

2016 Assessment of Fair Housing



Dauphin County Department of Community and Economic Development

Housing Authority of the County of Dauphin



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I. Cover Sheet

1. **Submission date:** January 13, 2017
2. **Submitter name:** Debra Laudenslager
3. **Type of submission (e.g., single program participant, joint submission):**
Joint Submission: Dauphin County, PA and Housing Authority of the County of Dauphin
4. **Type of program participant(s)(e.g., consolidated plan participant, PHA):**
Consolidated Plan Participant, PHA
5. **For PHAs, Jurisdiction in which the program participant is located:**
Dauphin County, PA
6. **Submitter members (if applicable):**
7. **Sole or lead submitter contact information:**
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 - b. **Title:** Executive Director
 - c. **Department:** Dauphin County Department of Community and Economic Development
 - d. **Street address:** 112 Market Street, 7th Floor
 - e. **City:** Harrisburg
 - f. **State:** PA
 - g. **Zip code:** 17101
8. **Period covered by this assessment:**
October 1, 2017 through September 30, 2022
9. **Initial, amended, or renewal AFH:**
Initial

- To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;
- The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

All Joint and Regional Participants are bound by the certification, except that some of the analysis, goals or priorities included in the AFH may only apply to an individual program participant as expressly stated in the AFH.

Signature

Date

William Pettigrew, Sr.

Chairman, Housing Authority of the County of Dauphin

Signature

Date

Jeff Haste

Chairman, Dauphin County Board of Commissioners

10. Departmental acceptance or non-acceptance:

Signature

Date

II. Executive Summary

1. Summarize the fair housing issues, significant contributing factors, and goals. Also include an overview of the process and analysis used to reach the goals.

The preparation of this Assessment of Fair Housing (AFH) serves as a component for the efforts of Dauphin County and the Housing Authority of the County of Dauphin to satisfy the requirements of the Housing and Community Development Act of 1974. This Act requires that any community receiving Community Development Block Grant (CDBG) funds and all public housing authorities to affirmatively further fair housing.

The federal Fair Housing Act prohibits discrimination in housing based on a person's race, color, religion, gender, disability, familial status, or national origin. In addition, the U.S. Department of Housing and Urban Development (HUD) issued a Final Rule on February 3, 2012 that prohibits entitlement communities, public housing authorities, and other recipients of federal housing resources from discriminating on the basis of actual or perceived sexual orientation, gender identity, or marital status. Persons who are protected from discrimination by fair housing laws are referred to as "members of the protected classes."

This AFH is a review of demographic data, metrics of discrimination and disparity, and local regulations and administrative policies, procedures, and practices that affect the location, availability, and accessibility of housing. It also assesses the conditions, both public and private, that affect fair housing choice.

A central component of the AFH consisted of countywide dialogue on the trends and issues relating to housing. This public engagement process solicited multiple perspectives including those of government agencies, fair housing advocates, housing developers, non-profit organizations, and the general public.

Two public meetings and nine stakeholder group interviews, plus additional phone conversations as needed, were conducted between June and July of 2016, with one additional public hearing to be held in September to receive public comment on the proposed AFH before final action and submission to HUD.

The combination of quantitative data analysis and qualitative research resulted in Dauphin County and the Housing Authority identifying a series of factors that contribute to fair housing issues. These contributing factors were assigned three priority levels based on the amount and strength of the supporting evidence that initially identified the factor:

- High – factors that limit or deny fair housing choice or access to opportunity, as well as other factors that are urgent or establish a foundation for future actions
- Medium – moderately urgent or building on prior actions
- Low – limited impact on fair housing issues

The contributing factors are organized into groups that align with the issues discussed in the Fair Housing Analysis section of the AFH: (B)(i) Segregation/Integration; (B)(ii) Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs); (B)(iii) Disparities in Access to Opportunity; (B)(iv) Disproportionate Housing Needs; (C) Publicly Supported Housing; (D) Disability and Access; and (E) Fair Housing Enforcement, Outreach Capacity, and Resources. Some contributing factors appear for multiple issues.

Table A: Contributing Factors

Contributing Factor	Priority	Discussion
(B)(i) Segregation/Integration		
Community opposition	Medium	Stakeholders cited examples from multiple areas of Dauphin County in which residents vocally opposed any new housing development that would accept Section 8. Some school districts also oppose affordable housing development because they do not want more children enrolling in their schools. The fact that strong community opposition, although uncommon to this degree in Dauphin County, can derail both real and potential affordable housing projects makes addressing this factor moderately urgent.
Private discrimination	Medium	Stakeholders indicated that race relations were strained in many areas of Dauphin County, and some residents may block affordable housing due to fears of racial or ethnic minorities moving into their neighborhoods. Efforts should be made to change public perception regarding affordable housing, multi-family housing, public transit systems, and other targets of “NIMBY-ism”.
Lack of public investments in specific neighborhoods, including services or amenities	Low	Transportation outside of the immediate Harrisburg area is infrequent and does not cover large portions of Dauphin County. Transit is often unavailable for second-shift or third-shift workers, which are more common shifts for entry level positions in the emerging warehousing industries. Inadequate transportation systems limit transit-dependent residents’ housing choices to the Harrisburg area rather than higher-opportunity areas in Dauphin County.

Contributing Factor	Priority	Discussion
Location and type of affordable housing	High	There is not enough affordable housing in Dauphin County to satisfy need. In addition to the quantity of affordable housing, the location of affordable housing is a major influence on segregation and integration. Dauphin County's most segregated neighborhoods (tracts 101, 102, and 700) contain some of the more affordable rental options in the County. In addition, over 25% of the Authority's Housing Choice Vouchers are used in Steelton's zip code, indicating that residents may have a difficult time finding affordable units in other areas of the County.
(B)(ii) R/ECAPs		
Lack of private investments in specific neighborhoods	Medium	Some landlords utilize exploitative leases on low-income renters who may not have legal experience to understand the implications of certain sections. Education and outreach on tenants' rights and leasing, especially towards renters in neighborhoods with concentrations of substandard housing. While the Housing Authority provides fair housing literature to landlords in Dauphin County, it does not regularly organize training or outreach to the private sector. The Housing Authority could host more regular landlord-oriented fair housing events and training.
Location and type of affordable housing	High	See above.
Land use and zoning laws	Medium	Dauphin County does not have a formal protocol in place to monitor and evaluate the zoning ordinances of its subrecipients for discriminatory language or provisions. As a result, it may be funding municipalities that do not affirmatively further fair housing choice in their zoning ordinance. Either Tri-County Regional Planning Commission or Dauphin County could also offer model language and policies for municipalities in order to establish best practices for fair housing.
(B)(iii) Disparities in Access to Opportunity		
The availability, type, frequency, and reliability of public transportation	High	According to local stakeholders, Dauphin County's transit system does not provide access to employment centers or certain critical community amenities such as medical centers in the City of Harrisburg and emerging commercial corridors in Cumberland County. Capital Area Transit's budget is extremely limited, and expanding coverage and/or frequency in one area will detract from another. However, due to the dependence of CAT on state government employees for ridership, its routes are frequently mismatched with those of the protected classes in the community.
Lack of private investments in specific neighborhoods	Low	Stakeholders repeatedly cited a lack of affordable child care options in Dauphin County. This restricts housing options for families with children, especially single-parent families. Inadequate child care also makes it more difficult for families with children to obtain employment, education, or job training. This may restrict housing choice to low-opportunity areas. This is also true of medical centers, which are lacking in northern Dauphin County.

Contributing Factor	Priority	Discussion
Location of employers	High	This contributing factor is closely tied to others concerning public transportation. Numerous major employers are located outside the county, or are located within the City of Harrisburg but are outside the reach or convenience of the current bus routes. This is especially true for residents of northern Dauphin County, where the remoteness of housing and wide dispersal of jobs makes transit dependency very difficult. Access to decent employment is one of the most effective pathways to increased opportunities for low-income families.
Location and type of affordable housing	High	See above.
(B)(iv) Disproportionate Housing Needs		
The availability of affordable units in a range of sizes	Medium	Small families with fewer than five members are less likely to have housing problems than large families and non-families. Non-families experience the most severe cost burden, and are more than twice as likely to be severely cost-burdened as large families. These facts indicate a significant disproportionate need for housing assistance for both large families with children and small (i.e. single person) households compared to other household types.
Lack of private investments in specific neighborhoods	Low	See above.
Lack of regional cooperation	Low	County rental assistance money is distributed on a first-come-first-served basis. This causes clients to rush the system and for those with the greatest need to potentially miss out. This system should be re-examined to assess whether a transition to need-based application process is feasible.
Land use and zoning laws	Low	The County is in the process of updating its comprehensive plan. Special effort should be made to add implementable goals on affordable housing for those with disproportionate housing needs in order to affirmatively further fair housing choice.
(C) Publicly Supported Housing		
Community opposition	Medium	See above.
Impediments to mobility	Low	Although on the whole the publicly supported housing inventory is reasonably dispersed throughout the County and generally follows population density patterns, there is a slight concentration of publicly supported units in and around Steelton. In addition, HCV holders are concentrated in the southern municipalities. This somewhat restricts the mobility of households that wish to live in the northern municipalities. However, since the availability of both jobs and rental housing is much higher in southern Dauphin than northern Dauphin, the relationship between this factor and discrimination is unclear.
(D) Disability and Access		
Lack of regional cooperation	High	The County has not recently completed a Section 504 Needs Assessment. It is currently in the process of making an inventory of its government and institutional buildings, which will include ADA compliance. This should be given a high priority, and an ADA coordinator should be designated within County government.

Contributing Factor	Priority	Discussion
Access to transportation for persons with disabilities	Medium	All of the issues regarding transit in Dauphin County already discussed apply to persons with disabilities. Individuals with disabilities are disproportionately affected by the limited transportation options as they tend to rely heavily on public transit due to an inability to drive, walk, or bike to destinations or a lack of income to purchase a personal vehicle. Because paratransit services are available through CAT's Share-a-Ride program, this factor as it specifically applies to persons with disabilities involves building on prior actions to address transit needs at a more basic level.
Inaccessible sidewalks, pedestrian crossings, or other infrastructure	Low	Currently, many areas of the County lack sidewalks, handicap accessible curb cuts, and APS signals. This is especially dangerous for bus commuters, who are often dropped off on roads with high speed limits and very little pedestrian infrastructure. However, the County is gradually installing sidewalks and curb cuts in areas where they were not previously required, and traffic signals are replaced with APS signals when repairs are required. Given that resources are already being devoted to mitigating this factor, the urgency to address it is low.
Lack of affordable, accessible housing in range of unit sizes	Medium	Similar to transportation issues, persons with disabilities share a basic need for affordable housing with other low-income households. For the most part, the greatest difficulty faced by a person with a physical disability looking to buy or rent a home is finding a unit that is already accessible or easily modified. Things like no-step entries, bathrooms on the first floor, curb cuts, etc. are not always common features in Dauphin County's housing stock. In addition, the number of accessible units in the Dauphin County Housing Authority's inventory is very low compared to demand.
Lack of regional cooperation	Low	The Housing Authority does not currently work with the Continuum of Care on accepting references of homeless clients. This would be a more efficient use of resources and also encourage wrap-around services, as the clients would already be receiving case management.
(E) Fair Housing Enforcement, Outreach Capacity, and Resources		
Lack of resources for fair housing agencies and organizations	High	Just as funding for CPD programs around the country have been decreasing, there is a chronic underfunding of enforcement, investigation, and outreach agencies in Dauphin County. Without sufficient enforcement resources, progress in affirmatively furthering fair housing will be extremely difficult. In addition, Dauphin County Housing Authority has not established a protocol for fair housing training amongst its employees. As a result, many of its employees have not recently attended a HUD-sanctioned fair housing training session. The Housing Authority should allocate resources to sponsor a fair housing training session, or arrange for its employees to visit a fair housing conference.
Land use and zoning laws	Low	Not all zoning ordinances are online, reducing transparency and ease of access for the general public as well as advocacy organizations.

The ultimate purpose of completing an AFH and identifying factors that significantly contribute to fair housing issues is to inform the County's and Housing Authority's future planning processes and funding decisions. Moving forward, the County and Housing Authority will allocate a portion of their federal resources to address these issues and affirmatively further fair housing.

In order to achieve this outcome, a series of goals was developed to overcome the identified contributing factors and related fair housing issues. Each goal is accompanied by metrics and milestones for determining what results will be achieved and the parties responsible for them. Limited financial and staff resources preclude the County and Housing Authority from pursuing the resolution of every contributing factor identified in the AFH. Therefore, only contributing factors determined to be a High or Medium priority are addressed by one or more of the following goals.

Table V: Goals and Priorities

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Revise CDBG and HOME grant application procedures to increase the number of funded projects that AFFH	Location and type of affordable housing The availability of affordable units in a range of sizes	Disparities in Access to Opportunity Disproportionate Housing Needs	Within 2 to 3 years, revise the CDBG and HOME application forms to require applicants to discuss how their project addresses the fair housing issues identified in the AFH and/or how the proposed project will contribute to furthering fair housing choice. Within 2 to 3 years, incorporate scoring criteria and an associated number of points into the CDBG and HOME project scoring sheets that evaluates the degree to which projects work to AFFH.	Dauphin County
Discussion: Because counties in Pennsylvania do not have land use control, Dauphin County's strongest leverage to achieve any of the goals in this AFH is through the design and implementation of its funding programs. Program design presents the opportunity to insert fair housing best practices at the ground floor of any community development activity. Dauphin County will use its annual funding application process to encourage activities that AFFH. In addition, the County will effectively focus the internal policies, procedures, and management of its HUD and other programs in a way that efficiently and consistently affirmatively furthers fair housing choice.				

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Continually monitor local zoning codes for discriminatory elements	Land use and zoning laws Location and type of affordable housing	Segregation/Integration R/ECAPs Disparities in Access to Opportunity	<p>Within 1 year, work with the Tri-County Regional Planning Commission to develop model zoning ordinance elements that reflect best practices in affirmatively furthering fair housing.</p> <p>Each year, evaluate 3 municipal zoning ordinances for the inclusion of regulations that may contribute to discriminatory practices, prioritizing those municipalities that regularly apply for grant funding. Provide guidance and a deadline for any necessary modifications.</p> <p>Within 2 to 3 years, adopt a policy to deny CDBG and HOME funding to those municipalities whose zoning ordinances are A) found to include regulations that may contribute to discriminatory practices, and B) not modified to remove identified regulations that may contribute to discriminatory practices by a set deadline.</p>	Dauphin County
<p>Discussion: Older zoning ordinances and other regulations that may not be in line with the AFFH rule can hinder housing choice, both explicitly and implicitly. Dauphin County does not have a formal protocol in place to monitor and evaluate the zoning ordinances of its local government sub-recipients for discriminatory language or provisions. As a result, it may be funding municipalities that discriminate and/or do not affirmatively further fair housing choice in their zoning ordinance. Model language and policies for municipalities to establish best practices for fair housing, technical assistance, and continuous communication to local units of government through these initiatives will help alleviate these contributing factors.</p>				

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
<p>Increase the amount of affordable housing in areas with higher access to opportunity as discussed in section (V)(B)(iii)(1)(f)(i)</p>	<p>Location and type of affordable housing</p> <p>Lack of private investments in specific neighborhoods</p>	<p>Segregation/Integration</p> <p>R/ECAPs</p> <p>Disparities in Access to Opportunity</p> <p>Publicly Supported Housing</p>	<p>Within 2 to 3 years, work with the Tri-County Regional Planning Commission to institute an evaluation of the impact on fair housing choice for every residential development proposal. Restructure existing policies to encourage proposals that increase the supply of affordable housing in high opportunity areas and/or outside of "concentration areas."</p> <p>Within 6 months, HACD will begin a campaign to increase participation of private landlords, particularly those in higher opportunity neighborhoods, in the HCV program. This could involve coordinating with real estate professionals, property managers, and others involved with rental housing.</p> <p>Within 1 year, and then on an ongoing basis, HACD will create and maintain a list of "friendly" landlords who have accepted HCVs in the past or have indicated a willingness to accept HCVs. HACD will regularly contact these and other known, non-participating landlords with information about the program, invitations to public meetings and educational events, and direct inquiries about unit availability.</p> <p>Work with Tri-County Planning to review the forthcoming County comprehensive plan to ensure that appropriate fair housing and affordable housing priorities and recommendations are included.</p>	<p>Dauphin County</p> <p>Dauphin County Housing Authority</p>

Discussion: There is not enough affordable housing in Dauphin County to satisfy need. In addition to the quantity of affordable housing, the location of affordable housing is a major influence on segregation and integration. Dauphin County will work with the public, private, and non-profit sectors on specific initiatives designed to expand opportunity for members of protected classes throughout the County. Some of these are relatively simple policy changes that can be revised to encourage development in integrated and high opportunity areas. Development incentive programs that are already in place or that can be easily implemented at little to no cost, such as fee waivers, expedited review, etc., will be primary tools for achieving this goal.

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Improve the utility of public transit for persons with disabilities and members of protected classes with low-incomes	<p>The availability, type, frequency, and reliability of public transportation</p> <p>Location of employers</p> <p>Access to transportation for persons with disabilities</p>	<p>Disparities in Access to Opportunity</p> <p>Disability and Access</p>	<p>Within 1 year, work with the Tri-County Regional Planning Commission to make available to municipalities technical assistance on how to incorporate public transit into residential development guidelines.</p> <p>Within 1 year, identify key community assets and major employers currently underserved by transit service.</p> <p>Within 2 to 4 years, work with Capital Area Transit and local municipalities to adjust transit routes and schedules to provide improved access to underserved locations within the County, as deemed feasible by CAT.</p> <p>Within 3 to 5 years, work with key businesses in the region that employ a large number of low income individuals to attempt to establish improved transportation for these individuals through private transportation solutions, subsidized fares, or other means.</p> <p>Within the 2017-2021 planning cycle, work with CAT to assist in the purchase of a van to assist low-income seniors in northern Dauphin County with transportation, particularly to medical centers.</p>	Dauphin County
<p>Discussion: Dauphin County's transit system does not provide access to employment centers or certain critical community amenities, such as medical centers in the City of Harrisburg and emerging commercial corridors in Cumberland County. Due to the dependence of CAT on relatively high-income state government employees for ridership, its routes do not adequately serve the needs of members of protected classes in the community that are low-income. Those who experience inadequate transit access include seniors, second-shift or third-shift employees, and persons with disabilities who cannot use the existing transit infrastructure safely.</p>				

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Expand the level of physical accessibility of housing and community facilities throughout Dauphin County	<p>Lack of affordable, accessible housing in range of unit sizes</p> <p>Lack of regional cooperation</p>	Disability and Access	<p>Within 6 months, assign County and HACD staff persons as ADA coordinators.</p> <p>Within 1 to 2 years, complete a Section 504 Needs Analysis for the County and notify municipalities about any deficiencies. Work with notified municipalities to devise a plan for addressing deficiencies.</p> <p>Include in the 2017-2021 Consolidated Plan goals to fund activities that increase accessibility, such as new housing construction; modifications to existing housing, facilities, and infrastructure; and transportation solutions.</p> <p>Within 3 to 5 years, provide technical assistance on ADA compliance, particularly for government buildings and parks, to all County municipalities.</p>	<p>Dauphin County</p> <p>Dauphin County Housing Authority</p>
<p>Discussion: Both Dauphin County and HACD have made measurable progress in creating accessible, affordable housing options since the 2002 AI. Even so, it is clear that the supply of accessible housing still does not satisfy demand. In fact, recently constructed accessible housing is already operating at capacity with very low turnover rates. Finding affordable housing near essential services is a significant barrier faced by persons with disabilities. Accessing certain supportive services, community facilities, employment, and other amenities can be challenging for persons with disabilities, especially if they are transit-dependent. Due to the aging population of Dauphin County, this lack of affordable, accessible housing will become increasingly important in the future.</p>				

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Increase the level of fair housing knowledge and understanding among housing developers, real estate professionals, elected officials, and the general public	Community opposition	Segregation/Integration	Within 6 months, create a page on the County's website for fair housing information and resources for how to report suspected discrimination.	Dauphin County
	Private discrimination Lack of private investments in specific neighborhoods	R/ECAPS Disparities in Access to Opportunity Disproportionate Housing Need Publicly Supported Housing Disability and Access Fair Housing Enforcement, Outreach Capacity, and Resources	Partner with local organizations such as lending institutions, attorneys, realtors, school districts, etc. to distribute informational materials and host a fair housing community forum annually. This should include engaging with protected classes to help citizens better understand their rights. Hold annual fair housing trainings for County and municipal elected officials, appointed boards, and department staff. Within 3 years, develop and make publicly available an inventory of best practices for outreach and community participation activities. Pay particular attention to engaging members of the protected classes that are chronically underrepresented in the County's and HACD regular efforts.	Dauphin County Housing Authority
Discussion: While fair housing education and outreach are constant needs in any jurisdiction, the County and HACD will work to improve the level of fair housing knowledge and understanding among local housing developers, real estate professionals, local elected officials, and the general public with a focus on members of the protected classes. In particular, HACD and the County will focus on engaging groups and individuals who have expressed opposition to affordable housing development in the past. The County and HACD will also partner with local organizations whose clients are protected classes to help citizens better understand their rights.				

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Strengthen fair housing education, investigation, enforcement, and operations	<p>Lack of resources for fair housing agencies and organizations</p> <p>Lack of private investments in specific neighborhoods</p> <p>Lack of regional cooperation</p>	Fair Housing Enforcement, Outreach Capacity, and Resources	<p>Annually train City and HACD staff in fair housing practices, including to refer callers about fair housing to a designated staff person. In addition, train all staff that interact with the public in techniques to communicate with those with language and/or cultural barriers.</p> <p>Within 1 year, conduct the four-factor analysis to determine the extent to which document translation is needed. Prepare a Language Access Plan if it is determined to be necessary.</p> <p>Within 1 year, update mobility counseling and fair housing literature for Housing Choice Voucher recipients who may not be aware of their rights or ability to use the voucher in high opportunity areas.</p>	<p>Dauphin County</p> <p>Dauphin County Housing Authority</p>
<p>Discussion: There is a chronic underfunding of enforcement, investigation, and outreach agencies in Dauphin County. Without sufficient financial resources, progress in affirmatively furthering fair housing will be extremely difficult. In addition, Dauphin County Housing Authority has not established a protocol for fair housing training among its employees. As a result, many of its employees have not recently attended a HUD-sanctioned fair housing training session. In order to overcome these contributing factors, a multi-pronged approach will be taken to increase the level of education, investigation, and enforcement related to fair housing in Dauphin County.</p>				

Dauphin County and the Housing Authority of the County of Dauphin first submitted an AFH to HUD on October 4, 2016. That AFH was not accepted for reasons detailed in a letter from HUD's Fair Housing and Equal Opportunity Office on December 1. To address the deficiencies initially identified by HUD, the County and HACD accepted technical assistance from Abt Associates, who held a multi-day training session in Dauphin County for the program participants and have reviewed all subsequent revisions made to the AFH. Any and all changes are reflected in this version of the AFH.

III. Community Participation Process

1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board.

The community participation process undertaken for this AHF was a collaborative effort between Dauphin County and the Housing Authority.

From July 20-21, 2016, a series of stakeholder interviews and consultations were conducted in Dauphin County. Over the course of these two days, approximately 17 individuals from organizations whose mission involves housing in one facet or another provided feedback. Stakeholders were identified by local staff and invited to participate personally. The list of stakeholder groups contacted directly can be found in section III(2).

Those who were not able to attend a group interview were contacted later by phone. This included persons who resided in areas identified as living in the designated “concentration area” discussed later in this report. It also included meeting with the President of the Resident Advisory Board, who provided feedback and addressed housing issues and complaints. No participants submitted written comments. However, their opinions and views were taken into account during the AFH process, and are reflected in the Fair Housing Goals and Priorities set forth in this document.

Two public meetings were held during the course of preparing the AFH:

- July 19 – A public meeting to solicit input on fair housing issues in the County. The meeting was held at Bistline House, an ADA-accessible HACD public housing development located at 1291 S. 28th Street, Harrisburg, PA, 17111. The meeting was held on Tuesday, July 19 from 1:30pm to 2:30pm. The meeting was advertised to tenants (through written notice included in monthly rent bills) as well as the general public. Information about fair housing, the County’s and HACD’s obligation to affirmatively further fair housing, and preliminary data and maps were presented. The hearing was advertised in the local newspaper. No members of the public attended.

- July 20 – A public meeting was held in the Dauphin County Department of Community and Economic Development to present information on fair housing and the AFH process. The meeting was located at the ADA-accessible departmental headquarters at 112 Market Street, Harrisburg, PA, 17101. The meeting was held on Wednesday, July 20 from 9:45am to 11:00am. The hearing was advertised in the local newspaper. There were two attendees. The attendees made a general comment regarding the limited availability of funding and the importance of YMCA's youth programs, but did not submit any written comment.

In addition to the public outreach activities undertaken during the AFH process itself, components of the subsequent Five-Year Consolidated Plan outreach efforts were designed to solicit additional feedback on fair housing and the goals, metrics, and milestones included in the AFH submitted to HUD.

Specifically, the following activities are planned to occur before the Consolidated Plan is submitted:

1. A public meeting.

This meeting will be advertised by utilizing Northern Dauphin County Community Services' email list and by asking faith based groups and social service providers to use their established announcement channels. It will be scheduled on an evening during the week so that the highest number of people are available to participate. The meeting will be held in coordination with the mandatory public outreach meeting required to receive comment on the County Consolidated Plan. Any recommendations related to meeting design or advertising that Northern Dauphin County Community Services or faith-based groups offer based on their previous experiences will be considered. Should this public meeting be poorly attended, the County and HACD will evaluate and consider additional outreach methods and efforts for future fair housing and consolidated planning purposes.

2. Two follow-up stakeholder focus groups.

The format of these focus groups will be a guided round-table discussion. Participants will be asked for feedback about the relevance and completeness of the goals included in the AFH. They will also be asked about other community development needs that might be unrelated to fair housing but that should be addressed by goals in the Consolidated Plan. Finally, participants will prioritize the goals discussed, including the AFH goals, so that the funding decisions made in the Consolidated Plan will best reflect the community's consensus about how to address the identified needs. Stakeholders unable to attend the meeting will be individually contacted by phone in order to obtain information and feedback.

The first meeting will be held in order to present AFH goals for discussion and feedback and to obtain input on community development and infrastructure

matters pertaining to the CP. The second meeting will be held to obtain feedback on goals being incorporated into the County's CP.

3. A survey for municipalities in the County.

Municipalities have already been asked to complete a survey as part of the Consolidated Planning process, but few responded. The survey will be reissued from the Executive Director of the Office of Community & Economic Development with a clearer explanation of how their responses could affect the County's funding decisions over the next five year.

The survey will also be updated to include additional fair housing questions. Examples of potential questions include:

Housing

- Does the municipality provide any fair housing education or outreach?
- Do residents of the community generally look unfavorably on affordable housing?
- Are rents affordable to households earning 80% or less of the area median income?
- Does the municipality have adequate services to address homelessness?
- Does the County have adequate services to address homelessness?
- Do the municipality participate in any of the County housing development, improvement or homebuyer programs?

Economic Development

- Is there adequate transit access to jobs in the municipality?
- Is there adequate transit access to jobs in the County?
- Does the municipality generally have an adequate amount of good paying jobs?
- Are jobs available at a variety of pay scales in the municipality?

Community Development

- Does the municipality have a land use plan which has been updated in the last 5 years?
- Is there adequate access to transit in the municipality?
- What transit improvements could be made that would be helpful to residents:
 - additional bus stops within the community
 - additional bus stops at other locations outside the municipality
 - additional stops at areas where there are a concentration of jobs
 - increased frequency of pick-up/drop-offs at bus stops
 - additional transit options
 - better affordability
- Availability of services for the disabled in the County?

- Availability of services for seniors in the County?
 - Availability of adequate services for children in the County?
 - Availability of services for persons suffering from domestic violence in the County?
 - Availability of services for persons suffering from addiction in the County?
 - Availability of services for veterans?
 - Availability of childcare in the municipality?
 - Availability of affordable childcare in the municipality?
4. Time on the agenda of the Housing Authority's regular resident meetings in the spring.

HACD will dedicate time during their regularly scheduled resident meetings to present the AFH goals to residents. During the meetings, residents will hear about the purpose of the AFH, what has been completed to date, and what the next steps are. Residents will be asked to consider the goals included in the AFH and whether or not they are appropriate based on their personal experiences looking for housing in the County. Residents will be asked if HACD should consider any additional actions or priorities not already included in the AFH goals.

2. Provide a list of organizations consulted during the community participation process.

A comprehensive cross-section of stakeholders was consulted during the community participation process. These stakeholders included representatives from the following organizations:

- Dauphin County Department of Community and Economic Development
- Housing Authority of the County of Dauphin
- Resident Advisory Board of the Dauphin County Housing Authority
- Tri-County Regional Planning Commission
- Capital Area Transit
- Tri-County Housing Development Corporation
- Greater Harrisburg Healthy Start
- The Salvation Army
- Hamilton Health Center
- Harrisburg Area YMCA
- Northern Dauphin County YMCA

3. How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.

The response to personal invitations for the stakeholder interviews was satisfactory; most stakeholders contacted attended a group interview or expressed an interest in participating in the process. The information obtained through the stakeholder interviews, both in-person and through follow-up telephone conversations, was excellent and invaluable in shaping the fair housing analysis.

Dauphin County and the Housing Authority hosted two public meetings as part of the AFH process. The meetings were publicized in the local newspaper and held at ADA-accessible locations in conveniently accessible parts of Dauphin County. One meeting was held at Bistline House, located at 1291 S. 28th Street, Harrisburg, PA, 17111 and lasted from 1:30pm to 2:30pm. The other meeting was held at the ADA-accessible departmental headquarters at 112 Market Street, Harrisburg, PA, 17101. This meeting was held on Wednesday, July 20 from 9:45am to 11:00am.

The lack of attendance at the two public meetings was disappointing. There were a total of two attendees at one meeting, and no attendees at the other meeting. The two attendees did not provide written comments, but did provide some general feedback.

To increase community participation in the future, the County and Housing Authority will consider more targeted advertising further in advance of public meetings, possibly by

partnering with local organizations that work directly with heavily affected populations and protected classes. It will also consider holding public meetings during the evening rather than during daytime working hours. Public meetings have generally been conducted during the day, in response to feedback from Housing Authority residents who were not able to attend evening public meetings due to issues with transit service.

The County and Housing Authority will consider holding meetings at several different times of day in the future. In addition, Dauphin County will make an effort to host community meetings in libraries and other civic buildings in an attempt to increase the level of community participation.

4. Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.

All comments received during the course of the stakeholder interviews are summarized below.

There is community opposition to affordable housing development

- Stakeholders cited examples from multiple areas of Dauphin County in which residents vocally opposed any new housing development that would accept Section 8.
- Stakeholders indicated that race relations were strained in many areas of Dauphin County, and some residents may block affordable housing due to fears of racial or ethnic minorities moving into their neighborhoods.
- Some school districts in Dauphin County oppose affordable housing development because they do not want more children enrolling in their districts.

There is a lack of public investment in specific neighborhoods, including services or amenities

- Transportation outside of the immediate Harrisburg area is infrequent and does not cover large portions of Dauphin County. Transit is often unavailable for second-shift or third-shift workers, which are more common shifts for entry level positions in the emerging warehousing industries. Inadequate transportation systems limit transit-dependent residents' housing choices to the Harrisburg area rather than higher-opportunity areas in Dauphin County. Increasing transit access in northern Dauphin County will also benefit the disproportionate amount of low-income seniors who live there.
- Stakeholders repeatedly cited a lack of affordable child care options in Dauphin County. Inadequate child care also makes it more difficult for families with children to obtain employment, education, or job training.
- The lack of a medical provider in northern Dauphin County makes it very difficult for seniors, disabled persons to live there, despite housing stock being relatively

affordable. This also disproportionately affects transit-dependent residents, who are disproportionately members of the protected classes.

- The Housing Authority generally holds its public meetings in official buildings or its own buildings. This can make it more difficult for residents to access them.

A lack of regional cooperation in Dauphin County has negative impacts on fair housing choice

- County rental assistance money is distributed on a first-come-first-served basis. This causes clients to rush the system and for those with the greatest need to potentially miss out.
- The County has not recently completed a Section 504 Needs Assessment. It is currently in the process of making an inventory of its government and institutional buildings, which will include ADA compliance.
- The Housing Authority should work with the Continuum of Care to accept referrals of homeless clients. This would be a more efficient use of resources and also encourage wrap-around services, as the clients would already be receiving case management.

Land use and zoning laws

- Dauphin County does not have a formal protocol in place to monitor and evaluate the zoning ordinances of its subrecipients for discriminatory language or provisions.
- Not all zoning ordinances are online, reducing transparency and ease of access for the general public as well as advocacy organizations.
- The County is in the process of updating its comprehensive plan.
- Because many ordinances in Dauphin County are so old, transit is not included in them.

The supply and location of affordable housing does not match current demand

- There is not enough housing available that is affordable to low and moderate-income residents of Dauphin County. In addition, many units that are affordable are not located in areas with access to transit, jobs, or other essential components of opportunity.

Private discrimination is a concern

- While the Housing Authority provides fair housing literature to landlords in Dauphin County, it does not regularly organize training or outreach to the private sector.
- Efforts should be made to change public perception regarding affordable housing, multi-family housing, public transit systems, and other targets of “NIMBY-ism”
- Some landlords utilize exploitative leases on low-income renters who may not have legal expertise to understand the implications.

Two public meetings were held as part of the AFH process. There were no attendees at the first public meeting, and two attendees at the second public meeting. The attendees provided general comments regarding the limited availability of funding. All personal information presented in this AFH is from this public meeting and the stakeholder interviews conducted.

IV. Assessment of Past Goals, Actions, and Strategies

1. Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:

a. Discuss what progress has been made toward their achievement

The last fair housing analysis for Dauphin County was undertaken in 2002. This analysis was prepared by the Dauphin County Department of Community and Economic Development and identified several impediments to fair housing choice. These impediments, and the progress that has been made towards overcoming them, are listed below:

Impediment: Lack of focus of fair housing by Dauphin County officials. This includes a lack of fair housing education and outreach, as well as a lack of referral and follow-up on fair housing issues.

Actions Taken: Dauphin County has expanded its First-Time Home Buyers program to assist more first time home buyers within the County. There have been multiple foreclosure credit repair programs set up by different agencies within the County. The County CHDO, Tri-County Housing Development Corporation is currently administering a lease to buy rental program for homeowners to purchase home after their credit has been repaired.

Impediment: Outdated municipal zoning ordinances

Actions Taken: At least seven municipal zoning ordinances in Dauphin County have been updated since 2002. These ordinances were updated with technical assistance from Tri-County Regional Planning Commission and incorporate best practices in fair housing.

Impediment: Lack of accessible, affordable housing options for persons with disabilities

Actions Taken: The Dauphin County Community Economic Development office has awarded CDBG funding to create a Local Housing Options Team Coordinator to assist with providing housing solutions to persons with disabilities. The Dauphin County Housing Authority has also utilized the Section 811 program offered by HUD and has built 12 ADA compliance rental units which are currently at maximum capacity.

Impediment: A shortage of affordable housing disparately affects housing choice for members of the protected classes

Actions Taken: The Dauphin County Redevelopment Authority is currently building mixed income rental housing units for lower to moderate income people.

b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences)

The Dauphin County Community and Economic Development office has strived to achieve all affordable housing goals and is currently implementing affordable housing options for low to moderate income people.

c. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.

The Dauphin County Community and Economic Development office has currently created the first Land Bank Authority in the State of Pennsylvania to address blighted residential and commercial structures in Dauphin County. This Land Bank Authority will hopefully assist to mitigate some of the housing issues within the County.

d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

Since the last fair housing analysis, both the County and the Housing Authority experienced difficulty achieving fair housing goals. This is primarily because the goals identified were beyond their financial and staffing capacity, or were too reliant on the actions of other entities. For example, equalizing the shortage of affordable housing in Dauphin County is significantly beyond the financial capacity of either entity and is therefore an unrealistic goal. Consequently, the City's financial and staffing resources were more heavily taken into consideration when defining the goals for this AFH.

Several past goals were included in this AFH based on their continued relevance to fair housing issues within Dauphin County. However, metrics and timelines were specified for each goal to improve the County's and Housing Authority's ability to demonstrate and achieve progress.

V. Fair Housing Analysis

A. Demographic Summary

1. Describe demographic patterns in the jurisdiction and region, and describe trends overtime (since 1990).

Race and Ethnicity

Dauphin County was first settled in the 1730s, when John Harris, Jr. was granted 300 acres of land on the Susquehanna River. The County was established on March 4, 1785. Since its founding in the 1780s, Dauphin County has hosted key government and administrative functions within the State of Pennsylvania. Government and public administration still play a pivotal role in the local economy and housing market in Dauphin County.

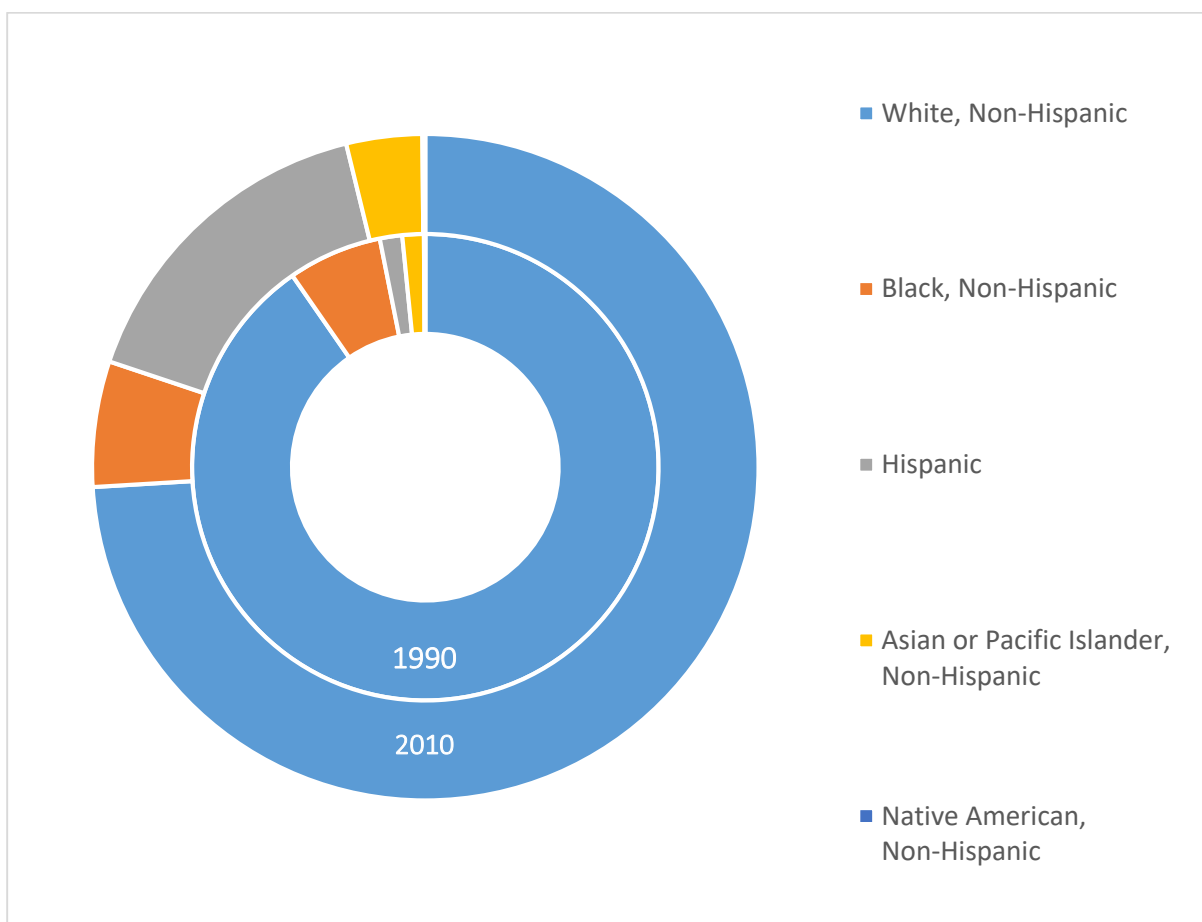
Like much of Pennsylvania, the region's primary economic base has been a mix of agriculture and industry. The County's strategic location alongside the Susquehanna River also made the area attractive to heavy industry, such as steel. This resulted in major manufacturing facilities locating in Dauphin County, drawing immigrants and spurring large amounts of housing construction during the steel booms in the 19th and 20th Centuries. Immigrants to Dauphin County have traditionally been either White or Black. However, this has changed since 1990.

The data used in this analysis refers to the Dauphin County entitlement jurisdiction, rather than the entirety of Dauphin County. This excludes the City of Harrisburg and the Township of Jefferson. The City of Harrisburg is a separate HUD entitlement and is completing a separate fair housing analysis. The Township of Jefferson has opted out of the CDBG program and therefore no data is available. This report will refer to "Dauphin County" as the Dauphin County jurisdiction, rather than the actual entire county.

Currently, Dauphin County's residents are primarily White, with non-White residents accounting for around 18% of County residents. Black residents are the largest minority group, followed by Hispanics, and then Asians. The Harrisburg-Carlisle CBSA Region, which consists of the entirety of Dauphin County as well as Cumberland and Perry Counties, is slightly less diverse than Dauphin County but has very similar demographics overall. In the CBSA, 80.5% of residents are White compared to 79.82% of Dauphin County.

The population of Dauphin County has changed significantly in the past 20 years. Between 1990 and 2010, the non-White population increased from 7.03% to 17.91%. Black and Hispanic residents were major drivers of this change, growing from 4.9% and 1.08% to 10.05% and 4.57%, respectively. The diversification of the population is important to take into account from a fair housing perspective, as there are now more members of the protected classes living in Dauphin County.

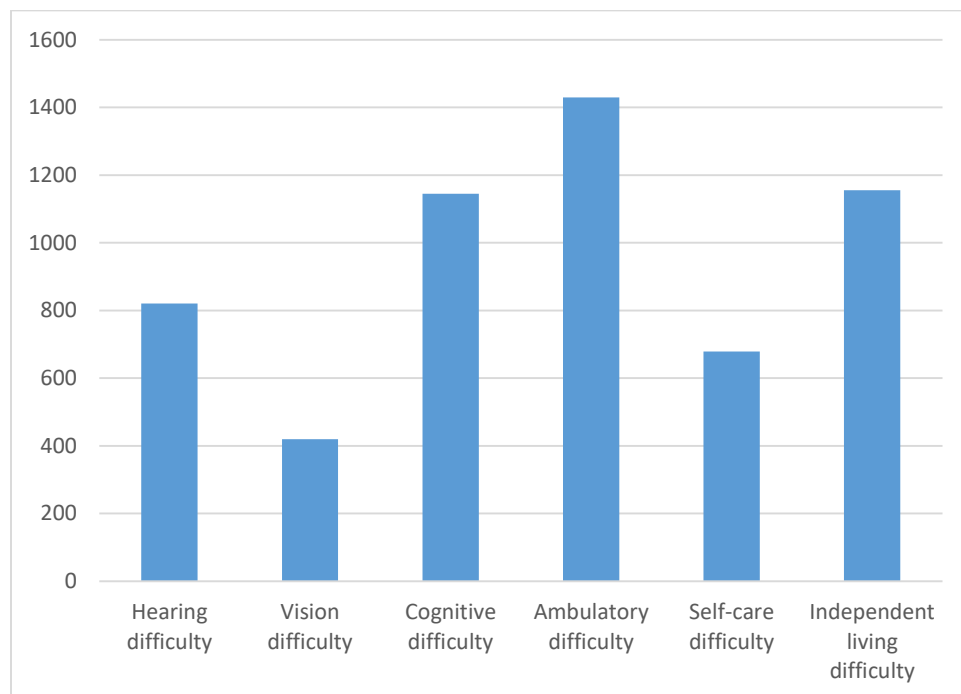
Figure 1: Race/Ethnicity



Disability

Across Dauphin County, 46,995 persons (approximately 15%) reported a disability in 2010. The most common type of disability was an ambulatory disability involving difficulty moving from place to place. Persons with ambulatory disabilities, which affect 6.1% of County residents, often require housing with accessibility features. The next most common disabilities are independent living and cognitive difficulties. This same pattern holds true for the region.

Figure 2: Disability Type



Families with Children

Families with children comprise about 41.3% of families in the County, down slightly from 41.8% in 1990, although slightly off from a peak of 44.3% in 2000. Family households in Dauphin County are slightly less likely to have children than family households in the greater Harrisburg-Carlisle CBSA.

National Origin and Limited English Proficiency

There are over 6,400 foreign-born residents of Dauphin County and over 5,100 residents with limited English Proficiency (LEP). While the most common countries of origin for foreign-born residents are India and Vietnam, the most common languages spoken by persons with LEP are Spanish and Chinese.

LEP Spanish-speakers are about equally prevalent in Dauphin County compared to the Harrisburg-Carlisle CBSA. However, Vietnamese LEP residents are more prevalent in the Harrisburg-Carlisle CBSA, indicating that LEP Vietnamese residents may be more likely to live in the greater region than in Dauphin County. The presence of persons speaking “Other West Germanic” languages in the region is likely from the Pennsylvania Dutch.

Table 1 – Demographics

	(Dauphin County, PA CDBG, HOME) Jurisdiction			(Harrisburg-Carlisle, PA CBSA) Region		
Race/Ethnicity		#	%		#	%
White, Non-Hispanic		171,466	79.82		442,343	80.50
Black, Non-Hispanic		21,587	10.05		53,841	9.80
Hispanic		9,816	4.57		25,831	4.70
Asian or Pacific Islander, Non-Hispanic		6,833	3.18		15,816	2.88
Native American, Non-Hispanic		241	0.11		747	0.14
Other, Non-Hispanic		308	0.14		663	0.12
National Origin	Country	#	%	Country	#	%
#1 country of origin	India	1,668	0.77	India	4,374	0.80
#2 country of origin	Vietnam	770	0.36	Vietnam	1,991	0.36
#3 country of origin	Dominican Republic	722	0.33	China excl. Hong Kong & Taiw	1,732	0.32
#4 country of origin	China excl. Hong Kong & Taiwan	720	0.33	Mexico	1,478	0.27
#5 country of origin	Philippines	573	0.26	Dominican Republic	1,287	0.23
#6 country of origin	Mexico	501	0.23	Korea	1,153	0.21
#7 country of origin	Canada	464	0.21	Philippines	1,053	0.19
#8 country of origin	Germany	417	0.19	Germany	963	0.18

Table 1 – Demographics

	(Dauphin County, PA CDBG, HOME) Jurisdiction			(Harrisburg-Carlisle, PA CBSA) Region		
#9 country of origin	Russia	310	0.14	Canada	843	0.15
#10 country of origin	Korea	269	0.12	Bosnia & Herzegovina	719	0.13
Limited English Proficiency (LEP) Language	Language	#	%	Language	#	%
#1 LEP Language	Spanish	2,397	1.17	Spanish	6,410	1.17
#2 LEP Language	Chinese	540	0.26	Vietnamese	1,272	0.23
#3 LEP Language	Vietnamese	466	0.23	Other west Germanic	911	0.17
#4 LEP Language	Other Indic Language	412	0.20	Chinese	891	0.16
#5 LEP Language	German	275	0.13	Other Indic languag	852	0.16
#6 LEP Language	Arabic	270	0.13	Arabic	851	0.15
#7 LEP Language	Other West Germanic Language	244	0.12	Serbo-Croatian	517	0.09
#8 LEP Language	Russian	216	0.11	Africanlang	509	0.09
#9 LEP Language	French	210	0.10	German	494	0.09
#10 LEP Language	Korean	140	0.07	Spanish	6,410	1.17
Disability Type		#	%		#	%
Hearing difficulty		6,931	3.43		17,934	3.52
Vision difficulty		3,661	1.81		8,737	1.72
Cognitive difficulty		8,993	4.46		24,272	4.77
Ambulatory difficulty		12,994	6.44		32,080	6.30
Self-care difficulty		5,075	2.51		11,554	2.27
Independent living difficulty		9,341	4.63		22,181	4.36

Sex		#	%		#	%
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Table 1 – Demographics

	(Dauphin County, PA CDBG, HOME) Jurisdiction		(Harrisburg-Carlisle, PA CBSA) Region		
Male		103,896	48.36		268,265 48.82
Female		110,926	51.64		281,210 51.18
Age		#	%		# %
Under 18		48,120	22.40		121,633 22.14
18-64		134,836	62.77		347,962 63.33
65+		31,866	14.83		79,880 14.54
Family Type		#	%		# %
Families with children		23,520	41.35		59,340 41.62

Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families.

Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 3: Data Sources: Decennial Census; ACS

Note 4: [Refer to the Data Documentation for details \(www.hudexchange.info\)](http://www.hudexchange.info).

Table 2 - Demographic Trends												
	(Dauphin County, PA CDBG, HOME) Jurisdiction						(Harrisburg-Carlisle, PA CBSA) Region					
	1990		2000		2010		1990		2000	2010		
Race/Ethnicity	#	%	#	%	#	%	#	%	#	%	#	%
White, Non-Hispanic	170,452	92.82	174,445	86.79	171,466	79.82	422,505	89.08	432,979	85.05	442,343	80.50
Black, Non-Hispanic	8,994	4.90	16,841	8.38	21,587	10.05	37,854	7.98	49,959	9.81	53,841	9.80
Hispanic	1,980	1.08	4,650	2.31	9,816	4.57	7,508	1.58	13,530	2.66	25,831	4.70
Asian or Pacific Islander, Non-Hispanic	1,788	0.97	3,998	1.99	6,833	3.18	5,165	1.09	9,721	1.91	15,816	2.88
Native American, Non-Hispanic	153	0.08	505	0.25	241	0.11	521	0.11	1,475	0.29	747	0.14
National Origin												
Foreign-born	4,119	2.24	7,320	3.64	12,115	5.59	10,153	2.14	17,541	3.45	29,279	5.33
LEP												
Limited English Proficiency	2,853	1.55	4,596	2.29	6,058	2.80	8,439	1.78	12,899	2.53	16,219	2.95
Sex												
Male	88,407	48.15	97,033	48.32	103,896	48.36	228,721	48.23	247,253	48.57	268,265	48.82
Female	95,199	51.85	103,801	51.68	110,926	51.64	245,507	51.77	261,809	51.43	281,210	51.18
Age												
Under 18	40,871	22.26	48,013	23.91	48,120	22.40	109,369	23.06	122,637	24.09	121,633	22.14
18-64	115,780	63.06	122,619	61.05	134,836	62.77	300,181	63.30	313,477	61.58	347,962	63.33
65+	26,954	14.68	30,202	15.04	31,866	14.83	64,678	13.64	72,948	14.33	79,880	14.54
Family Type												
Families with children	21,366	41.84	10,764	44.38	23,520	41.35	55,641	43.59	27,223	44.99	59,340	41.62

Note 1: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Note 2: Data Sources: Decennial Census; ACS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

2. Describe the location of homeowners and renters in the jurisdiction and region, and describe trends overtime.

The homeownership rate in Dauphin County slightly declined, from 65.3% in 2000 to 64% in 2010. The areas of high homeownership and high renter occupancy within the County have remained relatively unchanged in location, if not always in degree.

Overall, the rates of homeownership are higher in the northern communities of the County, which are further from the City of Harrisburg. Households on the border of Harrisburg or along the Route 322 corridor (one of the main access points into the City) are more likely to rent their homes.

In general, most of Dauphin County is moving towards homeownership. Unlike both overarching national trends and the City of Harrisburg, homeownership rates between 2000 and 2014 actually increased in many of the townships. However, homeownership rates are declining in southern Dauphin County, in and around Middletown and Steelton. These areas have relatively high homeownership rates, but are decreasing over time.

Conversely, renters tend to live in the communities around Harrisburg. The affordability of these areas differs slightly, with the townships along I-81 having higher median rents and property values. The most affordable rental units are available in the northern and eastern parts of the County, although the high homeownership rates mean that the number of rental units available in these areas is lower.

The areas that have highest rents are the central and southern census tracts. As discussed later in this report, these central areas of Dauphin County generally have more access to jobs, quality schools, and other indicators of opportunity. As a result, the higher median rental prices in these communities may be restricting housing choices for low-income residents of Dauphin County. The most affordable rental units are available in the northern parts of the County, although stakeholders noted that the high homeownership rates in these areas make it very difficult to find available rental units in these communities.

Figure 3: Homeownership

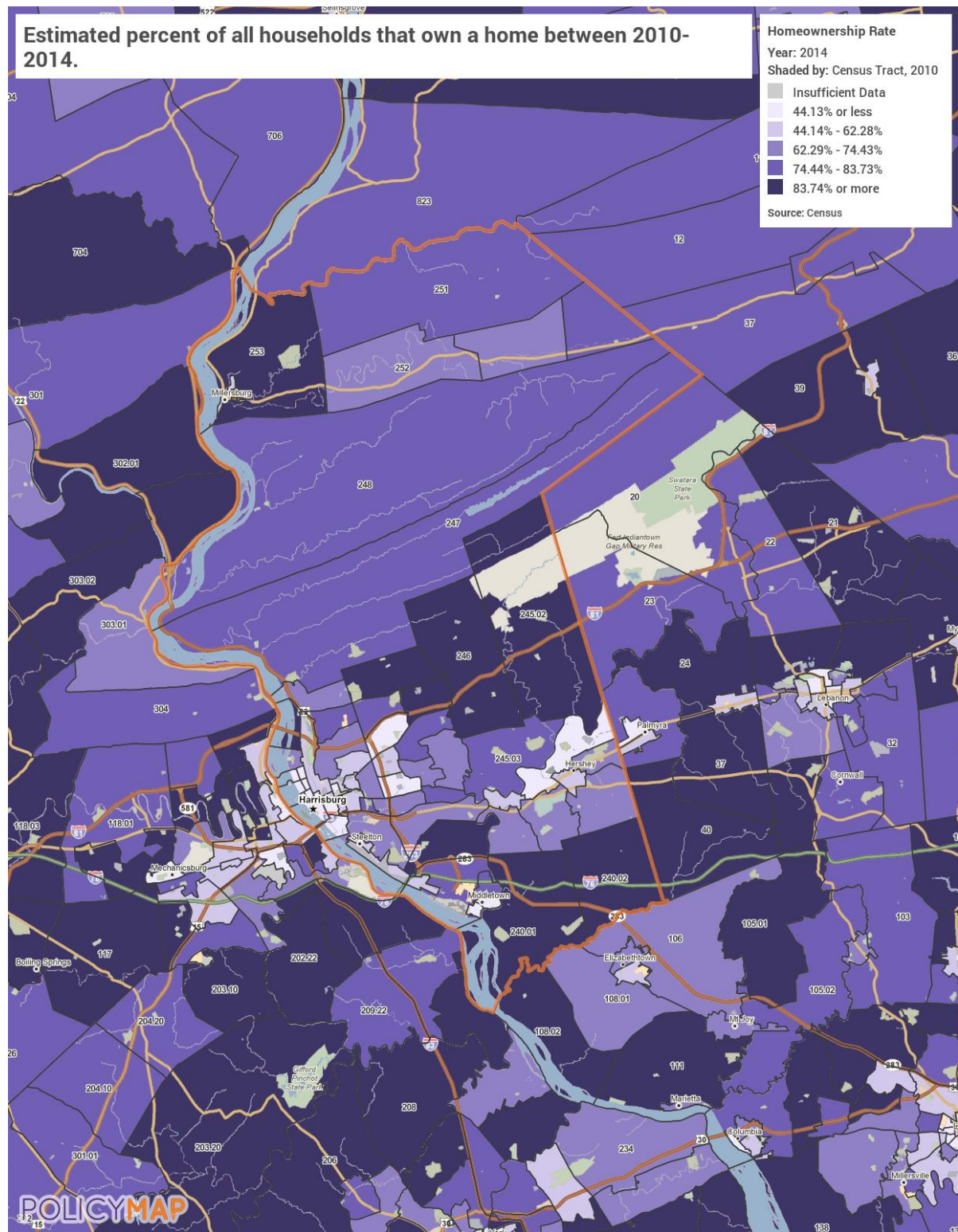


Figure 4: Change in Homeownership

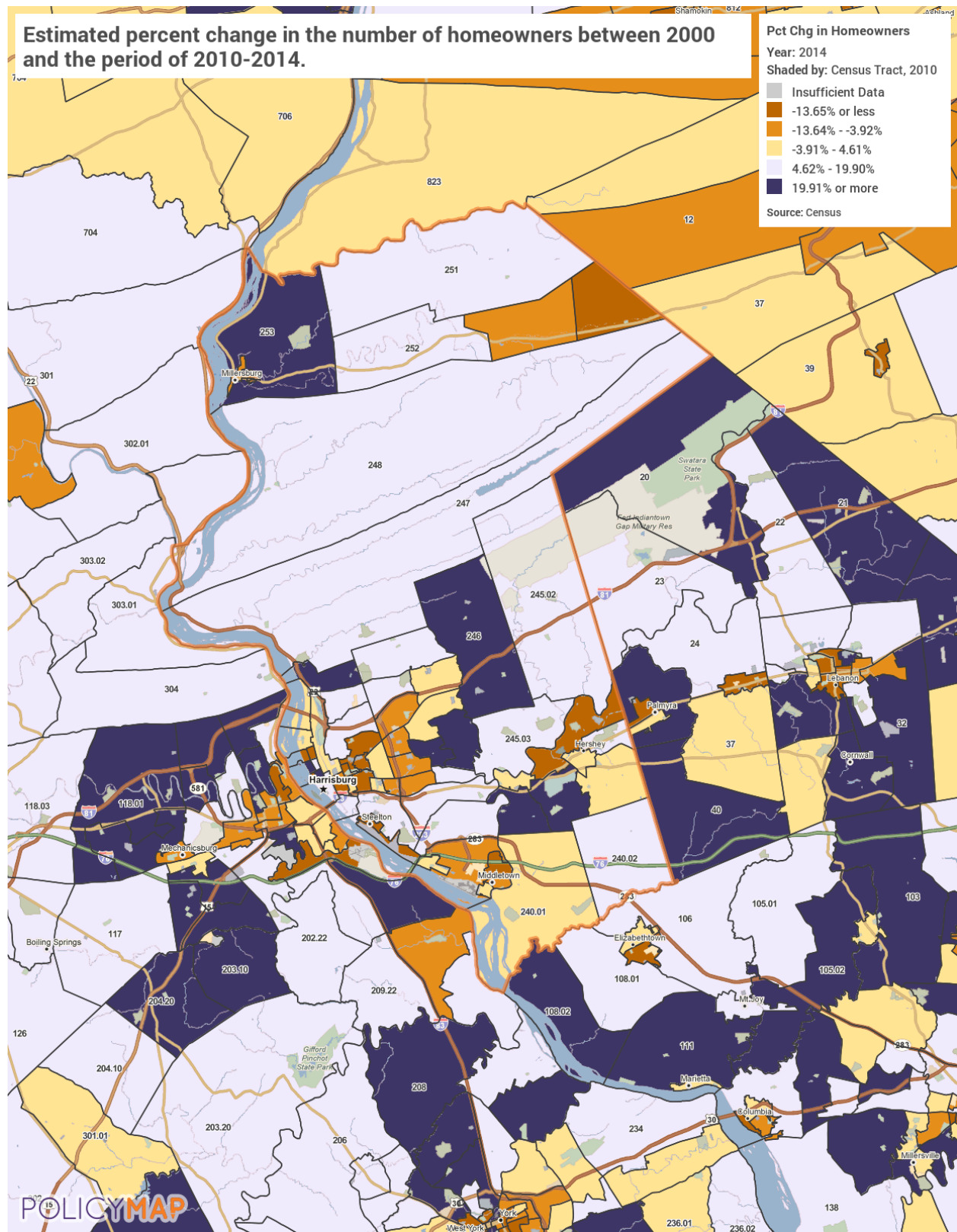
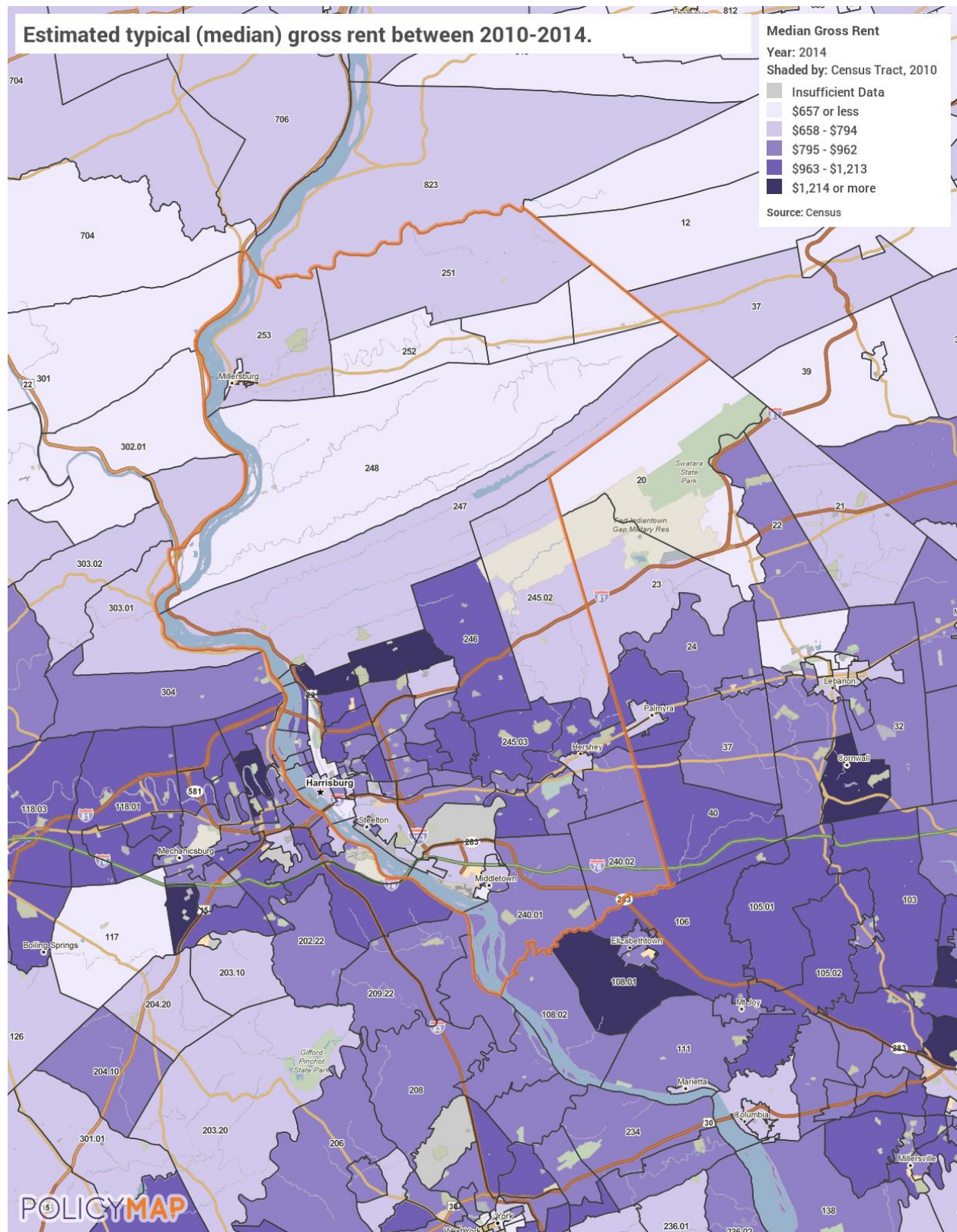


Figure 5: Median Gross Rent



B. General Issues

i. Segregation/Integration

1. Analysis

a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

The dissimilarity index measures the degree to which two racial or ethnic groups are evenly distributed across a geographic area and is commonly used for assessing residential segregation between two racial or ethnic groups. Dissimilarity index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation.

Context is important in interpreting the dissimilarity index. The index does not indicate spatial patterns of segregation, only the relative degree of segregation; and, for populations that are small in absolute numbers, the dissimilarity index may be high even if the group's members are evenly distributed throughout the area. Since White residents are the majority in Dauphin County, all other racial and ethnic groups were compared to the White population as a baseline.

In 2010, the dissimilarity indices for all non-White groups in Dauphin County were principally at the upper end of the “low” range, although there was substantial variation between the three indices. While Hispanic/White dissimilarity is relatively low, Black/White Dissimilarity is at the upper end of the moderate range. Whites and Hispanics had the lowest level of dissimilarity and Asians had moderate dissimilarity, although the small populations of these groups may be influencing the sample. This means that, while non-White groups in the City are moderately segregated from Whites, the level of segregation varies largely between races and ethnicities.

Dissimilarity levels are higher in the Harrisburg-Carlisle CBSA Region. This means that Dauphin County is relatively less segregated compared to the greater region. This is likely due to the fact that the entitlement area does not include the City of Harrisburg, where concentrations of racial and ethnic minorities are higher.

Table 3 - Racial/Ethnic Dissimilarity Trends						
	(Dauphin County, PA CDBG, HOME) Jurisdiction			(Harrisburg-Carlisle, PA CBSA) Region		
Racial/Ethnic Dissimilarity Index	1990	2000	2010	1990	2000	2010
Non-White/White	43.66	41.69	42.08	64.57	58.45	54.37
Black/White	53.52	50.67	52.74	74.12	69.57	67.94
Hispanic/White	27.07	35.18	38.70	53.93	52.42	49.64
Asian or Pacific Islander/White	31.14	30.73	41.35	34.12	35.37	44.91

Note 1: Data Sources: Decennial Census

Note 2: Refer to the Data Documentation for details (www.hudexchange.info).

b. Explain how these segregation levels have changed over time (since 1990).

The dissimilarity index has fluctuated over time for various groups in the County and in the region. Dissimilarity between Whites and all non-White groups in Dauphin County remained relatively constant at the moderate range.

These trends are slightly different in the region, where dissimilarity has always been higher. Segregation levels have decreased substantially, particularly between Blacks and Whites. An exception to this is the segregation between Whites and Asians, which increased between 1990 and 2010.

For all racial and ethnic groups except Hispanics and Asians, segregation decreased between 1990 and 2010. For Hispanics and Asians, segregation with Whites increased. This is an important finding, as both Hispanics and Asians are growing populations in Dauphin County.

Segregation in the region is higher, but has decreased as well. In contrast with Dauphin County, segregation between Hispanics and Whites decreased between 1990 and 2010. However, segregation between Blacks and Whites remains at 67.94, which is very high.

c. Identify areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

Whites are the predominant racial group in all tracts of Dauphin County, although less so in the tracts bordering the City of Harrisburg. The largest minority group are Black residents, who disproportionately live in neighborhoods adjacent to Harrisburg such as Penbrook, Progress, Steelton, and Paxtang. Diversity decreases north of I-81, as the County becomes much more rural and largely White.

The top countries for foreign-born residents are India, Vietnam, Dominican Republic, China, and the Philippines. Areas with concentration of foreign-born residents are along the Derry Street and I-83 corridors in southern Dauphin County. By contrast, most Indian residents live north of this area in and around Colonial Park and Paxtonia. This suggests a small suburban Indian enclave, while foreign-born residents of other nationalities tend to live closer to the City of Harrisburg. The areas in and around Hershey, PA contain large proportions of foreign-born residents, which could be attributed to the presence of the Hershey Medical Center as a major employer in the region.

The most commonly spoken languages amongst persons with limited English proficiency (LEP) are Spanish, Chinese, Vietnamese, Other Indic Languages, and German. LEP Spanish-speakers are concentrated south of Harrisburg, in and around Steelton, as well as in the Colonial Park area. Other LEP populations are more dispersed throughout Dauphin County.

Figure 6: Race/Ethnicity

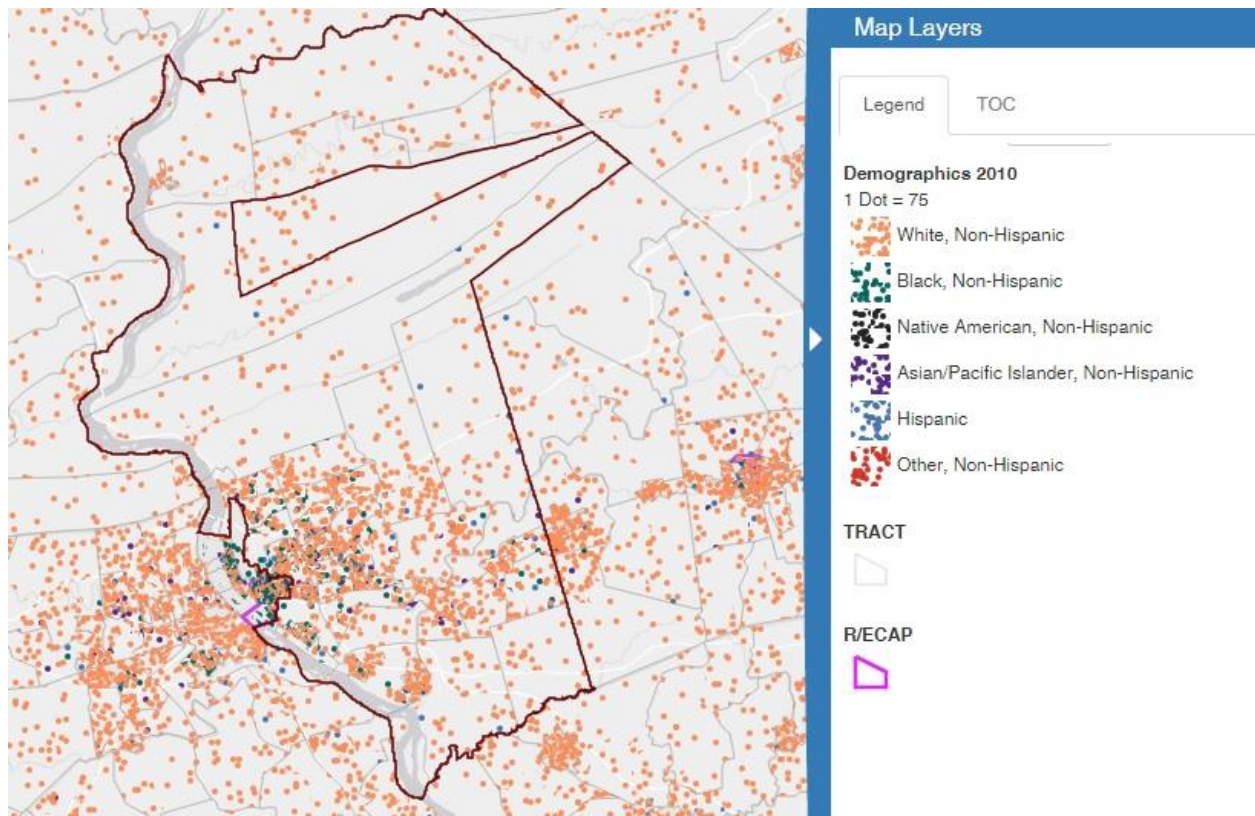


Figure 7: Predominant Race

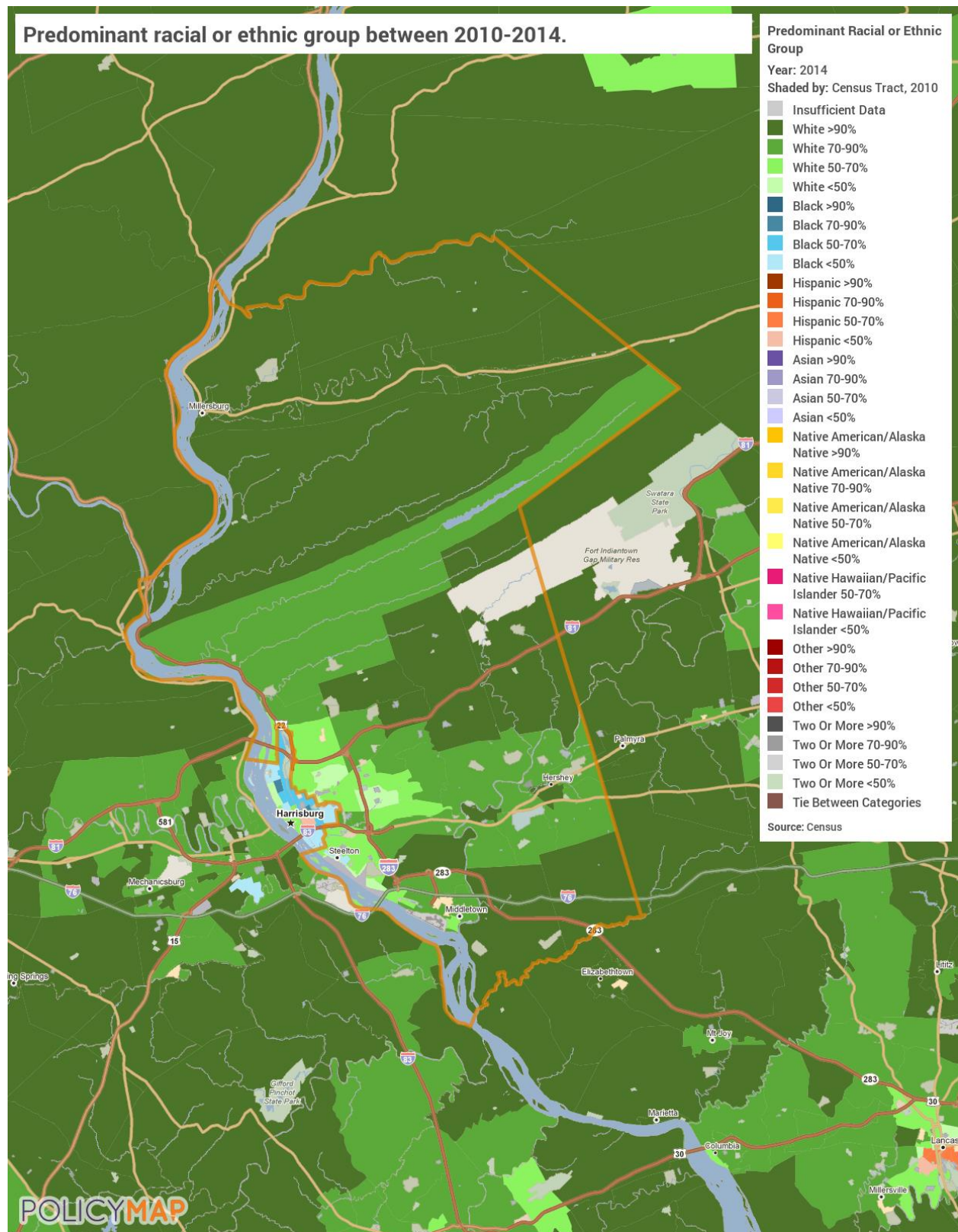


Figure 8: National Origin

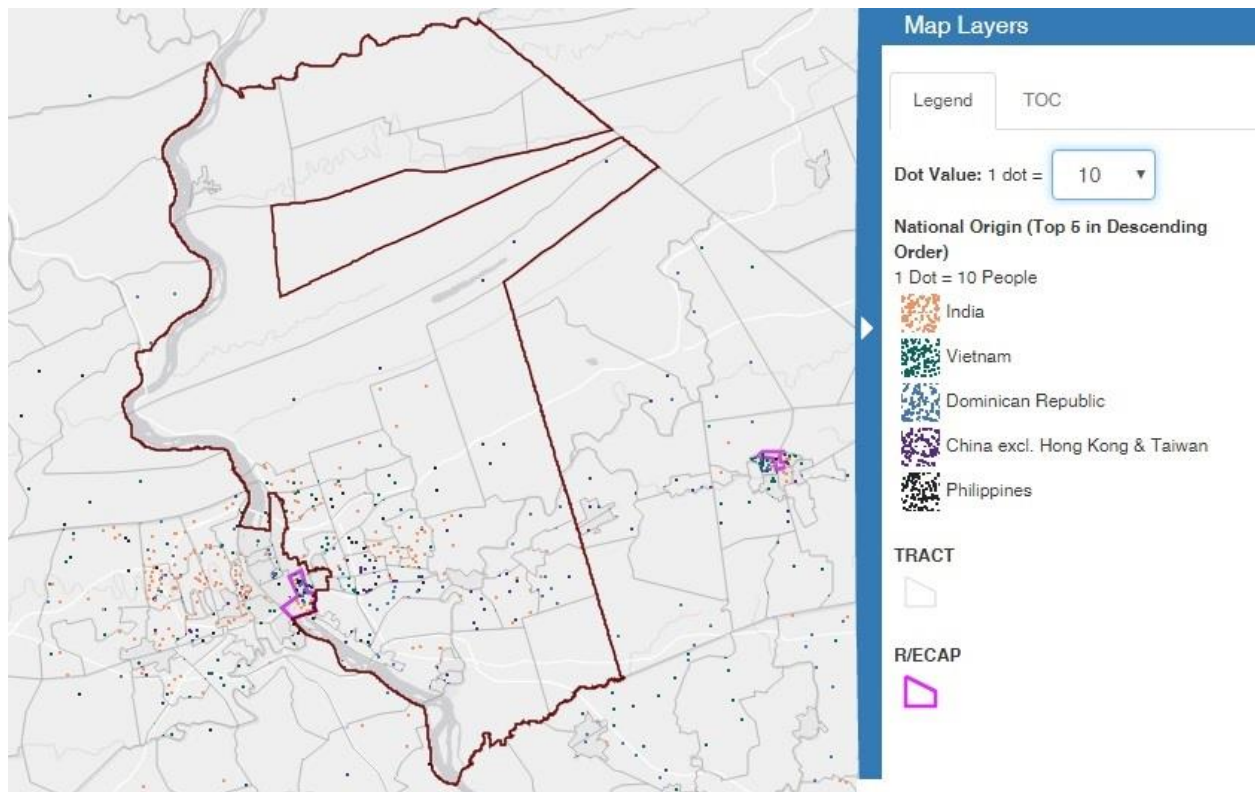


Figure 9: Foreign-Born Populations

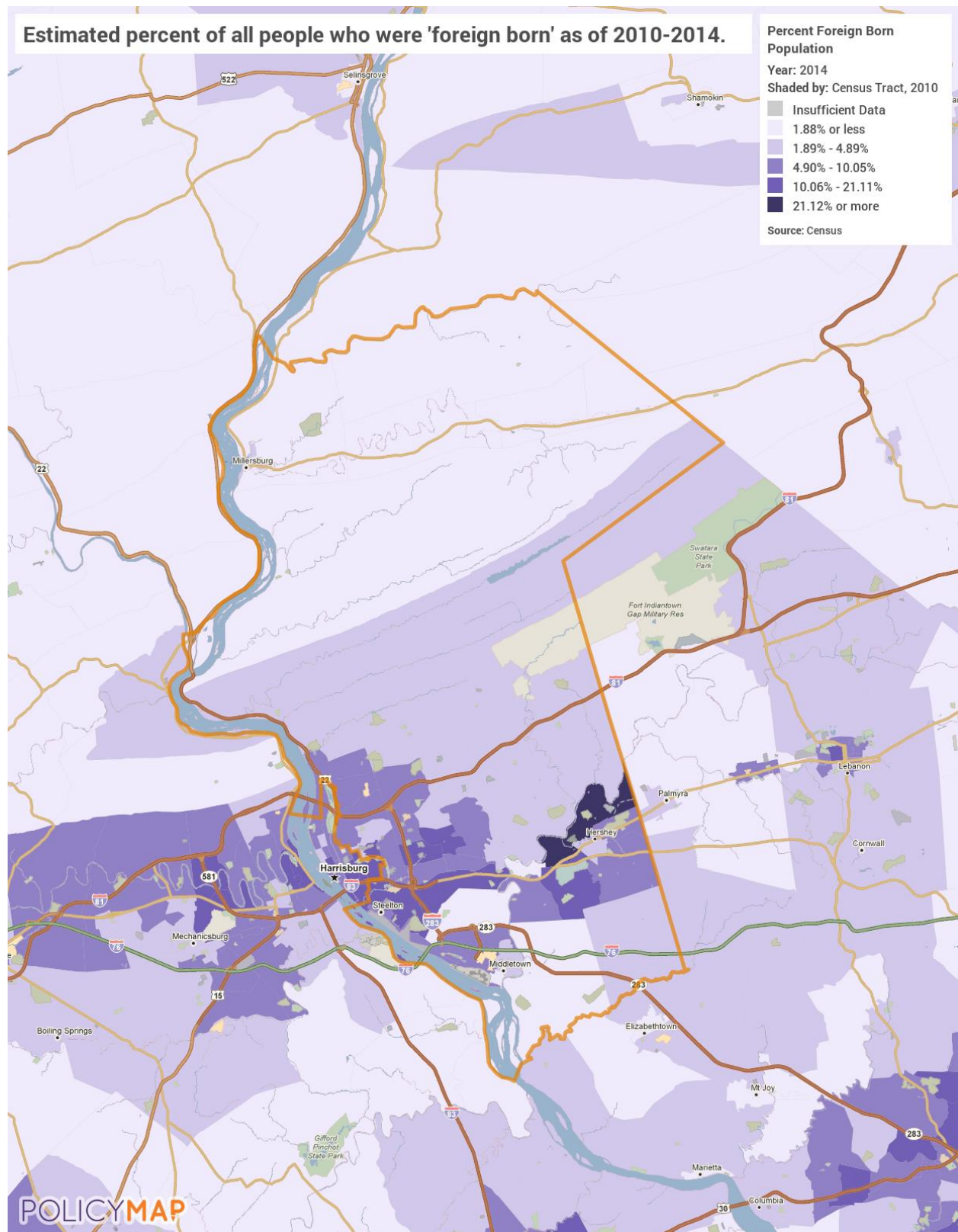
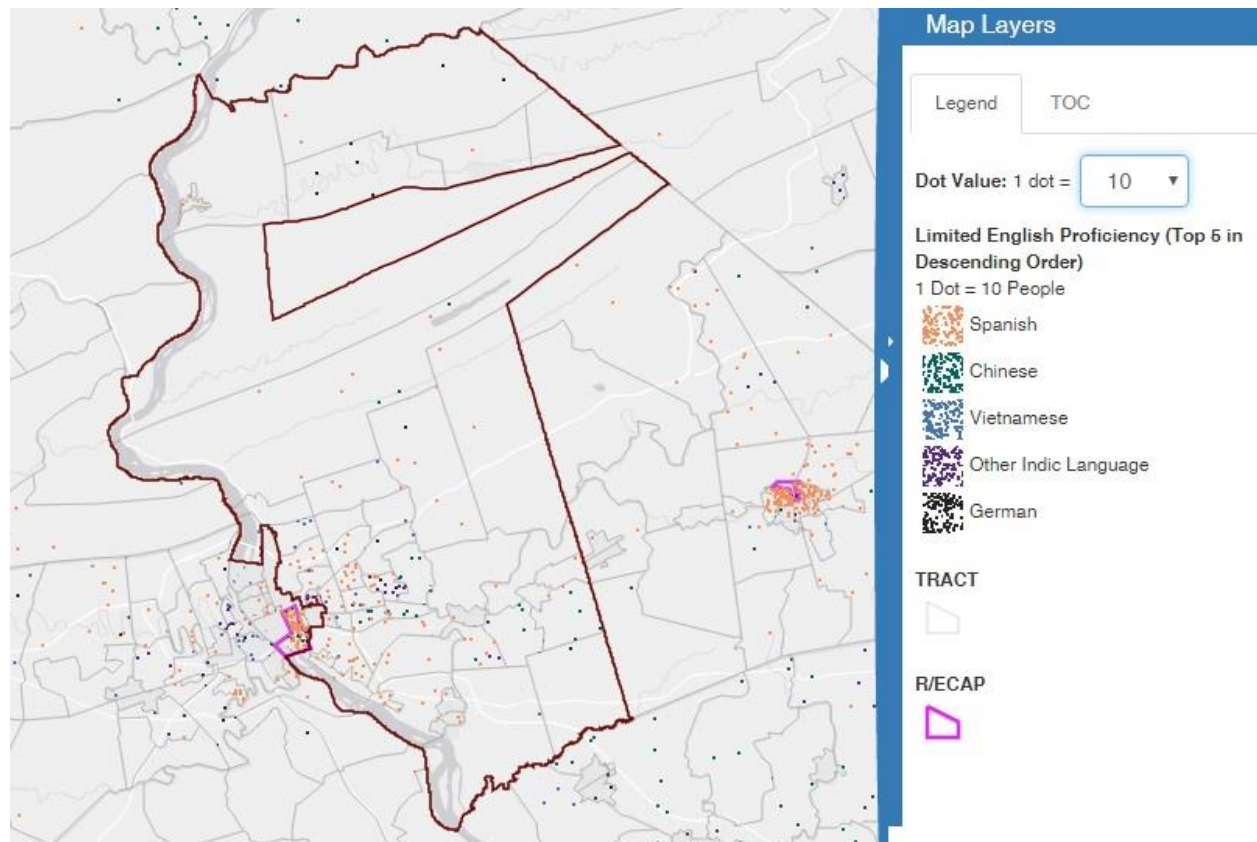


Figure 10: LEP



d. Consider and describe the location of owner and renter occupied housing in determining whether such housing is located in segregated or integrated areas.

Dauphin County has a slightly lower homeownership rate compared to other communities, with 64.3% in 2014. As a result, rental housing comprises a significant portion of the housing stock in much of the County. Much of the rental housing in the County is near Harrisburg, where neighborhoods with lower rates of homeownership are the same communities that have larger non-White populations.

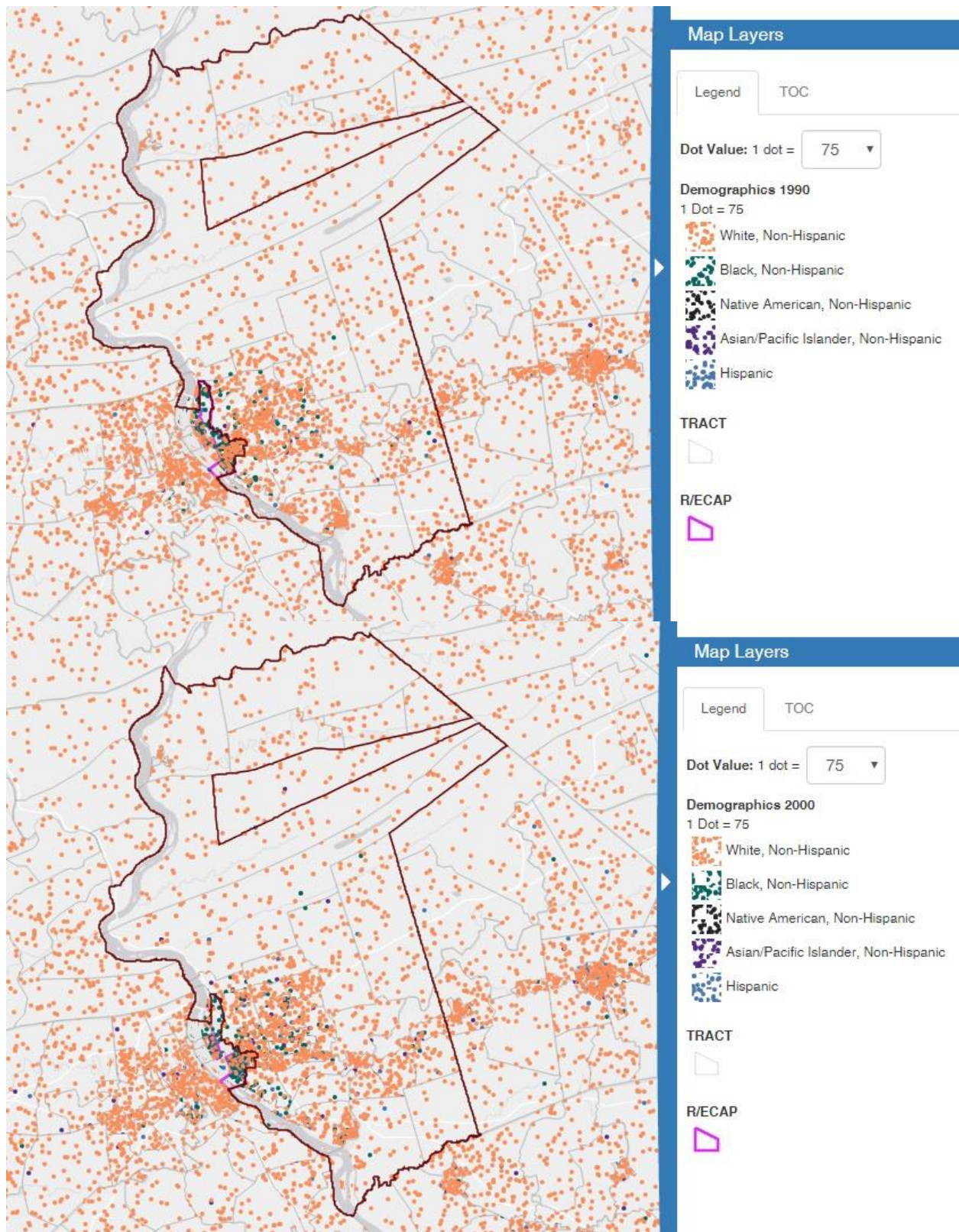
The areas with the highest rates of rental housing stock are Lower Paxton, Derry, and Middletown. While Lower Paxton and Derry have remained predominantly renter-occupied since 2000, Middletown has seen a significant decline in homeownership during this time period. These areas also contain higher levels of minority concentration than Dauphin County overall.

e. Discuss how patterns of segregation have changed over time (since 1990).

Dauphin County has diversified between 1990 and 2010, changing from 92.8% White in 1990 to 79.8% White in 2010. This is largely due to increases in the Black, Hispanic, and Asian populations in the County. Foreign-born residents have also increased as a proportion of the population, the majority of which are from either Latin America or Asia. As such, many neighborhoods with few non-White residents in 1990 have since become more diverse.

The overall dissimilarity indices for most non-White groups have decreased since 1990 in Dauphin County. However, this is not true for Hispanic and Asian households compared to White households. As both of these groups are expected to grow in the future, this is a noteworthy finding from a fair housing perspective. While neighborhoods have more non-White and foreign-born households than they did 20 years ago, these new households are more likely to live in segregated housing patterns compared to 1990.

Figures 11 and 12: Race/Ethnicity Trends, 1990



f. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future.

According to local stakeholders, Dauphin County's transit system does not provide access to certain critical community amenities or employment centers such as the warehousing industry in Cumberland County and medical centers for northern Dauphin County residents. Since LMI families rely more heavily on transit, the routing decisions made by Capital Area Transit (CAT) have the power to both exacerbate and alleviate segregation. However, CAT relies heavily on ridership from State employees, who use the bus to commute and receive subsidized bus passes. These employees generally work conventional daytime shift hours and can be served through a traditional hub-and-spoke transit system. As such, CAT's decision-making ability regarding hours and coverage are limited and tied heavily to the needs of their primary users, which are frequently mismatched with those of the protected classes in the community.

A disproportionate number of members of the protected classes must therefore live in or around the City of Harrisburg due to transit dependency, or be faced with extremely time-consuming commutes and/or limited job search prospects. This pattern has contributed to higher segregation in both Harrisburg and Dauphin County.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.

According to stakeholders interviewed, there is a shortage of affordable child care throughout Dauphin County. This lack of child care presents a major barrier for employment and education among single parents, as it effectively restricts housing choice to areas where child care is accessible and affordable. As a result, single parents may not be able to expand their job search radius, work full-time, or access additional job training or education. This negatively impacts the local economy and restricts fair housing choice for families with children.

In addition, there is significant community opposition to affordable housing development in certain areas of Dauphin County. Stakeholders interviewed noted that community members occasionally testified against any and all new development that would potentially accept Section 8 at public meetings. Stakeholders cited northern areas of Dauphin County as having a significantly different culture compared to the areas near Harrisburg, which can be difficult for new residents to acclimate to or feel welcome in. And, school districts have voiced opposition to new multi-family residential development because of the potential impact on school enrollment.

b. The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and mobility options for protected class groups.

Penn State has major plans to expand its Harrisburg campus, which is located in Middletown. It has plans to add several hundred dormitory units for students, and will offer aggressive financial aid packages in order to attract students who may otherwise apply to the State College campus. Penn State Harrisburg plans to expand its undergraduate student body to approximately 5,000 students from its current student body of 3,866. Stakeholders interviewed for this AFH noted that a disproportionate number of students who attend the Penn State Harrisburg program are foreign-born and often Asian. While student populations represent a different subset of needs compared to residents from the general population, it is likely that Middletown will experience a large increase in diversity—in race as well as age—in the near future.

Regarding mobility options, there are ongoing spatial mismatch problems between affordable housing, jobs, and critical amenities. While CAT aims to provide equitable service for low-income communities, its routes cannot generate enough ridership to serve many low-income areas of Dauphin County. As a result, some areas of Dauphin County have inadequate service. Transit is often unavailable for second-shift or third-shift workers, especially for residents in less developed areas of the County.

3. Contributing Factors of Segregation

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

Contributing factors:

- Community opposition
- Private discrimination
- Lack of public investments in specific neighborhoods, including services or amenities
- Location and type of affordable housing

ii. R/ECAPs

1. Analysis

a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction.

There are no R/ECAPs identified by HUD's AFFH data and mapping tool. According to HUD's "AFFH Data Documentation" report, the racial/ethnic concentration threshold for rural areas can be reduced from 50% to 20%. However, Dauphin County is not a rural county according to USDA criterion. In 2010, 20.1% and 4.5% of Dauphin County's population were non-White and Hispanic, respectively. Given this fact, even the lower threshold of 20% does not pinpoint any meaningful racial or ethnic concentrations in the County.

Instead, this analysis will consider tracts in which 20% or more of residents are non-White (roughly the countywide average) or Hispanic, and 25% or more live in poverty (roughly double the countywide rate, and lower than the 40% threshold used by the mapping tool).

Under this definition, two census tracts in Dauphin County entitlement area fall under the definition of R/ECAP. One is tract 233, which is in the Borough of Steelton located in southeastern Dauphin County. In 2014, the poverty rate in this tract was 26.8% and the percentage of non-White residents was 21.2%. This tract is home to a large concentration of high-rise public housing. This increases the racial and ethnic concentration as well as the number of persons living under the poverty line.

The second area is tract 237, which is in southwestern Dauphin County and is contained in the Borough of Middletown. In 2014, the poverty rate in this tract was 38.5% and the percentage of non-White residents was 34.7%.

b. Which protected classes disproportionately reside in R/ECAPs compared to the jurisdiction and region?

Although Dauphin County does not have an identified R/ECAP, Blacks and Hispanics are disproportionately concentrated in the two tracts identified in the previous section. In tract 237/Middletown, Black residents comprise 23.7% of the population and Hispanics comprise 9.9% of the population. In tract 241/Derry Township, Hispanics comprise 8.7% of the population and Blacks comprise 7.8%.

The following table on R/ECAPs is provided by HUD for the jurisdiction and the region. While there are no HUD-designated R/ECAPs within the County, there are 14,254 R/ECAP residents within the CBSA. About half of these residents are Non-Hispanic Blacks, and about 31% are Hispanic.

Table 4 – R/ECAP Demographics

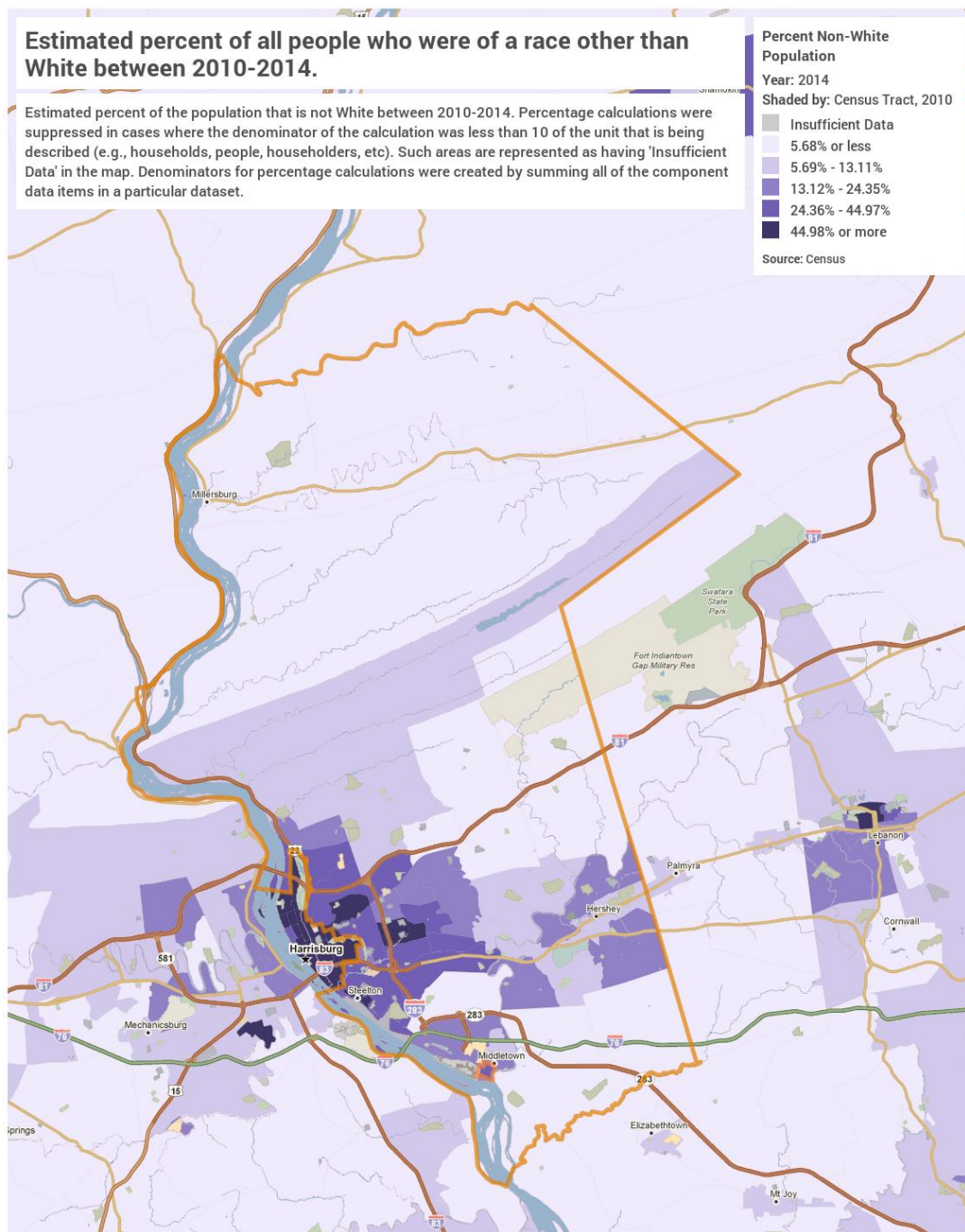
	(Dauphin County, PA CDBG, HOME) Jurisdiction			(Harrisburg-Carlisle, PA CBSA) Region		
Race/Ethnicity		#	%		#	%
Total Population in R/ECAPs		0	-		14,254	-
White, Non-Hispanic		0			1,451	10.18
Black, Non-Hispanic		0			7,217	50.63
Hispanic		0			4,529	31.77
Asian or Pacific Islander, Non-Hispanic		0			506	3.55
Native American, Non-Hispanic		0			35	0.25
Other, Non-Hispanic		0			36	0.25
Family Type		#	%		#	%
Total Families in R/ECAPs		0	-		3,283	-
Families with children		0			2,032	61.89
National Origin	Country	#	%	Country	#	%
#1 country of origin		0	-		14,254	-
#2 country of origin	Null	0	0.00	Mexico	213	1.49
#3 country of origin	Null	0	0.00	Honduras	178	1.25
#4 country of origin	Null	0	0.00	Vietnam	177	1.24
#5 country of origin	Null	0	0.00	Dominican Republic	165	1.16
#6 country of origin	Null	0	0.00	China excl. Hong Kong & Taiw	151	1.06
#7 country of origin	Null	0	0.00	Jamaica	84	0.59
#8 country of origin	Null	0	0.00	Guatemala	80	0.56
#9 country of origin	Null	0	0.00	Colombia	68	0.48
#10 country of origin	Null	0	0.00	Ecuador	40	0.28

Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 2: Data Sources: ACS 2010-2014

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

Figure 13: Non-White Populations



c. Describe how R/ECAPs have changed over time (since 1990).

Using the same criteria described above (20% or more non-White and 25% or more persons in poverty), there were no “concentration areas” in Dauphin County in 2000. However, the emergence of R/ECAPs since 1990 may actually be a sign of integration in the region, since the major concentration of racial and ethnic minorities in Dauphin County has been within the City of Harrisburg, which is outside the jurisdiction. The fact that Dauphin County is becoming more racially and ethnically diverse may be an indicator that regional integration is increasing.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.

There is no additional local information regarding R/ECAPs or locally defined “concentration areas” affecting other protected classes available.

b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.

The County’s policies and programs are designed to affirmatively further fair housing for all LMI individuals and members of the protected classes. No initiatives are directly targeted to R/ECAPs residents. However, certain services are directed towards members of the protected classes. Capital Area Transit, for example, runs a paratransit service for senior citizens, many of whom have disabilities. This increases mobility options for members of the protected classes.

Dauphin County also uses part of its CDBG budget to offer housing counseling. This includes credit counseling and homeownership counseling for low-income residents. Although specific data on the clientele of housing counseling services was not available, it is likely that many of the residents using this service are members of at least one protected class due to the income restrictions of the program.

3. Contributing Factors of R/ECAPs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

Contributing factors:

- Lack of private investment in specific neighborhoods
- Location and type of affordable housing
- Land use and zoning laws
- Private discrimination
- Lack of public investments in specific neighborhoods, including services or amenities

iii. Disparities in Access to Opportunity

1. Analysis

Table 12 - Opportunity Indicators, by Race/Ethnicity							
(Dauphin County, PA CDBG, HOME) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	68.82	53.41	69.01	30.46	57.33	52.38	59.25
Black, Non-Hispanic	62.31	35.70	63.46	35.04	67.63	54.18	48.15
Hispanic	61.96	41.51	62.87	33.84	64.97	54.37	50.77
Asian or Pacific Islander, Non-Hispanic	72.14	53.26	76.08	32.84	63.11	53.15	54.67
Native American, Non-Hispanic	64.83	51.47	67.19	31.98	60.32	51.31	55.58
Population below federal poverty line							
White, Non-Hispanic	63.73	50.74	62.94	30.64	57.10	51.27	60.19
Black, Non-Hispanic	49.26	29.42	55.14	36.53	69.18	50.70	44.89
Hispanic	49.28	32.57	47.94	35.07	67.30	46.31	46.46
Asian or Pacific Islander, Non-Hispanic	59.35	50.14	60.70	32.84	64.28	55.52	55.68
Native American, Non-Hispanic	80.54	55.35	75.15	28.85	55.31	63.85	68.46

Harrisburg-Carlisle CBSA	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	68.50	52.97	66.69	29.61	56.16	48.95	63.55
Black, Non-Hispanic	40.80	22.59	44.08	42.68	76.29	48.88	42.39
Hispanic	45.73	31.64	47.18	39.78	72.05	51.01	46.41
Asian or Pacific Islander, Non-Hispanic	68.76	52.61	72.42	34.30	65.11	55.40	55.76

Table 12 - Opportunity Indicators, by Race/Ethnicity							
(Dauphin County, PA CDBG, HOME) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Native American, Non-Hispanic	56.97	43.12	58.66	34.31	63.56	51.44	56.49
Population below federal poverty line							
White, Non-Hispanic	58.94	48.58	58.53	30.94	58.45	49.90	62.63
Black, Non-Hispanic	24.83	11.21	31.27	47.26	81.83	49.16	35.70
Hispanic	29.52	19.42	35.17	43.79	77.14	46.57	40.77
Asian or Pacific Islander, Non-Hispanic	49.87	39.37	56.67	38.16	70.75	53.65	51.34
Native American, Non-Hispanic	65.27	58.77	66.89	36.24	69.45	62.81	61.54

Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

Note 2: Refer to the Data Documentation for details (www.hudexchange.info).

a. Educational Opportunities

i. Describe any disparities in access to proficient schools based on race/ethnicity, national origin, and family status.

The range in educational opportunities varies by geography, with northern and eastern communities in Dauphin County having higher scores and the southern and western sections having lower scores. Tracts with higher concentrations of Black and Hispanic residents have lower opportunity scores. The total Black population's school proficiency index score is about 17 points lower than that of the White population. Similarly, the Hispanic population's school proficiency index score is about 12 points lower than the White population's score.

Proficiency indices decrease for the population living below the federal poverty line. The percentage rate at which the scores decrease is more severe for Black and Hispanic populations compared to other races or ethnicities.

Tracts that contain larger numbers of LEP or foreign-born residents do not necessarily have lower school proficiency index scores. However, there is variation within the sample: residents from India tend to be more dispersed throughout Dauphin County, while other foreign-born residents tend to be clustered in the areas near Harrisburg. These areas have lower school proficiency scores.

ii. Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.

Racial and ethnic minorities tend to be in the communities right outside of Harrisburg, particularly towards southernmost communities in Dauphin County. These tracts have the lowest school proficiency scores in Dauphin County. This pattern is repeated for foreign-born populations, with the exception of Indian residents. Families with children are relatively dispersed throughout Dauphin County, although areas near Harrisburg and Hershey tend to have more families with children. However, there is no discernible correlation between family status groups and school proficiency.

iii. Describe how school-related policies, such as school enrollment policies, affect a student's ability to attend a proficient school. Which protected class groups are least successful in accessing proficient schools?

As demonstrated by the school proficiency index provided by HUD, Black and Hispanic residents are the least successful in accessing proficient schools. This pattern is exacerbated for Black and Hispanic residents living below the federal poverty level. Overall school proficiency index scores are also low in areas with higher concentrations of LEP residents. There is no observed correlation between large families or other protected classes.

Figure 14: School Proficiency Index and Race/Ethnicity

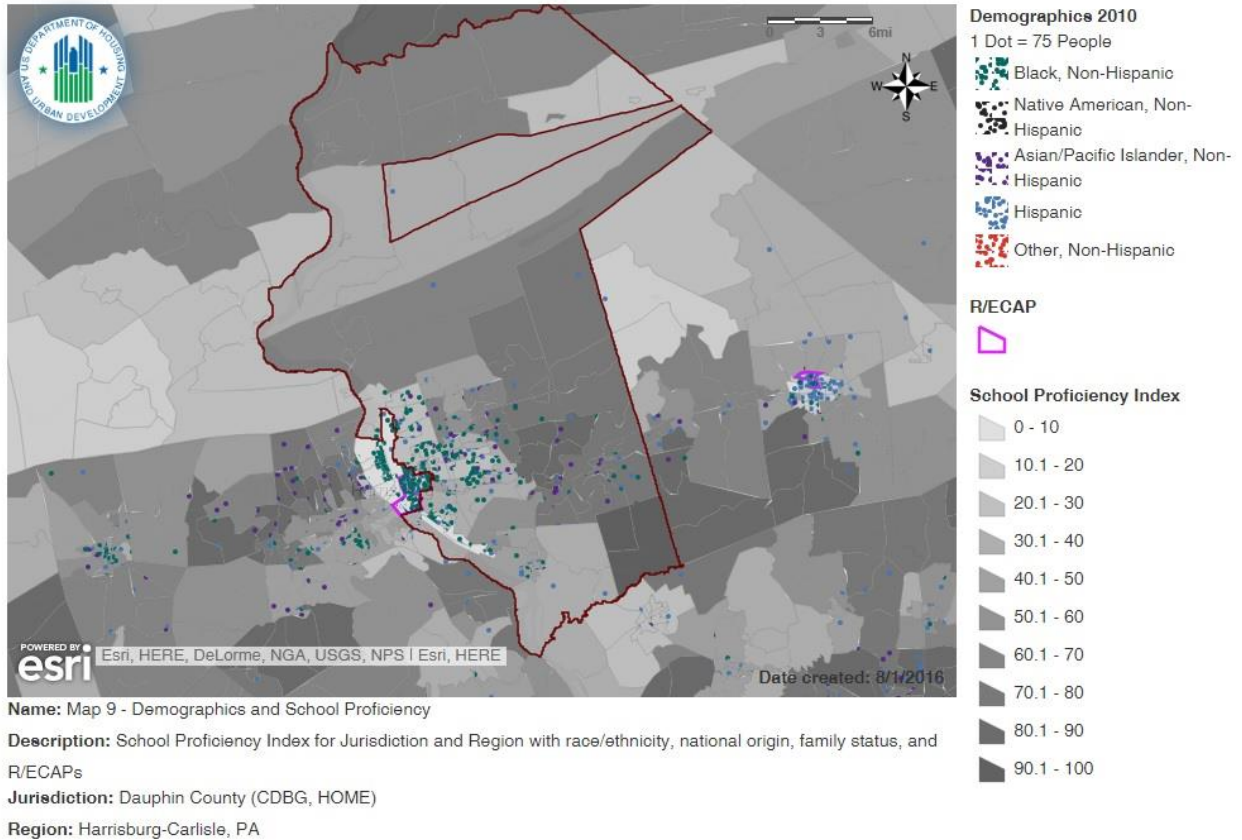
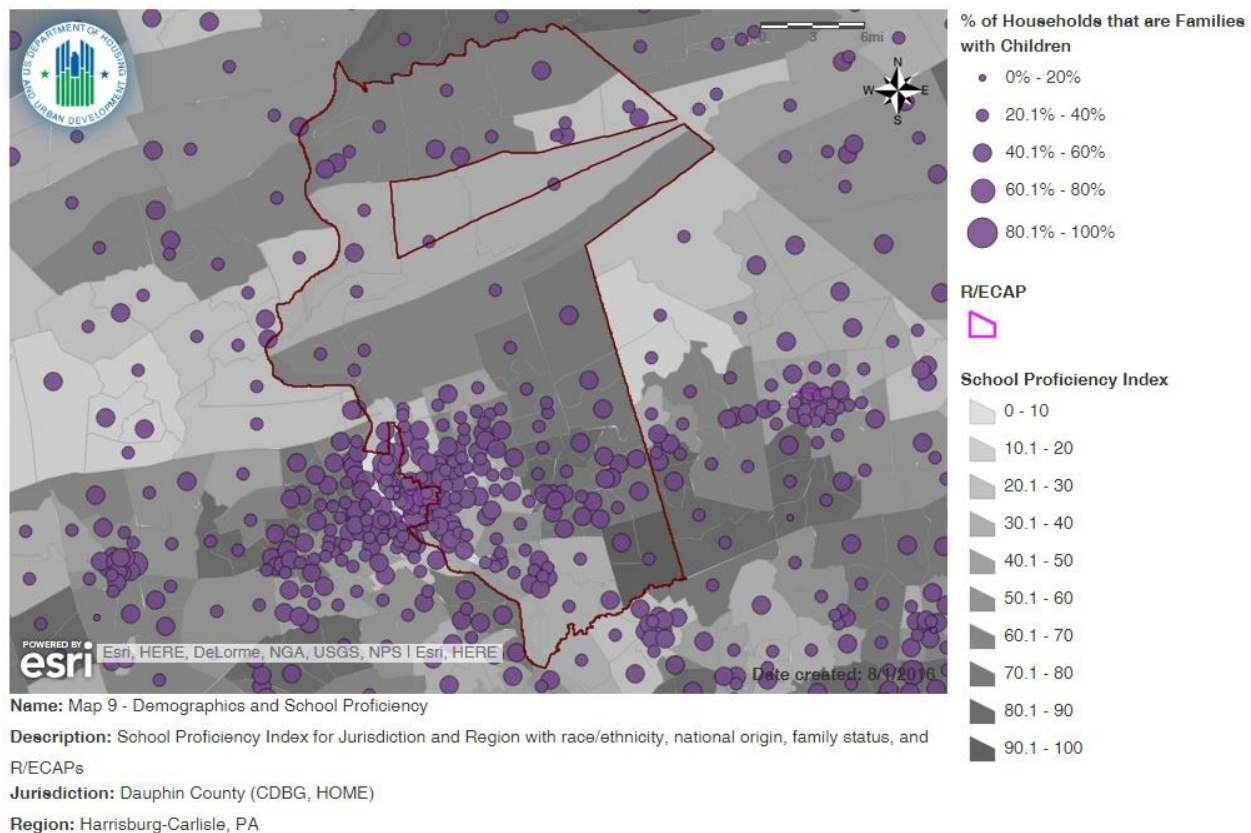


Figure 15: School Proficiency Index and Families with Children



b. Employment Opportunities

i. Describe any disparities in access to jobs and labor markets by protected class groups.

Labor Market Engagement Index measures unemployment, labor force participation, and educational attainment. Asians in Dauphin County have the highest Labor Market Index score, as it is seven points higher than Whites. Hispanics in Dauphin County have the lowest Labor Market Index score, a full 12 points lower than Whites. This is unusual, as Hispanic employment rates tend to be above-average at the national level. Black residents have a lower score than both Asians and Whites. These scores imply that more Whites and Asians in Dauphin County are actively employed than other racial or ethnic groups.

For the Jobs Proximity Index, on the other hand, the range of scores is narrower, with all racial and ethnic groups being within three points of each other. This is likely due to the relatively uniform access to jobs within Dauphin County. Despite having lower Labor Market Engagement scores, Blacks and Hispanics were at the higher end of this score. This means that, unlike many other jurisdictions, Blacks and Hispanics in Dauphin County do not necessarily have to travel farther to reach employment.

Hispanics living in poverty score much lower on both the Labor Market Index and Jobs Proximity Index than their wealthier counterparts, indicating a stronger dichotomy in this racial group. Labor Market Index scores were lowest for Blacks and Hispanics living below the poverty line.

ii. How does a person's place of residence affect their ability to obtain a job?

Jobs are concentrated in the City of Harrisburg as well as nearby Carlisle in Cumberland County. There are very few jobs in northern Dauphin County, particularly high-skill jobs. This makes it difficult for residents of northern Dauphin County to obtain employment, due to the low turnover among those currently employed. Residents near Harrisburg have access to more jobs, particularly if they are transit-dependent. This is reflected in the AFH tool's Labor Market Engagement map.

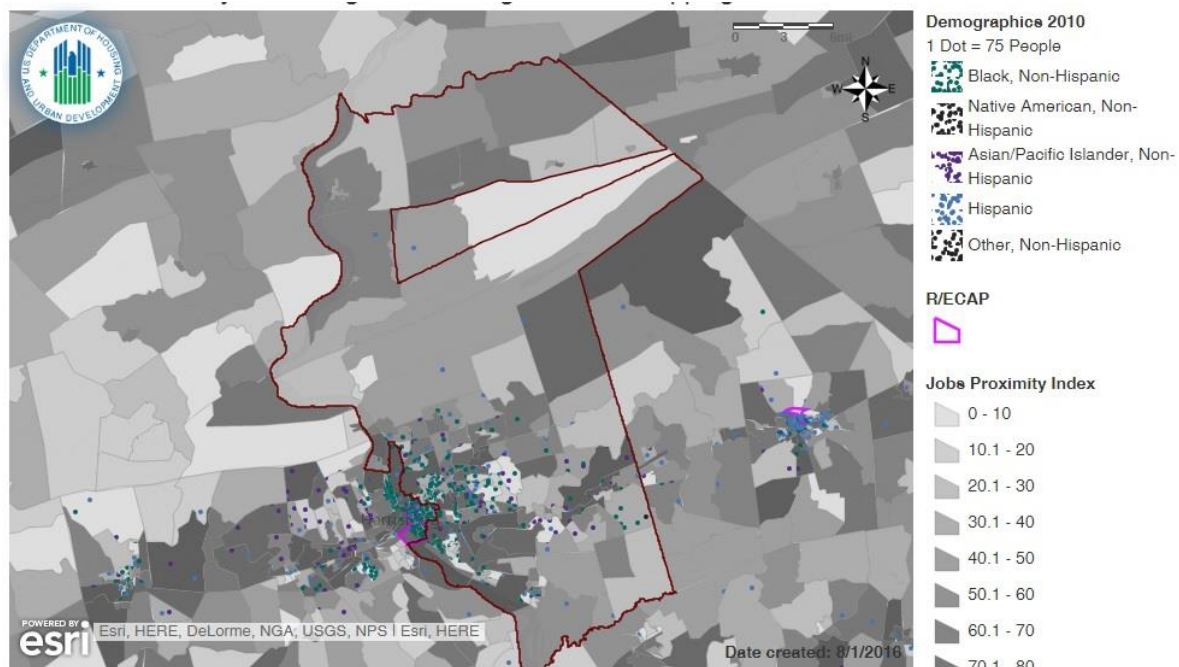
The fastest-growing job market is outside of Dauphin County in Carlisle. The growth of e-commerce has resulted in a boom in the warehousing business, which provides a growing number of attainable, entry-level jobs. Local experts noted that employees in warehousing are often upwardly mobile, gaining technical or vocational skills while on the job. However, warehouse locations can be difficult to get to from Dauphin County, resulting in the jobs being less attainable due to lengthy commutes and the absence of public transit to those locations.

iii. Which racial/ethnic, national origin, or family status groups are least successful in accessing employment?

Families with children can experience difficulty accessing employment due to a lack of affordable child care. This affects families at all income levels, but is a significant barrier especially for LMI families who need affordable options with longer or more convenient operating hours. This is particularly true in rural areas of Dauphin County, where childcare facilities can be located far from both residences and employment options.

Stakeholders expressed that entry-level, lower-skill employment opportunities are available in the community, particularly in the City of Harrisburg. However, these jobs are often hard to access via transit and are unsuitable for those with physical disabilities. In addition, many service sector jobs are part-time and shifts may run when public transit is not available or convenient.

Figure 16: Job Proximity Index and Race/Ethnicity



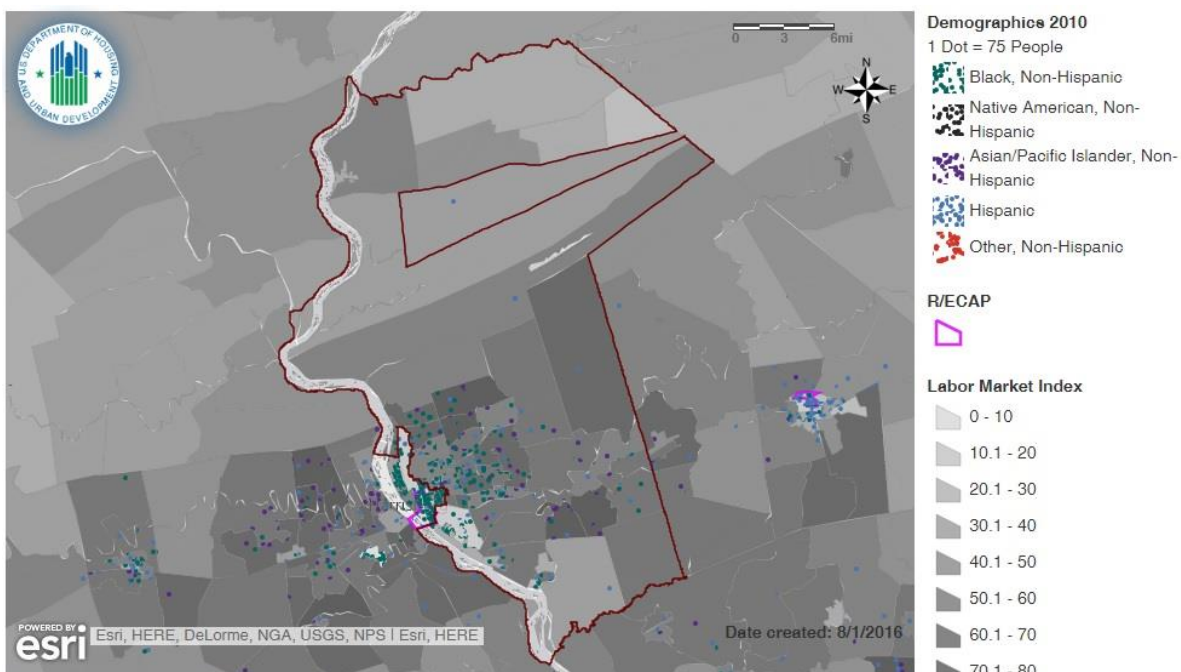
Name: Map 10 - Demographics and Job Proximity

Description: Jobs Proximity Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Dauphin County (CDBG, HOME)

Region: Harrisburg-Carlisle, PA

Figure 17: Labor Market Engagement Index and Race/Ethnicity



Name: Map 11 - Demographics and Labor Market

Description: Labor Engagement Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Dauphin County (CDBG, HOME)

Region: Harrisburg-Carlisle, PA

c. Transportation Opportunities

i. Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.

The Low Transportation Cost Index measures the cost of transport and proximity to public transportation by neighborhood. The Transit Trips Index measures how often low-income families in a neighborhood use public transportation.

The Low Cost Index is relatively uniform throughout the entitlement. Scores are slightly higher in Derry Township and the tracts near the City of Harrisburg, likely due to higher frequency of bus service. However, most of the County falls within moderate Index scores. Racial and ethnic minorities tend to live in and around Harrisburg, and therefore have slightly better access to transportation. These areas also have rents that are higher than rents in Harrisburg.

The results are similar for the Transit Trips Index. There are relatively uniformly low scores throughout Dauphin County, although tracts adjacent to Harrisburg have higher scores. These are where members of the protected classes are disproportionately located. The lowest scores in the two indices are in the communities in the extreme north of Dauphin County, although members of the protected classes are not concentrated there.

ii. Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?

Every racial and ethnic group has a higher Transit Index score than Low Cost Index score. This means that, although Dauphin County residents are using the transit system, transportation is still only moderately affordable. Whites have the lowest Transit Index scores, followed by Native Americans. Blacks have the highest scores.

Both the Transit and Low Transportation Cost Indices are lower for the larger CBSA than the County. In other words, residents of Dauphin County use the transit system more. However, Low Transportation Cost Index scores are generally also lower, indicating that Dauphin County residents also pay more for transportation than residents of the region overall. This difference is starkest for Black families whose Transit Index scores are 35-40% higher in the CBSA than the City.

Overall, the lack of reliable, affordable transit affects all low-income households, regardless of protected class, who rely on it to access jobs, education, and community facilities.

iii. Describe how the jurisdiction's and region's policies, such as public transportation routes or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.

Capital Area Transit (CAT) is the primary public transportation service provider in Dauphin County. The service overwhelmingly caters to state workers: about 65% of total ridership is from commuters traveling between suburban areas of Dauphin County and the City of Harrisburg. Most riders use CAT by choice and are not transit-dependent. Often, bus passes are subsidized by employers in Harrisburg and offer a much more cost-effective method of commuting. CAT's budget is extremely limited, and the agency cannot expand the geography or frequency of service without compromising another component of the transportation system.

Disparities are created due to CAT being both commuter-driven and hub-and-spoke designed. This puts residents whose commuting patterns do not fit into a suburb-to-city commuting schedule at a disadvantage. It also creates a disparity amongst second-shift and third-shift workers, because frequency is far less or nonexistent during off-peak times.

The remote location of growing job centers is a barrier to regional transportation coordination. Several stakeholders interviewed noted that warehousing jobs were a rapidly growing industry that provide entry-level jobs. These jobs could potentially benefit members of the protected classes, a demographic that has lower overall Labor Market Engagement Index scores than the countywide average. However, the majority of the opening warehouses are located in Cumberland County, near where the Pennsylvania Turnpike intersects I-81. Due to the relatively remote location of these warehouse parks, it is difficult to commute there without reliance on a personal vehicle. With the exception of Amazon, no major employers along this corridor have engaged with CAT to improve transportation to the expanding corridor. In addition to warehousing, many entry-level jobs are located in suburban areas such as strip malls, office parks, and other areas difficult to access through public transportation. This affects the ability of protected class groups to access available jobs through public transit.

Figure 18: Transit Trips Index and Race/Ethnicity

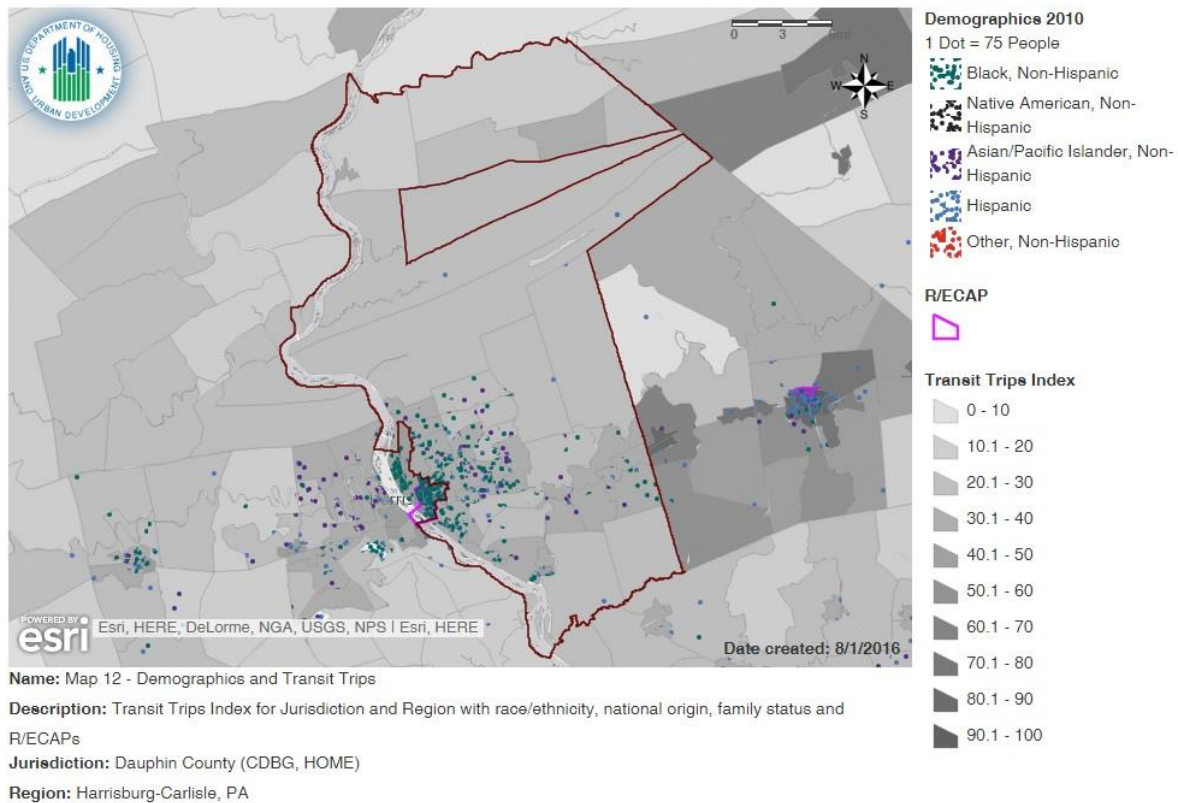
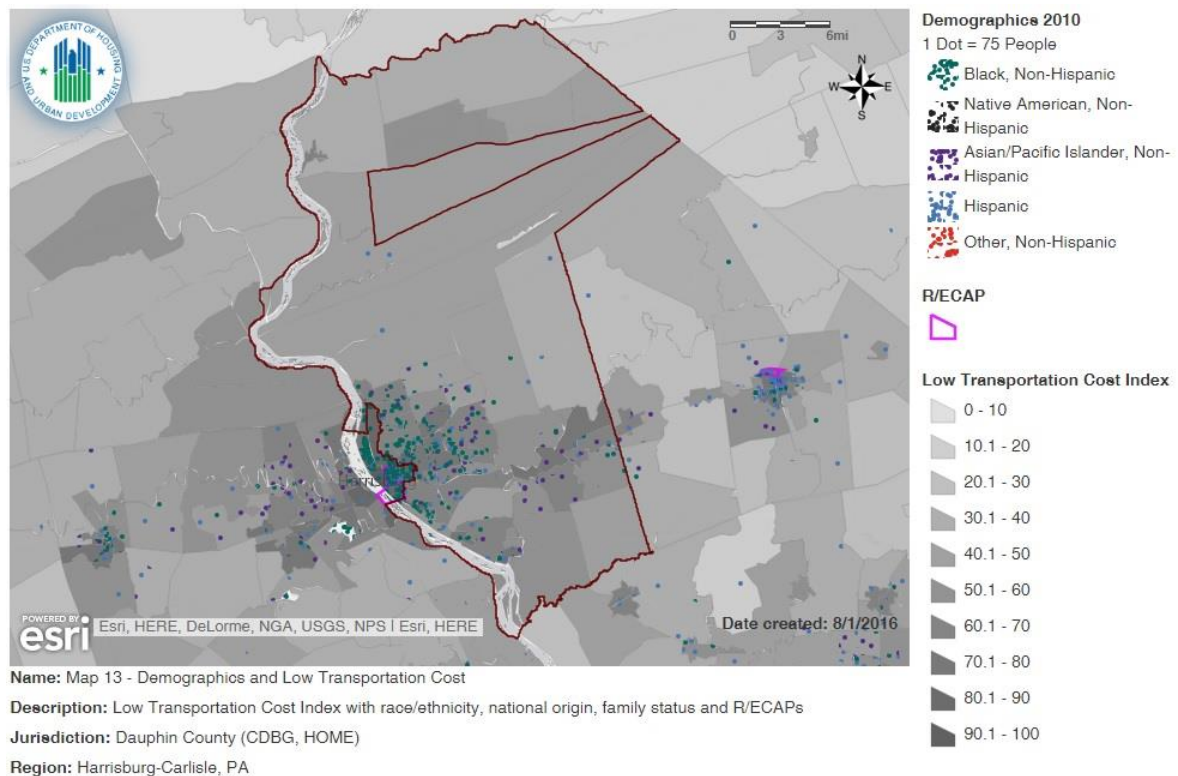


Figure 19: Low Transportation Cost Index and Race/Ethnicity



d. Low Poverty Exposure Opportunities

i. Describe any disparities in exposure to poverty by protected class groups.

Whites and Asians have the highest score on the Low Poverty Index, which is inversely related to poverty in a given neighborhood. Blacks and Hispanics have lower scores, with an 11-point difference between Hispanics (the lowest score) and Asians (the highest). This means that Hispanic and Black residents tend to live in neighborhoods with higher rates of poverty than other racial groups.

ii. What role does a person's place of residence play in their exposure to poverty?

Poverty is concentrated unevenly among the communities of Dauphin County. The areas with lowest exposure to poverty (i.e. highest index score) are in eastern Dauphin County, in tracts adjacent to (but not located in) Hummelstown and Hershey. The tracts containing Steelton, southern Middletown, and Highspire are the areas with the highest exposure to poverty. The tracts in northern Dauphin County located north of State Game Land 211 also have relatively high exposure to poverty, although this is a rural area that is socioeconomically different from the communities near Harrisburg.

There is not a large difference in exposure to poverty between neighborhoods in the County. The clustering of Low Poverty Index scores apparent within the City of Harrisburg does not extend outside into the County, indicating that much of the poverty in Harrisburg is located outside of the jurisdiction of Dauphin County.

iii. Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?

As previously mentioned, Hispanic and Black residents are the most affected by neighborhood poverty. Dauphin County's concentration areas are also among the most affected census tracts.

The areas with low exposure to poverty have fewer foreign-born residents than the rest of the County, although families with children are relatively evenly distributed throughout the jurisdiction. These two protected classes, at least, are more prevalent in neighborhoods with worse Low Poverty Index scores.

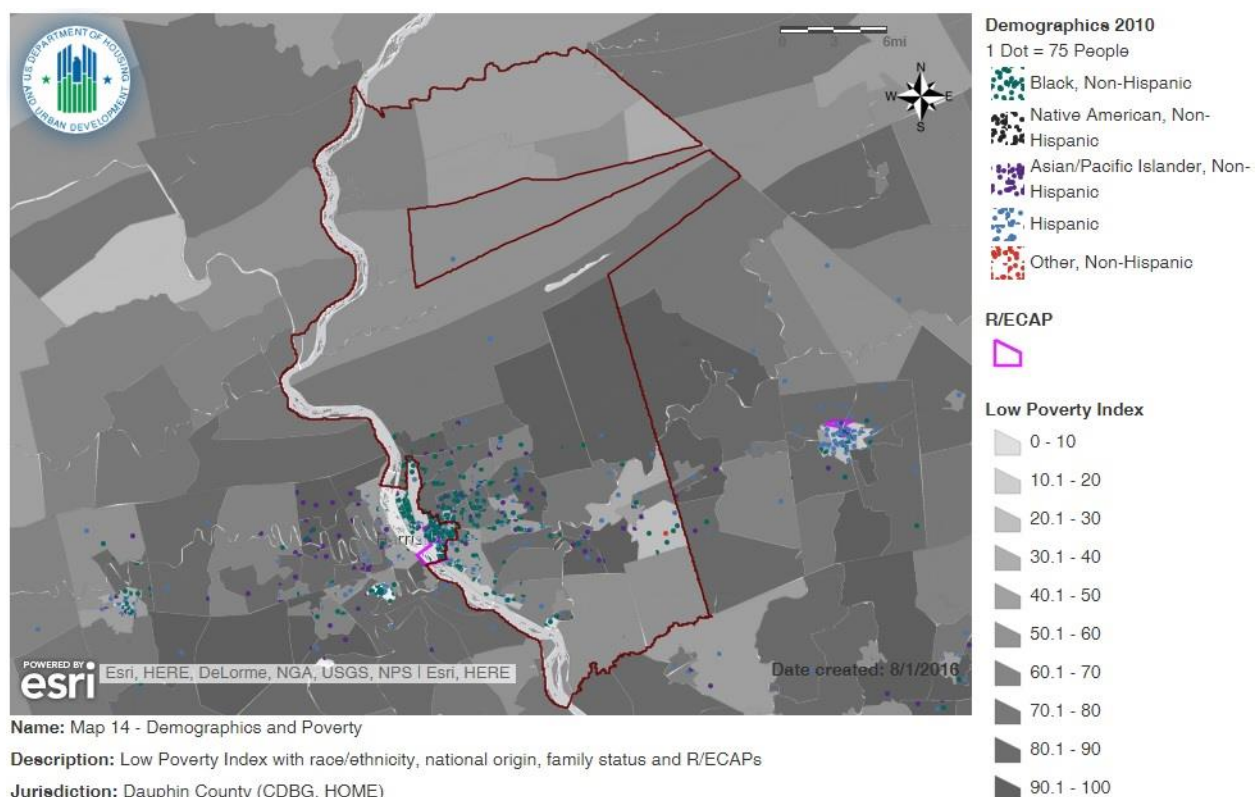
iv. Describe how the jurisdiction's and region's policies affect the ability of protected class groups to access low poverty areas.

The County's policies and programs are designed to affirmatively further fair housing for all LMI individuals and members of the protected classes.

The sharp jurisdictional and political boundaries between the City of Harrisburg and Dauphin County are barriers to coordinating regional approaches to poverty alleviation. Stakeholders described the City of Harrisburg as relatively autonomous

in its administration of programs and poverty strategies. Poverty in the region is concentrated within Harrisburg, and low-poverty areas are predominantly in neighboring Dauphin and Cumberland Counties. However, due to this jurisdictional divide, there are few collaborative approaches to opportunity expansion between the City of Harrisburg and Dauphin County. This reduces access to employment opportunities out in the County for City residents, and vice versa.

Figure 20: Low Poverty Index and Race/Ethnicity



e. Environmentally Healthy Neighborhood Opportunities

i. Describe any disparities in access to environmentally healthy neighborhoods by protected class groups.

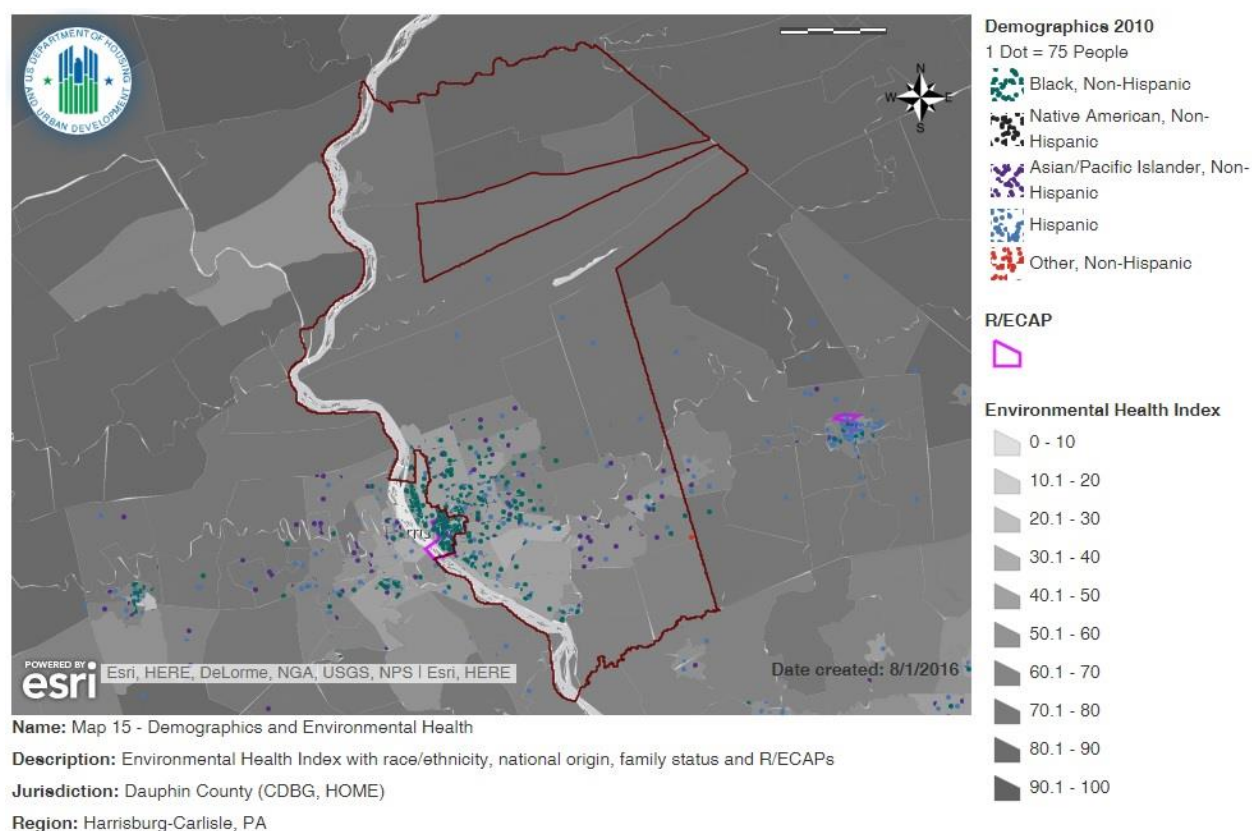
The Environmental Health Index measures exposure based on EPA estimates of air quality, carcinogenic, respiratory, and neurological toxins by neighborhood. The scores for individual racial and ethnic groups are relatively close to each other, although Black residents have the lowest scores. There is an 11-point disparity in the Environmental Health Index score between White and Black residents.

Neighborhoods within the County also received relatively similar scores, although scores are generally lower in tracts within suburban Harrisburg. The areas in the rest of the region, however, all scored slightly higher on the index, meaning that they are healthier places to live and have less exposure to potential health hazards. These areas, as discussed previously, also have smaller non-White populations.

ii. Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?

Non-Whites, foreign-born, and families with children, all of whom are more likely to live within the denser areas near Harrisburg, have less access to the environmentally healthier neighborhoods outside the Harrisburg area. This is especially true given the poor transportation connections between the City and the County, as previously discussed.

Figure 21: Environmental Health Index and Race/Ethnicity



f. Patterns in Disparities in Access to Opportunity

i. Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.

In the aggregate, indicators of opportunity are mostly evenly dispersed throughout Dauphin County. This is due to most Opportunity Indices scoring relatively closely throughout the County, as well as multiple indices that are inversely correlated with each other (such as Labor Market Engagement and Transit Trips). However, the overarching pattern remains that neighborhoods nearest Harrisburg, as well as Derry Township, have lesser access to opportunity compared to the rest of the County. These includes the County's locally defined "concentration area" tracts.

Of the protected classes for which there is data, Blacks and Hispanics appear to have the least access to opportunity overall.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.

As previously mentioned, private rental housing developers are compelled by the student market from Penn State's Middletown campus. This means new development activity serves this market and is often not aimed at increasing access to opportunity for protected classes or furthering fair housing goals. The same holds true, to some lesser degree, for public transit, which relies heavily on use by state employees.

The Harrisburg metro area is a major center of a rapidly growing warehousing industry. Many of these employers are located in Cumberland County, making these jobs more inaccessible to those without reliable private transportation.

b. The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).

No additional information relevant to access to opportunities is available.

3. Contributing Factors of Disparities in Access to Opportunity

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

Proposed Contributing Factors:

- The availability, type, frequency, and reliability of public transportation
- Lack of private investments in specific neighborhoods
- Location of employers
- Location and type of affordable housing

iv. Disproportionate Housing Needs

1. Analysis

a. Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?

Hispanic households experience housing problems at the highest rate in both the County and the region, followed by members of other races and then Blacks.

The difference in the rates of housing problems between the highest racial group (Hispanics) and lowest (Asians) is significant – 16 percentage points. White households, in fact, experience problems at a slightly lower rate than the County and region overall. Although the difference between the County and the region for most racial and ethnic groups is negligible, Hispanic and Black households in the CBSA region have higher rates of housing problems than their counterparts in Dauphin County. This is likely because it includes Harrisburg, where many households with housing problems are clustered.

All of these racial/ethnic trends are roughly comparable for households experiencing severe housing problems, too.

Small families with fewer than five members are much less likely to have housing problems than large families and non-families, with a rate of problems a full 13 percentage points lower than large families within the County.

When considering severe cost burden (paying more than 50% of household income on housing costs) alone, members of other races and Hispanics experience the highest rate. Whites and Asians have the lowest rate of severe cost burden, lower than both Whites and the Dauphin County rate overall. This means that Hispanic households and households of other races suffer from both cost burden and other severe problems (incomplete kitchen facilities, incomplete plumbing facilities, and overcrowding) more than any other group.

Small families are once again less likely than any other household type to be severely cost burdened. Non-families, in this case, experience the most severe cost burden. They are more than twice as likely to be severely cost-burdened as large families. This implies that cost burden is much more prevalent among non-family households than the other kinds of housing problems. Interestingly, large families are more likely to be cost burdened than small families, but about as likely to be *severely* cost burdened as small families. This may be a result of the many fixed-income senior citizens in Dauphin County, living either alone or with a spouse. Many stakeholders interviewed indicated that this was a large demographic struggling with housing affordability, especially in northern Dauphin County.

Table 9 - Demographics of Households with Disproportionate Housing Needs

Disproportionate Housing Needs	(Dauphin County, PA CDBG, HOME) Jurisdiction			(Harrisburg-Carlisle, PA CBSA) Region		
Households experiencing any of 4 housing problems*	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	17,901	72,296	24.76	48,960	186,695	26.22
Black, Non-Hispanic	2,727	7,522	36.25	8,539	18,812	45.39
Hispanic	1,260	3,111	40.50	3,409	7,865	43.34
Asian or Pacific Islander, Non-Hispanic	558	2,298	24.28	1,364	4,979	27.40
Native American, Non-Hispanic	8	24	33.33	58	145	40.00
Other, Non-Hispanic	460	1,161	39.62	935	2,476	37.76
Total	22,911	86,385	26.52	63,245	220,930	28.63
Household Type and Size						
Family households, <5 people	9,760	49,893	19.56	26,960	126,867	21.25
Family households, 5+ people	1,997	6,140	32.52	5,440	15,929	34.15
Non-family households	11,195	30,358	36.88	30,845	78,145	39.47

Households experiencing any of 4 Severe Housing Problems**	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	7,552	72,296	10.45	21,119	186,695	11.31
Black, Non-Hispanic	1,111	7,522	14.77	4,218	18,812	22.42
Hispanic	650	3,111	20.89	1,852	7,865	23.55
Asian or Pacific Islander, Non-Hispanic	217	2,298	9.44	639	4,979	12.83
Native American, Non-Hispanic	8	24	33.33	16	145	11.03
Other, Non-Hispanic	293	1,161	25.24	548	2,476	22.13
Total	9,825	86,385	11.37	28,390	220,930	12.85

Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: Data Sources: CHAS

Note 4: Refer to the Data Documentation for details (www.hudexchange.info).

Table 10 - Demographics of Households with Severe Housing Cost Burden

Households with Severe Housing Cost Burden*	(Dauphin County, PA CDBG, HOME) Jurisdiction			(Harrisburg-Carlisle, PA CBSA) Region		
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	6,999	72,296	9.68	18,875	186,695	10.11
Black, Non-Hispanic	990	7,522	13.16	3,760	18,812	19.99
Hispanic	569	3,111	18.29	1,579	7,865	20.08
Asian or Pacific Islander, Non-Hispanic	112	2,298	4.87	365	4,979	7.33
Native American, Non-Hispanic	4	24	16.67	12	145	8.28
Other, Non-Hispanic	244	1,161	21.02	459	2,476	18.54
Total	8,918	86,385	10.32	25,050	220,930	11.34
Household Type and Size						
Family households, <5 people	3,369	49,893	6.75	9,628	126,867	7.59
Family households, 5+ people	458	6,140	7.46	1,476	15,929	9.27
Non-family households	5,097	30,358	16.79	13,948	78,145	17.85

Note 1: Severe housing cost burden is defined as greater than 50% of income.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.

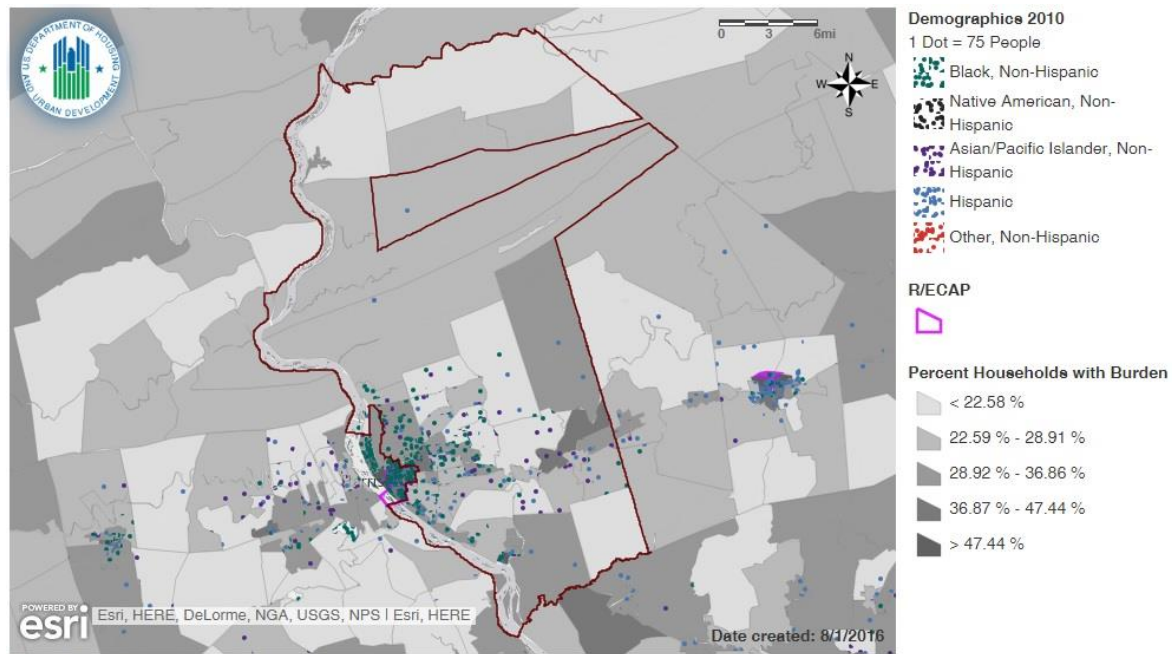
Note 4: Data Sources: CHAS

Note 5: Refer to the Data Documentation for details (www.hudexchange.info).

b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

Housing burden is highest in a few outlying areas, particularly the census tracts in southern Middletown and north of Hershey. These tracts contain a large amount of student housing and are likely outliers. Beyond these exceptions, housing burden is relatively clustered in the Harrisburg suburbs such as Penbrook, Progress, Paxtang, and Steelton. This includes the Steelton and Middletown “concentration areas”, which are still predominantly White and native-born.

Figure 22: Housing Problems and Race/Ethnicity



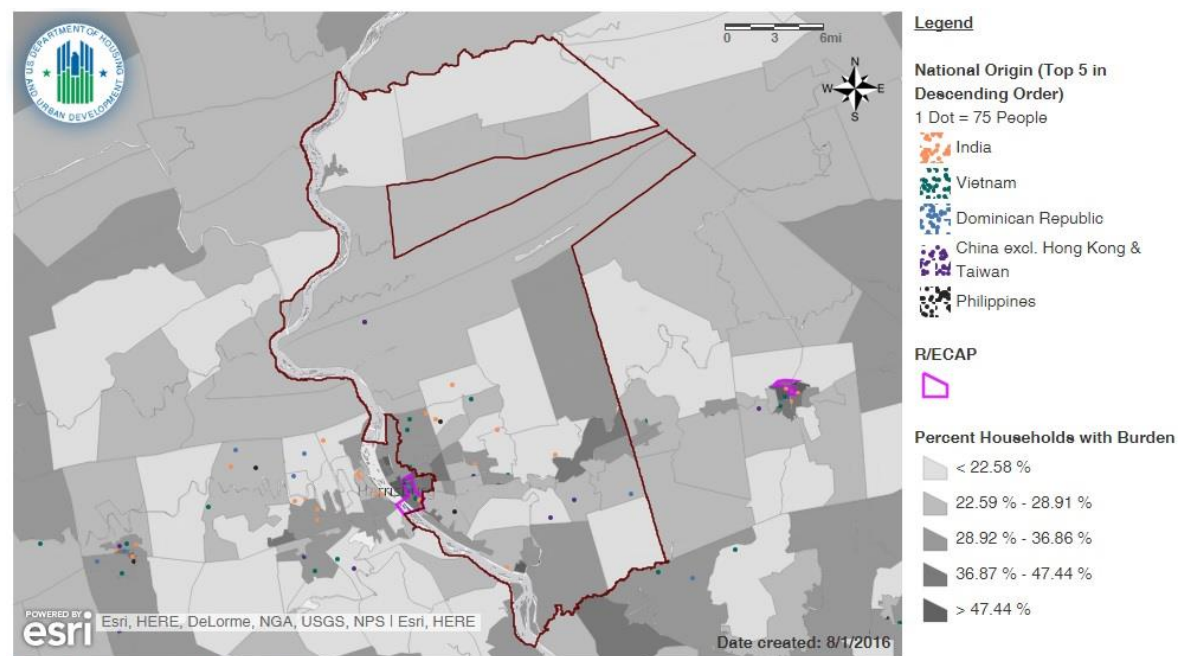
Name: Map 7 - Housing Burden and Race/Ethnicity

Description: Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and race/ethnicity dot density

Jurisdiction: Dauphin County (CDBG, HOME)

Region: Harrisburg-Carlisle, PA

Figure 23: Housing Problems and National Origin



Name: Map 8 - Housing Burden and National Origin

Description: Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and national origin dot density

Jurisdiction: Dauphin County (CDBG, HOME)

Region: Harrisburg-Carlisle, PA

c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing.

Large families comprise about 7% of the households accounted for in Table 9, and about 8.7% of households with problems. Even given their small relative numbers, about 32% of large families, or 1,997 households, experience at least one housing problem.

Households with children are more than half of those with a Housing Choice Voucher, more than one-quarter of those in Project-Based Section 8, and more than a fifth of those in public housing. Even so, there are more large family households with housing problems in the County than those currently receiving public assistance. This illustrates a greater need among families with children than the Housing Authority is able to address with its current HCV budget.

Table 11 - Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children

	(Dauphin County, PA CDBG, HOME) Jurisdiction							
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	479	69.62	74	10.76	127	18.46	138	20.06
Project-Based Section 8	313	66.31	106	22.46	51	10.81	127	26.91
Other Multifamily	43	93.48	2	4.35	0	0.00	0	0.00
HCV Program	235	22.84	333	32.36	411	39.94	582	56.56

Note 1: Data Sources: APSH

Note 2: Refer to the Data Documentation for details (www.hudexchange.info).

d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

Black and Hispanic households in Dauphin County have at least two times lower homeownership rates than other racial/ethnic groups. Asian households are the most likely to own their homes, even more than all County residents overall.

In the greater region, Hispanics still have the lowest homeownership rate, followed by Blacks. Asian residents are also less likely to be homeowners than White households, despite having similar median household incomes.

A household is more likely to be a homeowner in the greater CBSA than within Dauphin County, regardless of race and ethnicity. This is influenced by the population living in Harrisburg, which has a higher rate of renter-occupied housing than Dauphin County.

Rate of Owner-occupied Housing by Race/Ethnicity					
	(Dauphin County, PA CDBG, HOME) Jurisdiction				
	Total	White	Black	Hispanic	Asian
Households	89,830	77,241	8,188	2,786	2,123
Owner occupied	63,497	57,670	3,675	1,225	1,219
Renter occupied	26,333	19,571	4,513	1,561	904
Ownership rate	70.6%	74.6%	44.8%	43.9%	57.4%
	(Harrisburg-Carlisle, PA CBSA) Region				
Households	274,539	240,005	21,221	32,535	5,334
Owner occupied	190,929	176,870	8,148	10,018	3,089
Renter occupied	83,610	63,135	13,073	20,777	2,245
Ownership rate	69.5%	73.6%	38.3%	30.7%	57.9%

Note 1: Data Sources: 2006-2010 ACS

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.

According to several stakeholders, there has been an increase in exploitative and/or predatory leases within Dauphin County's low-end rental market. This includes severe penalties for late rent, high interest rates for rent not paid, and other unfair practices. According to some stakeholders, low-income tenants can quickly accumulate debt to the landlord, which enables the landlord to continue renting substandard housing under threat of eviction. These exploitative leases occur predominantly in low-income communities with higher rates of housing burden, such as Steelton and Middletown.

b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.

The Dauphin County Commissioners and Redevelopment Authority of Dauphin County recently partnered to complete a countywide Strategic Redevelopment Plan. The Strategic Plan identifies sites that are vacant, abandoned or underutilized with the goal of creating new economic development opportunities in Dauphin County, which includes housing opportunities. Many of the sites identified in the Strategic Plan are in parts of Dauphin County with disproportionately high concentrations of members of the protected classes, as well as tracts with disproportionately high housing needs.

The redevelopment projects highlighted in the Strategic Plan have the potential to positively impact the disproportionate housing needs in key communities in Dauphin County. One such project that has already been implemented is the redevelopment of an elementary school in Lykens through the LIHTC program. This project will assist the high number of low-income senior citizens living there who may be facing current or imminent housing problems. Several other key redevelopment sites in Dauphin County may also help members of the protected classes.

3. Contributing Factors of Disproportionate Housing Needs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.

Proposed Contributing Factors:

- The availability of affordable units in a range of sizes
- Lack of private investments in specific neighborhoods
- Lack of regional cooperation

C. Publicly Supported Housing Analysis

1. Analysis

a. Publicly Supported Housing Demographics

i. Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV))?

Black and Hispanic households are more heavily represented in the tenant-based housing choice voucher (HVC) program than in Housing Authority's project-based units. In terms of raw numbers, publicly supported housing residents are predominantly White, although White residents are disproportionately located in the Other Multifamily category. HCV users are disproportionately Black households. While the number of participating White households is roughly the same for each of the Authority's three programs, Whites account for a larger share of public housing tenants than voucher holders. Conversely, Blacks account for a larger proportion of HCV users.

Table 6 - Publicly Supported Housing Residents by Race/Ethnicity

(Dauphin County, PA CDBG, HOME) Jurisdiction	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	307	45.68	262	38.99	103	15.33	0	0.00
Project-Based Section 8	264	56.65	118	25.32	77	16.52	6	1.29
Other Multifamily	27	62.79	12	27.91	3	6.98	1	2.33
HCV Program	368	37.25	468	47.37	147	14.88	3	0.30
Income								
0-30% of AMI	5,686	76.93	763	10.32	591	8.00	198	2.68
0-50% of AMI	9,977	64.06	1,770	11.37	943	6.05	306	1.96
0-80% of AMI	21,954	72.26	3,369	11.09	1,623	5.34	531	1.75
Total	171,466	79.82	21,587	10.05	9,816	4.57	6,833	3.18

Note 1: Data Sources: Decennial Census; APSH; CHAS

Note 2: #s presented are numbers of households not individuals.

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

ii. Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

Through comparison between Table 1, Table 6, and CHAS data, each racial and ethnic group is roughly represented in proportion to how many eligible households there are in Dauphin County. In terms of public housing, Hispanics are slightly over-represented and Asians are under-represented (there were no Asian residents of public housing). In terms of project-based Section 8 units, Hispanics are slightly over-represented, Asians are slightly under-represented, and other races are in about the same proportion as the total number of eligible households from the general population.

Households must earn less than 50% of the area median income to qualify for the HVC program. The households that fit this description have a very similar racial and ethnic breakdown as the general population. However, Blacks and Hispanics are overrepresented in the HCV program, while Whites are underrepresented.

Table 1 - Demographics		
	(Dauphin County, PA CDBG, HOME) Jurisdiction	
Race/Ethnicity	#	%
White, Non-Hispanic	171,466	79.82
Black, Non-Hispanic	21,587	10.05
Hispanic	9,816	4.57
Asian or Pacific Islander, Non-Hispanic	6,833	3.18
Native American, Non-Hispanic	241	0.11
Other, Non-Hispanic	308	0.14

Note 1: All % represent a share of the total population within the jurisdiction or region

Note 2: Data Sources: Decennial Census; ACS

[Note 3: Refer to the Data Documentation for details \(www.hudexchange.info\).](http://www.hudexchange.info)

Qualifying Households by Race	
(Dauphin County, PA CDBG, HOME) Jurisdiction	
	% of Households w/ Income <50% HAMFI
White, Non-Hispanic	59.45%
Black, Non-Hispanic	25.03%
Hispanic	11.09%
Asian, Non-Hispanic	2.19%

Note 1: Data Sources: CHAS

b. Publicly Supported Housing Location and Occupancy

i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs.

There are no R/ECAPs in Dauphin County as defined by HUD's AFFH tool. Using the alternative definition described in section (V)(B)(ii), there are several publicly assisted developments directly within "concentration areas" that this report utilizes in place of HUD's R/ECAPs.

In Steelton, there are five public housing projects, one project-based Section 8 development, and one additional HUD multi-family assisted development within several blocks of each other. This is a tract identified previously as a high-minority, high-poverty area. It is also close to a large steel mill site, which, while not identified in HUD's opportunity mapping indices, may pose health hazards for nearby residents.

However, on the whole, the Project-Based Section 8, LIHTC, and Other Multifamily developments identified by HUD's AFFH tool are reasonably dispersed throughout the County and generally follow population density patterns. This is due primarily to the Housing Authority's active policy of locating developments near amenities, commercial corridors, public transit, and other amenities. A review of the maps generated by HUD's AFH tool show that there are at least 6 Other Multifamily developments outside of the concentration areas.

HCV holders, on the other hand, are plainly concentrated in the southern municipalities of Dauphin County, such as Steelton, Middletown, and Highspire. These areas have higher non-White, Hispanic, foreign-born, and renter populations than the County overall. Stakeholders interviewed indicated that substandard housing is a problem in these communities, as are absentee landlords.

Figure 24: Publicly Supported Housing and Race/Ethnicity

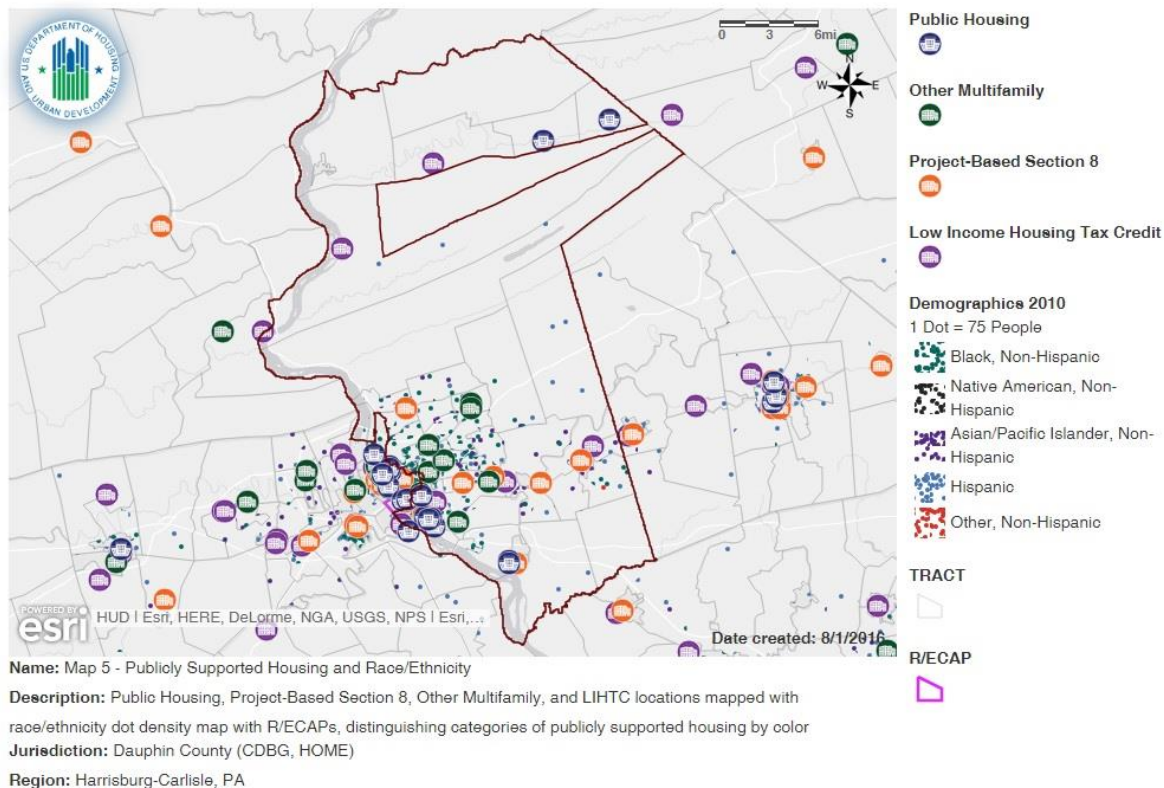
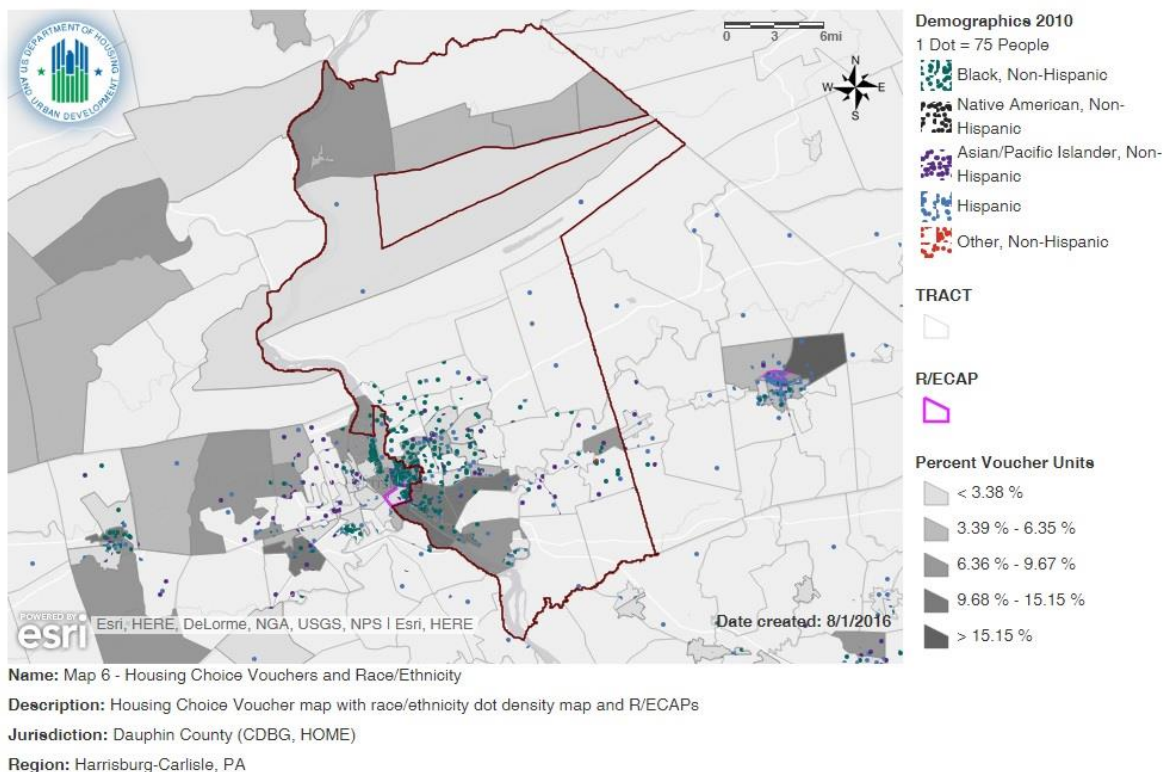


Figure 25: Housing Choice Vouchers and Race/Ethnicity



ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs?

Assisted housing serving the elderly is concentrated in Steelton. Many of these elderly residents are also disabled. This area is one of the tracts identified previously as a high-minority, high-poverty tract. It also has lower overall opportunity scores, as indicated by the index values provided by HUD.

The Housing Authority maintains eight publicly supported housing developments specifically for elderly persons, many of whom also have disabilities. Four of these eight developments are located in either Steelton or Middletown. The following developments are age-restricted:

- Hoy Towers, Steelton: 100 elderly units
 - 35 studio, 64 one-bedroom, one two-bedroom
- Bistline House, Harrisburg: 80 elderly units
 - 12 studio, 64 one-bedroom, 4 two-bedroom
- Latsha Towers, Steelton: 75 elderly units
 - 20 studio, 49 one-bedroom, 6 two-bedroom
- Essex House, Middletown: 50 elderly units
 - 30 studio, 18 one-bedroom, one two-bedroom
- Highspire Apartments, Highspire: 40 elderly units
 - 24 studio, 16 one-bedroom
- Rattling Creek Apartments, Lykens: 40 elderly units
 - 18 studio, 18 one-bedroom, two two-bedroom
- Griffith House, Steelton: 40 elderly units
 - 24 studio, 16 one-bedroom
- Gratz Park Terrace, Gratz: 30 elderly units
 - 27 one-bedroom, three two-bedroom

Cole Crest in Steelton offers 80 family units in addition to 20 elderly units. There are 30 one-bedroom units, 20 two-bedroom units, 32 three-bedroom units, 14 four-bedroom units, and four five-bedroom units. The remainder of the Housing Authority's inventory is available for family units.

In total, 386 of the 725 units (equivalent to 53% of all elderly/family/etc. units) are located in the "concentration area" identified previously. HUD's AFH Mapping Tool reports that there are 50 units in Middletown and 336 units in Steelton, which adds up to 790. However, this does not take into account the recent sale of scattered-site properties or the modernization of the Housing Authority's inventory, which reduced the total number of units from 790 to 725.

iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs?

Because there are no R/ECAPs as defined by HUD's AFFH tool, Table 7 provides no information about HRHA residents in R/ECAP and non-R/ECAP tracts.

Supplementary demographic data on public housing residents in concentration areas in Dauphin County appears earlier in the report.

Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category

(Dauphin County, PA CDBG, HOME) Jurisdiction	Total # units (occupied)	% Elderly	% with a disability*	% White	% Black	% Hispanic	% Asian/Pacific Islander	% Families w/ children
Public Housing								
R/ECAP tracts								
Non R/ECAP tracts								
Project-based Section 8								
R/ECAP tracts								
Non R/ECAP tracts								
Other HUD Multifamily								
R/ECAP tracts								
Non R/ECAP tracts								
HCV Program								
R/ECAP tracts								
Non R/ECAP tracts								

Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.

Note 2: Data Sources: APSH

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

iv. (A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category? Describe how these developments differ.

There is slight variation in the demographic composition of public housing developments throughout Dauphin County. Generally, the demographic composition of public housing developments reflects the demographics of the eligible households in the nearby community. Public housing in northern Dauphin County, which is a rural and mostly White area, has fewer Black residents. Rattling Creek Apartments and Laurel Hill are 92% and 75% White, respectively. This is representative of northern Dauphin County's demographic composition.

While there is no HUD-provided data on LIHTC developments, housing experts interviewed did not notice differences in presence of protected classes other than the increased presence of persons with disabilities in senior LIHTC housing.

B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing.

Several public housing developments that are owned and operated by the Housing Authority are senior housing. Because of this, no households in these developments have children.

As noted previously, the demographic breakdown of residents in public housing approximately matches the breakdown of eligible households in Dauphin County. Hispanics are slightly over-represented and Asians are under-represented in public housing. In terms of project-based Section 8 units, Hispanics are slightly over-represented, Asians are slightly under-represented, and other races are in about the same proportion as the total number of eligible households from the general population.

Table 8 - Demographics of Publicly Supported Housing Developments, by Program Category

Public Housing			
(Dauphin County, PA CDBG, HOME) Jurisdiction	Public Housing Race/Ethnicity (%)		Public Housing Households with Children (%)
Hoy Towers	White	42	0
	Black	43	
	Hispanic	13	
	Asian	0	
Lang Manor	White	24	50
	Black	51	
	Hispanic	25	
	Asian	0	
Genesis Court	White	28	65
	Black	49	
	Hispanic	23	
	Asian	0	
Latsha Towers	White	40	0
	Black	48	
	Hispanic	11	
	Asian	1	
Essex House	White	56	0
	Black	30	
	Hispanic	13	
	Asian	0	
Laurel Hill	White	75	61
	Black	12	
	Hispanic	13	
	Asian	0	
Rattling Creek Apts	White	92	0
	Black	5	
	Hispanic	3	
	Asian	0	
Griffith House	White	44	0
	Black	41	
	Hispanic	15	
	Asian	0	
Cole Crest	White	14	53
	Black	59	
	Hispanic	27	
	Asian	0	

Bistline House	White	49	0
	Black	36	
	Hispanic	14	
	Asian	1	

Note 1: For LIHTC properties, this information will be supplied by local knowledge.

Note 2: Percentages may not add to 100 due to rounding error.

Note 3: Data Sources: APSH

Note 4: Refer to the Data Documentation for details (www.hudexchange.info).

Table 8 - Demographics of Publicly Supported Housing Developments, by Program Category

Project-Based Section 8			
(Dauphin County, PA CDBG, HOME) Jurisdiction	Project-Based Section 8 Race/Ethnicity (%)		Project-Based Section 8 Households with Children (%)
Hummelstown Manor	White	92	0
	Black	4	
	Hispanic	4	
	Asian	0	
Eastridge Apartments	White	11	69
	Black	47	
	Hispanic	36	
	Asian	4	
Rutherford Park Townhouses	White	17	69
	Black	39	
	Hispanic	44	
	Asian	0	
Pheasant Hill	White	80	0
	Black	17	
	Hispanic	2	
	Asian	1	
Hershey Plaza	White	93	0
	Black	3	
	Hispanic	3	
	Asian	1	
Interfaith Apartments	White	88	0
	Black	10	
	Hispanic	2	
	Asian	1	

Note 1: For LIHTC properties, this information will be supplied by local knowledge.

Note 2: Percentages may not add to 100 due to rounding error.

Note 3: Data Sources: APSH

Note 4: Refer to the Data Documentation for details (www.hudexchange.info).

Table 8 - Demographics of Publicly Supported Housing Developments, by Program Category

Other HUD Multifamily			
(Dauphin County, PA CDBG, HOME) Jurisdiction	Other HUD Multifamily Race/Ethnicity (%)		Other HUD Multifamily Households with Children (%)
Creekside Village	White	50	0
	Black	20	
	Hispanic	20	
	Asian	10	
Baldwin Village	White	75	0
	Black	25	
	Hispanic		
	Asian		
New Song Village	White	56	0
	Black	39	
	Hispanic	6	
	Asian		

Note 1: For LIHTC properties, this information will be supplied by local knowledge.

Note 2: Percentages may not add to 100 due to rounding error.

Note 3: Data Sources: APSH

Note 4: [Refer to the Data Documentation for details \(www.hudexchange.info\)](http://www.hudexchange.info).

v. Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. Describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

Most publicly supported developments are a mix of White and Black households, with the predominant racial group varying by development. Compared to the overall demographics of Dauphin County, Black households are disproportionately represented in all types of housing subsidy relative to the percentage of Black households in Dauphin County. This is likely due to the fact that Black households have significantly lower median incomes than White households, as discussed previously.

Overall, there is not a strong correlation between the location of the development and the racial composition. The only notable deviance of the occupants' demographics from the corresponding census tract is the under-representation of Hispanics in some developments. The one development with a comparatively large Hispanic and small White population, Eastridge Apartments in Rutherford Township, also has the highest percentage of families with children. In addition, there are fewer Black residents in two developments in northern Dauphin County: Laurel Hill and Rattling Creek Apartments. These are located in predominantly White communities.

Several census tracts in Steelton and Middletown have high proportions of Black residents as well as high proportions of Black public housing residents living in high rise developments. Many of the residents are elderly, with very low incomes. This is largely due to the way the census tracts are created, as the total population other than the high rise residents is relatively low.

Table 8 – Characteristics of Publicly Supported Housing Developments

Development name	# Units in Project	Unit Classification		
		Family	Elderly	Accessible
Lang Manor	41	41		6
Cole Crest	100	80	20	7
Hoy Towers	100		100	5
Bistline House	100		80	7
Genesis Court	43	43		1
Latsha Towers	100		75	9
Essex House	50		50	3
Highspire Apartments	40		40	2
Rattling Creek Apartments	40		37	3
Griffith House	40		40	2
Laurel Hill	40	40		1
Grubb Terrace	10	10		2
Steelton Family Housing	18	18		2
Scattered Sites (Steelton)	18	1		-
Gratz Park Terrace	30		30	2
Minnich Terrace	20	20		1

c. Disparities in Access to Opportunity

- i. Describe any disparities in access to opportunity for residents of publicly supported housing, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.**

Public Housing

Dauphin County Housing Authority's public housing inventory is concentrated in and around the City of Harrisburg and the municipalities to the south along the river. In Steelton in particular there are five public housing projects, one project-based Section 8 development, and one additional HUD multi-family assisted development within several blocks of each other. Steelton also tends to be at the lower end of the opportunity indices in the County, particularly School Proficiency, Labor Market Engagement, Poverty Exposure, and to a lesser extent Job Proximity. This means that the residents of those Housing Authority developments (Cole Crest, Griffith House, Hoy Towers, Lang Manor, and Latsha Towers) have less overall access to opportunity than the County average.

Other Multifamily

There are only three "Other Multifamily" developments in the County, located in municipalities with varied access to opportunity. Baldwin Village is in Steelton, whose low access to opportunity has been previously discussed. Swatara Township, which is where New Song Village is located, also received low scores on the School Proficiency and Poverty Exposure indices, but higher scores than in Steelton. And in contrast, Swatara Township had among the highest scores on the Job Proximity index. The third Other Multifamily development, Creekside Village, is in Lower Paxton Township. The tract itself falls in the mid- to upper-range of all the opportunity scores within Dauphin County.

Project-based Section 8

Similar to Other Multifamily, Project-based Section 8 developments, which generally follow along Route 322 from Harrisburg to Hershey and south along the river, are located in municipalities with varied access to opportunity. The Hershey area has generally similar access to opportunity as the Harrisburg/Steelton area, including lower transportation costs, higher poverty, and higher job proximity relative to the County overall. Hershey does have much higher access to proficient schools than the western edge of the County, however. Between Harrisburg and Hershey is Hummelstown, which has one Project-based Section 8 senior development. Although Hummelstown has a very high score on the School Proficiency index, it scores much lower on Job Proximity than either Harrisburg or Hershey.

Low-income Housing Tax Credits

LIHTC projects are the most numerous and dispersed type of publicly supported housing throughout the County. This gives residents of LIHTC developments the most diverse options of neighborhoods and access to opportunity among all residents of publicly supported housing, especially when it comes to schools, jobs, and areas with low poverty exposure. Even so, LIHTC developments are still more often located in Harrisburg (which has upwards of 45 according to HUD data), the southern communities, and along Route 322.

Six LIHTC developments north of Harrisburg account for the bulk of publicly supported units in northern Dauphin County, the remainder being four public housing developments in Lykens and Williamstown. This portion of the County is primarily rural and as a result its residents have access to opportunity that differs from Harrisburg and other more-densely population areas of the County. For example, northern Dauphin had fewer transit trips, higher transit cost, better environmental health, and slightly lower overall labor market engagement. School Proficiency and Poverty Exposure are in the middle of the County's range. Job Proximity is mixed, most likely because of the broader distribution of employers typical in small towns and very rural areas.

Housing Choice Vouchers

HCV users are primarily concentrated in the communities to the south of Harrisburg such as Steelton, Swatara Township, Middletown, and Highspire. These areas have lower overall access to opportunity than the remainder of Dauphin County, as indicated by lower scores on several of the opportunity indices provided by HUD. In particular, these areas exhibit low access to proficient schools, which is critical because many HCV recipients are families with children.

Two other areas outside of the greater Harrisburg with high concentrations of HCVs are in Hershey and Upper Paxton Township. As previously described, Hershey by and large has greater but similar access to opportunity as Harrisburg. Upper Paxton Township is much more rural in nature, and as such has degrees of access to opportunity that are different than the more urban areas.

Housing for Families, Elderly, and Persons with Disabilities

HACD has almost twice as many units reserved for the elderly (472) as they do for families (253). As previously discussed, the bulk of public housing in Dauphin County is located in Harrisburg and Steelton. This means that most of the elderly and families with children that require public housing are also limited to this area and by the access to opportunity available there. The two developments in Williamstown are for families, while one of the two developments in Lykens is for elderly persons. These four developments account for 107 of HACD's 725 units.

According to available data, Project-based Section 8 developments are roughly split between those designated for seniors or for families. Approximately 70% of LIHTC developments are for families, with the remaining 30% for seniors. There does not appear to be any significant geographical difference between where the two different types of units are sited.

Although almost every public housing development has at least one accessible unit, the ones which have at least 5 or more (Bistline House, Cole Crest, Hoy Towers, Lang Manor, and Latsha Towers) are in the Steelton/Harrisburg area. The three Other Multifamily developments in the County, which are also outside of Harrisburg, are the only publicly supported developments designated entirely for persons with disabilities, both mental and physical. These developments are located close to Harrisburg, where the vast majority of the County's available social services are.

Regional View

From a regional perspective, there are a large number of public housing developments located in Harrisburg, outside the jurisdiction of Dauphin County. These eight developments represent at least another 800 households that live in neighborhoods with opportunity scores similar to Steelton's, namely low in School Proficiency, Labor Market Engagement, and Poverty Exposure. Although these units are in a different jurisdiction, this regional concentration of low access to opportunity has a negative effect on all residents.

When taken as a whole, publicly supported housing is weighted toward southern Dauphin County, especially in and around Harrisburg. In addition, there are areas with little to no supported housing, such as along I-81 in the eastern County and near the PA Turnpike in the southeastern corner of the County. Although many indicators of access to opportunity are relatively uniform throughout the County (i.e. transit trips and environmental health), the Harrisburg/Steelton area where most publicly supported housing is centered has demonstrably lower access to opportunities than elsewhere in the County as measured by HUDs indices.

This distribution is an outcome of the population distribution within the County also being weighted to the south. Stakeholders noted that the publicly supported housing that does exist in northern Dauphin County is relatively isolated from amenities and services. For families seeking access to social services or the job density of Harrisburg, being located in these areas could create a significant barrier in accessing opportunities that are important to them. Despite this, increasing the level of publicly supported housing outside of southwestern Dauphin County would expand housing choice.

The greater Harrisburg region has the highest concentration of publicly supported of anywhere in the surrounding counties. The cities of York, Lancaster, Lebanon are the next nearest population centers that have supported housing inventory in any comparable numbers. That means that residents who require housing assistance in

central Pennsylvania are most likely to find an available unit near Harrisburg. Based on the maps generated by HUD's AFFH tool, however, it is not clear that the counties around Dauphin have more or less access to opportunity. The most influential factors in this case are likely the greater population density and more readily available public services in Harrisburg.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.

According to the most recent analysis conducted by the Housing Authority, the Authority's waiting list has about 1,200 households. The waiting list for HCV dates back to 2003 and has about 500 applicants.

Public housing waiting lists are split between northern and southern Dauphin County. Vacancies in northern Dauphin County are more difficult to fill because of the lack of access to transit, jobs and other services. Because the homeownership rate in northern Dauphin County is so high, it is difficult for HCV holders to find units available to rent.

The Housing Authority is working with the local Continuum of Care (CoC) to make referrals of homeless residents of Dauphin County more efficient. The Authority currently prioritizes homeless residents, but does not have a way to accept direct referrals from the CoC. The Authority is working to streamline this process in order to ensure a more equitable, efficient and comprehensive delivery of services and housing to the homeless.

b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.

In addition to maintaining its publicly supported housing inventory, Dauphin County Housing Authority maintains its Family Self-Sufficiency Program (FSS). The FSS is a program offered to assist participants to become financially independent and self-sufficient. FSS focuses on such areas as education, job training, job placement, and addressing other family needs. All participants in the Section 8/Housing Choice Voucher Program and Public Housing residents are eligible and encouraged to participate in the Family Self-Sufficiency Program.

The Housing Authority also offers an Escrow Account program as part of the FSS. The Escrow Account is a type of savings account for the participant which is opened when the participant has employment income. Once the participant's portion of the rent increases because of higher income, the Authority places, generally, an amount

equivalent to the rental increases in the escrow account every month on behalf of the participant. The monthly amount deposited increases as income and rent increase, but can also decrease with a decrease in income.

Service plans are determined with the help of a dedicated case manager. The Contract of Participation is in effect for five years, and can be combined with other supportive services.

3. Contributing Factors of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

Proposed Contributing Factors:

- Community opposition
- Impediments to mobility

D. Disability and Access Analysis

1. Population Profile

a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

Persons with disabilities are dispersed throughout the County, with slight geographical variations in the concentrations of this protected class. For the most part, the concentration of persons with disabilities follows general population density. Most disabled persons are over 64.

However, there are a disproportionate number of disabled persons living in northern Dauphin County, particularly in the communities north of State Game Lands 211. These communities do not have the highest concentrations of individuals with disabilities, but a disproportionate number of persons living there have disabilities. This is likely due to the disproportionate number of senior citizens living in these areas. The communities in southern Dauphin County have much lower concentrations.

Neighborhoods with a larger non-White population tend to have a greater concentration of persons with disabilities compared to predominantly White areas of the County. Similarly, excluding university housing areas, neighborhoods with higher poverty levels also have larger concentrations of persons with disabilities.

The CBSA has a slightly lower disability rate than the County. Generally, the outer edges of the region have higher concentrations of individuals with disabilities. The cities of Harrisburg and Carlisle have higher proportions of disabled residents than the rest of the region.

Table 13 - Disability by Type

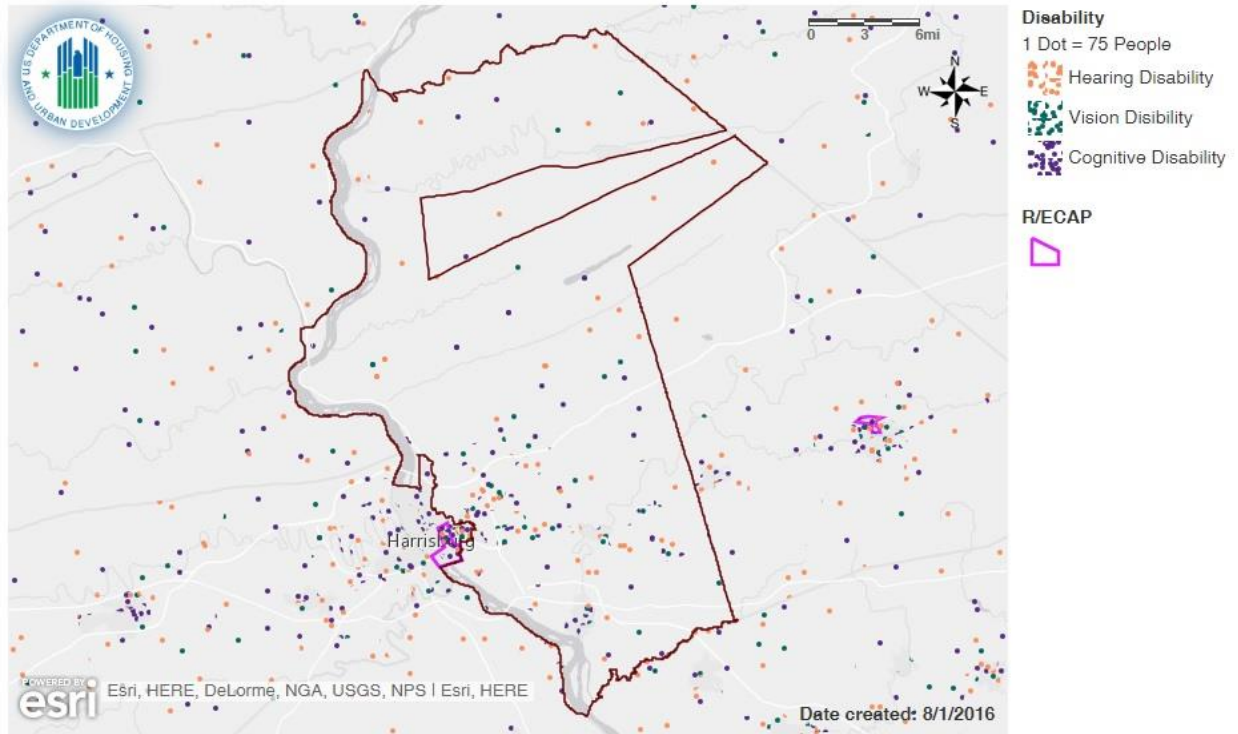
Disability Type	(Dauphin County, PA CDBG, HOME) Jurisdiction		(Harrisburg-Carlisle, PA CBSA) Region	
	#	%	#	%
Hearing difficulty	6,931	3.43	17,934	3.52
Vision difficulty	3,661	1.81	8,737	1.72
Cognitive difficulty	8,993	4.46	24,272	4.77
Ambulatory difficulty	12,994	6.44	32,080	6.30
Self-care difficulty	5,075	2.51	11,554	2.27
Independent living difficulty	9,341	4.63	22,181	4.36

Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: ACS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

Figure 26: Disability by Type



Name: Map 16 - Disability by Type

Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: Dauphin County (CDBG, HOME)

Region: Harrisburg-Carlisle, PA

b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges.

Geographic patterns vary slightly between types of disability. Individuals with ambulatory disabilities, for example, are clustered in and around Middletown, Hershey, and the Harrisburg suburbs. Hearing, vision, and cognitive disabilities are concentrated in both Steelton and northern Dauphin County.

While northern Dauphin County is relatively remote, it has a large number of individuals with hearing, vision, and cognitive disabilities. It also has a larger proportion of persons over 64.

Countywide, the 18-64 age group has the highest proportion of individuals with disabilities (6.01%), followed by individuals aged 65 and older (5.23%) and children aged 5-17 (0.98%). Steelton, Swatara, and Colonial Park have the highest concentrations of children with disabilities. There are high numbers of disabled persons ages 64 and up living in and around Colonial Park, Paxtang, Penbrook, and Middletown. There are no significant concentrations of individuals with disabilities by other age groups within the County.

Regionally, there is little variation in the geographic dispersion of individuals with disabilities between age groups and by type of disability. Overall, ambulatory and independent living difficulties are the most common type of disability.

Table 14 - Disability by Age Group

Age of People with Disabilities	(Dauphin County, PA CDBG, HOME) Jurisdiction		(Harrisburg-Carlisle, PA CBSA) Region	
	#	%	#	%
age 5-17 with Disabilities	1,975	0.98	5,664	1.11
age 18-64 with Disabilities	12,135	6.01	32,112	6.30
age 65+ with Disabilities	10,565	5.23	26,644	5.23

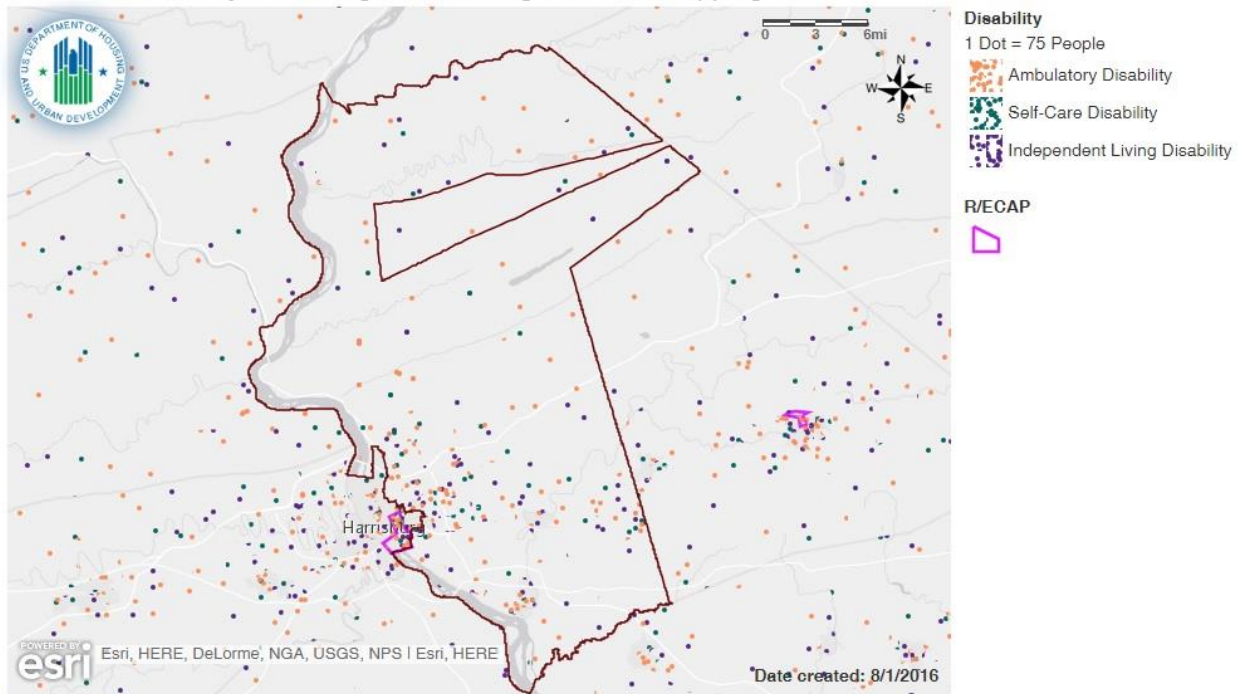
Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: ACS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

Figure 27: Disability by Type, Additional

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 16 - Disability by Type

Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: Dauphin County (CDBG, HOME)

Region: Harrisburg-Carlisle, PA

2. Housing Accessibility

a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

Given the high rates of cost burden throughout the County, it is clear that the supply of affordable housing does not currently satisfy demand. Furthermore, most single-family housing, which accounts for over half of Dauphin County's housing stock, is generally not accessible to persons with disabilities. The Fair Housing Act requires that most multi-family properties built after 1991 meet federal accessibility standards, but the vast majority of the County's housing stock was built before this time. Specific data on privately-owned affordable, accessible housing is unavailable.

It is reasonable to conclude that these findings indicate that neither the County nor the region has an adequate supply of affordable, accessible housing in a range of unit sizes. Due to the aging population of Dauphin County, this lack of affordable, accessible housing will become increasingly important in the future. This conclusion was supported by stakeholders interviewed who worked in the non-profit sector. According to non-profit groups who work with the elderly, it is extremely difficult to find ADA-accessible rental housing on the private market, especially for a low-income senior citizen.

Dauphin County Housing Authority periodically assesses its need compared to its current inventory as part of its planning and development efforts. Of the 725 units owned and operated by the Authority, only 53 are accessible. In the majority of cases, retrofitting existing units to become accessible would be either cost-prohibitive or result in a loss of units.

b. Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated?

The accessibility of housing in the private market is difficult to determine, as no accessibility surveys have been completed. Because most of Dauphin County's housing stock was built prior to ADA compliance requirements, it can be reasonably assumed that a large portion of all private housing stock is not accessible. As described in the demographic analysis, areas with the most affordable housing stock are located in either northern Dauphin County or in the southern communities near Steelton, Highspire, and Middletown. However, these tracts have lower opportunity scores than the County overall.

Of the Housing Authority's 16 developments, all but one have at least one accessible unit. The highest concentration of accessible housing is in Latsha Towers in Steelton, which has 9 accessible units out of 100 units total. The location of affordable accessible housing in the Authority's public housing developments is slightly concentrated in the "concentration areas" identified previously. The location of other

publicly supported housing, such as LIHTC developments, is more dispersed, and does not appear to align with segregated areas.

c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing?

Countywide, 55.9% of public housing residents, 12.5% of Project-Based Section 8 residents, and 26.5% of Housing Choice Voucher holders have a disability. Regionally, these figures are 40.7%, 19.8%, and 26.8%, respectively. Data is not available for type of disability.

The available figures indicate that at least some of the affordable housing stock is accessible, even if only a small percentage of it is designated as such. However, given that all of the publicly-supported housing units in the City and region are fully-occupied, individuals with disabilities may have to wait a long time to actually be able to move into these units or receive a voucher.

Other policies and practices that impact individuals' ability to access publicly supported housing include:

- Website accessibility: the Housing Authority's website (<http://www.dauphinhousing.org/>) is not accessible to individuals with visual impairments per W3C Web Accessibility guidelines.
- Admissions and Continued Occupancy Policies (ACOP) – The Housing Authority gives a preference to disabled applicants. The Authority also maintains a reasonable accommodation policy for their units, including making accommodations to apply for housing.
- Outreach to Improve Disabled Accessibility – The Housing Authority initially reaches out to landlords participating in the Section 8 program with information on disability, reasonable accommodation, and other fair housing material. However, there is no regular or routine effort to reach out to participating and non-participating property owners on the need for accessible units. Doing so may encourage more landlords with accessible units to make them available under the program.

Table 15 - Disability by Publicly Supported Housing Program Category		
(Dauphin County, PA CDBG, HOME) Jurisdiction	People with a Disability*	
	#	%
Public Housing	385	55.96
Project-Based Section 8	59	12.50
Other Multifamily	43	93.48
HCV Program	273	26.53
(Harrisburg-Carlisle, PA CBSA) Region		
Public Housing	746	40.72
Project-Based Section 8	334	19.89
Other Multifamily	43	63.24
HCV Program	797	26.88

Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Note 2: Data Sources: ACS

Note 3: [Refer to the Data Documentation for details \(www.hudexchange.info\)](http://www.hudexchange.info).

3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

Persons with disabilities live throughout Dauphin County. The few pockets that are closest to being segregated are chiefly due to the presence of publicly supported housing that is designated for persons with disabilities, group homes, nursing homes, or other similar facilities.

Housing Choice Voucher holders are able to use their vouchers throughout the community, with sufficient choice and integration compared to non-disabled voucher holders. However, there are also larger, affordable developments, such as Baldwin Village and the upcoming LIHTC redevelopment in Lykens, which cater to low-income elderly residents and may have higher concentrations of persons with disabilities than the surrounding neighborhoods.

b. Describe the range of options for persons with disabilities to access affordable housing and supportive services.

Finding affordable housing near essential services is a significant barrier faced by persons with disabilities. Accessing certain supportive services, community facilities, employment, and other amenities can be challenging for persons with disabilities, especially if they are transit-dependent. Several stakeholders cited the lack of a medical facility in northern Dauphin County as a significant obstacle for the disproportionate number of low-income senior citizens and persons with disabilities living there. Traveling to a medical facility from anywhere north of State Game Lands 211 requires a minimum one-hour drive into Harrisburg. For many Dauphin County residents, this is the closest medical facility that provides essential services.

4. Disparities in Access to Opportunity

a. To what extent are persons with disabilities able to access the following? Identify major barriers faced concerning:

i. Government services and facilities

The majority of the Dauphin County Department of Community and Economic Development services are located in the Dauphin County Economic Development building at 112 Market Street, Harrisburg, PA, 17101. This building has been recently retrofitted to be ADA compliant. The Dauphin County Housing Authority Headquarters, located at 501 Mohn Street, Steelton, PA, 17113, is also ADA compliant. The County's Mental and Behavioral Health facilities, County Department of Human Services facilities, Northern Dauphin Government Center facility, County Courthouse, and Veterans Memorial Building are all ADA compliant as well.

However, several other government facilities are not ADA compliant. Based on an ongoing analysis conducted by Dauphin County staff, the following buildings are not ADA compliant:

- Adult Probation Offices
- Work Release Center
- Booking/Night Court
- County Prison
- Recycling Center
- 12 District Justice Offices (out of 15 total)

While these non-ADA-compliant facilities do not represent a threat to fair housing choice, these issues do represent unequal access to government services and facilities for persons with disabilities.

ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

Currently, many areas of the County lack sidewalks, curb cuts, and APS signals. This is especially problematic for bus service, in which riders are occasionally left standing in dangerous areas not meant for pedestrians. However, the County is gradually installing sidewalks and curb cuts in older neighborhoods where they were not previously required, and traffic signals are replaced with APS signals when repairs are required. Additionally, the County is currently updating its comprehensive plan, which will directly address the County's need for streets that improve accessibility for all users and modes of transportation.

iii. Transportation

Capital Area Transit's regular busses are accessible for users with wheelchairs. However, stakeholders interviewed noted that the fixed-route bus stops may not be easily accessible for persons with disabilities due to the infrastructure. For individuals who cannot use fixed-route bus service, including wheelchair users, CAT offers its Special Efforts Transportation (SET) Program. The SET program provides door-to-door service for qualified disabled persons, in the areas and at the times when bus service is generally available. It is intended to be complementary to fixed-route bus service, and as such is intended to fulfill the requirements of the Americans with Disabilities Act (ADA). CAT has also received a grant from the Pennsylvania Department of Transportation that will provide shared-ride transportation at a discounted rate to qualified persons with a disability as defined by the Americans with Disabilities Act (ADA). However, stakeholders report that demand for this service exceeds supply, especially in northern Dauphin County. The Dauphin County Department of Community and Economic Development is looking into purchasing vans to use as paratransit services to supplement CAT service and resolve this issue.

iv. Proficient schools and educational programs

Dauphin County's school districts vary by area. Quality varies by district, although all school districts are subjected to strict statewide standards and guidelines. Generally, children with disabilities attend their local school.

v. Jobs

There is no designated specialized agency for workforce development amongst disabled populations. South Central PA Works (SCPa Works) in Harrisburg serves as the primary Workforce Investment Board for all Dauphin County residents. Its priority sectors are advanced manufacturing, logistics and transportation, and healthcare.

Many of the available jobs in the region, such as those in advanced manufacturing and logistics and transportation industries, are physically demanding and are often unsuitable for individuals with disabilities. Additionally, as discussed earlier, the limited

availability of transportation makes it difficult for those with disabilities to access employment opportunities.

b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

The Dauphin County Housing Authority outlines its reasonable accommodation policies in its ACOP as follows, and provides requestors with a Request for Reasonable Accommodation form:

A.

Is the requestor a person with disabilities? For this purpose the definition of person with disabilities is different than the definition used for admission. The Fair Housing definition used for this purpose is:

- A person with a physical or mental impairment that substantially limits one or more major life activities, has a record of such impairment, or is regarded as having such impairment. (The disability may not be apparent to others, i.e., a heart condition.)

If the disability is apparent or already documented, the answer to this question is yes. It is possible that the disability for which the accommodation is being requested is a disability other than the apparent disability. If the disability is not apparent or documented, the Housing Authority will obtain verification that the person requesting the accommodation is a person with a disability.

B.

Is the requested accommodation related to the disability? If it is apparent that the request is related to the apparent or documented disability, the answer to this question is yes. If it is not apparent, the Housing Authority will obtain documentation that the requested accommodation is needed due to the disability. The Housing Authority will not inquire as to the nature of the disability.

C.

Is the requested accommodation reasonable? In order to be determined reasonable, the accommodation must meet two criteria:

- Would the accommodation constitute a fundamental alteration? The Housing Authority's business is housing. If the request would alter the fundamental business that the Housing Authority conducts, that would not be reasonable. For instance, the Housing Authority would deny a request to have the Housing Authority do grocery shopping for a person with disabilities.

- Would the requested accommodation create an undue hardship? Frequently the requested accommodation costs little or nothing. If the cost would be an undue burden, the Housing Authority may request a meeting with the individual to investigate and consider equally effective alternatives.

D.

Generally the individual knows best what it is he or she needs; however, the Housing Authority retains the right to be shown how the requested accommodation enables the individual to access or use the Housing Authority's programs or services.

If more than one accommodation is equally effective in providing access to the Housing Authority's programs and services, the Housing Authority retains the right to select the most efficient or economic choice.

The cost necessary to carry out approved requests, including requests for physical modifications, will be borne by the Housing Authority if there is no one else willing to pay for the modifications. If another party pays for the modification, the Housing Authority will seek to have the same entity pay for any restoration costs.

If the tenant requests as a reasonable accommodation that they be permitted to make physical modifications at their own expense, the Housing Authority will generally approve such request if it does not violate codes or affect the structural integrity of the unit.

Any request for an accommodation that would enable a tenant to materially violate essential lease terms will not be approved, i.e. allowing nonpayment of rent, destruction of property, disturbing the peaceful enjoyment of others, etc.

There is no specific process for requesting a reasonable accommodation or accessibility modification in the County.

c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities.

For the most part, the greatest difficulty faced by a person with a physical disability looking to buy a home is finding a unit that is already accessible or easily modified. Features such as no-step entries, bathrooms on the first floor, curb cuts, etc. are not common features in Dauphin County's housing stock.

5. Disproportionate Housing Needs

a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities.

In Dauphin County in 2010, approximately 15% of the general public had some type of disability. By contrast, 55.9% of public housing residents and 26.5% of HCV holders have a disability.

According to the US Census, 21% of people with a disability in the County live below the poverty level, compared to 10.2% of people without disabilities. This disparity indicates that people with disabilities are over twice as likely to live in poverty, therefore requiring a disproportionate need for affordable housing. This indicates a need for publicly supported housing programs for persons with disabilities.

6. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region affecting groups with other protected characteristics.

Dauphin County Housing Authority opened Baldwin Village in 2009 to address the need for affordable accessible housing. Baldwin Village is located in Swatara Township and contains 12 accessible housing units. It is owned by Mohn Street Accessible Housing, Inc., a non-profit corporation.

Baldwin Village is intended and designed for low income persons with physical disabilities and was developed through HUD's Section 811 Program. This development has 10 one-bedroom units and 2 two-bedroom units, all of which are fully accessible and affordable. All units have their own front entrances from the parking area and rear entrances to a patio.

Baldwin Village was designed to accommodate persons with physical disabilities. Special features include adequate turn-around space in the units for wheelchairs, lower countertops, kitchen cabinets with easy open latches, lowered light switches, fully accessible bathrooms, a spacious shower, pocket doors to increase living space, accessible appliances, ample parking and accessible routes throughout the development.

Applications are being accepted for the Baldwin Village units; however, these units have very low turnover averaging only about one unit per year. Preferences are given for Mobility Impairment, Residency, Unsubsidized Tenant, and Persons with Physical Disabilities not living in an Accessible Unit.

b. The program participant may also describe other information relevant to its assessment of disability and access issues.

NIMBYism can occur in Dauphin County for various reasons, although it does not seem to be a principle and consistent impediment to fair housing choice. One example where NIMBYism can be recurring, according to stakeholders, is against group homes.

7. Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

Proposed Contributing Factors:

- Lack of regional cooperation
- Access to transportation for persons with disabilities
- Inaccessible sidewalks, pedestrian crossings, or other infrastructure
- Lack of affordable, accessible housing in range of unit sizes
- Lack of regional cooperation

E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

1. List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.

This section analyzes the existence of housing discrimination complaints or compliance reviews where a charge of a finding of discrimination has been made.

Complaints to HUD

Complaint data was requested from HUD on July 5, 2016. This data has not yet been received.

Complaints to Pennsylvania Human Relations Commission

Complaint data was requested from HUD on July 5, 2016. This data has not yet been received.

Complaint Analysis: Dauphin County Housing Authority

Complaints against the Dauphin County Housing Authority are reviewed by the Pennsylvania Human Relations Commission (PA HRC), a statewide organization. Since July 2011, there have been 8 complaints of alleged housing discriminations brought against the Dauphin County Housing Authority by clients. Of these complaints, six were from public housing residents and two were from Section 8 HCV clients.

Of these eight complaints, six of them were related to requests for reasonable accommodation for physical and/or mental disability. One housing discrimination complaint was regarding a refusal to lease housing due to a mental disability. One other housing discrimination complaint involved both landlord retaliation and discrimination in term and conditions of leasing housing, without a protected class specified in the complaint.

Four of these eight complaints were settled. Two of the settlements resulted in Section 8 Vouchers being issued to public housing residents who requested a reasonable accommodation for a disability.

Of the remaining four complaints, two were reviewed by the PA HRC and found to be without probable cause, one complaint resulted relocation within public housing due to a disability, and one complaint remains under review.

2. Describe any state or local fair housing laws. What characteristics are protected under each law?

The Pennsylvania Human Relations Act (PHRA), as amended, prohibits housing discrimination based on race, color, sex, religion, national origin, ancestry, handicap or disability, guide dogs, support animals, age (40 and above), pregnancy, familial status (families with children under age 18), use of a guide or support animal due to blindness, deafness or physical disability, or the disability of an individual with whom the person is known to have a relationship or association. While the State law appears to protect additional classes of people, it primarily expands on the classes protected under federal law. For example, pregnant females are protected within the familial status class of the federal law. The primary difference in the protected classes between the federal law and the Pennsylvania law is the lowering of the age to 40 for the older persons class. Consequently, persons residing in Pennsylvania have only slightly more protection under state law than under federal law in the area of housing discrimination.

Section 6 of the PHRA establishes the Pennsylvania Human Relations Commission (HRC). The powers and duties of the HRC include:

- The adoption of rules and regulations to carry out the PHRA
- The formulation of recommendations to units of local government
- The power to act upon complaints filed with the HRC
- The issuance of publications reports to promote good will and eliminate discrimination
- The distribution of fair practice notices
- The provision of notification to local human relation commissions of complaints received by the HRC from within a commission's jurisdiction
- The publication of all findings, decisions and orders.

The PHRA describes unlawful acts of discrimination and sets forth the procedure for aggrieved parties to file complaints. The act also describes the HRC's process for investigating and processing complaints

Section 5 of the PHRA deals with fair housing. Prohibited practices include:

- Discriminatory real estate practices, including refusal to sell or lease housing accommodations to members of the protected classes
- Discrimination in the terms and conditions of real estate transactions
- Discrimination in the lending of money to acquire, construct, rehabilitate, repair or maintain housing
- Discrimination in the refusal to make reasonable accommodation

- Advertising or marketing real estate in a way that makes members of the protected classes feel unwelcome or not solicited
- Making an inquiry concerning race, color, familial status, age, religion ancestry, sex, national origin or disability.

State or local laws may be certified as substantially equivalent to the federal Fair Housing Act when the U.S. Department of Housing and Urban Development (HUD) determines that the law provides rights, procedures, remedies and judicial review provisions that are substantially equivalent to the Act. Currently, the Pennsylvania Human Rights Commission participates in HUD's Fair Housing Assistance Program (FHAP) by virtue of the Pennsylvania Human Relations Act having been deemed substantially equivalent to the federal Fair Housing Act. PHRC's participation allows the agency the opportunity to receive funding to support a variety of fair housing administrative and enforcement activities, including complaint processing, training, implementation of data and information systems and other special projects.

3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

Other than through a first-time homebuyers' workshop, Dauphin County does not include a fair housing education component as part of its community development program.

The Fair Housing Council of the Capital Region, Inc. is a non-profit housing counseling organization. The Council is based in Harrisburg and conducts extensive housing counseling, an information hotline, landlord/tenant investigations, homeownership workshops, and processing of discrimination complaints. The Council provides outreach and enforcement for all of Dauphin County.

4. Additional Information

a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.

Dauphin County residents can receive fair housing services from a variety of local agencies, such as the Fair Housing Council of the Capital Region, the Dauphin County Housing Authority, or the Dauphin County Department of Community and Economic Development. These groups provide education and outreach, sponsor community events, process fair housing complaints and investigate complaints through testing, and work to promote a mutual understanding of diversity among residents.

While the Housing Authority provides fair housing literature to landlords in Dauphin County, it does not regularly organize training or outreach to the private sector.

Housing Authority staff interviewed during the AFH process indicated that neither they nor many key personnel have received regular fair housing training. In addition, the Housing Authority does not have any official policy or line item for providing fair housing training for staff. As a result, many staff may be inadequately trained to identify fair housing issues, process fair housing complaints, and refer persons who have been discriminated against to the appropriate resources. This reduces the potential for fair housing enforcement and outreach capacity within the Housing Authority.

b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

Zoning Analysis

Dauphin County has completed a preliminary zoning analysis of six key municipalities in the County. The power behind land development decisions in Pennsylvania resides with municipal governments through the formulation and administration of local controls. These include comprehensive plans, zoning ordinances and subdivision ordinances, as well as building and development permits.

This section includes analysis of a sample of six zoning ordinances that represent a variety of communities across the County in terms of settlement patterns and physical character. In providing CDBG funds to municipal subrecipients, the County is responsible to HUD to ensure that it is not investing in systems that perpetuate segregated housing patterns. In cases where this analysis determines that local rules are inconsistent with fair housing laws, the County will inform community leaders and suspend the award of County-administered competitive federal funds until problem issues are adequately addressed. In cases where local rules are legal but inconsistent with fair housing best practices, the County will inform community leaders and advise changes that would make ordinances more open and inclusive.

The ordinances reviewed include:

- Township of West Hanover
- Township of Derry
- Township of Washington
- Borough of Steelton
- Borough of Middletown
- Township of Susquehanna

The analysis was based on topics raised in HUD's Fair Housing Planning Guide, which include:

- The opportunity to develop various housing types (including apartments and housing at various densities)
- The treatment of mobile or manufactured homes
- Minimum lot size requirements
- Dispersal requirements for housing facilities for persons with disabilities in single family zoning districts
- Restrictions of the number of unrelated persons in dwelling units based on the size of the unit or the number of bedrooms

It is important to consider that the presence of inclusive zoning does not necessarily guarantee the fairness of a zoning ordinance. This analysis does not address the issue of availability, suitability or development potential of sites. While there have been no recent cases involving discriminatory zoning in Dauphin County, there is always a chance that this can become an issue. This is particularly true in the twelve communities of Dauphin County without zoning ordinances, as common fair housing issues such as blocking a group home may be easier without firm fair housing language in an ordinance.

Benchmarking

To evaluate the ordinances consistently, a benchmarking tool was used to assess each ordinance against eleven criteria that are either common indicators of impediments or language that addresses impediments to fair housing choice.

The full set of criteria includes:

1. Ordinance defines "family" inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit
2. Ordinance defines "group home" or similarly named land use comparatively to single family dwelling units
3. Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use/conditional use permit or public hearing
4. Ordinance regulates the siting of group homes as single family dwelling units without any additional regulatory provisions
5. Ordinance has a "Reasonable Accommodation" provision or allows for persons with disabilities to request reasonable accommodation/modification to regulatory provisions
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right

7. Ordinance does not distinguish between “affordable housing/multi-family housing” (i.e., financed with public funds) and “multi-family housing” (i.e., financed without any public funds)
8. Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing, or permanent supportive housing facilities exclusively to non-residential zoning districts
9. Ordinance permits manufactured units and modular housing on single lots like single family dwelling units
10. Ordinance permits mobile homes on single lots like single family dwelling units
11. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less
12. Ordinance does not include exterior standards for all single family dwelling units regardless of size, location, or zoning district

Each criteria was assigned one of two values. A score of “1” means that the impediment was not present in the ordinance or that the positive measure was in place. A score of “2” means that impediment was present or that the positive measure was not.

The final benchmark score is a simple average of the individual criteria. More specifically:

Score	Implication
1.00 - 1.24	Ordinance is at low risk relative to discriminatory provisions for housing and members of the protected classes
1.25 - 1.49	Ordinance is at moderate risk relative to discriminatory provisions for housing and members of the protected classes.
1.50 - 2.00	Ordinance is at high risk relative to discriminatory provisions for housing and members of the protected classes

Results

Every zoning ordinance that was inspected contained some level of mixed results. For some criteria, an ordinance scored well by omission rather than by affirmative action. For example, defining a family with a strict limit on the number of unrelated persons was occasionally problematic, but it represented a less critical fair housing issue in communities that made specific exception for group homes or for persons with disabilities. Some criteria, like allowing reasonable accommodation for persons with disabilities, were absent in all of the ordinances reviewed. Similarly allowing high density multi-family units by-right in at least one district were absent in most.

A high benchmark score, which indicates a high risk relative to fair housing issues, does not necessarily reflect a high probability of the real-world implementation of an ordinance causing impediments to fair housing choice. Nor does a low score mean that

impediments are unlikely to happen. The scores are merely guidelines to judge a particular code against known fair housing zoning issues.

Most ordinances reviewed for this assessment ranked as posing a low or moderate risk for discriminatory provisions. The most common problems were the absence of an allowance for reasonable accommodation for persons with disabilities and restricting the number of unrelated people who may live together.

The lowest-risk ordinances were Steelton and Susquehanna Township, which both scored 1.08. The highest-risk ordinance was Middletown's, which scored 1.55. Derry Township's ordinance also scored highly at 1.45. Although these ordinances have aspects that are known to promote fair housing, such as a permissive minimum lot sizes, they are lacking other constructive measures, such as unrestricted siting of group homes. Many have narrow definitions of "family" allowing only "a father, mother, grandfather, grandmother blood relative, a lawfully related person or single parent and their children" to live together.

Area	Score
Township of West Hanover	1.20
Township of Derry	1.45
Township of Washington	1.17
Borough of Steelton	1.08
Borough of Middletown	1.55
Township of Susquehanna	1.08

[Township of West Hanover](#)

With a score of 1.20, West Hanover's ordinance falls into the "low risk" range for discriminatory provisions. The ordinance requires no apparent limit on the number of "related" members, without a cap on the number of related persons. There are no "reasonable accommodation" provisions that allow persons with disabilities to request reasonable accommodation or modification to regulatory provisions. A municipality must accommodate all disabilities, as defined by the FHA, in group homes. Persons recovering from substance abuse or persons with HIV/AIDS, for example, cannot be excluded. In addition, the minimum lot size in West Hanover's medium-density residential district (the highest density available) is 15,000 square feet, or 0.34 acres. While this may be intended to preserve open space and reduce density in West Hanover, it also makes any potential new construction expensive due to the need to control a larger area of land. Due to West Hanover's proximity to Harrisburg, this

minimum lot size is quite large and may be limiting the supply of affordable housing that can be built in the Township. A balance should be struck between areas with larger lots and those for smaller lots that will more easily support creation of affordable housing.

Township of Derry

The Town of Derry's zoning ordinance scored moderately high on the benchmarking tool at 1.45, meaning that it contains several elements that pose risks of causing impediments to fair housing choice. Emergency housing, homeless shelters, and supportive housing is not a permitted use in any categories. This means that these types of housing are only allowed only through a special exception use permit.

In Derry Township there are no "reasonable accommodation" provisions in the zoning ordinance that allow persons with disabilities to request reasonable accommodation or modification to regulatory provisions.

Derry Township severely limits group homes. Applicants who want to site a group home in the Township must submit:

1. A statement describing the character of the facility.
2. The program's policies and goals and means proposed to accomplish the goals.
3. A description of the characteristics of the residents of the proposed group home, noting, in particular, their ages, number and any impairment which they may possess.
4. A study documenting the need for such a facility in Derry Township.

These extra regulations are not required for single-family homes and place a significant extra regulatory burden on group homes, thereby restricting housing choice for persons with disabilities.

Persons currently using or are addicted to a controlled substances are excluded, as are alcoholics. However, this should be revised to those being in recovery, as alcoholics and those recovering from illicit substance addiction qualify as being physically disabled and thus constitute a protected class.

In addition, no group home may be permitted within 2,000 feet of another group home. Group homes may only be conducted in a single-family detached dwelling. While this may be a well-intentioned means to control the saturation of group homes, it limits the areas that group homes can be placed in and therefore restricts fair housing choice.

The Board of Supervisors may also require any outdoor play or recreation (passive or active) to be enclosed by a six-foot high fence, if it is deemed necessary to protect the general welfare of the surrounding community. These are additional regulatory

provisions that impose an undue burden on the establishment of group homes and assume a level of threat to public safety and general welfare that is unfounded.

The zoning ordinance has rigorous exterior standards surrounding lighting and canopies. Some sort of exterior lighting plan must be submitted concurrently with a submission for a Subdivision and Land Development Plan under Chapter 185, Subdivision and Land Development, or upon submission of a Zoning Permit application in the event that a Subdivision and Land Development Plan is not required for the project. The exterior lighting and canopy standards in Derry Township's ordinance go beyond basic safety and may pose undue financial burden and additional regulatory requirements for development.

[Township of Washington](#)

The Town of Washington's zoning ordinance scored low on the benchmarking tool at 1.17, containing only two elements that pose risks of causing impediments to fair housing choice.

Restrictive definitions of family may impede unrelated individuals from sharing a dwelling unit. Defining family broadly advances non-traditional families and supports the blending of families who may be living together for economic purposes. However, Washington Township limits a single family to three unrelated individuals. These restrictions can impede the development of group homes, effectively restricting housing choice for the disabled. However, in some cases, caps on unrelated individuals residing together may be warranted to avoid overcrowding, thus creating health and safety concerns.

Like all other ordinances, Washington Township's ordinance does not have a reasonable accommodation policy for persons with disabilities.

[Borough of Steelton](#)

The Borough of Steelton's zoning ordinance scored low on the benchmarking tool at 1.67, containing only two elements that pose risks of causing impediments to fair housing choice.

The ordinance does not define a "group home" or similarly named land use as "a single family dwelling unit". However, family care facilities are permitted by right in residential districts and allow up to 8 persons with disabilities to live together.

In Steelton, there are no reasonable accommodation provisions in the zoning ordinance.

Manufactured homes are not allowed in flood-fringe and floodway areas for safety. Beyond this, manufactured homes are treated the same as single family dwellings. The same is true for mobile homes.

Borough of Middletown

The Borough of Middletown's zoning ordinance scored high on the benchmarking tool at 1.50, containing many elements that pose high risks of causing impediments to fair housing choice.

The Borough defines family as "no more than two persons are unrelated by blood, marriage, or adoption". This is a restrictive definition of family that focuses on the number of unrelated persons rather than their functioning as a single housekeeping unit or the capacity of their dwelling to house them without overcrowding.

Group homes are permitted in R-2 residential districts only, and only as a Special Exception Use. Applications for special exception uses must be approved by the Zoning Hearing Board, with recommendations by the Middletown Borough Planning Committee. This is an extraordinarily overly regulated process for group homes compared to single family residential dwellings for persons without disabilities. The ordinance does not allow up to 6 unrelated people with disabilities to reside in a group home without requiring a special use/conditional use permit or public hearing.

In R-2 multi-family, the densest residential zone available, apartment dwellings with more than 2 units are permitted as a Special Exception Use. This effectively reduces the land available in Middletown for multi-family development by right to zero. Because multi-family housing can be built and priced at more affordable levels than single-family detached housing, and because members of the protected classes have lower median incomes overall, this restriction has a disparate negative impact on members of the protected classes.

Township of Susquehanna

Susquehanna Township has a relatively low zoning ordinance risk level, with a score of 1.08. The only fair housing related concern identified is the lack of a reasonable accommodation policy for persons with disabilities.

5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors
Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing enforcement, outreach capacity, and resources and the fair housing issues, which are Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs .For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

Proposed Contributing Factors:

- Lack of resources for fair housing agencies and organizations
- Land use and zoning laws

VI. Fair Housing Goals and Priorities

1. For each fair housing issue, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.

The combination of quantitative data analysis and qualitative research resulted in Dauphin County and the Housing Authority identifying a series of factors that contribute to fair housing issues. These contributing factors were assigned three priority levels based on the amount and strength of the supporting evidence that initially identified the factor:

- High – factors that limit or deny fair housing choice or access to opportunity, as well as other factors that are urgent or establish a foundation for future actions
- Medium – moderately urgent or building on prior actions
- Low – limited impact on fair housing issues

The contributing factors are organized into groups that align with the issues discussed in the Fair Housing Analysis section of the AFH: (B)(i) Segregation/Integration; (B)(ii) Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs); (B)(iii) Disparities in Access to Opportunity; (B)(iv) Disproportionate Housing Needs; (C) Publicly Supported Housing; (D) Disability and Access; and (E) Fair Housing Enforcement, Outreach Capacity, and Resources. Some contributing factors appear for multiple issues.

Contributing Factor	Priority	Discussion
(B)(i) Segregation/Integration		
Community opposition	Medium	Stakeholders cited examples from multiple areas of Dauphin County in which residents vocally opposed any new housing development that would accept Section 8. Some school districts also oppose affordable housing development because they do not want more children enrolling in their schools. The fact that strong community opposition, although uncommon to this degree in Dauphin County, can derail both real and potential affordable housing projects makes addressing this factor moderately urgent.
Private discrimination	Medium	Stakeholders indicated that race relations were strained in many areas of Dauphin County, and some residents may block affordable housing due to fears of racial or ethnic minorities moving into their neighborhoods. Efforts should be made to change public perception regarding affordable housing, multi-family housing, public transit systems, and other targets of "NIMBY-ism".

Contributing Factor	Priority	Discussion
Lack of public investments in specific neighborhoods, including services or amenities	Low	Transportation outside of the immediate Harrisburg area is infrequent and does not cover large portions of Dauphin County. Transit is often unavailable for second-shift or third-shift workers, which are more common shifts for entry level positions in the emerging warehousing industries. Inadequate transportation systems limit transit-dependent residents' housing choices to the Harrisburg area rather than higher-opportunity areas in Dauphin County.
Location and type of affordable housing	High	There is not enough affordable housing in Dauphin County to satisfy need. In addition to the quantity of affordable housing, the location of affordable housing is a major influence on segregation and integration. Dauphin County's most segregated neighborhoods (tracts 101, 102, and 700) contain some of the more affordable rental options in the County. In addition, over 25% of the Authority's Housing Choice Vouchers are used in Steelton's zip code, indicating that residents may have a difficult time finding affordable units in other areas of the County.
(B)(ii) R/ECAPs		
Lack of private investments in specific neighborhoods	Medium	Some landlords utilize exploitative leases on low-income renters who may not have legal experience to understand the implications of certain sections. Education and outreach on tenants' rights and leasing, especially towards renters in neighborhoods with concentrations of substandard housing. While the Housing Authority provides fair housing literature to landlords in Dauphin County, it does not regularly organize training or outreach to the private sector. The Housing Authority could host more regular landlord-oriented fair housing events and training.
Location and type of affordable housing	High	See above.
Land use and zoning laws	Medium	Dauphin County does not have a formal protocol in place to monitor and evaluate the zoning ordinances of its subrecipients for discriminatory language or provisions. As a result, it may be funding municipalities that do not affirmatively further fair housing choice in their zoning ordinance. Either Tri-County Regional Planning Commission or Dauphin County could also offer model language and policies for municipalities in order to establish best practices for fair housing.
(B)(iii) Disparities in Access to Opportunity		
The availability, type, frequency, and reliability of public transportation	High	According to local stakeholders, Dauphin County's transit system does not provide access to employment centers or certain critical community amenities such as medical centers in the City of Harrisburg and emerging commercial corridors in Cumberland County. Capital Area Transit's budget is extremely limited, and expanding coverage and/or frequency in one area will detract from another. However, due to the dependence of CAT on state government employees for ridership, its routes are frequently mismatched with those of the protected classes in the community.
Lack of private investments in specific neighborhoods	Low	Stakeholders repeatedly cited a lack of affordable child care options in Dauphin County. This restricts housing options for families with children, especially single-parent families. Inadequate child care also makes it more difficult for families with children to obtain employment, education, or job training. This may restrict housing choice to low-opportunity areas. This is also true of medical centers, which are lacking in northern Dauphin County.

Contributing Factor	Priority	Discussion
Location of employers	High	This contributing factor is closely tied to others concerning public transportation. Numerous major employers are located outside the county, or are located within the City of Harrisburg but are outside the reach or convenience of the current bus routes. This is especially true for residents of northern Dauphin County, where the remoteness of housing and wide dispersal of jobs makes transit dependency very difficult. Access to decent employment is one of the most effective pathways to increased opportunities for low-income families.
Location and type of affordable housing	High	See above.
(B)(iv) Disproportionate Housing Needs		
The availability of affordable units in a range of sizes	Medium	Small families with fewer than five members are less likely to have housing problems than large families and non-families. Non-families experience the most severe cost burden, and are more than twice as likely to be severely cost-burdened as large families. These facts indicate a significant disproportionate need for housing assistance for both large families with children and small (i.e. single person) households compared to other household types.
Lack of private investments in specific neighborhoods	Low	See above.
Lack of regional cooperation	Low	County rental assistance money is distributed on a first-come-first-served basis. This causes clients to rush the system and for those with the greatest need to potentially miss out. This system should be re-examined to assess whether a transition to need-based application process is feasible.
Land use and zoning laws	Low	The County is in the process of updating its comprehensive plan. Special effort should be made to add implementable goals on affordable housing for those with disproportionate housing needs in order to affirmatively further fair housing choice.
(C) Publicly Supported Housing		
Community opposition	Medium	See above.
Impediments to mobility	Low	Although on the whole the publicly supported housing inventory is reasonably dispersed throughout the County and generally follows population density patterns, there is a slight concentration of publicly supported units in and around Steelton. In addition, HCV holders are concentrated in the southern municipalities. This somewhat restricts the mobility of households that wish to live in the northern municipalities. However, since the availability of both jobs and rental housing is much higher in southern Dauphin than northern Dauphin, the relationship between this factor and discrimination is unclear.
(D) Disability and Access		
Lack of regional cooperation	High	The County has not recently completed a Section 504 Needs Assessment. It is currently in the process of making an inventory of its government and institutional buildings, which will include ADA compliance. This should be given a high priority, and an ADA coordinator should be designated within County government.

Contributing Factor	Priority	Discussion
Access to transportation for persons with disabilities	Medium	All of the issues regarding transit in Dauphin County already discussed apply to persons with disabilities. Individuals with disabilities are disproportionately affected by the limited transportation options as they tend to rely heavily on public transit due to an inability to drive, walk, or bike to destinations or a lack of income to purchase a personal vehicle. Because paratransit services are available through CAT's Share-a-Ride program, this factor as it specifically applies to persons with disabilities involves building on prior actions to address transit needs at a more basic level.
Inaccessible sidewalks, pedestrian crossings, or other infrastructure	Low	Currently, many areas of the County lack sidewalks, handicap accessible curb cuts, and APS signals. This is especially dangerous for bus commuters, who are often dropped off on roads with high speed limits and very little pedestrian infrastructure. However, the County is gradually installing sidewalks and curb cuts in areas where they were not previously required, and traffic signals are replaced with APS signals when repairs are required. Given that resources are already being devoted to mitigating this factor, the urgency to address it is low.
Lack of affordable, accessible housing in range of unit sizes	Medium	Similar to transportation issues, persons with disabilities share a basic need for affordable housing with other low-income households. For the most part, the greatest difficulty faced by a person with a physical disability looking to buy or rent a home is finding a unit that is already accessible or easily modified. Things like no-step entries, bathrooms on the first floor, curb cuts, etc. are not always common features in Dauphin County's housing stock. In addition, the number of accessible units in the Dauphin County Housing Authority's inventory is very low compared to demand.
Lack of regional cooperation	Low	The Housing Authority does not currently work with the Continuum of Care on accepting references of homeless clients. This would be a more efficient use of resources and also encourage wrap-around services, as the clients would already be receiving case management.
(E) Fair Housing Enforcement, Outreach Capacity, and Resources		
Lack of resources for fair housing agencies and organizations	High	Just as funding for CPD programs around the country have been decreasing, there is a chronic underfunding of enforcement, investigation, and outreach agencies in Dauphin County. Without sufficient enforcement resources, progress in affirmatively furthering fair housing will be extremely difficult. In addition, Dauphin County Housing Authority has not established a protocol for fair housing training amongst its employees. As a result, many of its employees have not recently attended a HUD-sanctioned fair housing training session. The Housing Authority should allocate resources to sponsor a fair housing training session, or arrange for its employees to visit a fair housing conference.
Land use and zoning laws	Low	Not all zoning ordinances are online, reducing transparency and ease of access for the general public as well as advocacy organizations.

2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

The contributing factors selected throughout this AFH were assigned three priority levels based on the amount and strength of the supporting evidence that initially identified the factor:

- High – factors that limit or deny fair housing choice or access to opportunity, as well as other factors that are urgent or establish a foundation for future actions
- Medium – moderately urgent or building on prior actions
- Low – limited impact on fair housing issues

The contributing factors are grouped by the same issues that organize the AFH, and some factors may appear for multiple issues.

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Revise CDBG and HOME grant application procedures to increase the number of funded projects that AFFH	Location and type of affordable housing The availability of affordable units in a range of sizes	Disparities in Access to Opportunity Disproportionate Housing Needs	Within 2 to 3 years, revise the CDBG and HOME application forms to require applicants to discuss how their project addresses the fair housing issues identified in the AFH and/or how the proposed project will contribute to furthering fair housing choice. Within 2 to 3 years, incorporate scoring criteria and an associated number of points into the CDBG and HOME project scoring sheets that evaluates the degree to which projects work to AFFH.	Dauphin County
Discussion: Because counties in Pennsylvania do not have land use control, Dauphin County's strongest leverage to achieve any of the goals in this AFH is through the design and implementation of its funding programs. Program design presents the opportunity to insert fair housing best practices at the ground floor of any community development activity. Dauphin County will use its annual funding application process to encourage activities that AFFH. In addition, the County will effectively focus the internal policies, procedures, and management of its HUD and other programs in a way that efficiently and consistently affirmatively furthers fair housing choice.				

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Continually monitor local zoning codes for discriminatory elements	Land use and zoning laws Location and type of affordable housing	Segregation/Integration R/ECAPs Disparities in Access to Opportunity	<p>Within 1 year, work with the Tri-County Regional Planning Commission to develop model zoning ordinance elements that reflect best practices in affirmatively furthering fair housing.</p> <p>Each year, evaluate 3 municipal zoning ordinances for the inclusion of regulations that may contribute to discriminatory practices, prioritizing those municipalities that regularly apply for grant funding. Provide guidance and a deadline for any necessary modifications.</p> <p>Within 2 to 3 years, adopt a policy to deny CDBG and HOME funding to those municipalities whose zoning ordinances are A) found to include regulations that may contribute to discriminatory practices, and B) not modified to remove identified regulations that may contribute to discriminatory practices by a set deadline.</p>	Dauphin County
<p>Discussion: Older zoning ordinances and other regulations that may not be in line with the AFFH rule can hinder housing choice, both explicitly and implicitly. Dauphin County does not have a formal protocol in place to monitor and evaluate the zoning ordinances of its local government sub-recipients for discriminatory language or provisions. As a result, it may be funding municipalities that discriminate and/or do not affirmatively further fair housing choice in their zoning ordinance. Model language and policies for municipalities to establish best practices for fair housing, technical assistance, and continuous communication to local units of government through these initiatives will help alleviate these contributing factors.</p>				

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
<p>Increase the amount of affordable housing in areas with higher access to opportunity as discussed in section (V)(B)(iii)(1)(f)(i)</p>	<p>Location and type of affordable housing</p> <p>Lack of private investments in specific neighborhoods</p>	<p>Segregation/Integration</p> <p>R/ECAPs</p> <p>Disparities in Access to Opportunity</p> <p>Publicly Supported Housing</p>	<p>Within 2 to 3 years, work with the Tri-County Regional Planning Commission to institute an evaluation of the impact on fair housing choice for every residential development proposal. Restructure existing policies to encourage proposals that increase the supply of affordable housing in high opportunity areas and/or outside of "concentration areas."</p> <p>Within 6 months, HACD will begin a campaign to increase participation of private landlords, particularly those in higher opportunity neighborhoods, in the HCV program. This could involve coordinating with real estate professionals, property managers, and others involved with rental housing.</p> <p>Within 1 year, and then on an ongoing basis, HACD will create and maintain a list of "friendly" landlords who have accepted HCVs in the past or have indicated a willingness to accept HCVs. HACD will regularly contact these and other known, non-participating landlords with information about the program, invitations to public meetings and educational events, and direct inquiries about unit availability.</p> <p>Work with Tri-County Planning to review the forthcoming County comprehensive plan to ensure that appropriate fair housing and affordable housing priorities and recommendations are included.</p>	<p>Dauphin County</p> <p>Dauphin County Housing Authority</p>

Discussion: There is not enough affordable housing in Dauphin County to satisfy need. In addition to the quantity of affordable housing, the location of affordable housing is a major influence on segregation and integration. Dauphin County will work with the public, private, and non-profit sectors on specific initiatives designed to expand opportunity for members of protected classes throughout the County. Some of these are relatively simple policy changes that can be revised to encourage development in integrated and high opportunity areas. Development incentive programs that are already in place or that can be easily implemented at little to no cost, such as fee waivers, expedited review, etc., will be primary tools for achieving this goal.

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Improve the utility of public transit for persons with disabilities and members of protected classes with low-incomes	<p>The availability, type, frequency, and reliability of public transportation</p> <p>Location of employers</p> <p>Access to transportation for persons with disabilities</p>	<p>Disparities in Access to Opportunity</p> <p>Disability and Access</p>	<p>Within 1 year, work with the Tri-County Regional Planning Commission to make available to municipalities technical assistance on how to incorporate public transit into residential development guidelines.</p> <p>Within 1 year, identify key community assets and major employers currently underserved by transit service.</p> <p>Within 2 to 4 years, work with Capital Area Transit and local municipalities to adjust transit routes and schedules to provide improved access to underserved locations within the County, as deemed feasible by CAT.</p> <p>Within 3 to 5 years, work with key businesses in the region that employ a large number of low income individuals to attempt to establish improved transportation for these individuals through private transportation solutions, subsidized fares, or other means.</p> <p>Within the 2017-2021 planning cycle, work with CAT to assist in the purchase of a van to assist low-income seniors in northern Dauphin County with transportation, particularly to medical centers.</p>	Dauphin County
<p>Discussion: Dauphin County's transit system does not provide access to employment centers or certain critical community amenities, such as medical centers in the City of Harrisburg and emerging commercial corridors in Cumberland County. Due to the dependence of CAT on relatively high-income state government employees for ridership, its routes do not adequately serve the needs of members of protected classes in the community that are low-income. Those who experience inadequate transit access include seniors, second-shift or third-shift employees, and persons with disabilities who cannot use the existing transit infrastructure safely.</p>				

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Expand the level of physical accessibility of housing and community facilities throughout Dauphin County	<p>Lack of affordable, accessible housing in range of unit sizes</p> <p>Lack of regional cooperation</p>	Disability and Access	<p>Within 6 months, assign County and HACD staff persons as ADA coordinators.</p> <p>Within 1 to 2 years, complete a Section 504 Needs Analysis for the County and notify municipalities about any deficiencies. Work with notified municipalities to devise a plan for addressing deficiencies.</p> <p>Include in the 2017-2021 Consolidated Plan goals to fund activities that increase accessibility, such as new housing construction; modifications to existing housing, facilities, and infrastructure; and transportation solutions.</p> <p>Within 3 to 5 years, provide technical assistance on ADA compliance, particularly for government buildings and parks, to all County municipalities.</p>	<p>Dauphin County</p> <p>Dauphin County Housing Authority</p>
<p>Discussion: Both Dauphin County and HACD have made measurable progress in creating accessible, affordable housing options since the 2002 AI. Even so, it is clear that the supply of accessible housing still does not satisfy demand. In fact, recently constructed accessible housing is already operating at capacity with very low turnover rates. Finding affordable housing near essential services is a significant barrier faced by persons with disabilities. Accessing certain supportive services, community facilities, employment, and other amenities can be challenging for persons with disabilities, especially if they are transit-dependent. Due to the aging population of Dauphin County, this lack of affordable, accessible housing will become increasingly important in the future.</p>				

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Increase the level of fair housing knowledge and understanding among housing developers, real estate professionals, elected officials, and the general public	Community opposition	Segregation/Integration	Within 6 months, create a page on the County's website for fair housing information and resources for how to report suspected discrimination.	Dauphin County
	Private discrimination Lack of private investments in specific neighborhoods	R/ECAPS Disparities in Access to Opportunity Disproportionate Housing Need Publicly Supported Housing Disability and Access Fair Housing Enforcement, Outreach Capacity, and Resources	Partner with local organizations such as lending institutions, attorneys, realtors, school districts, etc. to distribute informational materials and host a fair housing community forum annually. This should include engaging with protected classes to help citizens better understand their rights. Hold annual fair housing trainings for County and municipal elected officials, appointed boards, and department staff. Within 3 years, develop and make publicly available an inventory of best practices for outreach and community participation activities. Pay particular attention to engaging members of the protected classes that are chronically underrepresented in the County's and HACD regular efforts.	Dauphin County Housing Authority
Discussion: While fair housing education and outreach are constant needs in any jurisdiction, the County and HACD will work to improve the level of fair housing knowledge and understanding among local housing developers, real estate professionals, local elected officials, and the general public with a focus on members of the protected classes. In particular, HACD and the County will focus on engaging groups and individuals who have expressed opposition to affordable housing development in the past. The County and HACD will also partner with local organizations whose clients are protected classes to help citizens better understand their rights.				

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Strengthen fair housing education, investigation, enforcement, and operations	<p>Lack of resources for fair housing agencies and organizations</p> <p>Lack of private investments in specific neighborhoods</p> <p>Lack of regional cooperation</p>	Fair Housing Enforcement, Outreach Capacity, and Resources	<p>Annually train City and HACD staff in fair housing practices, including to refer callers about fair housing to a designated staff person. In addition, train all staff that interact with the public in techniques to communicate with those with language and/or cultural barriers.</p> <p>Within 1 year, conduct the four-factor analysis to determine the extent to which document translation is needed. Prepare a Language Access Plan if it is determined to be necessary.</p> <p>Within 1 year, update mobility counseling and fair housing literature for Housing Choice Voucher recipients who may not be aware of their rights or ability to use the voucher in high opportunity areas.</p>	<p>Dauphin County</p> <p>Dauphin County Housing Authority</p>
<p>Discussion: There is a chronic underfunding of enforcement, investigation, and outreach agencies in Dauphin County. Without sufficient financial resources, progress in affirmatively furthering fair housing will be extremely difficult. In addition, Dauphin County Housing Authority has not established a protocol for fair housing training among its employees. As a result, many of its employees have not recently attended a HUD-sanctioned fair housing training session. In order to overcome these contributing factors, a multi-pronged approach will be taken to increase the level of education, investigation, and enforcement related to fair housing in Dauphin County.</p>				