/senate/558>

²⁶ SEA 240. Emotional support animals. 2018. <https://iga.in.gov/legislative/2018/bills/senate/240>

need reasonable accommodations for emotional support animals. Specially, the state law adds additional requirements for approval of such accommodations and adds infractions for medical professionals. Such language conflicts with guidance published by HUD – guidance that would overrule any state claim. The outcome of this law has been confusion by both housing providers and housing consumers in not realizing the federal applicability. HUD eventually determined that any fair housing administrative complaints with allegations of disability discrimination related to the presence of emotional support animal(s) would now stay or be routed to HUD, bypassing Indiana’s state and local FHAP agencies.

Please visit the FHCCI’s Bad Bills Page²⁷ for other state laws which we have identified as limiting fair housing choice.

Increase Fair Housing Enforcement

Housing discrimination is not always easy to detect. Sometimes the discrimination may be obvious, such as a housing provider making an explicitly discriminatory statement about a protected class. However, housing discrimination more often occurs in more subtle and less obvious forms than before, especially as technology and artificial intelligence (AI) becomes more ingrained into the housing industry. Strong fair housing laws are critical, but there also needs to be vigorous enforcement to combat the decades of discriminatory practices and systemic forms of discrimination which may be difficult for the general consumer to detect.

As more technology becomes infused within the housing market, especially during tenant screening and lending or insurance decisions, the need to evaluate and maintain transparency and awareness of fair housing laws remain more important than ever before. In 2023, the FHCCI released, *The State of Fair Housing in Indiana: No Way Home: Tenant Screening Barriers to Housing*,²⁸ which documented how Hoosiers are being shut out of housing opportunities, often due to discriminatory housing practices being enhanced by technology.

A robust enforcement program ensuring equal housing opportunities for residents should be encouraged statewide, such as implementation of more education and testing programs to ensure that discrimination is detected and deterred. A strong outreach and referral process for victims of housing discrimination is also imperative within city governments. Entitlement jurisdictions must also be diligent in ensuring they are meeting their affirmatively furthering fair housing requirements. State and local agencies should also pursue strong public interest provisions when resolving fair housing complaints and conduct aggressive outreach to combat uncovered forms of housing discrimination.

Support Agencies Working to Address Housing Discrimination

The FHCCI and other nonprofit organizations working to represent victims of housing discrimination need the freedom and support to advocate for their clients and to address systemic forms of housing discrimination, often difficult for victims to uncover. What typically sets private, nonprofit fair housing organizations apart from state and local governments is that they work at the grassroots level, evaluate and counsel inquiries, analyze data and trends, and conduct testing and other forms of enforcement activities.

HUD studies have also shown that having the presence of fair housing organizations ensures that complaints that move forward to enforcement action have strong evidence, thereby easing administrative and court burdens. Currently, the FHCCI is the only nonprofit fair housing advocacy organization in Indiana despite many states having several groups, including our neighbors Illinois (six groups), Michigan (six groups), and Ohio (nine groups). Indiana’s population warrants more than one fair housing organization to address Indiana’s critical fair housing needs.

²⁷ Fair Housing Center of Central Indiana. *List of Passed Indiana Legislation Which Are Barriers to Affirmatively Furthering Fair Housing*. <https://www.fhcci.org/programs/public-policy/bad-bills-list/>

²⁸ Fair Housing Center of Central Indiana. *The State of Fair Housing in Indiana: No Way Home: Tenant Screening Barriers to Housing*. May 2023. <https://www.fhcci.org/wp-content/uploads/2023/06/Tenant-Screening-Report-FINAL2.pdf>

APPENDICES

Appendix I: Allegations in Filed Complaints in Indiana by Protected Class - HUD FY 2019-2023

Source: U.S. Department of Housing & Urban Development

County	Race	Color	National Origin	Religion	Sex	Disability Status	Familial Status	Retaliation	Total Allegations
Adams	1	0	1	0	2	9	1	0	14
Allen	125	0	18	6	45	122	28	33	377
Bartholomew	1	0	1	0	1	5	2	0	10
Benton	0	0	0	0	0	0	1	0	1
Blackford	1	0	0	0	1	1	0	0	3
Boone	2	0	0	0	0	1	0	1	4
Brown	0	0	0	0	0	0	1	0	1
Carroll	1	0	0	0	0	4	1	0	6
Cass	0	0	0	0	0	2	0	0	2
Clark	6	0	1	0	1	14	2	1	25
Clay	0	0	0	0	0	1	0	0	1
Clinton	0	0	0	0	0	0	1	0	1
Crawford	0	0	0	0	0	1	0	0	1
Daviess	0	0	0	1	0	1	1	0	3
Dearborn	0	0	0	0	0	2	0	0	2
Decatur	3	1	0	0	0	2	0	0	6
DeKalb	0	0	0	0	1	1	0	0	2
Delaware	4	0	0	0	2	19	1	1	27
Dubois	0	0	1	0	0	1	0	0	2
Elkhart	16	1	14	1	9	31	7	4	83
Fayette	0	0	0	0	0	0	0	0	0
Floyd	3	0	0	0	1	8	0	0	12
Fountain	0	0	0	0	0	0	0	0	0
Franklin	0	0	0	0	0	1	0	0	1
Fulton	0	0	0	0	0	0	0	0	0
Gibson	1	0	0	0	0	1	0	0	2
Grant	0	0	0	0	0	3	0	0	3
Greene	2	0	0	1	0	1	0	0	4
Hamilton	20	1	4	2	9	17	4	0	57
Hancock	3	0	2	0	0	2	0	1	8
Harrison	0	0	0	0	2	2	0	0	4
Hendricks	2	0	0	0	0	10	1	0	13
Henry	0	0	0	1	0	4	0	0	5
Howard	0	0	0	0	1	5	0	0	6
Huntington	1	0	0	0	0	3	0	0	4
Jackson	1	1	0	0	0	1	0	0	3
Jasper	0	0	0	0	0	0	0	0	0
Jay	0	0	0	0	0	0	0	0	0
Jefferson	0	0	0	0	1	1	0	0	2
Jennings	0	0	0	0	0	0	0	0	0
Johnson	2	0	0	0	1	9	3	0	15
Knox	0	0	0	0	0	2	0	0	2
Kosciusko	3	0	0	0	1	5	0	0	9
LaGrange	0	0	0	0	0	0	0	0	0
Lake	44	2	6	0	29	63	21	10	175
LaPorte	5	0	0	0	1	8	4	0	18
Lawrence	0	0	0	0	0	1	0	0	1
Madison	4	0	2	0	2	4	2	0	14
Marion	99	9	18	1	24	88	20	15	274
Marshall	0	0	0	0	0	0	0	0	0
Martin	0	0	0	0	0	0	0	0	0
Miami	1	0	0	0	2	4	0	0	7
Monroe	3	0	1	0	0	15	3	2	24
Montgomery	1	0	0	0	1	4	0	0	6
Morgan	1	0	0	0	1	3	0	0	5

County	Race	Color	National Origin	Religion	Sex	Disability Status	Familial Status	Retali-ation	Total Allegations
Newton	0	0	0	0	0	0	0	0	0
Noble	1	0	0	0	0	1	0	0	2
Ohio	0	0	0	0	0	0	0	0	0
Orange	0	0	0	0	0	1	0	0	1
Owen	0	0	0	0	0	0	0	0	0
Parke	0	0	0	0	0	4	0	0	4
Perry	0	0	0	0	0	0	0	0	0
Pike	9	2	0	0	0	4	2	1	18
Porter	6	0	0	0	2	9	2	0	19
Posey	1	0	1	0	0	1	1	0	4
Pulaski	0	0	0	0	0	1	0	0	1
Putnam	1	0	0	0	1	0	1	0	3
Randolph	0	0	0	0	1	0	0	0	1
Ripley	0	0	0	0	0	2	0	0	2
Rush	0	0	0	0	1	1	0	0	2
St. Joseph	52	2	5	0	32	62	12	13	178
Scott	1	0	1	0	0	1	0	0	3
Shelby	0	0	1	0	0	6	0	1	8
Spencer	0	0	0	0	0	0	0	0	0
Starke	0	0	0	0	0	0	0	0	0
Steuben	0	0	0	0	0	2	0	0	2
Sullivan	0	0	0	0	0	0	0	0	0
Switzerland	0	0	0	0	0	1	0	0	1
Tippecanoe	6	0	0	0	1	16	3	0	26
Tipton	0	0	0	0	0	0	0	0	0
Union	0	0	0	0	0	0	0	0	0
Vanderburgh	40	1	3	0	14	25	3	11	97
Vermillion	0	0	0	0	0	1	0	0	1
Vigo	1	0	0	0	1	3	0	1	6
Wabash	0	0	0	0	1	3	1	0	5
Warren	0	0	0	0	0	0	0	0	0
Warrick	1	0	0	0	0	4	1	1	7
Washington	0	0	0	1	0	2	1	0	4
Wayne	2	0	0	0	2	1	2	0	7
Wells	0	0	0	0	1	2	1	0	4
White	0	0	0	0	0	0	0	0	0
Whitley	0	0	0	0	1	3	1	1	6
Total	486	20	80	14	196	638	135	97	1,666

Appendix II: HUD FY 2019-2023 Indiana Complaints, Allegations, and Closures

Source: U.S. Department of Housing & Urban Development

County	Filed Complaints	% of Filed Complaints	Filed Allegations	% of Filed Allegations	Closed Complaints	% of Closed Complaints
Adams	19	1.4%	23	1.4%	19	1.5%
Allen	305	23.2%	377	22.6%	303	23.3%
Bartholomew	8	0.6%	10	0.6%	8	0.6%
Benton	1	0.1%	1	0.1%	1	0.1%
Blackford	3	0.2%	3	0.2%	4	0.3%
Boone	3	0.2%	4	0.2%	3	0.2%
Brown	1	0.1%	1	0.1%	1	0.1%
Carroll	5	0.4%	6	0.4%	4	0.3%
Cass	2	0.2%	2	0.1%	2	0.2%
Clark	20	1.5%	25	1.5%	20	1.5%
Clay	1	0.1%	1	0.1%	2	0.2%
Clinton	1	0.1%	1	0.1%	1	0.1%
Crawford	1	0.1%	1	0.1%	0	0.0%
Daviess	3	0.2%	3	0.2%	4	0.3%
Dearborn	2	0.2%	2	0.1%	3	0.2%
Decatur	4	0.3%	6	0.4%	4	0.3%
DeKalb	2	0.2%	2	0.1%	3	0.2%
Delaware	22	1.7%	27	1.6%	21	1.6%
Dubois	2	0.2%	2	0.1%	2	0.2%
Elkhart	67	5.1%	83	5.0%	67	5.2%
Fayette	0	0.0%	0	0.0%	0	0.0%
Floyd	10	0.8%	12	0.7%	9	0.7%
Fountain	0	0.0%	0	0.0%	0	0.0%
Franklin	1	0.1%	1	0.1%	1	0.1%
Fulton	0	0.0%	0	0.0%	1	0.1%
Gibson	2	0.2%	2	0.1%	2	0.2%
Grant	3	0.2%	3	0.2%	3	0.2%
Greene	4	0.3%	4	0.2%	4	0.3%
Hamilton	42	3.2%	57	3.4%	37	2.8%
Hancock	6	0.5%	8	0.5%	6	0.5%
Harrison	3	0.2%	4	0.2%	3	0.2%
Hendricks	13	1.0%	13	0.8%	12	0.9%
Henry	5	0.4%	5	0.3%	4	0.3%
Howard	6	0.5%	6	0.4%	5	0.4%
Huntington	3	0.2%	4	0.2%	3	0.2%
Jackson	2	0.2%	3	0.2%	2	0.2%
Jasper	0	0.0%	0	0.0%	0	0.0%
Jay	0	0.0%	0	0.0%	0	0.0%
Jefferson	2	0.2%	2	0.1%	2	0.2%
Jennings	0	0.0%	0	0.0%	0	0.0%
Johnson	14	1.1%	15	0.9%	14	1.1%
Knox	2	0.2%	2	0.1%	3	0.2%
Kosciusko	8	0.6%	9	0.5%	8	0.6%
LaGrange	0	0.0%	0	0.0%	0	0.0%
Lake	123	9.4%	175	10.5%	115	8.9%
LaPorte	14	1.1%	18	1.1%	14	1.1%
Lawrence	1	0.1%	1	0.1%	1	0.1%
Madison	10	0.8%	14	0.8%	10	0.8%
Marion	224	17.1%	274	16.4%	225	17.3%
Marshall	0	0.0%	0	0.0%	0	0.0%
Martin	0	0.0%	0	0.0%	0	0.0%
Miami	6	0.5%	7	0.4%	6	0.5%
Monroe	21	1.6%	24	1.4%	21	1.6%
Montgomery	5	0.4%	6	0.4%	5	0.4%
Morgan	5	0.4%	5	0.3%	5	0.4%

County	Filed Complaints	% of Filed Complaints	Filed Allegations	% of Filed Allegations	Closed Complaints	% of Closed Complaints
Newton	0	0.0%	0	0.0%	0	0.0%
Noble	2	0.2%	2	0.1%	2	0.2%
Ohio	0	0.0%	0	0.0%	0	0.0%
Orange	1	0.1%	1	0.1%	1	0.1%
Owen	0	0.0%	0	0.0%	0	0.0%
Parke	4	0.3%	4	0.2%	4	0.3%
Perry	0	0.0%	0	0.0%	0	0.0%
Pike	13	1.0%	18	1.1%	15	1.2%
Porter	15	1.1%	19	1.1%	15	1.2%
Posey	3	0.2%	4	0.2%	3	0.2%
Pulaski	1	0.1%	1	0.1%	1	0.1%
Putnam	2	0.2%	3	0.2%	2	0.2%
Randolph	1	0.1%	1	0.1%	1	0.1%
Ripley	2	0.2%	2	0.1%	2	0.2%
Rush	1	0.1%	2	0.1%	1	0.1%
St. Joseph	121	9.2%	178	10.7%	120	9.2%
Scott	2	0.2%	3	0.2%	2	0.2%
Shelby	8	0.6%	8	0.5%	6	0.5%
Spencer	0	0.0%	0	0.0%	0	0.0%
Starke	0	0.0%	0	0.0%	0	0.0%
Steuben	2	0.2%	2	0.1%	4	0.3%
Sullivan	0	0.0%	0	0.0%	0	0.0%
Switzerland	1	0.1%	1	0.1%	1	0.1%
Tippecanoe	25	1.9%	26	1.6%	27	2.1%
Tipton	0	0.0%	0	0.0%	0	0.0%
Union	0	0.0%	0	0.0%	1	0.1%
Vanderburgh	69	5.3%	97	5.8%	69	5.3%
Vermillion	1	0.1%	1	0.1%	1	0.1%
Vigo	5	0.4%	6	0.4%	5	0.4%
Wabash	3	0.2%	5	0.3%	3	0.2%
Warren	0	0.0%	0	0.0%	0	0.0%
Warrick	6	0.5%	7	0.4%	5	0.4%
Washington	4	0.3%	4	0.2%	4	0.3%
Wayne	5	0.4%	7	0.4%	5	0.4%
Wells	4	0.3%	4	0.2%	4	0.3%
White	0	0.0%	0	0.0%	0	0.0%
Whitley	5	0.4%	6	0.4%	3	0.2%
Total	1,313	100%	1,666	100%	1,299	100%

Appendix III: Closed Indiana Complaints by Closure Group, HUD FY 2019-2023

Source: U.S. Department of Housing & Urban Development

County	Admin/ Litigation/ FHAP Closing - Complain- ant's Favor	Admin/ Litigation/ FHAP Closing - Defendant's Favor	Admini- strative Closure	Conciliation/ Settlement Successful	DOJ/ External Closure	No Closure Reason Reported	No Cause
Adams	0	2	1	1	0	2	13
Allen	3	14	8	43	0	1	234
Bartholomew	1	2	2	0	0	0	3
Benton	0	0	0	0	0	0	1
Blackford	0	0	1	0	0	0	3
Boone	1	0	0	0	0	0	2
Brown	0	0	0	0	0	0	1
Carroll	0	1	1	0	0	0	2
Cass	1	0	0	0	0	0	1
Clark	0	0	4	5	0	1	10
Clay	0	0	0	0	0	0	2
Clinton	0	0	0	1	0	0	0
Crawford	0	0	0	0	0	0	0
Daviess	0	1	0	0	0	0	3
Dearborn	0	0	1	1	0	0	0
Decatur	0	0	0	0	0	1	3
DeKalb	1	0	0	2	0	0	0
Delaware	2	1	2	6	0	0	10
Dubois	0	1	0	0	0	0	1
Elkhart	2	3	12	16	0	0	34
Fayette	0	0	0	0	0	0	0
Floyd	1	0	1	3	0	0	4
Fountain	0	0	0	0	0	0	0
Franklin	0	0	0	0	0	0	1
Fulton	1	0	0	0	0	0	0
Gibson	0	0	0	1	0	0	1
Grant	0	0	1	1	0	0	1
Greene	0	0	1	0	0	0	3
Hamilton	2	1	1	6	0	2	25
Hancock	0	1	0	0	0	0	5
Harrison	1	1	0	0	0	1	0
Hendricks	2	2	1	2	0	1	4
Henry	0	0	0	1	0	1	2
Howard	0	1	0	2	0	0	2
Huntington	0	0	0	1	0	0	2
Jackson	0	0	0	0	0	0	2
Jasper	0	0	0	0	0	0	0
Jay	0	0	0	0	0	0	0
Jefferson	0	0	1	0	0	0	1
Jennings	0	0	0	0	0	0	0
Johnson	0	2	2	7	0	1	2
Knox	1	0	0	0	0	0	2
Kosciusko	0	1	1	0	0	1	5
LaGrange	0	0	0	0	0	0	0
Lake	12	5	7	19	0	2	70
LaPorte	0	3	1	1	0	0	9
Lawrence	0	0	0	1	0	0	0
Madison	0	0	0	0	0	1	9
Marion	22	15	14	42	1	9	122
Marshall	0	0	0	0	0	0	0
Martin	0	0	0	0	0	0	0
Miami	0	1	0	0	0	0	5

County	Admin/ Litigation/ FHAP Closing - Complain- ant's Favor	Admin/ Litigation/ FHAP Closing - Defendant's Favor	Admini- strative Closure	Conciliation/ Settlement Successful	DOJ/ External Closure	No Closure Reason Reported	No Cause
Monroe	1	3	3	8	0	3	3
Montgomery	2	1	1	0	0	0	1
Morgan	0	1	2	0	0	1	1
Newton	0	0	0	0	0	0	0
Noble	0	0	0	0	0	0	2
Ohio	0	0	0	0	0	0	0
Orange	0	0	0	1	0	0	0
Owen	0	0	0	0	0	0	0
Parke	0	0	0	2	0	0	2
Perry	0	0	0	0	0	0	0
Pike	1	5	0	2	0	0	7
Porter	0	5	2	3	0	0	5
Posey	1	0	0	0	0	0	2
Pulaski	0	1	0	0	0	0	0
Putnam	0	0	0	0	0	0	2
Randolph	0	0	0	1	0	0	0
Ripley	0	2	0	0	0	0	0
Rush	0	0	0	1	0	0	0
St. Joseph	7	5	5	26	0	6	71
Scott	1	0	0	0	0	0	1
Shelby	0	2	0	3	0	1	0
Spencer	0	0	0	0	0	0	0
Starke	0	0	0	0	0	0	0
Steuben	0	1	0	1	0	0	2
Sullivan	0	0	0	0	0	0	0
Switzerland	0	0	0	0	0	0	1
Tiptecanoe	1	3	0	10	0	1	12
Tipton	0	0	0	0	0	0	0
Union	0	0	0	1	0	0	0
Vanderburgh	6	1	1	17	0	0	44
Vermillion	0	0	0	0	0	0	1
Vigo	1	0	0	3	0	0	1
Wabash	0	0	1	2	0	0	0
Warren	0	0	0	0	0	0	0
Warrick	0	0	1	0	0	0	4
Washington	0	2	0	0	0	0	2
Wayne	0	0	0	1	0	0	4
Wells	0	0	1	3	0	0	0
White	0	0	0	0	0	0	0
Whitley	1	1	0	1	0	0	0
Totals	75	91	80	248	1	36	768

Appendix IV: Administratively Filed Complaints and Allegations in Indiana, HUD FY 2000-2023

Source: U.S. Department of Housing & Urban Development

Fiscal Year	Total Complaints	Total Allegations	Color	Disability	Familial Status	National Origin	Race	Religion	Retaliation	Sex
2000	159	177	3	45	19	22	73	7	1	7
2001	147	177	3	36	18	15	77	1	6	21
2002	138	164	0	39	17	13	62	3	9	21
2003	127	166	3	42	17	12	62	3	5	22
2004	176	210	2	68	19	18	74	3	5	21
2005	214	247	2	62	30	32	86	3	5	27
2006	213	264	0	85	27	16	98	6	9	23
2007	194	246	2	75	33	19	87	3	8	19
2008	225	263	0	92	22	7	117	5	3	17
2009	201	259	3	59	40	13	103	1	7	33
2010	257	325	0	106	36	21	103	0	9	50
2011	224	291	1	90	30	20	101	4	10	35
2012	191	227	1	83	18	10	66	2	18	29
2013	202	255	0	96	14	24	73	1	12	35
2014	259	319	2	107	30	19	104	4	10	43
2015	247	304	3	113	28	18	89	1	15	37
2016	245	302	1	111	24	22	91	3	11	39
2017	240	293	3	129	19	16	82	0	13	31
2018	254	314	0	134	25	14	85	5	15	36
2019	240	315	0	126	23	16	90	3	22	32
2020	206	256	3	107	26	8	62	1	11	38
2021	297	372	12	120	42	18	117	2	13	48
2022	287	373	4	138	26	20	115	5	24	41
2023	283	350	1	147	18	18	102	3	27	34
Total	5,226	6,469	49	2,210	601	411	2,119	69	268	739
Average	227	281	2	96	26	18	92	3	12	32
% of Total Allegations		100	0.8%	34.2%	9.3%	6.4%	32.8%	1.1%	4.1%	11.4%

ABOUT THE FAIR HOUSING CENTER OF CENTRAL INDIANA

The Fair Housing Center of Central Indiana (FHCCI) offers an array of programs and activities to ensure that discrimination does not impact a Hoosier's choice of housing. We were incorporated in August 2011 by a small group of dedicated fair housing advocates. The FHCCI began operations in January 2012 and is a 501(c)(3) nonprofit organization.

Mission: The mission of the FHCCI is to ensure equal housing opportunities by eliminating housing discrimination through advocacy, enforcement, education, and outreach.

Vision: The FHCCI recognizes the importance of "home" and envisions a country free of housing discrimination where every individual, group, and community enjoys equal housing opportunity and access in a bias-free and open housing market. We envision a country where integrated neighborhoods are the norm, and private and public sectors guarantee civil rights in an open and barrier-free community committed to healing the history of discrimination in America.

Programs: The FHCCI offers four main programs to fight housing discrimination and promote equal housing opportunity: Advocacy, Education, Inclusive Communities, and Public Policy.

Service Area: The FHCCI primarily serves 24 counties in Central Indiana: Bartholomew, Boone, Brown, Clinton, Decatur, Delaware, Fayette, Franklin, Hamilton, Hancock, Hendricks, Henry, Johnson, Madison, Marion, Monroe, Morgan, Putnam, Randolph, Rush, Shelby, Tipton, Union, and Wayne. We are available to assist other Indiana counties as staff resources and budgets allow. We are the only nonprofit organization in all of Indiana, at the time of this report issue date, focusing exclusively on fair housing.

To learn more about the FHCCI, its activities and programs; or about fair housing laws; or to review breaking news; or to donate, please visit our website at www.fhcci.org.



www.fhcci.org

317-644-0673 info@fhcci.org

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317-644-0673

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