



CITY OF HARRISBURG, PA

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

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SECTION I: EXECUTIVE SUMMARY

INTRODUCTION

The City of Harrisburg, Pennsylvania has prepared an Analysis of Impediments to Fair Housing Choice (AI) to satisfy the requirements of the Housing and Community Development Act of 1974, as amended. This act requires that any community receiving Community Development Block Grant (CDBG) funds must affirmatively further fair housing. The City of Harrisburg's Department of Building and Housing Development (DBHD) oversees this program and is charged with the responsibility of conducting its CDBG program in compliance with the federal Fair Housing Act. The responsibility of compliance with the federal Fair Housing Act extends to nonprofit organizations and other entities which receive federal funds through the City of Harrisburg.

Entitlement communities receiving CDBG entitlement funds are required to:

- Examine and attempt to alleviate housing discrimination within their jurisdiction;
- Promote fair housing choice for all persons;
- Provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, or national origin;
- Promote housing that is accessible to and usable by persons with disabilities; and
- Comply with the non-discrimination requirements of the Fair Housing Act.

These requirements can be achieved through the preparation of an Analysis of Impediments to Fair Housing Choice. The following Analysis of Impediments to Fair Housing Choice serves as a comprehensive look at fair housing issues in the City of Harrisburg. The report includes an analysis of various demographic, economic, and housing indicators; a review of public and private sector policies that affect fair housing; and a review of the city's efforts to create fair housing choice. It is to be used as a resource document the city can reference for insights into community needs and strategies that can help address those needs.

Fair housing choice means that residents have the necessary information, opportunity, and options to live where they choose without unlawful discrimination (24 CFR 5.152) and is composed of three components:

1. Analysis of Impediments to Fair Housing Choice
2. Taking Actions to Eliminate Identified Impediments
3. Maintenance of Records

SUMMARY OF FINDINGS:

The conclusion of this analysis has identified several current impediments to fair housing choice, some of which are related to those identified in the previous Analysis of Impediments. Key findings identified in this analysis to fair housing choice are:

1. Low Median Household Income
2. Large Number of Absentee Landlords
3. Inadequate Access to Mortgage Counseling
4. Older Housing Stock
5. Deferred Housing Maintenance
6. High Number of Vacant Housing Units
7. Growing Amount of Overcrowded Housing
8. Low Home Values
9. Long Waiting List for Public Housing
10. Limited Property Tax Base
11. Growing and High Percentage of Housing Cost Burdened Households
12. Limited Demand for Housing Construction and Housing Surplus
13. Outdated Zoning Code
14. Shortage of Beds for the Homeless
15. Reduction of Housing Funds

ACTIONS TO ADDRESS IMPEDIMENTS:

In an effort to overcome or ameliorate barriers to fair housing choice, the City of Harrisburg identified corresponding strategic actions for consideration and implementation. The actions listed will be addressed over the next five years, aligning the accomplishments of these actions with the consolidated planning cycle. Although it is likely that not all impediments will be eliminated in the short period of five years, the city will strive to affirmatively further fair housing and reduce these barriers to promote fair housing choice. Further details are found in the Fair Housing Action Plan section.

- Action 1: Expand Demolition Program
- Action 2: Expand First-Time Homebuyer's Program
- Action 3: Address Home Lending Practices
- Action 4: Expand Housing Renovations
- Action 5: Expand Scattered Sites Opportunities
- Action 6: Provide Leadership and Support to End Homelessness
- Action 7: Preserve the Existing Housing Stock
- Action 8: Actively Plan for Redevelopment
- Action 9: Develop a Vacant Housing Registry
- Action 10: Strongly Promote the Use of LERTA
- Action 11: Revise the City's Zoning Code

FAIR HOUSING CONCEPTS

Housing choice plays a critical role in influencing individuals' and families' abilities to realize and attain personal, educational, employment, and income potential. The fundamental goal of HUD's fair housing policy is to make housing choice a reality through sound planning. Through its on-going focus on Fair Housing Planning (FHP), HUD "is committed to eliminating racial and ethnic discrimination, illegal physical and other barriers to persons with disabilities, and other discriminatory practices in housing." Among the recurring key concepts inherent in FHP are:

- *Affirmatively Further Fair Housing (AFFH)*: Under its community development programs, HUD requires its grantees to affirmatively further fair housing through three broad activities: 1) conduct an *Analysis of Impediments to Fair Housing Choice*; 2) act to overcome identified impediments; and 3) track measurable progress in addressing impediments and the realization of fair housing choice.
- *Affordable Housing*: Decent, safe, quality housing that costs no more than 30% of a household's gross monthly income for utility and rent or mortgage payments.
- *Fair Housing Choice*: The ability of persons, regardless of race, color, religion, national origin, disability, gender, or familial status, of similar income levels to have the same housing choices.
- *Fair Housing Planning (FHP)*: Fair Housing Planning consists of three components, including The *Analysis of Impediments*; a detailed *Action Plan* to address identified impediments; and a monitoring process to assess progress in meeting community objectives. FHP consists of a close examination of factors that can potentially restrict or inhibit housing choice and serves as a catalyst for actions to mitigate identified problem areas.
- *Impediments to Fair Housing*: Any actions, omissions, or decisions based upon race, color, religion, national origin, disability, gender, or familial status that restrict, or have the effect of restricting, housing choice or the availability of housing choice.
- *Low and Moderate Income*: Defined as 80% of the median household income for the area, subject to adjustments for areas with unusually high or low incomes or housing costs. *Very low income* is defined as 50% of the median household income for the area, subject to adjustments for areas with unusually high or low incomes or housing costs. Poverty level income is defined as 30% or below median household income.
- *Private Sector*: Private sector involvement in the housing market includes banking and lending institutions, insurance providers, real estate and property management agencies, property owners, and developers.
- *Public Sector*: The public sector for the purpose of this analysis includes local and state governments, regional agencies, public housing authorities, public transportation, community development organizations, workforce training providers, and community and social services.

METHODOLOGY

The analysis consists of a comprehensive review of laws, regulations, policies, and practices affecting housing affordability, accessibility, availability, and choice within the City of Harrisburg. The assessment specifically includes an evaluation of:

- Existing socio-economic conditions and trends in the city, with a particular focus on those that affect housing and special needs populations.
- Public and private organizations that impact housing issues in the city and their practices, policies, regulations, and insights relative to fair housing choice.
- The range of impediments to fair housing choice that exists within both the urban center and other areas of the city.
- Specific recommendations and activities for the jurisdiction to address any real or perceived impediments that exist and ensure it meets federal requirements to affirmatively further fair housing by reducing or eliminating barriers to fair housing choice in the city.

The planning process was launched with a comprehensive review of existing studies for information and data relevant to housing need and related issues. These documents included local comprehensive plans and ordinances; the 5-Year Consolidated Plan for the City of Harrisburg; the previous Analysis of Impediments to Fair Housing Choice, among other policy documents.

DEMOGRAPHICS AND TRENDS

Utilizing quantitative data sources such as U.S. Census Bureau reports, American Community Survey data (ACS), the U.S. Bureau of Labor Statistics (BLS), PolicyMap, Federal Financial Institutions Examination Council (FFIEC), and local plans and reports, demographic and housing data was collected for the City of Harrisburg to determine any patterns or trends that may indicate a concentration of protected classes in any one area of the city. Data collected and analyzed also included population demographics, household status, income, and other relevant data. Information on the availability of housing, including various housing types and sizes, affordability levels, and accessibility for disabled persons, was also reviewed.

DATA COLLECTION

Data collection included an analysis of fair housing choice and any limitations due to existing conditions within the city or surrounding localities. A comprehensive review and assessment of current land use policies, local laws, ordinances, and practices that may affect fair housing choice within the City of Harrisburg was conducted.

ACS 2017-2021 five-year estimates were the most recent datasets at the time of research that incorporated all the issues for cross sectional analyses. It should be noted that the comparison of 2021 data to 2010 Census data is the best means for understanding trends that offer statistically significant forecasts on the demographic, economic, and housing trends for the next five to ten years. When available, more recent data is used to offer a static point of information, but should not be used to dismiss the wider trend analysis

on which this report focuses. Data regarding fair housing lending policies and practices was analyzed using the Home Mortgage Disclosure Act (HMDA) and Private Mortgage Insurance Companies (PMIC).

ORGANIZATION OF THE ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

The *Analysis of Impediments to Fair Housing Choice (AI)* is an internal analysis of factors that may be potentially preventing access to fair housing choice in the community. Understanding the impediments to fair housing choice is an important step in addressing housing needs. This report is meant to provide information to decision makers in the community and assist in guiding the use of grant funds and other resources that target affordable housing.

In *Section II*, the city's community demographics and economic characteristics are discussed. This section looks for the relationship between race or ethnicity and income. A household's income is a major component of access to affordable housing and a relationship between income and race may point to an impediment to fair housing choice.

Section III focuses on the housing profile of the city. The cost and availability of units for both renters and homeowners are analyzed to determine if the existing housing stock meets the needs of the community. Additionally, construction patterns are addressed to look at future housing development.

Section IV discusses lending practices and statistics. The demographics of applicants and information about loan denials are analyzed to determine if the lending market is contributing to impediments to fair housing choice.

In *Section V*, the impact of local public policies and programs is discussed. While well-intentioned, there are often unintended consequences to policies that may contribute to impediments to fair housing choice.

Section VI identifies existing Fair Housing programming in the city and county, including the work of the Fair Housing Council of the Capital Region and other Fair Housing agencies. It also outlines Fair Housing complaint processes and lists complaints made in the city between 2018 and 2021. This section also describes citizen participation, four-factor analysis, and language access plan to identify the city's capacity to reach all residents.

In *Section VII* the city describes progress that has been made on implementing actions recommended by the 2019 AI, including both public and private sector impediments.

Section VIII is the Summary of Identified Impediments. This section reviews fair housing issues in the city, identifies barriers to fair housing choice, and outlines actions to address these barriers.

Lastly, *Section IX* provides a selection of recommendations to mitigate these barriers to affordable housing including a combination of planning, legal, and financial tools.

SECTION II: COMMUNITY PROFILE

DEMOGRAPHICS

A key component in understanding impediments to fair housing choice is understanding the demographics and history of the city. Harrisburg is the capital of Pennsylvania and located in Dauphin County. It is also the principal city in the Harrisburg-Carlisle metropolitan area. Harrisburg area has been occupied by humans for approximately 5,000 years and includes periods of diverse and complicated interactions between different cultures. Today the impact of the city's industrial history and status as a major training area for the Union Army during the Civil War can still be felt. At its foundation, the Analysis of Impediments strives to determine how *people* are being impacted by impediments to fair housing and if any groups are disproportionately impacted, and the history of the area greatly impacts its current demographics.

TABLE: POPULATION – 2010 TO 2020

City/State	2010	2020	% Change 2010-2020
Harrisburg	49,332	49,247	-0.2%
Pennsylvania	12,612,705	12,794,885	+1.4%

Source: 2010 Census, 2016-2020 ACS 5-Yr Estimates (DP05)

RACE AND ETHNICITY

Harrisburg experienced steady growth from the late 18th century until the 1950's. In the 1950's the population began to slowly decline, from nearly 90,000 people to 50,000 in 2020. The population shift in Harrisburg is not represented at the state level, which has continued to grow in recent years. The city is a majority Black community with nearly 52% of the population identifying as Black or African American. There is also a substantial Hispanic community in the city.

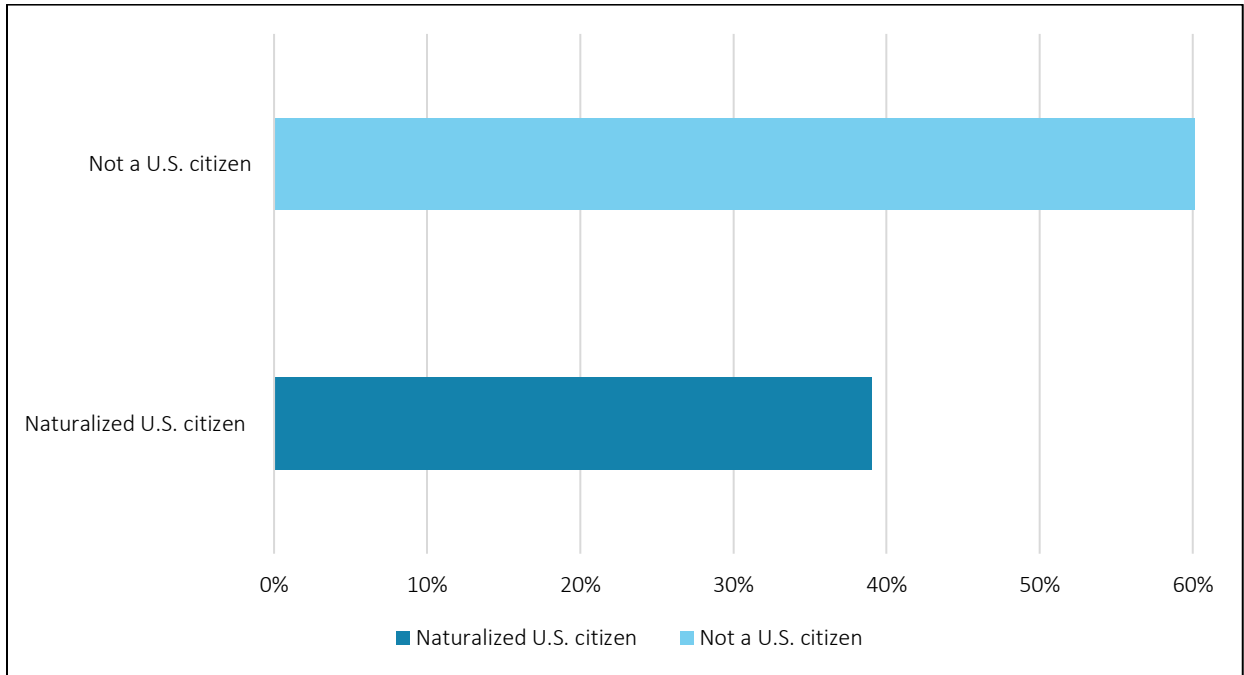
TABLE: POPULATION BY RACE AND ETHNICITY (DP05)

	Population	Percent
Total Population	49,247	100.0%
Race		
White	16,892	34.3%
Black	25,463	51.7%
American Indian and Alaska Native	272	0.5%
Asian	1,621	3.3%
Native Hawaiian and Other Pacific Islander	0	0%
Other Single Race	2,646	5.4%
Multiracial	2,353	4.8%
Ethnicity		
Hispanic	11,630	23.6%
Not Hispanic	37,617	76.4%

Source: United States Census Bureau ACS 2020 (DP05)

The foreign-born population of Harrisburg is primarily non-citizens and approximately 40% are naturalized citizens. This is an important data point because non-citizens often face additional difficulties in accessing fair housing. Non-citizens are more likely to face language difficulties and economic struggles and may be victims of predatory landlords. Given the demographics of the city it is likely that many non-citizens are Spanish speaking.

CHART: FOREIGN BORN POPULATION IN HARRISBURG CITY

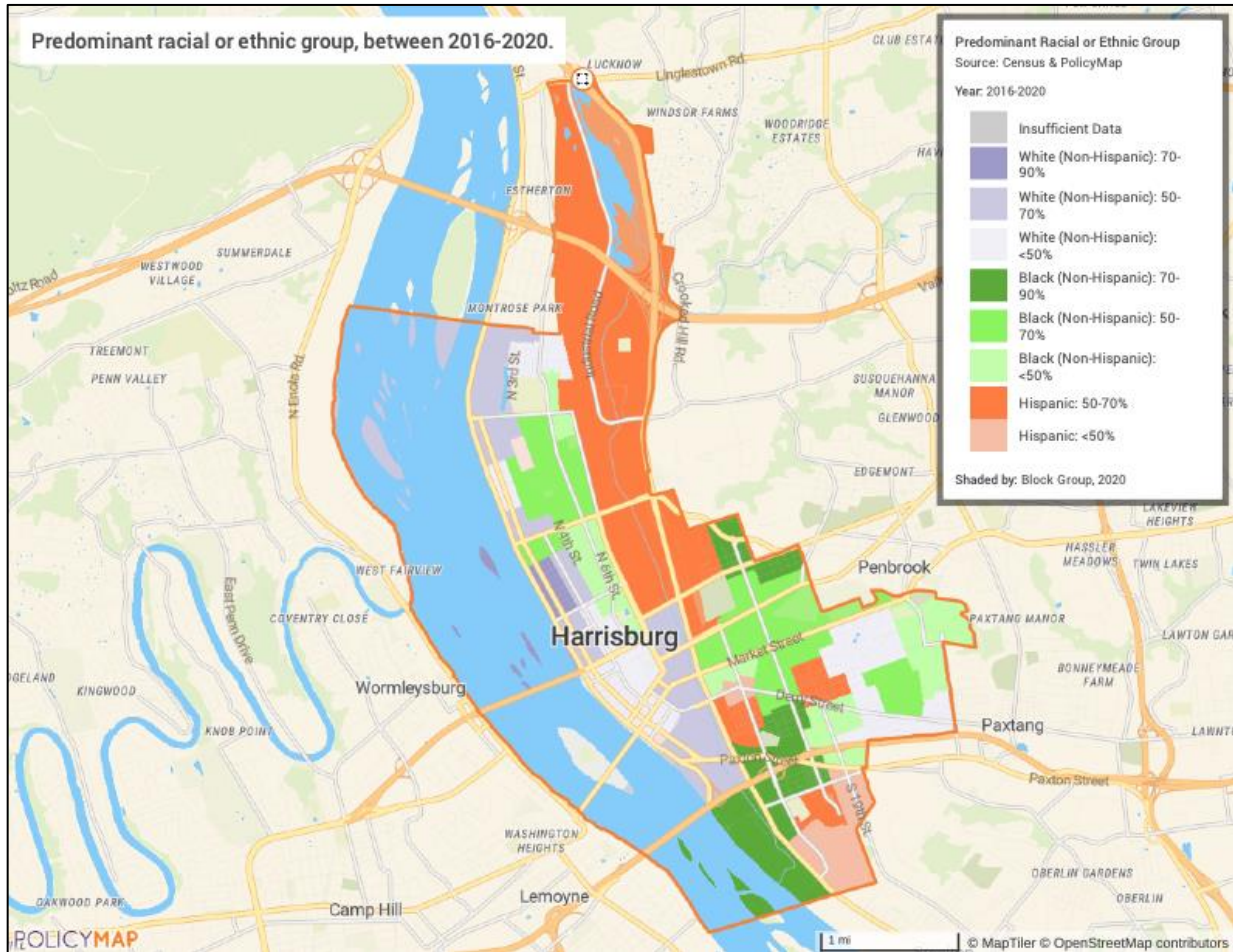


Source: United States Census Bureau ACS 2016-2020 (DP02)

SEGREGATION/INTEGRATION

Despite the relatively diverse population there are areas of Harrisburg with a notable racial concentration. Tracts near the river are predominantly occupied by white residents and tracts inland are majority Black or majority Hispanic. If the areas with primarily non-White residents also have lower median household income or greater poverty rates it may indicate correlation between race, ethnicity, and economic opportunities.

MAP: PREDOMINANT RACE



Source: United States Census Bureau ACS 2016-2020 via PolicyMap

AGE

Harrisburg has a significantly lower median age than the state. According to the 2016– 2020 ACS data, the median age in the county was 31.5 compared to 40.9 years in Pennsylvania. Only 11.2 percent of the population is over 65 years old, but statewide that rate is 18%. This may be an indication of an impediment to fair housing choice for older residents.

Meeting the housing needs of the elderly is especially important. As communities across the nation grow proportionately older, the needs of the elderly must be factored into community plans and programs to provide appropriate social services, healthcare, and housing. Housing is central to these evolving needs, particularly access to housing options that are decent, safe, affordable, accessible, and located in proximity to services and transportation. Housing is one of the most essential needs of the elderly because the affordability, location and accessibility of their residence will directly impact their ability to access health and social services – both in terms of financial cost and physical practicality. Senior housing was selected as one of the top three priorities for housing in the city’s community housing needs survey.

TABLE: AGE DISTRIBUTION

AGE COHORT	Total Persons in Group	Percent
Under 5 years to 19 years	14,613	29.67%
20 to 24 years	3,762	7.64%
25 to 44 years	14,147	28.73%
45 to 49 years	2,557	5.19%
50 to 64 years	8,686	17.64%
65 years and over	5,482	11.13%
Total population	49,247	100%
Median age (years)	31.5	-
Source: 2016-2020 ACS 5-Yr Estimates (S0101)		

DISABILITY

Residents with disabilities often require special housing units and have limited income, which makes affording safe and secure homes difficult. In Harrisburg over 16% of the population has a disability, and the likelihood that a person has a disability increases with age. Over 38% of residents over the age of 65 years old report at least one disability. In total, there are nearly 50,000 people who may need ADA accessible housing units. A lack of accessible units can be an impediment to fair housing access. Not only are the individuals with disabilities impacted, but their entire household can end up without appropriate housing. This issue is magnified with residents who are on a fixed income due to age.

TABLE: DISABILITY STATUS OF THE CIVILIAN NONINSTITUTIONALIZED POPULATION

Type	Number	Percent
Total Civilian Noninstitutionalized Population	48,918	--
<i>With a disability</i>	8,047	16.4%
Under 18 years	13,577	--
<i>With a disability</i>	1,485	10.9%
18 to 64 years	29,960	--
<i>With a disability</i>	4,476	14.9%
65 years and over	5,381	--
<i>With a disability</i>	2,086	38.8%
Source: 2016-2020 ACS 5-Yr Estimates		

HOUSEHOLD TYPES

In addition to race and ethnicity, it is important to understand what types of households live in the community and what their needs might be. It isn't sufficient to have enough housing units available if those units are not the right size for residents. In Harrisburg, approximately 70% of the households are married or cohabitating couples. The needs of these households differ from the approximately 6,200 householders living alone. If the supply of housing units does not include a variety of sizes, this can be an impediment to housing choice for some residents.

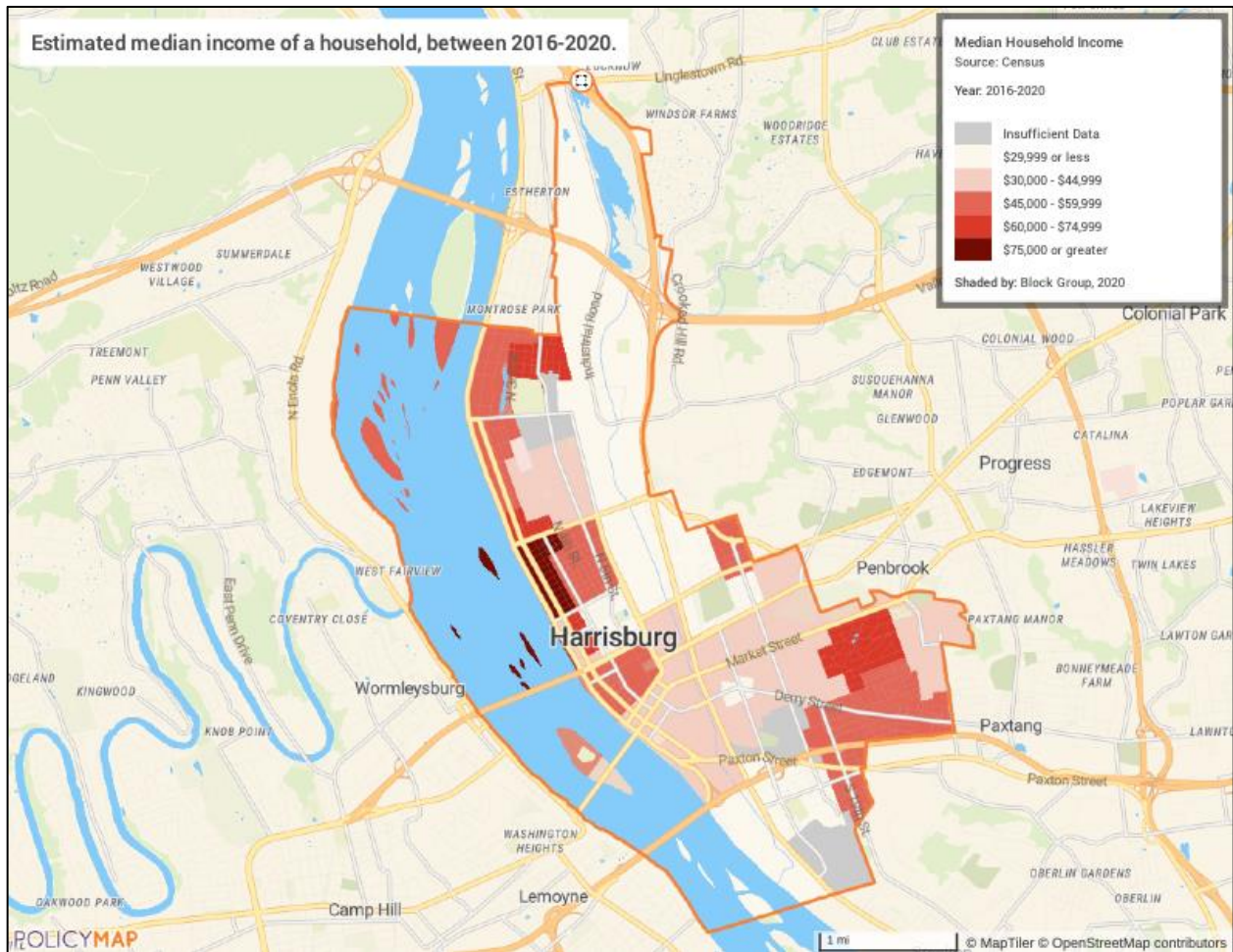
TABLE: HOUSEHOLDS BY TYPE

Type	Number	Percent
Total households	20,953	100%
Married-couple household	4,320	20.6%
• With children of the householder under 18 years	1,350	6.4%
Cohabiting couple household	10,443	49.8%
• With children of the householder under 18 years	N/A	N/A
Male householder, no spouse/partner present	1,204	5.7%
• With children of the householder under 18 years	746	3.6%
Female householder, no spouse/partner present	4,985	23.8%
• With children of the householder under 18 years	3,028	14.5%
Households with one or more people under 18 years	5,846	27.9%
Households with one or more people 65 years and over	6,433	30.7%
Average household size	2.29	(X)
Average family size	3.24	(X)
Source: United States Census Bureau ACS 2016-2020 (S1101)		

INCOME AND POVERTY

Due to the correlation between race and geography it is important to determine if there is a similar correlation between income and geography. The following map shows the median household income by block group. The areas with the highest median household incomes are nearest the river and those with lower incomes are more inland. As a reminder, these high income areas correlate closely with the tracts that are majority White.

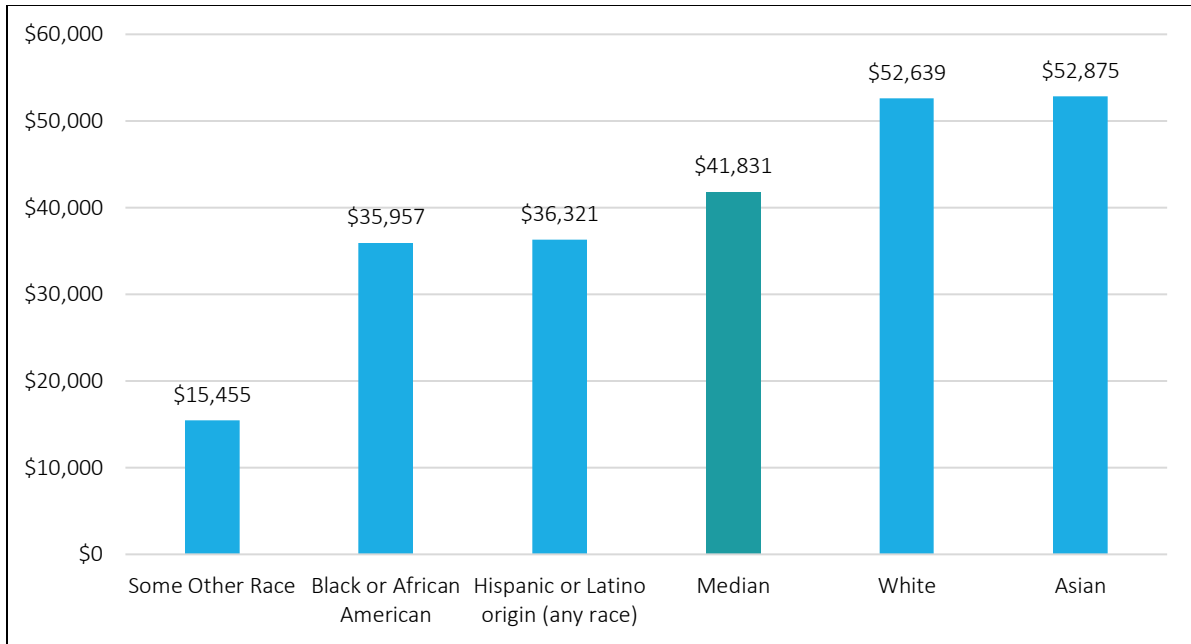
MAP: MEDIAN HOUSEHOLD INCOME



Source: United States Census Bureau ACS 2017-2021 via PolicyMap

As noted above, there appears to be a relationship between race/ethnicity and income. When income is broken down specifically by race and ethnicity the disparity becomes clear. Hispanic and Black households make approximately \$5,000 less than the median household income and White or Asian households make over \$10,000 more.

CHART: HOUSEHOLD MEDIAN INCOME BY RACE/ETHNICITY



Source: United States Census Bureau ACS 2016-2020 (\$1903)

Income and poverty are closely related. In Harrisburg the citywide poverty rate is 26.5% but there are differences in poverty rate among racial and ethnic groups. The highest poverty rates were reported by Black and Hispanic households, with both over 30%.

TABLE: POVERTY BY RACE AND ETHNICITY

	Population Below Poverty Level	Percent Below Poverty Level
Citywide	12,853	26.5%
White, non-Hispanic	1,818	15.5%
Black	7,685	30.5%
American Indian and Alaska Native	61	22.4%
Asian	102	6.5%
Native Hawaiian and Other Pacific Islander	0	0%
Some other race alone	1,340	10.4%
Multiracial	367	15.7%
Hispanic	4,181	36.4%

Source: 2016-2020 ACS 5-Yr Estimates

COST BURDEN

According to HUD, households paying an excess of 30% of their monthly household income towards housing costs (renter or owner) are considered to be “cost burdened.” When a household is cost burdened, they are at an increased risk of homelessness and a substandard living environment. To analyze the impact of cost burden on residents, the population is separated into three housing types: homeowners with a mortgage, homeowners without a mortgage, and renters.

Renters are, by far, the most cost burdened group in the city. Over 40% of renters are cost burdened and approximately 35% of renters pay 35% or more of their income toward housing costs. Even without considering housing cost burden, renters have greater housing instability and a greater likelihood of needing assistance. A household that can purchase property within their means is able to provide a more secure housing situation and create intergenerational wealth. First time homebuyer assistance and assisting renters who wish to own a home is one proven way to help alleviate financial pressure on renters.

Homeowners have a significantly lower cost burden rate, but there are still homeowner households within the city who lack the income necessary for economic security. Approximately 12.7% of homeowners without a mortgage and approximately 24.7% of homeowners with a mortgage are cost burdened. Homeowners without a mortgage have a particularly low-cost burden rate. However, they also are more likely to be elderly and may lack disposable income, meaning any increase in housing costs can cause significant problems.

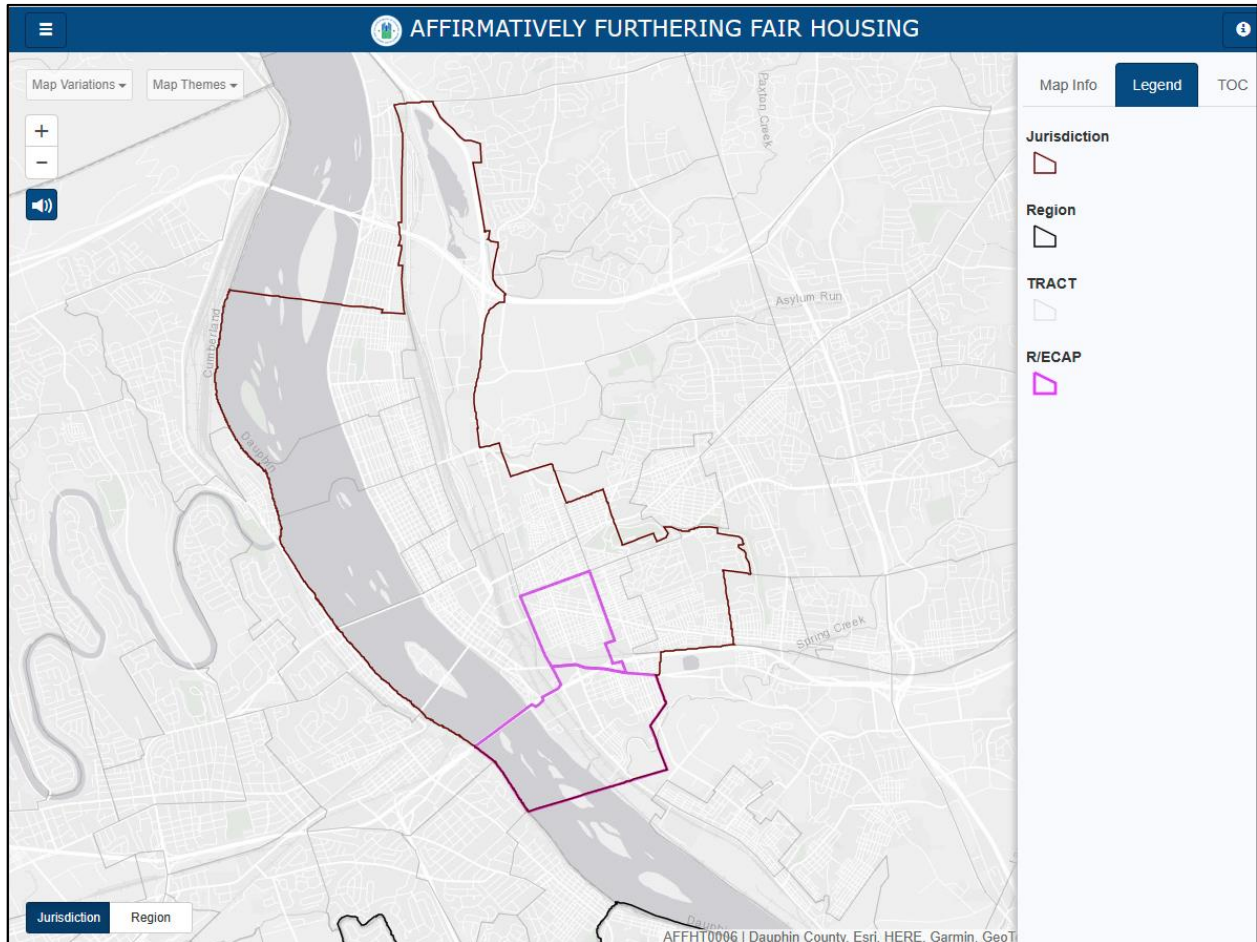
TABLE: MONTHLY HOUSING COSTS

	Homeowners with a Mortgage		Homeowners without a Mortgage		Renters	
	Number	Percentage	Number	Percentage	Number	Percentage
Less than 20%	2,359	49.6%	1,976	79.5%	4,650	35.5%
20.0 to 24.9%	791	16.6%	144	5.8%	1,583	12.1%
25 to 29.9%	429	9.0%	76	3.1%	1,543	11.8%
30 to 34.9%	350	7.4%	89	3.6%	811	6.2%
35% or more	823	17.3%	201	8.1%	4,519	34.5%
Total Cost Burdened	4,752	19.0%	2486	9.9%	13,106	52.3%
Source: 2016-2020 ACS 5-Yr Estimates (DP04)						

RACIALLY/ETHNICALLY CONCENTRATED AREAS OF POVERTY (R/ECAP)

One key issue that HUD has identified is areas of racial or ethnic concentrations of poverty and the relationship between financial characteristics and location. According to the most recent data available there are two tracts in Harrisburg that are R/ECAPs, both of which are located in the southern portion of the city. This is a reduction since the previous AI which found seven tracts that had racial or ethnic concentrations of poverty.

MAP: R/ECAP TRACTS



Source: Department of Housing and Urban Development AFFH Mapping Tool (AFFHT0007)

SECTION III: HOUSING PROFILE

The availability of housing in a variety of types, sizes, and costs is imperative for access to fair housing choice. For a community to attract and maintain residents there must be housing available for all types of families of all income levels, both for renters and homeowners.

HOUSING STOCK

Throughout Harrisburg, one-unit structures make up a majority of all housing units. Since 2010, the housing stock in the city has decreased slightly from 25,673 to 25,044 units. There has been little fluctuation in the percentage of housing units by type. The largest change was for structures with 1-unit attached structures, which decreased by over 1,000 units.

HUD defines a single-family structure as a structure with one to four units. Using that definition, approximately 75% of all housing units are single-family. An important group of property types are called the “Missing Middle” and represent housing types that are neither 1-unit nor large complexes with 20 or more units. These units tend to provide affordable housing options for many residents but are rare in many communities. In Harrisburg, approximately 27.7% of all units are in this important group.

TABLE: PROPERTY TYPE IN 2010 AND 2020

	2010		2020	
	Number	Percentage	Number	Percentage
1-unit, detached structure	2,796	10.9%	2,982	11.9%
1-unit, attached structure	12,712	49.5%	11,692	46.7%
2 units	2100	8.2%	1953	7.8%
3 or 4 units	2,588	10.1%	2,101	8.4%
5-9 units	1,176	4.6%	1,840	7.3%
10-19 units	1,363	5.3%	1,061	4.2%
20 or more units	2,914	11.4%	3,263	13.0%
Mobile Home	12	0.0%	152	0.6%
Boat, RV, Van, etc.	12	0.0%	0	0.0%
Total	25,673	100%	25,044	100%
Source: 2006-2010, 2016-2020 ACS 5-Yr Estimates (DP04)				

The following table compares unit sizes from 2010 and 2020. The availability of large units with three bedrooms or more has decreased by nearly 1,000 units. The only two unit sizes that have a larger housing stock are 1-bedroom and 2-bedroom units.

TABLE: UNIT SIZE

	2010		2020	
	Number	Percentage	Number	Percentage
No bedroom	1813	7.1%	1493	6.0%
1 bedroom	4,881	19.0%	5,392	21.5%
2 bedrooms	5,680	22.1%	5,809	23.2%
3 bedrooms	7,967	31.0%	7,768	31.0%
4 bedrooms	2,686	10.5%	2,403	9.6%
5 or more bedrooms	2,646	10.3%	2,179	8.7%
Total	25,673	100%	25,044	100%
Source: 2006-2010, 2016-2020 ACS 5-Yr Estimates (DP04)				

The housing stock in Harrisburg is relatively old when compared to the state as a whole. Approximately 88% of the city’s housing units were built before 1980 and only 4% were built after 2000. At the state level 69% of the units were built after 1980. Units built prior to 1980 are at risk of having lead-based paint in them and require special care during rehabilitation. In Harrisburg, over 22,000 units have a lead based paint hazard. The city runs a lead-based paint hazard program that helps residents mitigate any hazards.

TABLE: YEAR UNIT BUILT

	Pennsylvania		Harrisburg	
	Number	Percentage	Number	Percentage
Built 2020 or later	104,117	1.8%	186	0.7%
Built 2010 to 2019	93,167	1.6%	62	0.2%
Built 2000 to 2009	464,687	8.1%	737	2.9%
Built 1990 to 1999	549,062	9.6%	1,112	4.4%
Built 1980 to 1989	547,325	9.6%	808	3.2%
Built 1970 to 1979	716,112	12.5%	2,102	8.4%
Built 1960 to 1969	578,217	10.1%	2,178	8.7%
Built 1950 to 1959	772,266	13.5%	3,720	14.9%
Built 1940 to 1949	410,227	7.2%	2508	10.0%
Built 1939 or earlier	1,478,165	25.9%	11631	46.4%
Total	5,713,345	100%	25,044	100%
Source: 2016-2020 ACS 5-Yr Estimates (DP04)				

OCCUPANCY CHARACTERISTICS - HOUSING TENURE

Home ownership is a key component of securing multi-generational wealth and stability. Disparities in access to home ownership can be an impediment to fair housing choice, particularly when it is linked to race or ethnicity. In Harrisburg, approximately 35% of households live in owner-occupied units, which is a five percent decline from the 2010 rate.

TABLE: HOUSING OCCUPANCY IN 2010 AND 2020

	2010		2020	
	Number	Percentage	Number	Percentage
Total Housing Units	25,673	100%	25,044	100%
Occupied Housing Units	20,754	80.8%	20,986	83.8%
<i>Owner Occupied Units</i>	8,300	40.0%	7,360	35.1%
<i>Renter Occupied Units</i>	12,454	60.0%	13,626	64.9%
Vacancy Housing Units	4,919	19.2%	4,058	16.2%
Source: 2006-2010, 2016-2020 ACS 5-Yr Estimates (DP04)				

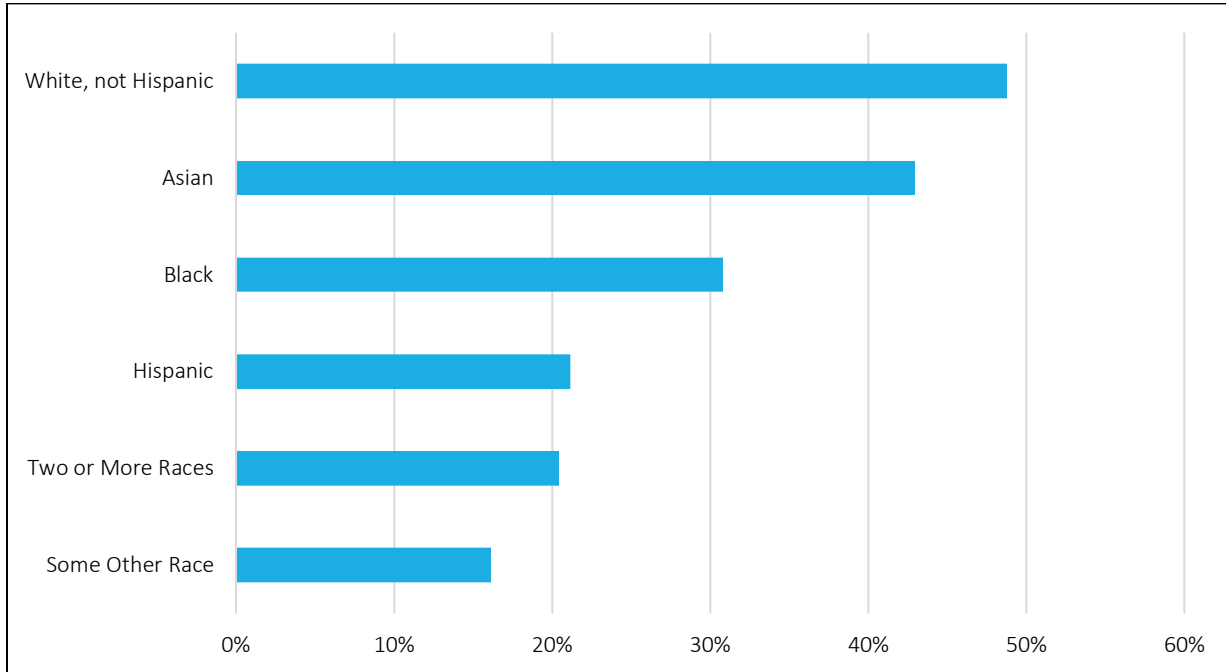
TABLE: HARRISBURG HOMEOWNERSHIP BY RACE/LATINO ETHNICITY 2020

	Owners	Percent	Renters	Percent
White	3,703	50.3%	4,955	36.4%
Black or African American	3,141	42.7%	7,055	51.8%
American Indian and Alaska Native	8	0.1%	39	0.3%
Asian	238	3.2%	316	2.3%
Native Hawaiian and Other Pacific Islander	0	0.0%	0	0.0%
Some other race	161	2.2%	837	6.1%
Two or more races	109	1.5%	424	3.1%
Hispanic or Latino origin	836	11.4%	3,116	22.9%
TOTAL	7,360	100%	13,626	100%

Source: United States Census Bureau ACS 2016-2020 (S2502)

White, non-Hispanic households are more likely than other groups to be homeowners. Nearly 50% of White households live in owner-occupied units. Black and Hispanic households have significantly lower home ownership rates than White or Asian households.

CHART: PERCENT OF POPULATION LIVING IN OWNER-OCCUPIED UNITS BY RACE/ETHNICITY

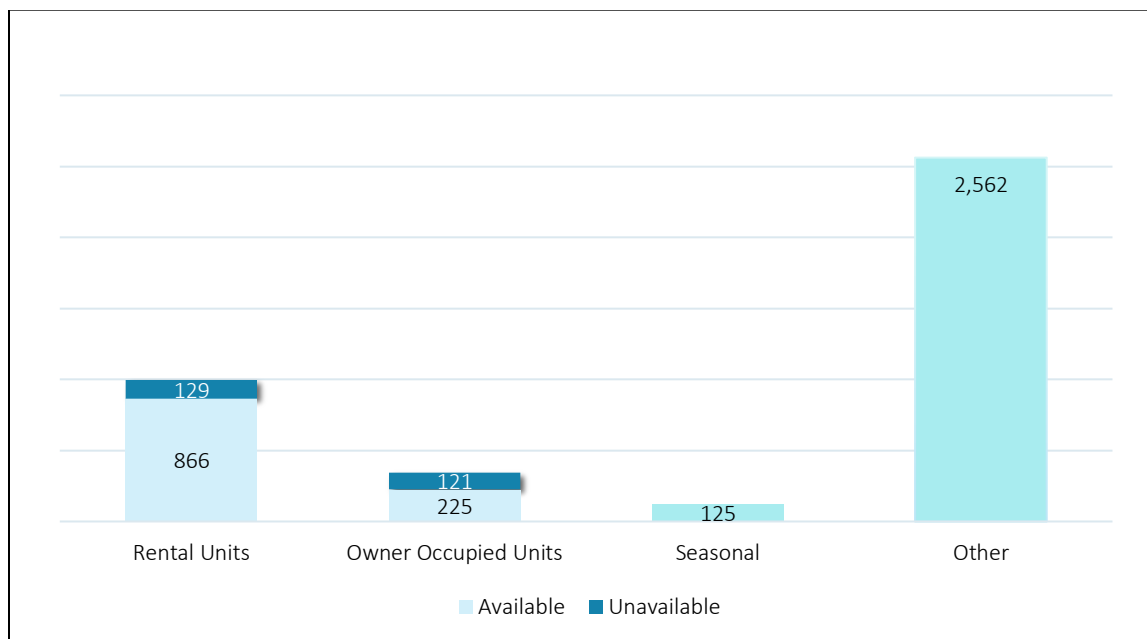


Source: United States Census Bureau ACS 2016-2020 (S2502)

VACANCY

In Harrisburg, there are approximately 4,000 vacant units. Rental units are more likely to be vacant compared to owner occupied units. This may be due to several issues, including unit sizes that do not match consumer needs and unit costs beyond a household's ability to pay. The largest overall category is "other vacant" which is primarily units that are currently unfit for human occupation.

CHART: STATUS OF VACANT UNITS



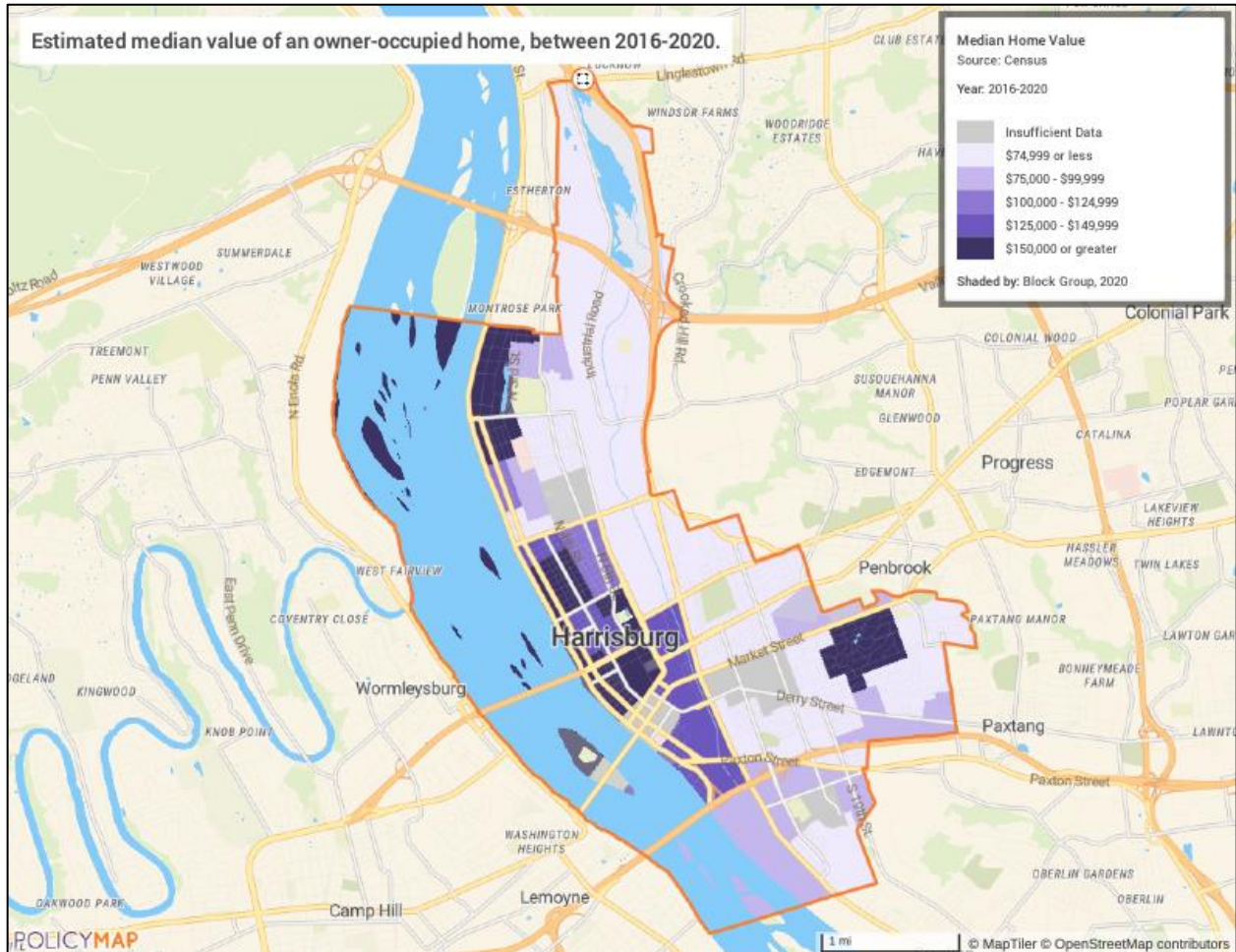
Source: United States Census Bureau ACS 2016-2020 (B25004)

Data note: Available are for rent or for sale, Unavailable are rented or sold (not occupied).

OWNER-OCCUPIED UNITS

The price of owner-occupied units appears to be closely related to geography. Areas that are along the river have higher median home value. As noted above, these areas are primarily occupied by White residents. In the inland parts of the city the median home value is cut in half to under \$75,000.

MAP: *MEDIAN VALUE*

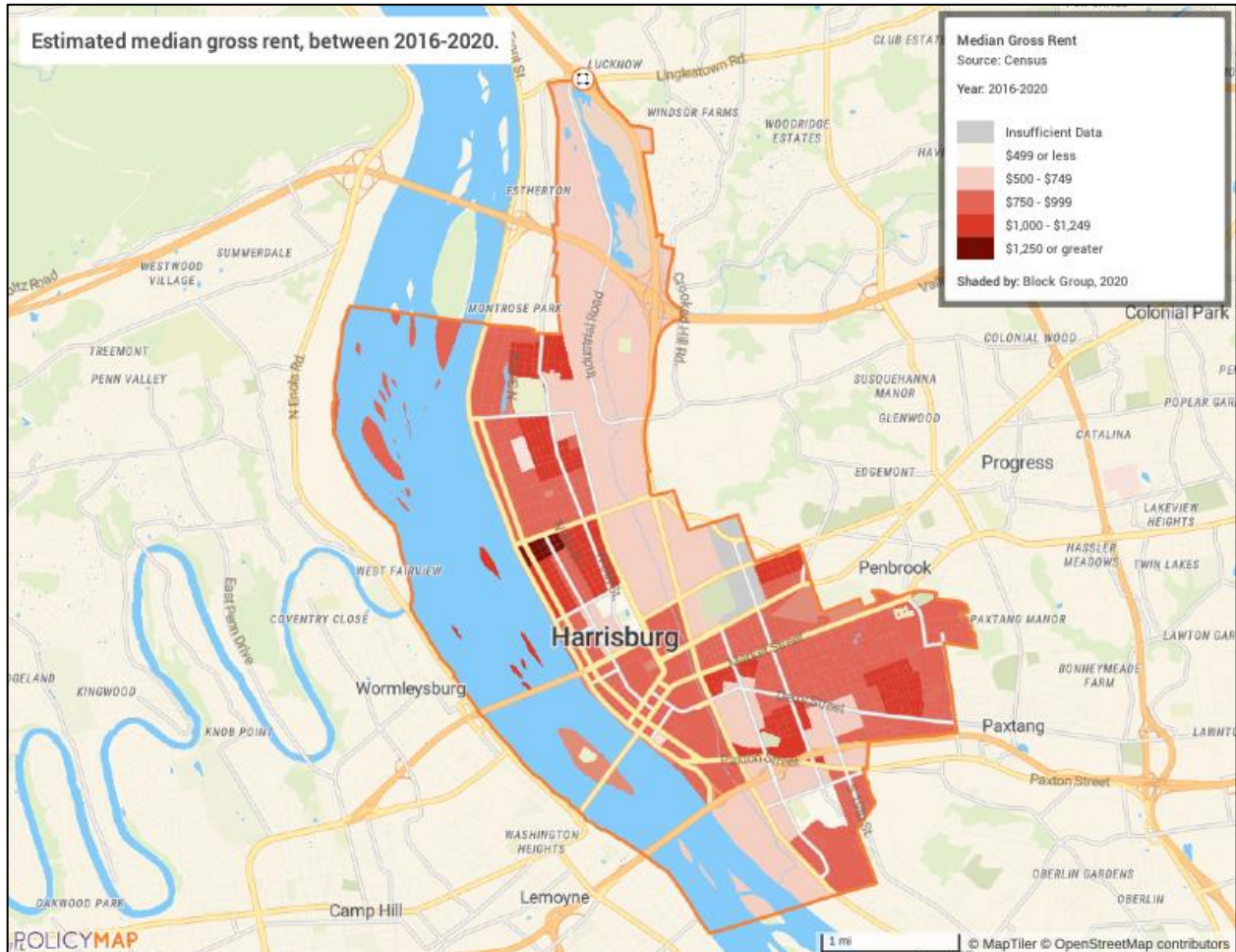


Source: United States Census Bureau ACS 2017-2020 via PolicyMap

RENTER OCCUPIED UNITS

Like owner-occupied units, median rent is related to geography, though not as closely. Tracts along the river tend to have higher rents but there is only one tract where the median rent is over \$1,250. In most of the city the median rent is between \$500 and \$1,000.

MAP: MEDIAN RENT

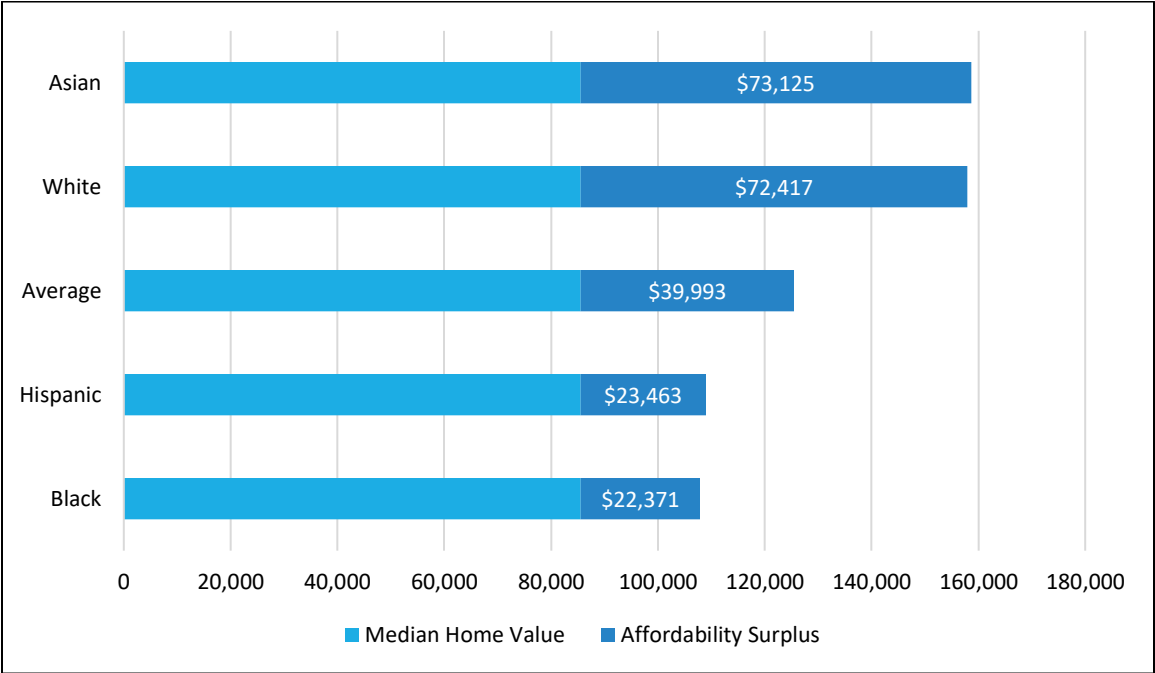


Source: United States Census Bureau ACS 2016-2020 via PolicyMap

HOMEOWNER AFFORDABILITY GAP

The homeowner affordability gap is the difference between the median home value and what is affordable for residents earning the median income by race or ethnicity. In Harrisburg, all groups have an affordability surplus. That means that each racial or ethnic group can, on average, afford a median priced home in the city. However, this does not mean that the housing demand is being met. There are multiple factors beyond price that impact home ownership.

CHART: AFFORDABILITY GAP



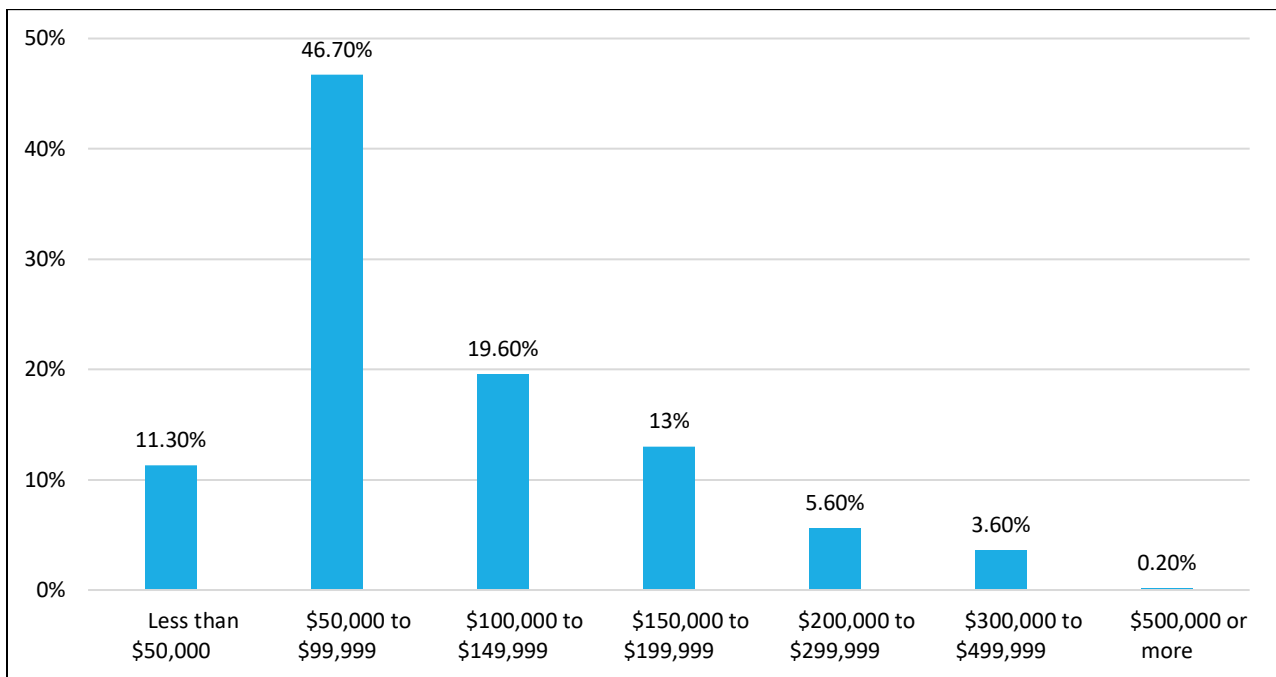
Source: United States Census Bureau ACS 2017-2020

HOME VALUE DISTRIBUTION LEVELS

The chart below shows the distribution of reported home values of owner-occupied homes in Harrisburg. The area median income (AMI) for Harrisburg was \$41,831 in 2020. Generally, households at 60%, 80%, 100% and 120% of the AMI in Harrisburg should be able to afford homes of about \$75,000, \$100,000, \$125,000 and \$150,000, respectively. Pennsylvania’s Housing Element law requires that each city and county develop local housing programs designed to meet its “fair share” of existing and future housing needs for all income groups.

In Harrisburg, 17% of rental units in 2020 had a monthly rent of \$500 or less, and 70% of units rented for \$1,000 or less monthly. Based on affordability standards defining an affordable rent at or below 30% of income, monthly rent levels at \$500 and \$1,000 are affordable to households with annual incomes of \$20,000 and \$40,000, respectively. For reference, 30% AMI is \$26,220 and 50% AMI is \$43,700.

CHART: DISTRIBUTION OF REPORTED HOME VALUES



Source: United States Census Bureau ACS 2017-2020

SECTION IV – PRIVATE LENDING ANALYSIS

LEGISLATION

FAIR HOUSING ACT 1968

“Discrimination in mortgage lending is prohibited by the federal Fair Housing Act and HUD's Office of Fair Housing and Equal Opportunity actively enforces those provisions of the law. The Fair Housing Act makes it unlawful to engage in the following practices based on race, color, national origin, religion, sex, familial status or handicap (disability):

- Refuse to make a mortgage loan or refinance a mortgage loan;
- Refuse to provide information regarding loans;
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees;
- Discriminate in appraising property;
- Refuse to purchase a loan or set different terms or conditions for purchasing a loan; and
- Discriminate in providing other financial assistance for purchasing, constructing, improving, repairing, or maintaining a dwelling or other financial assistance secured by residential real estate.”¹

HOME MORTGAGE DISCLOSURE ACT

The Home Mortgage Disclosure Act (HMDA), enacted by Congress in 1975, requires that mortgage lenders make loan data public. HMDA tracks information to ensure that fair and safe home financing is available in all geographic areas including urban neighborhoods. This information is made available to highlight whether or not lending institutions are servicing the neighborhoods and communities in which they are located. HMDA data is a useful tool in accessing lending practices and trends within a jurisdiction. The Consumer Financial Protection Bureau oversees HMDA compliance. Data collected and reported on includes applications, approvals and denials, loan amount, type of loan, applicant demographic information, property type, and census tract. This information is released annually each September. Since enactment of the HMDA in 1975, lending institutions have been required to collect and publicly disclose data regarding applicants including: location of the loan (by Census tract, City, and MSA); income, race and gender of the borrower; the number and dollar amount of each loan; property type; loan type; loan purpose; whether the property is owner-occupied; action taken for each application; and, if the application was denied, the reason(s) for denial. Property types examined include one-to-four family units, manufactured housing, and multi-family developments.

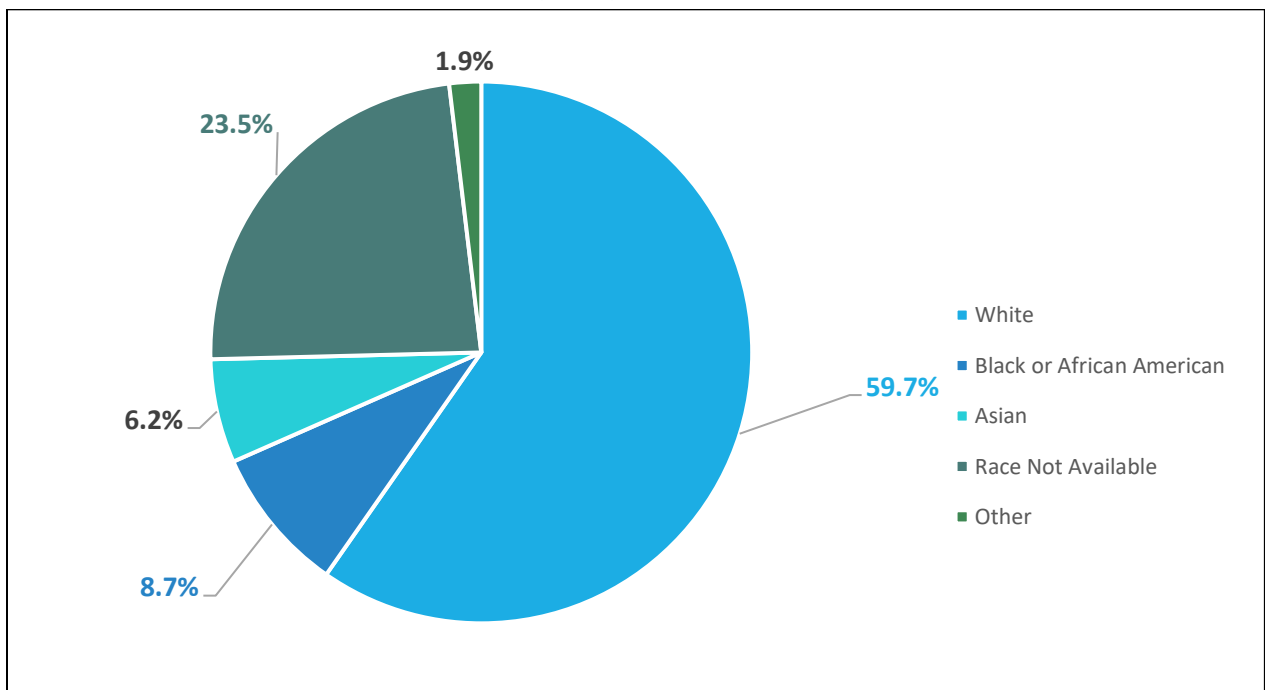
¹ https://www.hud.gov/topics/fair_lending

ANALYSIS

Citywide lending practices were analyzed using data gathered from lending institutions in compliance with the Home Mortgage Disclosure Act. It is recommended that the analysis of HMDA data be tempered by the knowledge that no one characteristic can be considered in isolation but must be considered in light of other factors. For instance, while it is possible to develop conclusions simply based on race data, it is more accurate when all possible factors are considered, particularly in relation to loan denials and loan pricing. According to the Federal Financial Institutions Examination Council (FFIEC), “with few exceptions, controlling for borrower-related factors reduces the differences among racial and ethnic groups.” Borrower-related factors include income, loan amount, lender, and other relevant information included in the HMDA data.

Not all HMDA data is available at the city-level. The following data covers the entirety of Dauphin County. Most applicants in 2021 were White at 59.7%. Black applicants represented 8.7% of all home purchase applications, and nearly one-quarter of applicants did not provide racial information. Without additional information about the applicants who did not provide racial data it is not possible to determine whether the share of applicants varied from the population as a whole.

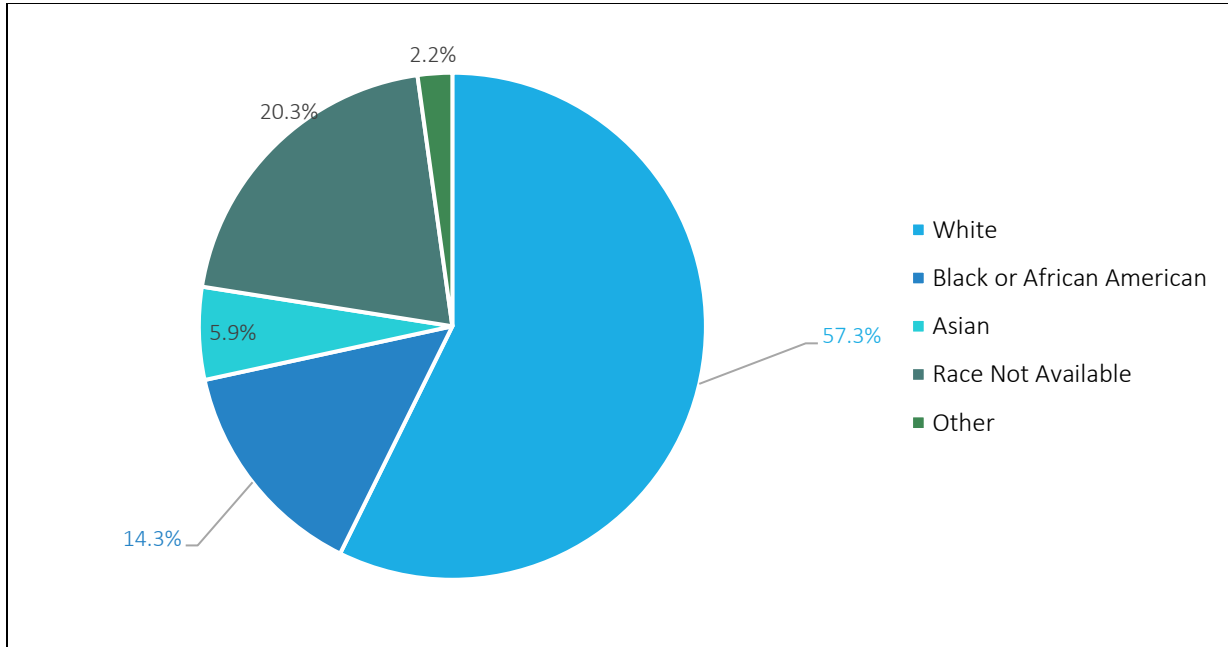
CHART: APPLICANTS BY RACE/ETHNICITY (2020)



Source: HMDA

In Dauphin County, the most significant discrepancy is denials by race. Black or African American households were 8.7% of applicants, but made up 14.3% of all denials. As mentioned above, this alone does not prove discrimination or illegal activity. However, it does show a problem that warrants analysis and an opportunity to provide more targeted support for future homeowners.

CHART: DENIALS BY RACE/ETHNICITY



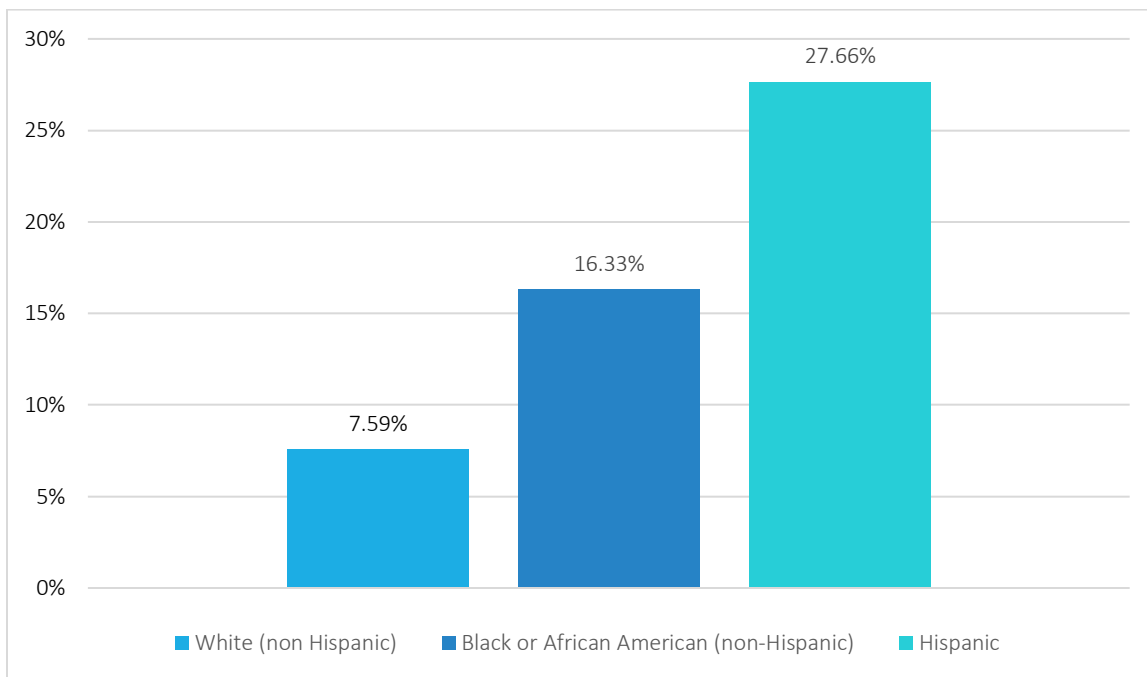
Source: HMDA

HIGH-COST LENDING BY RACE OR ETHNICITY

In 2010, HMDA adjusted its calculations to identify high-cost lending more accurately. A loan is considered “high-cost” when the APR on the loan is 1.5% higher than the average prime offer rate for a first lien loan or more than 3.5% higher for a second lien loan. In Harrisburg, approximately 9.4% of all loans were high-cost loans. This is nearly three times the statewide rate of 3.4%.

The following chart compares the frequency of high-cost loans by race and ethnicity. Due to the limited sample size, enough data is available for only White (non-Hispanic), Black or African American (non-Hispanic), and Hispanic households. Over one-quarter of all loans to Hispanic households were high-cost, which is significantly higher than other groups. White (non-Hispanic) households reported the lowest rate of high-cost loans at 7.6%.

CHART: PERCENT OF LOANS BY RACE OR ETHNICITY



Source: HMDA

SECTION V – PUBLIC PROGRAMS AND POLICIES

CITY ASSISTANCE PROGRAMS

Harrisburg seeks a proactive role and has implemented a range of public policies that encourage affordable housing opportunities through a variety of programs. Key policies and programs most relevant that support the expansion of affordable and fair housing in Harrisburg include:

Policy 1: Use of American Rescue Plan Funding

The city utilized part of the American Rescue Plan (ARP) funding to help meet the housing and supporting needs of the community’s most vulnerable population. A portion of these federal funds is being used to assist with affordable rentals for the homeless.

Policy 2: Offer Tax Abatement for Residential Improvements

The city’s revised tax code provides for a 10-year tax abatement and exemption program for qualifying residential improvements and new housing construction in deteriorated neighborhoods.

Policy 3: Require Residential Rental Property Inspection

The city has a rental housing inspection program to address older housing units that are in continuous need of maintenance and contribute to the high cost of housing. The city’s code enforcement system requires inspection when a property is transferred or sold, in conjunction with a rental program requiring inspections of rental housing every three years.

Policy 4: Broad-minded 2020 Comprehensive Plan (HBG2020)

The 2020 Comprehensive Plan identifies critical challenges and recommends a wide range of public policies to address housing needs in the city. The active implementation of this plan will strengthen the city’s neighborhoods and efforts to attract new housing investment and improve the city’s housing supply.

Policy 5: Encourage City Residency for Municipal Employees

The city conducts outreach efforts to city employers and new city hires to encourage new employees to purchase and reside in existing Harrisburg housing units.

Policy 6: Use of the Local Economic Revitalization Tax Act Program

To promote and encourage new development as well as the rehabilitation of existing structures, the city enabled the use of the Local Economic Revitalization Tax Act Program (LERTA) in 2015. This important financial tool assists in the eventual tax base increase, the creation of jobs, and overall city redevelopment. The Harrisburg School District and Dauphin County each endorsed and participate in this incentive.

The Pennsylvania law allows municipalities, counties, and school districts to waive or defer property taxes on the increased value of improved properties in distressed areas. LERTA acts as an incentive where development may not occur by making some projects financially feasible. Since Harrisburg’s adoption, the 10-year property tax break has helped stimulate the rehabilitation of small, existing residential properties.

GENERAL PLAN

The City of Harrisburg 2020 Comprehensive Plan is a policy document that sets forth the framework necessary for orderly growth and development reflecting the community's values today, while anticipating the needs, wants, and desires of future generations.

The Comprehensive Plan's Housing Section² establishes goals, objectives, and actions that the city will take to respond to local housing conditions and needs. The Comprehensive Plan identified several key housing issues in the city. A large majority of the city's housing stock was built before 1960. The age of the housing stock contributes to multiple issues such as deferred maintenance and a high number of vacant housing units. There are far more units available for sale than there are buyers. Additionally, the city's median home value is low compared to the county and state. There has been a slow increase in residential building, and new construction typically includes low-cost, stick build, suburban style models which are incompatible with the city's historic construction. Lastly, households are experiencing high rates of cost burden, meaning they spend more than 30% of their income on housing expenses. Housing cost burden leads to housing instability, and puts a strain on public housing options and the Housing Choice Voucher (HCV program) while increasing homelessness.

The Plan identified seven overarching goals to address these issues.

1. Preserve the existing housing stock.
2. Increase resident homeownership so that 50% of all housing units are owner-occupied by 2030.
3. Adopt a housing reinvestment strategy to improve the condition of the existing housing stock.
4. Adopt an inclusive and equitable development strategy to introduce mixed-value housing opportunities, especially in neighborhoods experiencing disinvestment.
5. Incentivize development throughout the city.
6. Develop area plans and targeted redevelopment area plans prior to undertaking significant development efforts.
7. Ensure quality housing is attainable and available for all city residents.

The city's comprehensive plan also includes key action items to meet these goals. Examples of these actions include increasing staff to perform building inspections, creating opportunities for construction of new market-rate homes, amending zoning codes to allow mixed-value housing options in all neighborhoods, promoting the preservation of currently affordable housing, and more. See the Comprehensive Plan for more details on actions to address housing issues in the city.

² http://s3.amazonaws.com/harrisburgpa.gov/wp-content/uploads/20200910110539/Comprehensive-Plan-DRAFT-July-2020_.pdf

HUD PROGRAMS

The City of Harrisburg receives multiple grants from the United States Department of Housing and Urban Development (HUD). These entitlement grants are awarded to urban communities on a formula basis to support affordable housing and community development activities.

The Community Development Block Grant (CDBG) program is used to plan and implement projects that foster revitalization of eligible communities. The primary goal of the program is the development of viable urban communities. Program objectives include the provision of decent housing, a suitable living environment, and expanded opportunities principally for low- to moderate-income individuals and families. The City of Harrisburg receives an annual allocation of CDBG funds from HUD, which is used to fund eligible housing, public improvements, and public service programs meeting the needs of low-to-moderate income individuals and families. Activities can include:

- Acquisition/Rehabilitation
- Homebuyer Assistance
- Homeless Assistance
- Economic Development
- Public Infrastructure & Facility Improvements
- Public Services

CDBG, HOME, and ESG funds all work to address local housing needs. In order to achieve the program objectives, each qualifying activity must meet one of the three broad National Objectives:

- a. Primarily benefit low- and moderate-income families. More specifically, 51% of the project must benefit families with incomes at or below 80% of the median income.
- b. Aid in the prevention or elimination of slum or blight. Activities considered to aid in the prevention or elimination of slum or blight are activities located within a designated area which: 1) meets a definition of a slum, blighted, deteriorated, or deteriorating area under state or local law; and 2) where there is a substantial number of deteriorating or dilapidated buildings or needed improvements throughout the area.
- c. Meet urgent community development needs. Proposed project must meet needs that have a particular urgency where existing conditions pose a serious and immediate threat to the health or welfare of the community where other financial resources are not available to meet the needs.

In addition to CDBG, the City of Harrisburg also receives Emergency Solutions Grant (ESG) funding. The primary objective of the ESG program is to assist people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. ESG funds can be used to provide a wide range of supportive services and financial assistance under the five program components: Street Outreach, Emergency Shelter, Rapid Re-Housing, Homelessness Prevention, and HMIS.

The City also receives HOME Investments Partnerships (HOME) Program funding. HOME funds are intended to create affordable housing for low-income households. The City uses HOME to fund a wide range of activities including building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to low-income people. Despite these important resources, funding levels fall short of addressing the range of housing needs in the city.

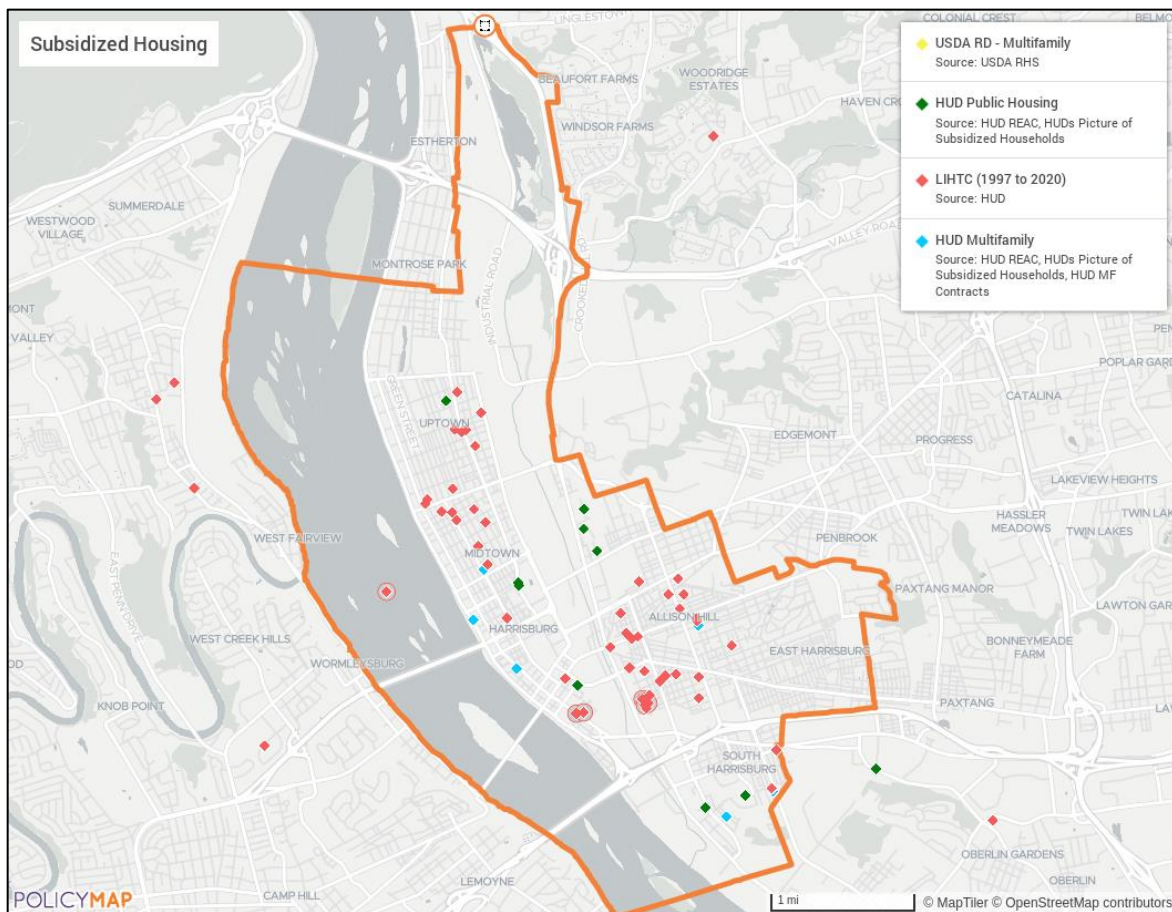
PUBLICLY SUPPORTED HOUSING

In 2021, there were 3,283 federally subsidized rental housing units in Harrisburg, Pennsylvania. These units made up 24.3% of the city's total rental stock. Of these subsidized units, 1,642 were HUD public housing units, which are owned and operated by the federal government. The remaining units were privately owned but received federal subsidies. In addition to the federally subsidized programs tracked here, some jurisdictions also have rental units that are subsidized by state or local sources.

This inventory does not include approximately 874 Housing Choice Vouchers, which are also known as Section 8 vouchers. The Housing Choice Voucher (HCV) program is a federal program that provides rental assistance to low-income households. Tenant-based HCVs can be used in any rental housing unit that meets the program's requirements. Project-based HCVs are tied to specific rental housing units. Low Income Housing Tax Credit (LIHTC). The majority of these vouchers are tenant-based, which means that they can be used in any rental housing unit that meets the program's requirements.

The average rent for a federally subsidized housing unit in Harrisburg is \$800 per month.³ The majority of the federally subsidized rental units in Harrisburg are located in the city's central and eastern areas. The waitlist for federally subsidized rental housing in Harrisburg is typically several years long.

MAP: FEDERALLY SUBSIDIZED PROPERTIES 2018



Source: HUD Multifamily DB, HUD's Picture of Subsidized Households, LIHTC

³ Pennsylvania Housing Finance Agency. (2022). Affordable housing fact sheet 2022

SECTION VI – FAIR HOUSING PROFILE

FAIR HOUSING PROGRAMS

The City of Harrisburg partners with the Harrisburg Housing Authority (HHA) to promote a variety of activities to fight housing discrimination, including free education, outreach to the community, and the investigation of housing discrimination complaints. The capacity of the partnership enables the city to provide fair housing information, outreach, and enforcement for fair housing.

The HHA abide by the nondiscrimination requirements of 24 CFR 960.203: Title VI of the Civil Rights Act of 1964 (42 U.S.C. 200d), which forbids discrimination based on race, color, religion, national origin, or sex in programs receiving Federal financial assistance. (24 CFR part 1); The Fair Housing Act of 1988 (42 U.S.C. 3601-3619), which also prohibits discrimination in housing practices based on disability in residential real estate-related transactions. (24 CFR parts 100, 108, 109, and 110); Executive Order 11063 on Equal Opportunity Housing. (24 CFR part 107); Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), which prohibits discrimination based on disability in programs receiving Federal financial assistance. (24 CFR part 8); The Age Discrimination Act of 1975 (42 U.S.C. 61016107), which prohibits discrimination based on age in programs receiving Federal financial assistance. (24 CFR part 146); Title II of the Americans with Disabilities Act. (42 U.S.C. 12101-12213); Executive Order 13166 requiring agencies and grantees to take affirmative steps to communicate with people who need services or information in a language other than English. (Improving Access to Services for Persons with Limited English Proficiency [LEP]); Obligation to Affirmatively Further Fair Housing. (24 CFR § 960.103(b) and 24 CFR §903.7(o)); Violence Against Women Act. Title IV, sec. 40001-40703 of the Violent Crime Control and Law Enforcement Act, H.R. 3355; any applicable state laws or local ordinances; and, any legislation protecting the individual rights of tenants, applicants or staff that may subsequently be enacted.

FAIR HOUSING COMPLAINTS

Housing discrimination complaints can be filed directly with HUD. In Pennsylvania the housing discrimination complaints are processed by HUD’s Philadelphia Office of Fair Housing and Equal Opportunity (FHEO). Fair housing complaints can be used as an indicator to identify heavily impacted areas and characteristics of households experiencing discrimination in housing. The Fair Housing Act lists seven prohibited bases for discrimination: race, color, national origin, religion, sex, disability, and familial status. The Fair Housing Act makes it unlawful to coerce, threaten, intimidate or interfere with anyone exercising or aiding others in enjoying their fair housing rights.

The following analysis considers fair housing complaint data filed against respondents in Harrisburg with the U.S. Department of Housing and Urban Development (HUD) between 2018 and 2022. Using this data, the report identifies and analyzes the following:

- Absolute number of complaints filed with HUD in the city
- Basis of complaints filed
- Issues of complaints filed

While conducting the analysis, several data limitations were identified. Though not exhaustive, the list below summarizes the most important limitations of the datasets. The complaint process relies on people self-reporting, and the data represents only those complaints that were filed. Due to lack of knowledge or

resources, instances of discrimination are often under-reported. Though five years of data provide a basis for simple analysis, a longitudinal approach of complaint outcomes is not possible in this analysis. HUD’s dataset only includes closed cases that were filed during this time period.

A total of 34 fair housing complaints were filed with HUD between 2018-2022. Sixteen of the complaints included disability as the sole factor or in combination with other reported issues (47%). Race was a factor in 41% of the cases. National origin, retaliation, sex, or familial status made up the other bases of complaints according to HUD data.

TABLE: FAIR HOUSING COMPLAINTS IN HARRISBURG FROM 2018 TO 2022

Filing Date	Bases
03/23/18	Sex, Disability, Retaliation
04/30/18	Sex, Retaliation
08/02/18	Disability
02/22/19	Religion
08/19/19	Race
09/16/19	Disability
01/07/20	Sex
07/20/20	Disability
08/10/20	Disability
08/18/20	Disability
09/30/20	Race, Disability, Retaliation
11/04/20	Race, Disability, Retaliation
12/29/20	Religion, Disability
01/07/21	National Origin
01/07/21	Disability
01/19/21	National Origin
01/21/21	Race, Sex
01/29/21	Race, Disability, Retaliation
02/19/21	Disability
04/22/21	Race
06/11/21	Race, Disability, Retaliation
07/30/21	Race
08/09/21	Race
09/16/21	Race
10/13/21	Disability
11/01/21	Race
02/03/22	National Origin, Sex
03/25/22	Race
04/01/22	Race, Retaliation
04/12/22	Race, Sex, Familial Status
05/02/22	Familial Status
05/12/22	Disability, Retaliation
05/19/22	Disability
05/25/22	Religion, Retaliation

Source: HUD

FAIR HOUSING ENFORCEMENT, OUTREACH, AND CAPACITY

HUD's office of Fair Housing and Equal Opportunity (FHEO) is responsible for enforcing the federal Fair Housing Act and other civil rights laws that prohibit discrimination in the sale, rental, or financing of dwellings because of race, color, national origin, religion, sex, familial status, or handicap. HUD's Region III office handles the investigation and processing of housing discrimination complaints for the region.

The City works in partnership with The Fair Housing Council of the Capital Region, Inc. to provide services related to fair housing, including landlord/tenant counseling, first time homebuyer workshops, and credit counseling. The FHCCR is the primary agency that engages in Fair Housing work within the city of Harrisburg and the greater Dauphin County area.

FOUR-FACTOR ANALYSIS AND LANGUAGE ACCESS PLAN (LAP) FOR LIMITED ENGLISH PROFICIENCY PERSONS

HUD Entitlement Programs: CDBG, HOME, ESG

Purpose: In compliance with Executive Order 13166, the City of Harrisburg has developed the following Four-Factor Analysis and Language Action Plan (LAP) for Limited English Proficiency (LEP) persons residing in Harrisburg. The following document covers the City of Harrisburg as a whole. An additional analysis will be conducted on each program if necessary.

History: Under Federal law Title VI of the Civil Rights Act of 1964, discrimination was made illegal in programs that received federal financial assistance. For LEP persons, it protects individuals on the basis of their race, color, or national origin. In certain situations, failure to ensure that persons who have LEP can effectively participate in, or benefit from, federally assisted programs may violate Title VI's prohibition against race/ethnicity and national origin discrimination.

Persons who, as a result of their race/ethnicity and national origin, and who do not speak English as their primary language and have limited ability to speak/read/write or understand English may be entitled to language assistance under Title VI in order to receive City services, benefits, and/or participate in City sponsored programs.

Four-Factor Analysis: When a recipient has undertaken efforts to comply with regulations requiring the needed translation of materials. There is no specific method for ensuring compliance but undertaking a four-factor analysis, adoption of a Language Access Plan (LAP) for vital materials and making necessary translation will be "strong evidence" of compliance.

Factor 1: Determine the number or proportion of LEP persons in the eligible service population. HUD provides the following guidance for what documents should be provided and when:

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more LEP persons in eligible population	Translate vital documents
>5% of eligible population and more than 50 are LEP persons	Translate vital documents
>5% of eligible population and 50 or less are LEP persons	Translated written notice of right to receive free oral interpretation of documents
5% or less of eligible population and less than 1,000 are LEP persons	No written translation required

Factor 2: The frequency with which LEP persons come in contact with the program.

Factor 3: The nature and importance of the program, activity, or service

Factor 4: The resources available and costs to the recipient

Examples of language assistance includes but is not limited to oral interpretation, bilingual staff, telephone service lines interpreter, written translation services, notices to staff and recipients about the availability of LEP services; or referrals to community liaisons. When the four-factor analysis is complete the jurisdiction should produce a Language Access Plan and follow through with the plan.

Factor 1: Size of LEP Population

Overall, Harrisburg has a significant limited English proficiency population that may require translation services. In 2021, an estimated 5,251 individuals spoke English less than “very well,” representing 11.5% of the total population 5 years old or older. Spanish speaking individuals were the largest part of this group with 4,007 persons.

Due to the importance of HUD programs and the universal availability of some programs the entire jurisdiction was analyzed. Additional four-factor analyses can be conducted on a program basis with a more limited geographic range.

The table below displays the number of persons that speak a language other than English at home and how many speak English less than “very well”. The latter individuals are considered LEP. Over half of Spanish speaking persons are LEP and make up approximately 8.8% of the total population 5 years and over. This meets two criteria for LEP, which is more than 1,000 LEP persons and greater than 5% are LEP in the eligible population.

TABLE: LANGUAGE SPOKEN AT HOME – HARRISBURG, PA

Language	Speaks a language other than English		Limited English-Speaking Persons (LEP)		
	#	%	# LEP	% LEP Persons	% of Total Population*
Population 5 years and over	45,682	(X)	5,251	(x)	11.5%
Spanish	7,038	15.4%	4,007	56.9%	8.8%
Other Indo-European	1,002	2.2%	560	55.9%	1.2%
Asian and Pacific Island	675	1.5%	394	58.4%	0.9%
Other	658	1.4%	290	44.1%	0.6%

Source: 2017-2021 American Community Survey 5-Year Estimates – S1601
 *Note: The % of Total Population for LEP is the percent of LEP persons from the total population 5 years and over in Harrisburg.

Factor 2: Frequency of Contact

Housing services require ongoing communication and needs to be available throughout the year. Depending on the program specifics, procedures will vary as detailed in the LAP. Race and Ethnicity beneficiaries are reported in the City’s annual Consolidated Annual Performance Report to HUD. In the following table, it shows the race/ethnicity composition of households or individuals assisted in Harrisburg by entitlement program. Approximately 19% of households that utilized CDBG were Hispanic. Hispanic households are more likely to have Spanish-speaking LEP individuals than households of other races or ethnicities.

TABLE: RACIAL AND ETHNIC COMPOSITION OF HOUSEHOLDS/INDIVIDUALS ASSISTED

	CDBG	HOME	ESG
White	53	0	76
Black or African American	101	0	468
Asian	1	0	0
American Indian or American Native	0	0	2
Native Hawaiian or Other Pacific Islander	0	0	5
Total	155	0	551
Hispanic	28	0	71
Not Hispanic	146	0	514

Source: City of Harrisburg 2021 CAPER

Factor 3: Nature and Importance of the Program

Per the “Department of Housing and Urban Development Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons”, HUD programs play a critical role in the community and should rank high on the critical/non-critical continuum. The importance will vary depending on each program, but the housing department is critical.

Factor 4: Available Resources

Given the limited resources available, it is imperative that a cost/benefit analysis is done when considering translation efforts for each program. It is difficult to gauge whether a community’s participation (or lack thereof) is due to failed outreach efforts or if they generally do not have a need. Citywide, there is one LEP community, Spanish speaking, that warrant considering translation services. However, efforts can be made to assist other populations as needed.

In general, all documents should be available in Spanish, and it would be incredibly beneficial if a staff member could also serve as a point of contact for the Spanish LEP community. The remainder LEP populations should be targeted on a project-by-project basis. The jurisdiction should also reach out to community leaders who may be able to provide translation services. Regardless, every language mentioned above should be made aware of their right to a free oral translation of documents upon request.

Conclusion

To assist in showing strong evidence for compliance with Title VI's prohibition against discrimination, the Harrisburg Community Development Department produce a thorough Language Access Plan. This plan should provide guidance for the creation of translated documents on a program-by-program basis. Care should be taken to ensure documents are prepared ahead of time for any disaster relief to minimize delays in service for households harmed by hurricanes or similar natural disasters.

LANGUAGE ACCESS PLAN

As a result of the Four-Factor Analysis, the City of Harrisburg has determined persons with limited English proficiency who primarily speak Spanish are in-need of language assistance. For this purpose, the following types of language assistance to be provided as needed throughout HUD entitlement programs CDBG:

- Notices have been posted in Spanish in City Hall for COVID-19 events and disaster preparedness education and supply distribution. All program notices should be posted in Spanish and, when feasible, newspaper postings should be in Spanish and English.
- All public notices and published citizen participation advertisements will continue to include a statement that services and program materials are available in Spanish upon request.
- All citizen participation notices will include a statement that translators will be available at public meetings upon prior request.
- If needed, a translator may be retained to provide oral translation at public meetings and hearings, and during the implementation of the project activities (as needed for housing and public services).
- If other populations of LEP persons are identified in the future, the City of Harrisburg will consider additional measures to serve the language access needs of those persons.

SECTION VII – PROGRESS OF PAST GOALS

This section describes the progress made on implementing the actions recommended by the 2016 AI.

In October 2016, the City completed an Analysis to Impediments to Fair Housing Choice (AI) to remain in compliance with the CDBG, HOME, and ESG programs. The City found that all appropriate measures have been taken by the City's housing programs and other relevant community housing programs to not restrict housing choice to any person based on race, color, religion, sex, disability, familial status, or national origin. Housing choice has been negatively impacted by the following factors which the City has limited capability to implement corrective measures:

- Weak local economy with above average unemployment rates for Harrisburg residents;
- Elevated number of persons living in Harrisburg at or below the federal poverty line;
- High property taxes that limit the opportunity for LMI persons to achieve homeownership;
- Housing values and rental costs that continue to grow faster than household incomes;
- An extraordinarily high percentage of housing units with one or more housing problems as defined by HUD (43%)
- Economically and functionally obsolete housing stock that is cost prohibitive to improve.

In the city's 2020 Consolidated Annual Performance Evaluation Report (CAPER), the city cited the following steps taken to incentivize developers to create affordable housing.

- Partnering with private investors for a \$30 million investment initiative in the Allison Hill Neighborhood.
- Collaborating with Tri-County HDC and HHA to redesign and beautify a pedestrian walkway, add 16 new single family town homes, and 48 high quality and affordable apartments. The project included the demolition of vacant and blighted properties while increasing homeownership in the neighborhood.
- Tri-County received funding from the CDBG program as well as a \$350,000 grant from the Harrisburg Impact Project, a non-profit committed to redeveloping Harrisburg, to complete 48-unit apartment units spread over three new buildings and will be available to residents who make less than 60% AMI.
- Section 7-301.2 PURPOSE of the zoning code was enacted in 2014 to promote, protect, and facilitate the public health, safety, and general welfare; and protect existing residential neighborhoods and to provide diverse housing opportunities, including housing that is affordable. The City is also considering other options for new housing development to increase the supply of affordable housing units.

In its' 2021 CAPER, the city reported the following actions taken to address impediments to fair housing choice and affordable housing:

- The City has addressed low homeownership rates among minority households by actively marketing decent, safe and affordable home purchase opportunities in outlets that target the City's predominately minority population. This includes advertising on the City's website, newspaper advertisements, outreach to City employers and new City hires, and attendance at City and regional homebuyer expos.
- The City has also, through the activities in its community and housing development programs, worked to address high housing costs, housing problems and remove obsolete housing stock as identified in the AI. In PY 2021, the City assisted 81 LMI homeowner households with housing

rehab activities to remove lead and structural deficiencies.

In 2017, the city and HHA collaborated to produce a joint Assessment of Furthering Fair Housing (AFFH) Plan designed to provide meaningful goals and strategies that can be reasonably expected to achieve a material positive change in disparities in housing need and in access to opportunity. Some of these strategies included:

- Replacing segregated living patterns with truly integrated and balanced living patterns;
- Transforming racially or ethnically concentrated areas of poverty into areas of opportunity; and,
- Fostering and maintaining compliance with civil rights and fair housing laws.

The city continues to pursue each of these strategies. As noted in the AI, the city has limited funding and capacity to address many of the impediments identified but continues to seek solutions and strategies to affirmatively further fair housing choice.

SECTION VIII – SUMMARY OF IDENTIFIED IMPEDIMENTS

This section reviews fair housing issues, barriers to fair housing choice in Harrisonburg, and outlines actions to address these barriers. The impediments to fair housing choice are presented in three categories:

- **Fair Housing Related Impediments**
- **Affordable Housing Impediments**
- **Fair Housing Action Plan**

The conclusion of this analysis has identified several current impediments to fair housing choice, some of which are related to those identified in the previous Analysis of Impediments.

Recommendations have been identified that can help alleviate these impediments by moving the City of Harrisonburg forward. Key findings identified in this analysis to fair housing choice are:

1. Low Median Household Income
2. Large Number of Absentee Landlords
3. Inadequate Access to Mortgage Counseling
4. Older Housing Stock
5. Deferred Housing Maintenance
6. High Number of Vacant Housing Units
7. Growing Amount of Overcrowded Housing
8. Low Home Values
9. Long Waiting List for Public Housing
10. Limited Property Tax Base
11. Growing and High Percentage of Housing Cost Burdened Households
12. Limited Demand for Housing Construction and Housing Surplus
13. Outdated Zoning Code
14. Shortage of Beds for the Homeless
15. Reduction of Housing Funds

FAIR HOUSING-RELATED IMPEDIMENTS

Impediment 1: Low Median Household Income

Harrisburg's households' median income of \$41,831 in 2020 is less than the median incomes of the county, state, and nation. Over 29% of the city's households make less than 30% of area median income which limits housing access. The city, as a whole, is an LMI area with 70.8% of the residents classified as low-to moderate-income households. As a result, 100% of federal entitlement funds are available to be used throughout the city. Furthermore, residents' income and wages are not keeping pace with rising housing costs, and the overall cost of living and homeownership is even more out of reach for many residents.

Impediment 2: Large Number of Absentee Landlords

There were frequently expressed concerns from residents during the CDBG public comment period and public participation process about the number of absentee landlords. Unfortunately, many absentee landlords tend to be less responsive to housing maintenance needs or neglect these needs.

Impediment 3: Inadequate Access to Mortgage Counseling Services

Predatory mortgage lending, which provides low-income households with higher interest rates and costs, can create a financial burden. The lack of education and limited information about residential lending practices, the use of credit, and other financial literacy skills disadvantage low-income households as well as first-time buyers. Although opportunities exist in Harrisburg for learning about credit and purchasing a home, many households are often not aware of the resources and, therefore, do not avail themselves of such services until they are in foreclosure or unable to make their house payments.

AFFORDABLE HOUSING IMPEDIMENTS

Impediment 4: Older Housing Stock

Over 90% of owner and renter-occupied housing units in the city were built before 1980 and 82% constructed prior to 1970. Homes that are more than 50 years of age or older contribute to the need for higher maintenance and repair costs. Although age does not necessarily imply the house's condition, it does require increased maintenance. In addition to the housing stock age, many Harrisburg residents are increasingly living in blighted communities.

Impediment 5: Deferred Housing Maintenance

Given the significant deferred housing maintenance issues, the city is at risk of losing historic housing stock that can never be replaced. Due to the city's slow population growth and new housing unit construction, it is unlikely that replacement housing units will be of similar size or have similar levels of masonry or carpentry detail. The potential loss of these older units will diminish the character of these older neighborhoods.

Impediment 6: High Number of Vacant Housing Units

Harrisburg has the highest rental housing vacancy rate in the state and more than double the vacancy rate of Dauphin County. Nearly 20% of the city's housing units were reported vacant in 2018 according to the U.S. Census. This vacancy rate grew from 15.4% in 2000 and 19.2% in 2010. This rate reflects not only a lack of demand but can contribute to a decline in property values, deferred maintenance, and neighborhood blight.

Impediment 7: Growing Amount of Overcrowded Housing

The U.S. Census defines "overcrowding" as more than one person per room. In Harrisburg, crowded housing conditions since 2010 have increased from 365 housing units to 560 units in 2020, an increase of 195 units or 53%.

Impediment 8: Low Home Values

Dauphin County officials state that in parts of the city, the value of homes is too low relative to the cost of renovation or new construction, and it makes it difficult to support a capital investment without a government subsidy. Consequently, subsidies are routinely needed to renovate vacant housing units.

Impediment 9: Long Waiting List for Public Housing

The Harrisburg Housing Authority owns and operates nine housing developments, which contain 1,725 affordable rental units, and administers 990 housing choice vouchers. However, federal resources for housing programs, such as Housing Choice Vouchers (Section 8), do not match the need. There were 1,623 households on the waiting list in 2017. The housing authority's voucher program has an annual turnover of 25%. Consequently, persons who were issued a housing voucher may expect an average of 23 months on the waiting list.

Impediment 10: Limited Property Tax Base

Harrisburg has a unique role as the Pennsylvania State Capitol and Dauphin County seat. As a result, there is an unusually high number of government owned parcels that do not pay property taxes, which limits the city's property tax base. The presence of many non-profit, tax-exempt organizations further compounds this limited municipal tax base.

Impediment 11: Growing and High Percentage of Housing Cost Burdened Households

The city has a high percentage of cost burdened households totaling 38.5% of all renters and homeowners. The percentage of renter households is double the percentage of households in owner-occupied units. The 2018 income figures reflect a decline in the number and percentage of owner-occupied households since 2010 but an increase of 1,377 renter-occupied households since 2000.

TABLE: COST BURDENED HOUSEHOLDS 2018

Household Type	Total Occupied 35.1%	Cost Burdened	Percent of Total
Owner Occupied	7,022	1,677	23.9%
Renter Occupied	12,801	5,959	46.6%
Total Occupied Units	19,823	7,636	38.5%

Source: U.S. Census 2014 – 2018 American Community Survey.

Impediment 12: Limited Demand for New Housing Construction and a Housing Surplus

Assuming the city's average overall household size is 2.29 persons, as provided in the 2020 U.S. Census, the projected number of households in 2040 to support the projected population shows that the number of housing units within the city currently will satisfy the population projection.

Population projections show that the recommended number of housing units within the city currently will satisfy the number of housing units that will be needed in 2040. It is estimated that there may be more than 5,000 units than needed, based solely on average household size. This surplus provides opportunities to provide or repurpose to maintain and increase affordable housing.

Impediment 13: Outdated Zoning Code

The city's 2020 Comprehensive Plan (HBG2020) identifies a range of desirable zoning changes that can facilitate new housing investment and development. Several traditional zoning practices and codes in the city create undesirable, inflexible, and inefficient economic and use segregations that the city must address.

Impediment 14: Shortage of Beds for the Homeless

There is a demand for more beds for the homeless. The city is part of the Capital Area Coalition on Homelessness (CACH) whose primary purpose is to be responsible for strategic planning, development, and delivery of services and shelter for persons who are homeless. The 2018 Point in Time Survey identified 445 persons as being homeless in Harrisburg and Dauphin County. As of 2018, within Dauphin County and the city, there were 285 emergency shelter beds, 25 safe haven beds, 180 transitional housing beds, and 218 permanent supportive beds to serve the homeless population.

Impediment 15: Reduction in Housing Funds

There is a decline and a shortage of local and federal funding for housing related programs including with the Harrisburg Housing Authority.

SECTION IX – FAIR HOUSING ACTION PLAN

The City of Harrisburg recognizes that important steps and programs are required to mitigate many of these barriers to affordable housing including a combination of planning, legal and financial tools. These recommended actions seek to not only build on existing policies but offer new or expanded actions to stimulate residential investment and increase the supply of affordable housing in the city. Therefore, the following actions will further the city's housing objectives.

Action 1: Expand Demolition Program

The city can improve blighted areas through an increase in the demolition of existing vacant structures that are dangerous and/or contributing to blight. Demolishing buildings reduces risks to public safety, eliminates blight, and promotes economic renewal. The city needs to prioritize demolition in targeted housing areas for redevelopment and site assembly for redevelopment.

Action 2: Expand First-Time Homebuyer's Program

The city participates in the Dauphin County First-Time Homebuyer's Program, which provides second or subordinated loans to eligible first-time homebuyers of Dauphin County homes. Increased funding for this program must be a priority.

Action 3: Address Home Lending Practices

The city needs to continue to address and publicize predatory home lending issues by partnering with the Task Force of South-Central Assembly for Effective Governance. This effort requires the city to work more actively with financial institutions and in the real estate finance processes that inhibit the development of housing and the purchase of housing by owner-occupants. These efforts should also include improving knowledge and awareness of the Fair Housing Act; related housing and discriminatory laws and regulations; and continue to educate and make residents aware of their rights under the Fair Housing Act and the Americans with Disabilities Act (ADA).

Action 4: Expand Housing Renovations

The city needs to actively explore and seek to increase grant and/or loan funding incentives for the renovation of the existing housing stock for low to moderate-income households and develop a sustainable funding strategy for an on-going housing renovation program.

Action 5: Expand Scattered Sites Opportunities

Harrisburg officials need to identify private partners with a goal of adding more affordable housing to the Harrisburg Housing Authority's Scattered Site program and a possible Rental Assistance Demonstration conversion and/or Low-Income Tax Credit program (LIHTC) to provide funding for needed improvements to their current residential properties.

Action 6: Provide Leadership and Support to End Homelessness

Residents and city officials need to provide leadership participation in the Capitol Area Coalition of Homeless (CACH), the City's designated lead entity for housing and services to families experiencing homelessness. This action includes adopting and utilizing CACH's Blueprint to End Homelessness and actively participate in its implementation.

Action 7: Preserve the Existing Housing Stock

The city should increase its code enforcement staff to inspect, stabilize, and preserve existing buildings. This includes targeted, equitable, and effective code enforcement for safe and healthy housing free of hazardous conditions, ensuring that renter-occupied housing is maintained and operated according to the minimum standards established in the City's Building Maintenance Code.

Action 8: Actively Plan for Redevelopment

Where land use is transitioning, the city should prepare detailed area master plans to prepare for residential redevelopment. This action will identify areas throughout the city as the most appropriate locations for new construction and use existing tools such as the City of Harrisburg Land Bank, HRA, and the Vacant Property Review Board to assemble land for future development. The city should actively encourage the acquisition of housing by non-profit organizations, land trusts, or tenants to protect housing from upward pressures of prices and rents, along with developing neighborhood reinvestment plans to promote the revitalization of neighborhood commercial centers, introduction of contemporary housing types, and infrastructure rehabilitation.

Action 9. Develop a Vacant Housing Registry

The city should create and maintain a housing dashboard of metrics to monitor housing inspection, demolition, new housing construction, renovation activity, and other housing related benchmarks.

Action 10: Strongly Promote the Use of LERTA

LERTA is one of the most important financial tools available to the city to encourage renovation and rehabilitation. The city should develop marketing strategies to better inform residents, realtors, lenders, developers, and others of the benefits of the program.

Action 11: Revise the City's Zoning Code

Amend the Zoning Code to allow mixed-value housing options to occur in all neighborhoods. This includes allowing higher residential densities in moderate density multi-family zones for housing that is limited to elderly or disabled households. These revisions should also incorporate new housing options such as:

- a. Allowing higher residential densities in moderate density multi-family zones for housing that is limited to elderly or disabled households (e.g., active adult or age-restricted communities), due to their lower traffic generation and parking impacts.

- b. Utilizing cohousing--a community designed to have physical spaces that allow neighbors to interact with others just outside private homes easily, including a common kitchen, dining space, and gardens to bring people together.
- c. Allowing collaborative living where residents share living space and a set of interests, values, or intentions. Co-living tends to be urban and integrated into a single building, house, or apartment.
- d. Supporting cooperatives where the owners of each unit and resident are shareholders.
- e. Enabling the establishment of hostels that offer low-cost, short-term shared sociable lodging where guests can rent a bed, usually a bunk bed in a dormitory, with shared use of a lounge and sometimes a kitchen.

CONCLUSION

As this Analysis of Impediments to Fair Housing Choice has identified, the City of Harrisburg continues to face various challenges addressing the barriers of fair housing choice, especially affordable housing for low- and moderate-income households. Citywide leadership continues to press forward with actionable policy and community-oriented results to affirmatively further fair housing choice.

In collaboration with the community residents, housing stakeholders, and the numerous non-profit and for-profit partners, the city can build on recent improvements, city strengths, and opportunities to increase fair housing choice moving forward. The Fair Housing Action Plan included in this AI can serve as a roadmap for both policymakers and the public to focus efforts and advance fair housing choice in the near future. These goals easily align with the city's vision described in its 2020 Comprehensive Plan. The city can further leverage its CDBG and HOME funding and public programs to assist the realization of these goals. The actions listed will be addressed over the next five years, aligning the accomplishments of these actions with the consolidated planning cycle.

In conclusion, implementation of these actions will support the affordable housing needs in the City of Harrisburg and expand the amount of affordable housing and further fair housing practices. Although all the impediments will not likely be eliminated in a short time period, such as five years, the City of Harrisburg will strive to affirmatively further fair housing and reduce these barriers to promote fair housing choice.

APPENDIX

FEDERAL FAIR HOUSING LAWS

Federal laws provide the backbone for U.S. fair housing regulations. A brief list of laws related to fair housing, as defined on the U.S. Department of Housing and Urban Development's (HUD's) website, is presented below:

Fair Housing Act Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18), and handicap (disability).

Title VIII was amended in 1988 (effective March 12, 1989) by the Fair Housing Amendments Act. In connection with prohibitions on discrimination against individuals with disabilities, the Act contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.

Title VI of the Civil Rights Act of 1964. Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.

Section 504 of the Rehabilitation Act of 1973. Section 504 prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

Section 109 of the Housing and Community Development Act of 1974. Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development Block Grant Program.

Title II of the Americans with Disabilities Act of 1990. Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

Architectural Barriers Act of 1968. The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 be accessible to and useable by handicapped persons.

Age Discrimination Act of 1975. The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

Title IX of the Education Amendments Act of 1972. Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.

FAIR HOUSING RELATED PRESIDENTIAL EXECUTIVE ORDERS

Executive Order 11063. Executive Order 11063 prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

Executive Order 11246. Executive Order 11246, as amended, bars discrimination in federal employment because of race, color, religion, sex, or national origin.

Executive Order 12892. Executive Order 12892, as amended, requires federal agencies to affirmatively further fair housing in their programs and activities, and provides that the Secretary of HUD will be responsible for coordinating the effort. The Order also establishes the President's Fair Housing Council, which will be chaired by the Secretary of HUD.

Executive Order 12898. Executive Order 12898 requires that each federal agency conduct its program, policies, and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color, or national origin.

Executive Order 13166. Executive Order 13166 eliminates, to the extent possible, limited English proficiency as a barrier to full and meaningful participation by beneficiaries in all federally assisted and federally conducted programs and activities.

Executive Order 13217. Executive Order 13217 requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.