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Characteristics of the Ongoing Residential Foreclosure Crisis

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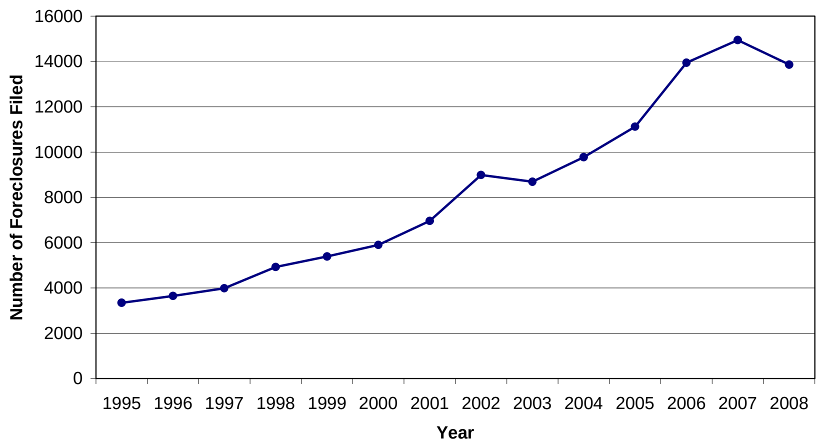
Chairman Kucinich and members of the subcommittee, it is an honor to appear before you today to present research on how the foreclosure crisis has played out in Cleveland and Cuyahoga County. It is important because Cleveland is one example of historic industrial cities with relatively weak housing markets that have been very hard hit by subprime lending and foreclosure. But Cleveland has fought back, drawing on its longstanding network of nonprofit and government agencies that were engaged in the process of stabilizing neighborhoods before the foreclosure crisis, and readily took action when the crisis hit.

The Foreclosure Crisis in Northeast Ohio

We point to the start of the current crisis as some time between 2003 and 2004, when foreclosure filings in the region began a rapid, sustained spike. As the chart below illustrates, the number of foreclosure filings in Cuyahoga County more than quadrupled between 1995 and 2007 (Schiller & Hirsh, 2008) reaching a peak of more than 14,000 filings per year, higher than any county in Ohio. Since 2006 alone, one in five homes have foreclosed in the hardest hit areas.

Foreclosure filings in Cuyahoga County, 1995-2008



Source: Policy Matters Ohio. (2008). Foreclosure filings in Ohio, 1995-2008; Cuyahoga County.

Types of Loans that Foreclose

But the seeds of the crisis were sown early in the decade as independent mortgage companies (IMCs) began to dominate local mortgage markets with subprime loans, particularly on the City's east side and inner ring suburbs. To study characteristics of foreclosed loans, we used matching techniques to link a sample of HMDA mortgage records with locally recorded mortgage documents and foreclosure filings (Coulton, Chan, Schramm, & Mikelbank, 2008). The results showed that the strongest predictor—by far—of a loan foreclosing is its status as a subprime loan (i.e. loan with a high interest rate spread as designated by HMDA). [1] In fact, holding other factors such as buyer income constant, home purchase loans that were subprime *had an 816 percent higher chance of going into foreclosure* than other loans. We estimate that 65 percent of the subprime loans in the study foreclosed within three years of origination. Most of the subprime loans were originated by IMCs through unregulated independent mortgage

[1] *Subprime loan:* If the annual percentage rate (APR) of the loan is more than three percent (or five percent in the case of junior-liens) above the yield of a Treasury security of comparable maturity at the time the loan was made, the loan is classified as high cost. This is a proxy for subprime lending. In the study, we refer to these as subprime loans. It should be noted that such high-cost loans can be made by any lender, not just those classified as subprime lenders by HUD (the Department of Housing and Urban Development). Additionally, there is no other information in HMDA (Home Mortgage Data Act) to indicate whether the loan has other features, such as variable interest or prepayment penalties, that could affect foreclosure.

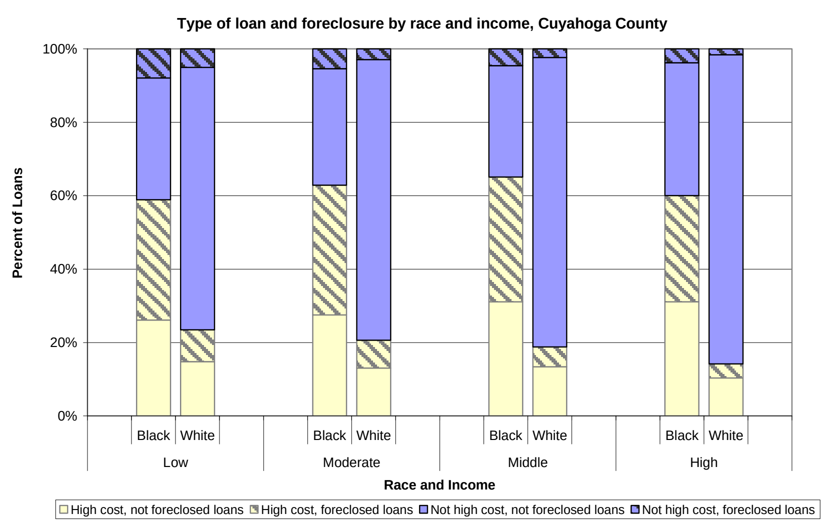
Originator	On HUD subprime list	Percent subprime loans	Percent subprime loans with foreclosure
Top 20 originators of subprime loans, 2005-2007, and foreclosure rates within 2 years of origination			
1 Argent	Yes	87.34	45.74
2 New Century Mortgage	Yes	95.41	55.37
3 Wells Fargo	Certain subsidiaries	36.16	25.02
4 Countrywide	Certain subsidiaries	25.92	22.25
5 National City	Certain subsidiaries	29.00	26.09
6 Aegis	Yes	87.15	47.38
7 Long Beach Mortgage	Yes	99.34	65.22
8 Option One Mortgage	Yes	94.04	43.12
9 BNC	Yes	94.06	46.55
10 People's Choice Financial	Yes	93.52	45.21
11 Novastar Mortgage	Yes	97.96	41.88
12 Accredited Home Lenders	Yes	96.21	34.11
13 Intervale Mortgage	No	87.23	31.95
14 Chase	Certain subsidiaries	96.53	16.45
15 Southstar Funding	Yes	84.67	36.77
16 Indymac Bank	No	55.04	32.27
17 Equifirst	Yes	93.24	27.13
18 Citi	Certain subsidiaries	36.04	5.08
19 Ameriquest Mortgage	Yes	71.17	20.58
20 Aames Funding	Yes	92.88	40.67

Source: HMDA, Loan Origination and Foreclosure Matched Data File
Prepared by: Center on Urban Poverty and Community Development, Mandel School of Applied Social Sciences, Case Western Reserve University.
http://neocando.case.edu

brokers. As seen in the table below, a few lenders dominated the market for those subprime loans that foreclosed. In fact, although 223 individual lenders made at least one sub-prime loan, 75% of the subprime loans that foreclosed were made by the top 20 companies listed here. To cite one example, Long Beach Mortgage, whose loan portfolio was made up almost entirely of subprime lending (99.34 percent), originated the 7th-highest number of subprime loans in Cuyahoga County. Of those loans, 65 percent went into foreclosure. Long Beach Mortgage—now defunct, like many of its peers in the industry—operated out of Anaheim, California (Coulton, Chan, Schramm, & Mikelbank, 2008).

Disproportionate Effect on Minorities

Subprime lending and foreclosure did not fall evenly on everyone. In fact, the research reveals marked disparities among races both in the originations of subprime loans and in related foreclosures. African Americans, compared with whites of similar income, held subprime loans two to four times more often than their white counterparts, leading to high rates of foreclosure among this population of borrowers (*see chart)* . In fact, the highest income bracket showed the largest disparity, with African Americans receiving subprime loans 4.2 times as often as whites.



Source: HMDA, Loan Origination and Foreclosure Matched Data File
Prepared by: Center on Urban Poverty and Community Development, Mandel School of Applied Social Sciences, Case Western Reserve University.
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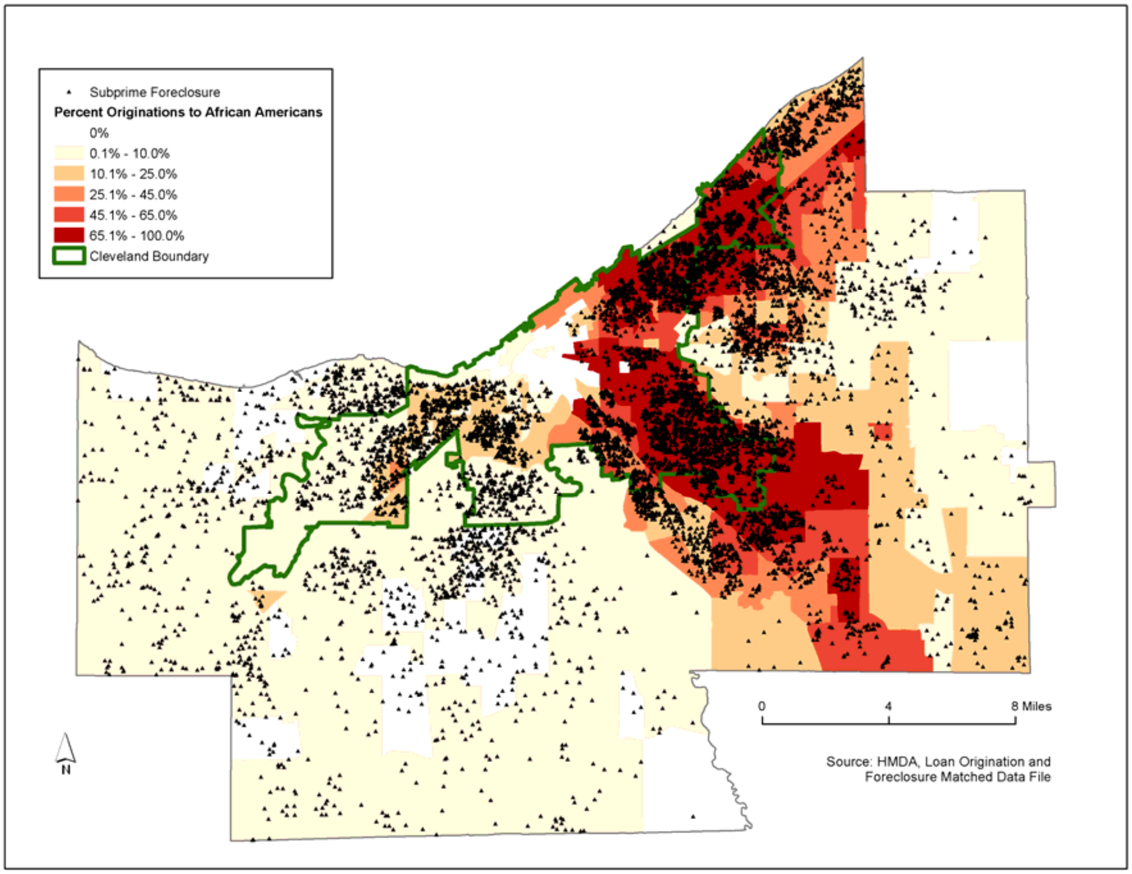
Racial disparities in subprime lending translate into the region's highest rates of foreclosure in predominately African American neighborhoods, which account for nearly half the foreclosures on subprime loans. Below is a map of Cuyahoga County indicating the percent of borrowers that are African American in each census tract, with points representing the locations of the subprime loans that foreclosed. The neighborhoods with large numbers of African American homeowners are the ones that are bearing most of the costs of the crisis going forward, such as loss of property values and the costs of demolition and remediation (Coulton, Chan, Schramm, & Mikelbank, 2008).

Subprime foreclosures by concentration of loans to African American borrowers



Foreclosure sales overwhelm the system

The foreclosure process ends with houses being sold at foreclosure sale. In a typical market, there is a reasonable demand for properties that emerge from the foreclosure process via a public auction. Before the foreclosure crisis, more foreclosed properties were purchased by private buyers (individual people and investors) at foreclosure sale. In 2000, private buyers made up 35 percent of the market for properties at foreclosure sale. Now, almost all properties coming out of foreclosure sale enter REO (real-estate owned) status. REO is the term utilized for a property that is owned by a bank or lender. Where there used to be a sizeable demand for foreclosed properties, there are virtually no private buyers at foreclosure sales any longer; private buyers made up only eight percent of the market for foreclosure sales in 2008. Area banks, too, are largely absent from the local REO picture, which is now almost completely dominated by national lenders and government sponsored entities (Coulton, Mikelbank, & Schramm, 2008).

What that means is, with less private demand for REO properties, these vacant homes often sit idle and untended. Median time in REO is now over a year, while it was closer to 6 months before the crisis (Coulton, Mikelbank, & Schramm, 2008). Properties in REO can be problematic because they are susceptible to vandalism and property devaluation, and also because it can be difficult for neighbors and others to figure out who owns the property, and who should be called or fined when the property is in violation housing codes. In Ohio, property owners are supposed to record their deeds to identify themselves as owner of record for the property. When a property has reverted to a bank in a foreclosure sale, for instance, but the bank has not recorded the deed as a matter of public record, the result is administrative confusion. *Court dockets* will indicate ownership by the financial institution; however, without the deed's being recorded, the *owner of public record* will be the foreclosed-upon homeowner. This discrepancy becomes an issue when properties are cited for code violations and other public nuisances. Notices are misdirected and repairs delayed, which results in these empty structures continuing to decay. In 2008, an Ohio bill[2] was passed that allows sheriff's departments to record foreclosure deeds on behalf of a new owner, usually a mortgage company—a helpful change administratively.

As if having enormous numbers of properties languishing in REO were not enough, properties that get stuck in the foreclosure process itself can be even more problematic. For example, as of November 2009 more than 5,396 properties have a decree of foreclosure but more than 180 days have elapsed without a foreclosure sale. Referred to as possible "bank walk-a-ways," the homeowner retains responsibility for the taxes and maintenance of the property, owing to an Ohio law that stipulates the foreclosed homeowner remains the rightful owner until a home is sold at foreclosure sale and a foreclosure deed granted. With the previous owner gone, this can lead to a number of foreclosed and abandoned properties that are unknown to authorities, and can also lead to troubles for the homeowner.

Huge loss of property value

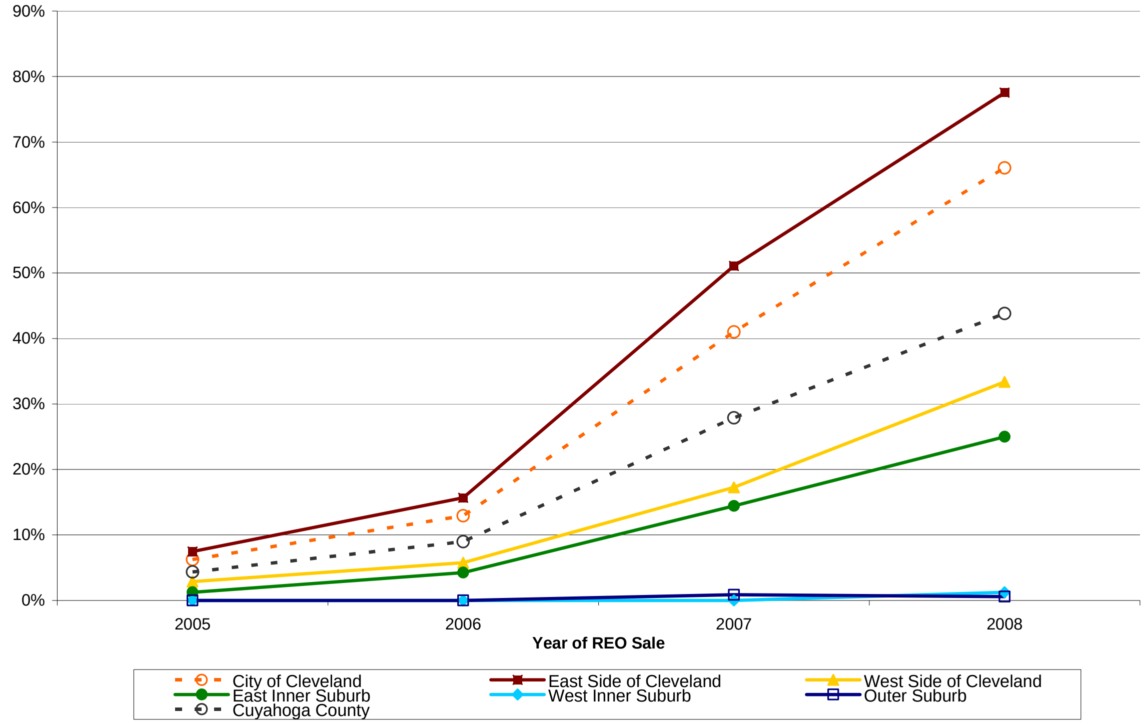
In Cuyahoga County, the City of Cleveland, and Cleveland's suburbs, properties sold out of REO are selling for far less than their estimated market value before foreclosure filing. Back in 2000, for example, properties sold out of REO were purchased for approximately 75 percent of their previous estimated market value. By 2007, however, properties leaving REO in the City of Cleveland were selling for a mere *13 percent of their estimated market value*. In Cuyahoga County and suburban Cleveland, properties selling out of REO in 2007 fared only slightly better, fetching sales prices of 22 percent and 37 percent of their estimated market value, respectively. For a weak market like Northeast Ohio that saw little run-up in housing values in the early 2000s, this precipitous drop in home values is a debilitating blow to neighborhoods, communities, and the entire region (Coulton, Schramm, Hirsh, 2008).

Even worse, REO properties are increasingly being sold at extremely distressed prices—defined as $10,000 or less—mainly to out-of-state corporations and individuals looking for bargains. Between 2005 and 2008, REO properties purchased at these very low prices made up an increasing percentage of all REO properties sold. As shown in the chart below, 4.3 percent of REO properties in Cuyahoga County in 2005 were sold at extremely distressed prices. This proportion skyrocketed to 43 percent in 2008, a ten-fold increase. As is the case with subprime lending, this trend of selling houses at extremely low prices has affected the region

[2] Ohio House Bill 138 in the 127th General Assembly. More information is available at http://www.legislature.state.oh.us/BillText127/127_HB_138_EN_N.pdf

disproportionately. In this case, too, much of the activity is concentrated on Cleveland's east side. In 2005, between 7 and 8 percent of properties on the city's east side coming out of REO were sold for less than $10,000. Three years later, *nearly 80 percent* of the more than 2,770 properties on the east side sold out of REO were purchased at these extremely distressed prices (Coulton, Schramm, Hirsh, 2008).

Percentage of all REO properties sold at extremely distressed prices of $10,000 or less, Cuyahoga County, 2005-2009



Source: Tabulation by Center on Urban Poverty and Community Development of Cuyahoga County Auditor Data

One key finding is that just a few sellers are making most of these sales. The top 5 sellers of REO properties for $10,000 or less accounts for more than 50 percent of these transactions. These companies are Deutsche Bank National Trust, Wells Fargo, U.S. Bank National Association, Fannie Mae and Bank of New York. Another finding, less conclusive, is that houses sold at $10,000 or less are making up substantial percentages of all REO properties sold by a seller. What that means is that some sellers are unloading great quantities of REO properties, and are doing so at extremely low prices. "Dumping" is what some call it. However, this is one area where public record can be deceiving. It is important to note that while public record indicates the party that holds title to a property, it is often the case that a bank or lender has hired a servicer to handle transactions related to the property. Most property sales out of REO are handled by mortgage servicers whose identity does not appear in the public records of the sales transfer, making communication about the property difficult for parties interested in purchasing it or raising concerns about its condition (Coulton, Schramm, Hirsh, 2008).

On the purchasing side, data reveal that there were many buyers of these properties—more than 1,200—with only a handful buying groups of more than 100 properties in the Cleveland area.

Here, too, local records are not always indicative of what's happening. Buyers may purchase properties under many different auspices, for instance, and may own many more properties than public records show. By and large, however, buyers are out-of-state corporations or investors. These investors typically have relationships with sellers of REO properties. Some sellers package properties regionally and sell to their customers in bulk; almost all properties are sold site unseen. These transactions, which are collectively defining and reshaping some neighborhoods in the region, are often being conducted by individuals who have never been to Northeast Ohio (Coulton, Schramm, Hirsh, 2008).

The majority of these properties become tax delinquent. Many are resold quickly in very poor condition with only a small price increase. Some of these bulk purchasers are adopting business models that involve land contracts, direct financing to homebuyers, and other tools that are outside the main real estate market practices (Coulton, Schramm, Hirsh, 2008).

Efforts to Address Foreclosures in Cuyahoga County

In 2005 Cuyahoga County officials found themselves facing a steep increase in foreclosure filings and scores of people losing their homes. The huge volumes overwhelmed the court system, to the point that it was taking three to five years for a foreclosure case to move through the courts. The foreclosures also spawned a surge of related problems, including vacant properties that were lowering neighboring property values, attracting vandals, and reducing the tax dollars that city officials desperately needed to address these very problems. Cuyahoga County officials joined forces with leaders of several municipalities to take up the fight against foreclosures, undertaking two distinct efforts.

The first was a response to the county's critical need to expedite the foreclosure process. County officials devised an overhaul to the judicial foreclosure process, including procedural changes that sped up the process and ultimately cleared a longstanding backlog of foreclosure cases (Weinstein, Hexter, & Schnoke, 2006, 2008).

The second, more strategic effort undertaken by this collaborative of county and municipal officials was broader and more far-reaching than streamlining the foreclosure process. This second effort facilitated partnerships among area agencies and nonprofits to initiate activities, programs, and, where warranted, legal action specifically aimed at preventing further foreclosures. Called the *Cuyahoga County Foreclosure Prevention Initiative*, this effort involves 11 county agencies, nine housing nonprofits, and numerous municipalities, area lenders, and other community advocacy groups.

Coordinating and implementing the various components of the initiative required significant cooperation, skill, and resources. Government agencies collaborated across bureaucratic lines of authority. Public and nonprofit groups conferred to make sure their collective efforts were synchronized and minimally overlapping. And, led by Cuyahoga County officials' example, each of the participating groups demonstrated horizontal and vertical collaboration with each other and with the county.

One critical component of the initiative has been United Way's 2-1-1 First Call for Help, a hotline that directs people to appropriate social services providers for a variety of needs. In collaboration with the foreclosure prevention initiative, 2-1-1 connects callers in foreclosure to participating Northeast Ohio housing counseling agencies. Together, these organizations serve as a vital link between individual homeowners facing foreclosure and their lenders. As of February 2009, the initiative has recorded a 53 percent success rate at preventing foreclosures among homeowners who seek foreclosure counseling. To date Cuyahoga County has invested several million dollars in the foreclosure prevention initiative. Additional financing was secured through a redeployment of assets from existing programs to address the crisis (Hexter & Schnoke, 2009).

From downward spiral to productive reuse

A critical component of any effort to bring vacant properties back to productive use is financing. The federal Neighborhood Stabilization Program (NSP) is a crucial aspect of this equation, allotting funds to localities so they may used to meet that locality's specific needs. NSP funds in Cleveland and Cuyahoga County help support the demolition and remediation of these vacant and abandoned properties. However, given the enormity of the need, NSP will only go so far.

Another critical component of any such restorative effort is connecting REO properties to organizations and people who can bring them back to occupancy or productive use. On a national level, there are two organizations that are beginning to acquire REO properties and connect them to local organizations: The nonprofit National Community Stabilization Trust (NCST) was formed in 2008 by six national nonprofits with expertise in community development and housing. The REO Clearinghouse, a for-profit agency formed by Safeguard Properties, was established in early 2009. Both agencies' purpose is to help stem the decline of communities with high concentrations of vacant and abandoned property, and both work to connect national-level servicers with local community development organizations, offering foreclosed properties to these organizations at discounted rates. Cleveland was one of the first cities to work with NCST and the REO Clearinghouse. Current work is small in scale and strategically focused on very specific areas, and will help inform and direct broader efforts going forward.

On a local level, once an organization establishes a connection with holders of REO properties—a sometimes difficult step—it can employ one of several measures to return properties to viable use. One new approach to cycling vacant Northeast Ohio houses back into productive use is the recently established county land bank, whose primary function is to obtain and make use of tax-foreclosed properties. The county land bank, which is structured as a county land reutilization corporation (LRC), is modeled after a highly successful program in Genesee County, Michigan.

Strategically, the LRC can help further revitalization efforts of individual communities as well as regional efforts. By strategically amassing land, the LRC can help communities implement plans for communal green spaces. Pooling properties in the new land bank will also mitigate the risks associated with land-ownership, which was previously assumed by small, local CDCs. These same area CDCs are expected to play a central role in getting land bank properties back on the market.

Finally, efforts are under way at the neighborhood level to help prevent homes from deteriorating, whether they are occupied or temporarily vacant. Northeast Ohio has many programs which complement the efforts at the city and county level aimed at combating the foreclosure crisis. Cleveland and Cuyahoga County's response to the crisis exemplifies the value of coordination and cooperation among several levels of government coupled with the integral involvement of a large number of non-profit organizations and citizens. A critical component in understanding Cleveland's capacity to handle this crisis is the long history investment in building community capacity. Going back several decades, local and national philanthropic organizations have invested in institution building by providing targeted and sustained resources to the field, particularly through intermediaries, such as Neighborhood Progress Inc., Cleveland Housing Network, Enterprise Community Partners and others, that support housing and community development. Moreover, these foundations have provided essential support to develop a robust capacity among local universities that, in part, through longstanding partnerships with local governments can provide up to date data on housing and neighborhoods.

Looking ahead

The City Planning Commission, working together with Kent State University's Cleveland Urban Design Collaborative, has prepared a comprehensive plan for restructuring the city and making use of blighted, vacant land. This plan, *Re-Imagining a More Sustainable Cleveland*, outlines potential revitalization projects that promote sustainable growth and help preserve home values in neighborhoods within a city that's experiencing a shrinking population. In the midst of this devastating crisis, there is hope. Cleveland has been characterized as "resilient," with collaboration taking place not only horizontally across local communities but also vertically with the county (Swanstrom, Chapple, Immergluck, 2009).

Conclusions and policy considerations

To summarize what the data reveal, Cleveland and Cuyahoga County entered this decade with a modestly appreciating housing market, a manageable number of foreclosures, and a community development system set up to help return vacant properties to productive use. Then subprime mortgages arrived on the scene and, in some sections of the city and suburbs, rapidly supplanted prime rate loans as the primary product for home purchases and refinances. Many of these loans foreclosed relatively quickly and foreclosures reached unprecedented rates. The sheer numbers overwhelmed the system. Neighborhoods with large African-American populations were particularly hard hit by foreclosures and the negative spillover effects.

The data also document a growing number of properties that entered prolonged periods of vacancy, stuck either in the foreclosure process or in REO portfolios of mortgage companies and servicers. Untended properties deteriorated and were vandalized, reducing the likelihood that these houses could be sold and reoccupied. The value of housing stock plummeted, leading speculators to buy properties in some neighborhoods in bulk and for pennies on the dollar.

Intervention is needed in every stage of the process. Some programs are targeted to loan origination, so that solid and workable loan products are made available to buyers at terms they can manage. Other efforts aim to prevent foreclosures by counseling homeowners before they are in default or assist them once foreclosure actions have been filed, seeking resolutions that are preferable to occupants being evicted and properties sitting vacant. Protecting vacant property and minimizing the harm to the rest of the neighborhood is a focus of other programs. And methods of strategically implementing neighborhood stabilization and land reutilization are also underway.

What more is needed to allow communities like Cleveland to weather this crisis and prevent similar situations in the future? Certainly, reform at the national level—in the credit system and in consumer protections—an end to the recession and a strong regional economy will be essential to the revitalization of Cleveland and similar communities across the nation. The suggestions below, on the other hand, focus on policies and tools to support more effective local action in avoiding, mitigating, and dealing with such crisis in the future.

> Implement mechanisms to enforce responsibility by lenders and servicers. This research makes clear that foreclosures are disproportionately costly over the long term to the neighborhoods in which they are concentrated while the short term gains went to the lenders and servicers. Spillover costs—which mushroom as houses remain in foreclosure or REO, or are shifted among speculators—are borne by neighbors, local government, and philanthropic organizations. Lenders and servicers, many of which have no local connection, have too little incentive to modify loans, keep occupants in homes as long as possible, protect vacant property, bring houses up to code and seek responsible buyers for these properties. The reality is that foreclosure is very costly, and more of these costs should fall on the lenders and servicers to shift the incentives in the direction of community stabilization. However, if not accompanied by the tools and local capacity for enforcement, these options might simply result in more homes falling through the cracks.
>
> Strengthen consumer protections and continue to promote fair lending. In Cleveland's low income neighborhoods, increased access to credit was mainly provided in the form of subprime loans. The companies originating a large proportion of these loans relied heavily on independent mortgage brokers who had monetary incentives to originate higher cost loans. Moreover, brokers could operate unscreened for criminal records. Thus, in too many instances loans were made based on inflated appraisals and inadequate documentation. African-American borrowers and neighborhoods have borne a disproportionate share of this fallout. Even though local leaders saw the dangers early on they were unsuccessful in passing laws to control predatory lending[3], (that some have labeled "reverse redlining") or preventing this disproportionate impact on minority groups. While it is also true that greater enforcement and awaited anti-predatory lending rules are now in place, there is no doubt that consumers need better protections. In particular, these protections should focus on low income, less sophisticated consumers, operating in an imperfectly competitive market where mortgage products are complicated and risky. Relying on disclosure mandates and financial education programs has proven not to be enough. As the case in Cleveland unfortunately shows, inadequate regulation

[3] This case involved three local ordinances adopted by the City of Cleveland in 2002, pursuant to the home rule amendment, that prohibited various "predatory" practices by consumer lending institutions doing business in the city. Shortly after they were adopted, the Cleveland ordinances were challenged in a court action initiated by the American Financial Services Association ("AFSA"). AFSA asserted that the Cleveland ordinances were in conflict with legislation enacted earlier in 2002 by the Ohio General Assembly, Sub. H.B. 386, which established regulatory guidelines applicable to all residential mortgage lenders doing business in Ohio. One provision in the bill, codified as O. R.C. §1.63, stated the legislature's intent to "preempt" the entire field of mortgage lending regulation for the state and included language barring local governments anywhere in Ohio from enacting local mortgage lending regulations." From McGlinchey Stafford Client Alert: Ohio Supreme Court Decides the Cleveland Predatory Lending Ordinance Case

and perverse incentives are conducive to criminal activity too. Today a Cleveland area task force is engaged in the criminal prosecution of scores of individuals who took advantage of the situation, but in the future these types of criminal enterprises can be prevented by having the tools in place to prevent victimization.

Preserve affordable housing options, including sustainable homeownership and rental opportunities. Many of the housing units that have cycled through an extended period of REO, vacancy and resale at distressed prices will end up in demolition, especially in neighborhoods with high concentrations of foreclosures. Just a few years ago, these units housed low and moderate income renters and homeowners, but in a weak housing market the costs of saving these homes well exceeds the potential return. In many respects demolition presents an opportunity to reduce concentrated poverty and bring the supply of housing more in line with the shrinkage in the number of households, but more is needed to enable low and moderate income families to relocate to decent housing in mixed income areas. Without attention to both the ability of households to pay for housing and the adequacy and location of affordable housing stock, concentrated poverty neighborhoods may simply be re-created elsewhere.

The foreclosure crisis represents an opportunity for the federal government to recommit itself to affordable housing programs. This includes expansion of the Housing Choice Voucher program, increased funding for the Housing Trust Fund and the Low-Income Housing Tax Credit, and more programs to help first time homebuyers who were disproportionately targeted by predatory lenders. At the local level it is time to move beyond a narrowly focused project approach. Coalitions built to address the foreclosure crisis can be harnessed to mobilize a regional approach to affordable housing, using data to realistically calibrate the right mix between demand side and supply side solutions. It is a favorable time for local groups to encourage green building methods and mixed income developments along with help for low-income renters and home buyers to shore up the demand for such units. In places like Cleveland, where many distressed properties have been purchased out of REO and are being recycled back into low cost rentals with only cosmetic changes, attention must also be given to the health hazards that inevitably worsened during prolonged vacancy. Increased resources for health inspections, enforcement and remediation are necessary to protect new occupants.

Support strategic use of resources for neighborhood stabilization and land reutilization in shrinking cities. The clean up from this crisis will take years, but in a shrinking city this work must be done strategically so that the investments will be sustainable. Federal support needs to continue beyond its current authorization for neighborhood stabilization work. Regions like Cleveland also need to maintain data systems that can help identify areas where funds can be targeted for greater effect. Continued, consistent data collection and ongoing research are needed in any community dealing with a problem of this magnitude. Unfortunately, in many regions the collection and provision of foreclosure-related data have been primarily in the realm of for-profit companies. However, an integrated, real-time data system requires cooperation among a number of government agencies, who must be willing to modify how they collect and distribute their own information so that it can be linked with other sources' and used for the common good.

But a community needs more than data-- It needs bold leaders and engaged citizens willing to take action. It also needs the space to have open and honest conversations about the scale and scope of the problem and what can be done about it.

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