

# Analysis of Impediments to Fair Housing Choice

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DAUPHIN COUNTY DEPARTMENT OF COMMUNITY AND ECONOMIC  
DEVELOPMENT (DCED)

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## Introduction & Executive Summary of the Analysis

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### Why the AI was Developed

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- Dauphin County, PA has prepared this Analysis of Impediments to Fair Housing Choice (AI) to satisfy the requirements of the Housing and Community Development Act of 1974, as amended, which requires that any unit of government receiving funds through the U.S. Department of Housing and Urban Development (HUD) affirmatively further fair housing (AFFH). Dauphin County is an urban county entitlement and receives annual allocations through HUD’s Community Development Block Grant and HOME Investment Partnerships programs.

On June 10, 2021, HUD published the Interim Final Rule to issue new guidance on a HUD grantee’s obligation to affirmatively further fair housing. Specifically, the IFR “does not require HUD grantees to participate in a fair housing planning process.” However, because grantees remain obligated to certify annually that they are affirmatively furthering fair housing, preparing a fair housing planning document remains the best method for documenting a grantee’s analysis and research to demonstrate that it is fulfilling its AFFH obligation. HUD further expanded its guidance to state that grantees “may choose to continue to engage in familiar fair housing planning processes such as continuing to implement a completed AI or AFH, updating an existing AI or AFH, or conducting a new AI or AFH. Grantees may also choose to engage in other means of fair housing planning that meaningfully supports their certification.”

Dauphin County has chosen to prepare an AI to document where racially and ethnically concentrated areas of poverty exist within its jurisdiction, how county policies, programs and laws expand or restrict housing choice for members of the protected classes, any impediments or barriers to fair housing choice that exist, and the actions it will undertake to eliminate the impediments.

### Participants

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As the lead agency in the preparation of the AI, DCED was committed to an extensive outreach process to solicit input from residents and stakeholders. Outreach initiatives included remote public meetings, remote stakeholder meetings, and an online survey; meetings were held remotely due to the COVID-19 pandemic and were held on:

- Public Meetings
  - Wednesday, October 18, 2021, 10 am
  - Wednesday, October 25, 2021, 6 pm
- Stakeholder Meetings
  - Friday, October 20, 2021, 10 am
  - Friday, October 20, 2021, 2 pm
  - Friday, October 27, 2021, 10 am
  - Friday, October 27, 2021, 2 pm

The Participation Appendix includes the documentation of all outreach activities, lists of all attendees, and complete summaries of all meetings held in conjunction with the outreach

conducted for the 2022-2026 Consolidated Plan, the 2022 Annual Action Plan and the AI. The online survey had a low response rate, and no analysis was performed on the results as the sample size is too small to be meaningful. The anonymous survey responses are also included in the Participation Appendix.

### Methodology Used

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A comprehensive approach was used to complete the AI. The following sources were utilized:

- Most recently available demographic data regarding population, race and ethnicity, household, housing, income, and employment at the census tract, county subdivision, and county levels
- A variety of online databases providing indicators that reflect local issues and based on research that validates the connections between the indicators and increased opportunity in Dauphin County
- Public policies, codes, and statutes affecting the siting and development of housing
- Administrative policies concerning fair housing, affordable housing, and community development
- Financial lending institution data from the Home Mortgage Disclosure Act (HMDA) database
- Agencies that provide housing and housing related services to members of the protected classes, and
- Interviews and stakeholder meetings conducted with local agencies and non-governmental organizations that provide housing and housing related services to members of the protected classes.

### How AI was Funded

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The AI was funded with Dauphin County CDBG and HOME funds.

### Progress Achieved Since Previous Assessment of Fair Housing

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The goals and actions set forth in the 2017-2021 Assessment of Fair Housing (AFH) were broad and, in some cases, aspirational, meaning that the goals were unlikely to be achieved within a five-year timeframe because of the extent of the resources – human and financial – required to meet the needs. The following table outlines the goals and timeframes defined in the 2017 AFH, as well as provides an update on the progress achieved since then. The information provided below is taken from the Consolidated Annual Performance & Evaluation Reports (CAPERs) submitted to HUD annually.

<b>Goals, Recommended Actions, Timeframe, and Accomplishments</b>
<b>Goal 1: Revise CDBG and HOME grant application procedures to increase the number of funded projects that AFFH.</b>
<b>Two- and Three-Year Actions</b>

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.

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.

**Accomplishments**

As discussed in the 2017 AFH, counties in Pennsylvania do not have land use control; therefore, Dauphin County's strongest leverage to affirmatively further fair housing choice is through the design and implementation of its funding programs. Throughout 2017-2021, the County has effectively focused the internal policies, procedures, and management of its HUD and other programs in a way that efficiently and consistently affirmatively furthers fair housing choice.

The Dauphin County Department of Community and Economic Development (DCED) completed a full review and update of its policies and procedures, risk assessment, application, and monitoring processes in Program Years 2020-2021. CDBG and HOME Policies and Procedures were revised to provide greater specificity, and DCED created a Monitoring Workbook that includes supplemental worksheets, checklists, template correspondence, and other items to streamline monitoring and assist subrecipients with administering projects. DCED also implemented a CDBG orientation training for all subrecipients and created formal risk assessment worksheets to use in qualifying applications and prioritizing subrecipient monitoring. Lastly, the County revised its CHDO operating and set-aside agreements.

**Goal 2: Continually monitor local zoning codes for discriminatory elements.**

**One-Year Actions**

Work with the Tri-County Regional Planning Commission to develop model zoning ordinance elements that reflect best practices in affirmatively furthering fair housing.

Annually 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.

**Two- and Three-Year Actions**

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.

**Accomplishments**

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 developmental permits. Dauphin County, through the TCRPC Attainable Housing Work Group, has completed analysis and ranking of all 39 municipalities relative to strength of affordable housing in zoning ordinances. The workgroup is made up of over 30 stakeholders representing municipal government, private development, higher education, the Commonwealth of Pennsylvania, Dauphin County, the Housing Authority of Dauphin County, and nonprofit, affordable housing developers. The analysis of municipal zoning is currently being finalized, and municipal outreach will follow to begin the process of sharing model ordinances, best practices, and amending zoning ordinances County-wide. Eight municipalities were determined to have adequate zoning for promoting affordable housing.

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. It is doing this through the Attainable Housing Work Group process.

**Goal 3: Increase the amount of affordable housing in areas with higher access to opportunity.**

**One-Year Actions**

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.

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.

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.

### Two- and Three-Year Actions

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.”

### Accomplishments

Expanding housing choice by increasing affordable housing and access to opportunity is ongoing and will continue to be a goal as the level of need far exceeds available resources. Housing choice expansion is a balance between improving living conditions of households within areas of higher poverty, as well as providing pathways to housing choice in areas of higher opportunity. Recognizing existing programs that have aided in promoting affordable housing, Dauphin County has continued to invest in the Dauphin County First-Time Homebuyers Program, the Dauphin County Home Rehabilitation Program, and the Fair Housing Council of Central Pennsylvania's Housing Counseling Program. These support programs dovetail with construction of new affordable housing to meet the goal of providing and advancing homeownership and housing of LMI families.

The following has been accomplished with respect to increasing affordable housing and access to opportunity in Program Years 2017-2020:

- **Critical Home Repair Program:** Habitat for Humanity repaired 24 housing units for low-income homeowners, including the elderly and physically disabled.
- **Housing Counseling Program:** The Fair Housing Council of Central Pennsylvania assisted 322 low- and moderate-income individuals or families to become homeowners through education, support, and budget counseling.
- **HOME Rehabilitation Program:** Rehabilitated 32 housing units County-wide (excluding Harrisburg).
- **First Time Homebuyers Program:** Tri County Community Action (TCCA) assisted 177 first-time homebuyers through its program, which offers housing counseling and directly qualifies potential buyers for down-payment and closing-cost assistance.
- **Cherry Orchard Place:** This development was completed in 2021, providing 49 apartments for seniors aged 62 and older, including disabled individuals and qualified veterans requiring support services. The development has 3 of the units for persons at 20% AMI, 5 units for 50% AMI, 17 units for tenants at 50% AMI, 18 units allocated to households with incomes up to 60% AMI, and 6 units are at market rate. Five of the units are reserved for supportive housing of qualified veterans utilizing VASH Vouchers, and three units have Section 8 Project Based Vouchers.
- **Frank S. Brown Boulevard Redevelopment:** 6 of 12 affordable townhouse units have been completed in Steelton, which will be sold to low-moderate income persons/families.

In addition to housing benefits provided, the County, through its partnership with Tri-County Regional Planning Commission, has also completed an analysis of all zoning ordinances and scored municipalities based on the degree to which their zoning ordinances hinder the development of affordable housing. Maps of locations of investments (see the AI section on Assisted Housing Location Patterns) indicate that investments are located both in R/ECAPs as well as areas of higher opportunity.

**Goal 4: Improve the utility of public transit for persons with disabilities and members of protected classes with low incomes.**

**One-Year Actions**

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.

Identify key community assets and major employers currently underserved by transit service.

**Two- and Three-Year Actions**

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.

**Four- and Five-Year Actions**

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.

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.

**Accomplishments**

Capital Area Transit (CAT) and Tri-County Regional Planning Commission are currently working with the Harrisburg Area Transportation Study to develop the Regional Transportation Plan 2045 (RTP2045). Dauphin County has been providing feedback for RTP2045 and has allocated 2021 funds to transportation improvements for veterans served by the Robert M. Jackson Memorial House.

According to CAT's 2020 Network Redesign, State of the System Report, the following changes were completed between 2017-2019: Addition of new services, including job-based service to Chewy, changes in route alignments, and spacing optimization. The report also identified underserved areas in Steelton, Hummelstown/Hersey, and the northern county. To meet the higher demand in these areas, CAT has prioritized adding evening and weekend service to Hershey and exploring circulator service in northern Dauphin County.<sup>1</sup>

<sup>1</sup> CAT 2020 Network Redesign, State of the System. (September, 2019). Accessed at: <https://www.cattransit.com/wp-content/uploads/sites/2/2020/07/Task-1.1-CAT-State-of-the-System.pdf>

**Goal 5: Expand the level of physical accessibility of housing and community facilities throughout Dauphin County.**

**One- and Two-Year Actions**

Within 6 months, assign County and HACD staff persons as ADA coordinators.

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.

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.

**Three- and Four-Year Actions**

Within 3 to 5 years, provide technical assistance on ADA compliance, particularly for government buildings and parks, to all County municipalities.

**Accomplishments**

The following has been accomplished with respect to expanding accessibility of housing and community facilities in Program Years 2017-2020:

- **Steelton Borough Repaving and Restoration Project:** Pine and Harrisburg Streets were repaved in PY 2017-2018 to further improve road conditions of this area of the borough, including expanding handicapped accessibility through installation of ADA curb ramps.
- **Dauphin Borough Parks Project Accessibility Phase:** The 2017 project removed material and architectural barriers that restrict the mobility and accessibility of elderly and disabled persons, connecting the Lions Club Park and the Market Square Park with an ADA compliant route through the construction of 4 curb ramps and the modification of 8 existing ramps.
- **ADA Upgrades to Farm Show Complex:** ADA visitors are an important demographic to the shows hosted at the PA Farm Show Complex. In 2019, ADA upgrades were made throughout the facility, and the elevator was replaced.

The following activities were funded in PY2020, though commencement has been delayed due to the Coronavirus Pandemic:

- **Project Hope:** An ADA ramp will be installed leading to the front door of the New Hope Living Baptist Church, and the front doors will be retrofitted with hardware to make them ADA compliant.
- **Cherry Orchard Place:** Construction is planned for a 49-unit senior and veterans apartments including ADA accessible units.

In addition, the County has continued to fund activities that increase accessibility, such as new housing construction and modifications to existing housing, facilities, and infrastructure, through the HOME Rehabilitation Program and Habitat for Humanity's Blight Remediation and Critical Home Repair Programs. Dauphin County will continue to set aside CHDO operating and set-aside funds for future new construction of affordable housing.



**Goal 6: Increase the level of fair housing knowledge and understanding among housing developers, real estate professionals, elected officials, and the general public.**

**One- and Two-Year Actions**

Within 6 months, create a page on the County’s website for fair housing information and resources for how to report suspected discrimination.

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.

**Three- Year Actions**

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.

**Accomplishments**

Since the 2017 AFH, the County and HACD have focused on engaging groups and individuals who have expressed opposition to affordable housing development in the past and partnered with local organizations whose clients are protected classes to help citizens better understand their rights. The County provided funding assistance to the Fair Housing Council for its housing counseling, financial counseling/education, landlord/tenant mediation, referral services, and health care. The Fair Housing Council estimated that 12,000 people were helped in PY 2017-2019. The County also utilized 2019 CDBG funds to assist the Latino/Hispanic American Community Center; this organization created a bilingual case management team to educate and provide a wide range of services to help support basic needs, including housing and financial counseling.

**Goal 7: Strengthen fair housing education, investigation, enforcement, and operations.**

**One-Year Actions**

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.

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.

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.

**Accomplishments**

In 2020, the County has broadened its affirmative marketing policy to be more thorough and detailed in its guidance and requirements.



## Conclusions: Impediments to Fair Housing Choice

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Several impediments to fair housing choice were identified and are described below, most of which were identified in the previous AFH. The impediments are carried over because they are still relevant today. Based on these impediments, a Fair Housing Action Plan with recommendations to be undertaken by Dauphin County and its collaborating partners over the next five years was developed and is described in the final section of this analysis.

**Impediment:** Consistent with the 2017 AFH, assisted housing generally follows population density patterns and is reasonably dispersed throughout the Urban County; however, a lack of affordable, accessible housing within high opportunity areas remains a barrier that disproportionately affects members of the protected classes.

- Both Dauphin County and HACD have made measurable progress in creating accessible, affordable housing options since the 2017 AFH. Even so, it is clear that the supply of accessible housing still does not satisfy demand. In fact, the County noted in its 2020 Annual Action Plan that newly 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, the lack of affordable, accessible housing will become increasingly important in the future as this segment of the population becomes mobility-restricted.
- The housing stock tends to be deteriorating and in need of rehabilitation, particularly among the more affordable units. Older units built prior to 1978 tend to be in the northern part of the County, including the Boroughs of Millersburg, Elizabethville, and Gratz, and along the southern border of Dauphin County, including the City of Harrisburg, and the Boroughs of Highspire, Middletown, and Royalton. Units built prior to 1978 are likely to have lead paint, which poses a health risk to occupants, particularly those who are younger than six years of age.

**Impediment:** Zoning ordinances for municipalities within the Urban County continue to restrict housing choice for members of the protected classes. This jeopardizes Dauphin County's ability to affirmatively further fair housing.

- The TCRPC Attainable Housing Work Group has completed an analysis and ranking of all 39 municipalities relative to strength of affordable housing in zoning ordinances. While the report is being finalized, only eight municipalities were determined to have adequate zoning for promoting affordable housing.

- Of the eight ordinances reviewed in the zoning risk assessment, the AI found that the majority are at a higher risk for discrimination due to:
  - 1) ***Restrictive definition of ‘family’ that places a cap on the number of unrelated persons.*** Present in 6/8 reviewed ordinances, restrictive definitions of family may impede unrelated individuals from sharing a dwelling unit, limiting the housing choice of non-traditional families who may be living together for economic purposes. This cap can also impede the development of group homes, effectively impeding housing choice for the disabled.
  - 2) ***Additional conditions imposed on group homes that are not applied on all residential uses in the zoning district.*** Present in 6/8 reviewed ordinances, such conditions or restrictions are an impediment to the siting of group homes, restrict housing choice for persons with disabilities, and are inconsistent with the Fair Housing Act.
  - 3) ***Limiting the location of mobile/manufactured homes to areas other than those where single-family housing is permitted.*** Present in 3/8 reviewed ordinances, restrictions on mobile homes may disproportionately impact members of the protected classes by limited a low-cost housing option.
- In cases where the TCRPC and/or the AI determines that local rules are inconsistent with fair housing laws, Dauphin County, through the TCRPC Attainable Housing Work Group, will inform community leaders and suspend the award of County-administered competitive federal funds until problem issues are adequately addressed.

***Impediment:*** Members of the protected classes are more likely to have lower incomes, higher unemployment rates and higher poverty rates. Limited housing choice restricts access to community assets for members of the protected classes.

- Members of the protected classes tend to have lower incomes and higher unemployment rates than their counterparts, which reduces housing choice.
- Moderate levels of segregation exist in Dauphin County and members of the protected classes are more likely to live in R/ECAPs where housing is more affordable.
- Poverty has lasting effects that can impact a wide range of factors, including public education primarily funded by the local community, job opportunities, and the ability to find and afford quality housing.
- While fair housing and affordable housing are distinct from each other, there is a link when sufficient affordable housing is not located throughout a jurisdiction, including in higher opportunity areas and outside R/ECAPs.

**Impediment:** Fair housing education and outreach efforts are not adequately meeting need.

- 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 paired testing, and work to promote a mutual understanding of diversity among residents.
- Underfunding of fair housing agencies in Dauphin County is an ongoing issue; insufficient resources make affirmatively furthering fair housing through enforcement, investigation, and outreach extremely difficult.

**Impediment:** Members of the protected classes are disproportionately denied mortgages in the private sector.

- Homeownership has historically been a way for a family to create generational wealth, which allows families additional opportunities such as accessing equity to pay for higher education or start a business. Increasing homeownership rates among members of the protected classes can assist in wealth-building.
- Non-White households were less likely to be homeowners than White households.
- Home mortgage data indicates that Black/African American and Hispanic applicants faced higher denial rates and lower origination rates (approvals) than White applicants.

## Jurisdictional Background Data

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The scope of the AI encompasses the Dauphin County entitlement jurisdiction, rather than the entirety of Dauphin County. The City of Harrisburg is a separate HUD entitlement, and the Township of Washington has opted out of Dauphin County's CDBG program. The AI will refer to the "Urban County" as the Dauphin County entitlement jurisdiction, which excludes the City of Harrisburg and the Township of Washington. Data analysis is primarily conducted at the county- and city-level, though maps and certain analyses such as the Dissimilarity Index and the Opportunity Indices are conducted at the census tract level.

## Demographic, Income, and Employment Data

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This section will describe demographic characteristics that affect housing choice among Dauphin County residents. It will provide context for existing conditions and pinpoint issues to inform strategies for broadening the availability of housing opportunities. The U.S. Census Bureau's 2019 American Community Survey (ACS) 5-Year Estimates are the most recent and reliable data source available at the time of this report and have been utilized in all cases, as well as 2010 Decennial Census and 2014 ACS 5-Year Estimates to provide comparison.

## Key Findings

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- Between 2000 and 2019, 12 of Dauphin's 40 county subdivisions (30%) experienced inconsistent population growth in which the total population increased from 2000 to 2010 but declined from 2010 to 2019.
- Dauphin County has continued to diversify as a result of increases in Black/African American and Hispanic populations between 2000 and 2019.
- Despite overall declining unemployment rates across demographic groups between 2010 and 2019, racial minorities in Dauphin County continued to experience above-average rates of unemployment.
- In 2019, Conewago Township had the highest median income in Dauphin County at \$93,850. The lowest median incomes were found in the City of Harrisburg (\$39,685) and Steelton Borough (\$38,836), located just outside of Harrisburg.
- When adjusted for inflation, changes in real household income have varied by race/ethnicity.
- Black/African American and Hispanic households experienced lower incomes as well as higher rates of poverty than White residents in Dauphin County.
- Black/African American persons are nearly three times more likely to be living below poverty level than their White counterparts and only slightly less likely to be living below poverty than Hispanic persons.
- Lower median incomes and higher rates of poverty limit housing choice among Black/African American and Hispanic households in Dauphin County.
- Overall, the Urban County has moderate levels of segregation, though these levels changed between 2014-2019 depending on race and ethnicity.
- Consistent with the 2017 AFH, India, Vietnam, China, and the Dominican Republic continue to be among the top countries for foreign-born County residents.
- In the Urban County, Spanish or Spanish Creole is the language most often spoken by persons with Limited English Proficiency, who comprise 1.25% of the Urban County population.

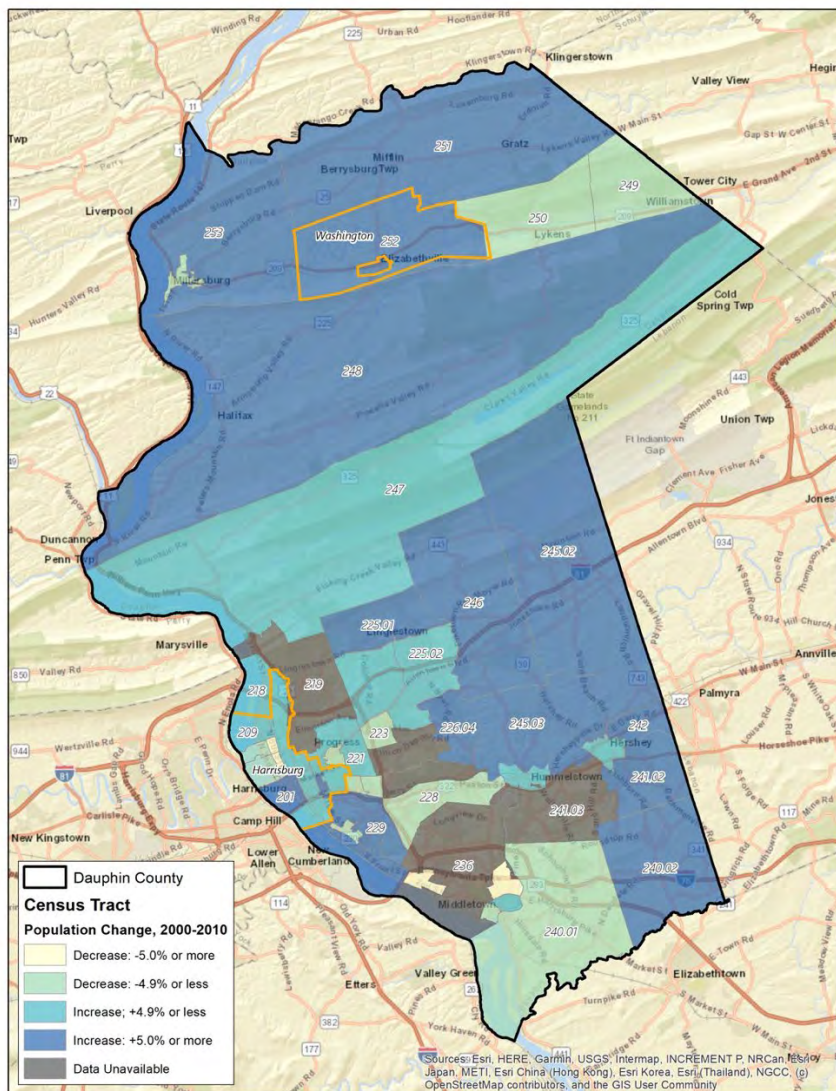
- Because there are 2,587 persons with LEP who speak Spanish or Spanish Creole, this triggers the safe harbor threshold for translation of vital documents.
- Dauphin County has a lower prevalence rate of persons with disabilities than Pennsylvania, with approximately 12.4% of the population reporting one or more disabilities compared to 14% at the state level.
- Ambulatory difficulty was the most common type of disability among persons aged 18-64 and among the elderly, aged 65 and over.
- Labor force participation rates in Dauphin County among persons with one or more disabilities was 28.9% compared to 69.8% among persons without a disability.
- In Dauphin County, the median earnings among persons with disabilities was equivalent to 43% of the median earnings of persons without disabilities. Persons with disabilities are almost twice as likely to live in poverty than persons without disabilities.
- Family households comprised the majority of Dauphin County households at 62.0% (63.4% for the Urban County) in 2019. This is a slight decrease from 2014, when family households comprised 63.0% of all households in Dauphin (65.1% in the Urban County).
- Female-headed households with children often experience difficulty in obtaining housing as a result of lower incomes and higher expenses such as childcare.

## Population Trends

*Between 2000 and 2019, 12 of Dauphin's 40 county subdivisions (30%) experienced inconsistent population growth in which the total population increased from 2000 to 2010 but declined from 2010 to 2019.*

The population of Dauphin County increased by nearly 24,000 residents between 2010 and 2019. The majority of the County's population growth occurred between 2000 and 2010, with a growth rate of 6.5%, more than double that of 2010-2019. This pattern was also present at the Urban County level, which experienced a slightly higher rate of increasing population than Dauphin County as a whole in 2000-2010 (7.7% in the Urban County compared to 6.5%) declining to a rate of 3.7% in 2010-2019. Note that for the map below, and all maps throughout the document, the municipalities outlined in gold are either opted out of the Urban County (Washington Township) or are direct HUD Entitlement communities (Harrisburg).

**Map 1: Population Change, 2000-2010**



Source: U.S. Census Bureau, Decennial Census (2000 and 2010, SF1 P001)



Table 1: Change in Population, 2000-2019

	Total Population, 2000-2019			Change in Total Population	
	2000	2010	2019	% Change 2000-2010	% Change 2010-2019
<b>Pennsylvania</b>	<b>12,281,054</b>	<b>12,702,379</b>	<b>12,791,530</b>	<b>3.4%</b>	<b>0.7%</b>
<b>Dauphin County</b>	<b>251,798</b>	<b>268,100</b>	<b>275,632</b>	<b>6.5%</b>	<b>2.8%</b>
Berrysburg Borough	354	368	339	4.0%	-7.9%
Conewago Township	2,847	2,997	3,078	5.3%	2.7%
Dauphin Borough	773	791	774	2.3%	-2.1%
Derry Township	21,273	24,679	25,093	16.0%	1.7%
East Hanover Township	5,322	5,718	5,935	7.4%	3.8%
Elizabethville Borough	1,344	1,510	1,611	12.4%	6.7%
Gratz Borough	676	765	745	13.2%	-2.6%
Halifax Borough	875	841	989	-3.9%	17.6%
Halifax Township	3,329	3,483	3,500	4.6%	0.5%
<b>Harrisburg City</b>	<b>48,950</b>	<b>49,528</b>	<b>49,209</b>	<b>1.2%</b>	<b>-0.6%</b>
Highspire Borough	2,720	2,399	2,492	-11.8%	3.9%
Hummelstown Borough	4,360	4,538	4,688	4.3%	3.3%
Jackson Township	1,728	1,941	1,791	12.3%	-7.7%
Jefferson Township	327	362	319	10.7%	-11.9%
Londonderry Township	5,324	5,335	5,228	0.2%	-0.1%
Lower Paxton Township	44,424	47,360	49,065	6.6%	3.6%
Lower Swatara Township	8,149	8,268	8,837	1.5%	6.9%
Lykens Borough	1,937	1,779	1,807	-8.2%	1.6%
Lykens Township	1,095	1,618	1,696	47.8%	4.8%
Middle Paxton Township	4,823	4,976	5,080	3.2%	2.1%
Middletown Borough	9,242	8,901	9,315	-3.7%	4.7%
Mifflin Township	662	784	814	18.4%	3.8%
Millersburg Borough	2,562	2,557	2,519	-0.2%	-1.5%
Paxtang Borough	1,570	1,561	1,726	-0.6%	10.6%
Penbrook Borough	3,044	3,008	2,984	-1.2%	-0.8%
Pillow Borough	304	298	320	-2.0%	7.4%
Reed Township	182	239	216	31.3%	-9.6%
Royalton Borough	963	907	1,221	-5.8%	34.6%
Rush Township	180	231	307	28.3%	32.9%
South Hanover Township	4,793	6,248	6,797	30.4%	8.8%
Steelton Borough	5,858	5,990	5,953	2.3%	-0.6%
Susquehanna Township	21,895	24,036	24,954	9.8%	3.8%
Swatara Township	22,611	23,362	24,792	3.3%	6.1%
Upper Paxton Township	3,930	4,161	4,259	5.9%	2.4%
<b>Washington Township</b>	<b>2,047</b>	<b>2,268</b>	<b>2,196</b>	<b>10.8%</b>	<b>-3.2%</b>
Wayne Township	1,184	1,341	1,336	13.3%	-0.4%
West Hanover Township	6,505	9,343	10,352	43.6%	10.8%
Wiconisco Township	1,168	1,210	1,058	3.6%	-12.6%
Williams Township	1,135	1,112	1,003	-2.0%	-9.8%
Williamstown Borough	1,433	1,387	1,234	-3.2%	-11.0%
<b>Urban County*</b>	<b>200,801</b>	<b>216,304</b>	<b>224,227</b>	<b>7.7%</b>	<b>3.7%</b>

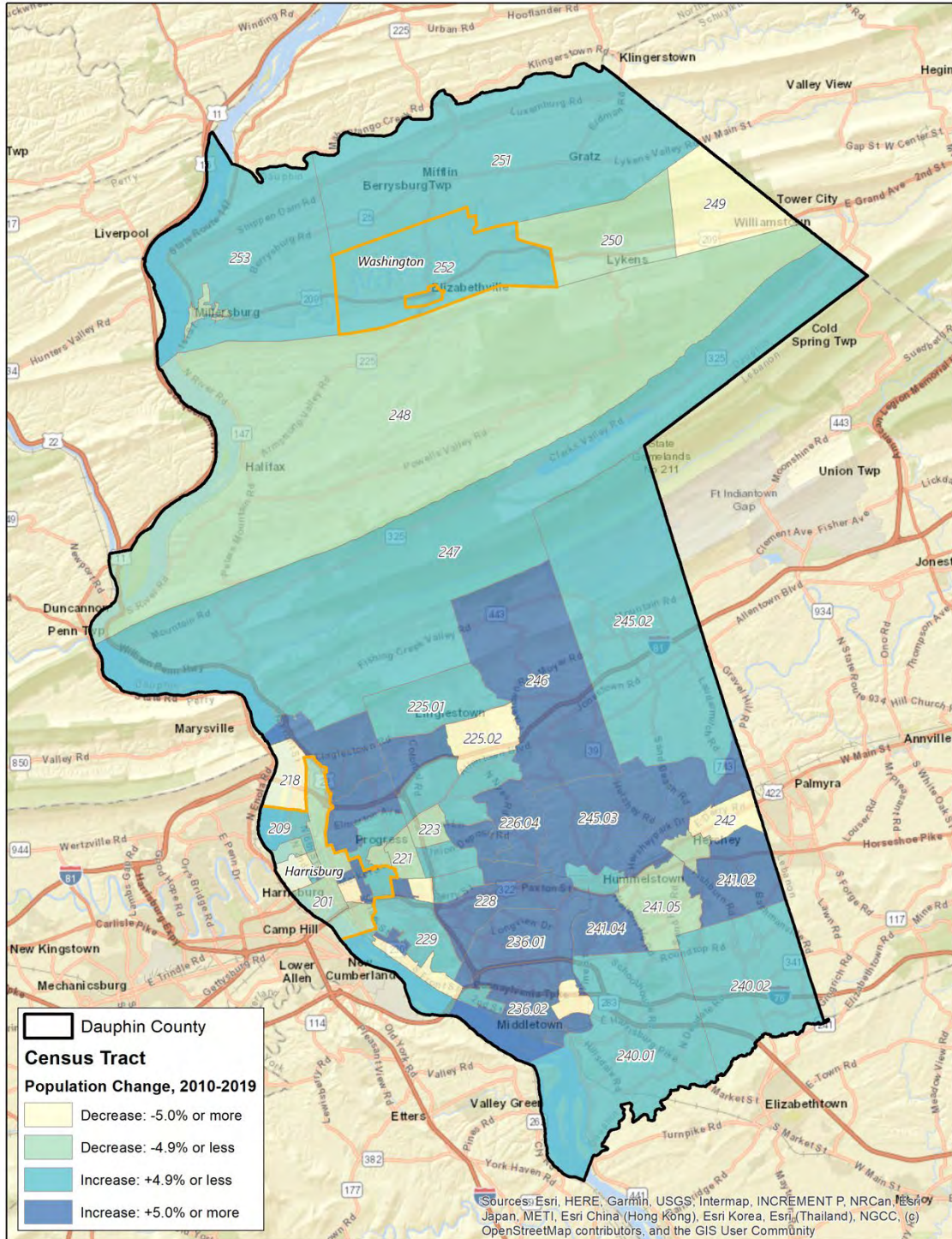
\*Urban County includes all County subdivisions except the City of Harrisburg, a separate entitlement area, and Washington Township, an opt-out community.

Source: U.S. Census Bureau, Decennial Census (2000 and 2010, SF1 P001); 2019 ACS 5 Year Estimates (DP05)



Twelve of Dauphin’s 40 county subdivisions (30%) experienced inconsistent population growth during this period, including the City of Harrisburg, which saw a 1.2% increase in population between 2000 and 2010 followed by a 0.6% decline in 2010-2019.

**Map 2: Population Change, 2010-2019**



Source: U.S. Census Bureau, 2010 Decennial Census (SF1 P001); 2019 ACS 5 Year Estimates (DP05)



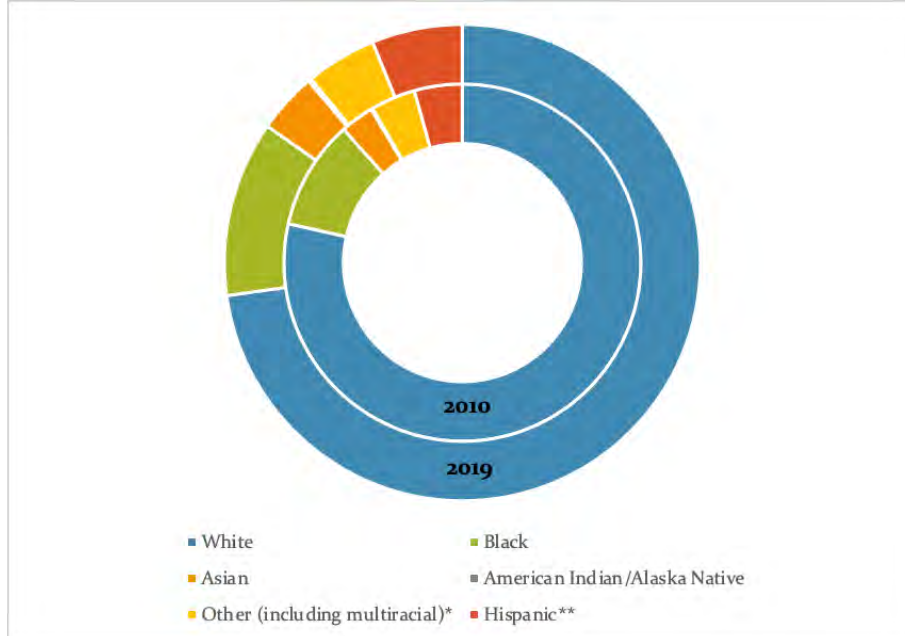
## Race and Ethnicity

*Dauphin County has continued to diversify as a result of increases in Black/African American and Hispanic populations between 2010 and 2019.*

Consistent with the 2017-2021 Assessment of Fair Housing (AFH), Dauphin County has continued to diversify as Black/African American and Hispanic populations expand. In 2010, non-White racial groups in the Urban County accounted for 17.9% of the total population; by 2019, this segment comprised 22.4% of the Urban County's total population. Despite high rates of growth among Asian, American Indian/Alaskan Native, and 'Other' racial minority groups, their respective shares of the Urban County's total population increased very little.

Black/African American and Hispanic residents continued to be the major drivers of diversification between 2010 and 2019. The largest minority group in the Urban County by a large margin, Black/African American residents grew from 10.4% of the total population in 2010 to 12.7% by 2019. The Hispanic population nearly doubled during this time, increasing from 9,281 residents (4.5% of the total population) in 2010 to 14,706 (6.6%) in 2019.

**Figure 1: Racial & Ethnic Diversity in Urban County, 2010-2019**



Source: U.S. Census Bureau, 2010 Decennial Census (SF1 P001);  
2019 ACS 5 Year Estimates (DP05)

**Table 2: Racial & Ethnic Diversity, 2010-2019**

	2010		2019		Percent Change in Population 2010 to 2019
	Number	Percentage	Number	Percentage	
<b>Dauphin County</b>	<b>268,100</b>	<b>100.0%</b>	<b>275,632</b>	<b>100.0%</b>	<b>2.8%</b>
White	194,910	72.7%	193,282	70.1%	-0.8%
Non-White	73,190	27.3%	82,350	29.9%	12.5%
Black	48,386	18.0%	53,826	19.5%	11.2%
Asian	8,580	3.2%	12,073	4.4%	40.7%
American Indian/Alaska Native	578	0.2%	719	0.3%	24.4%
Other (including multiracial)*	15,646	5.8%	15,732	5.7%	0.5%
Hispanic**	18,795	7.0%	25,457	9.2%	35.4%
<b>Urban County***</b>	<b>216,304</b>	<b>100.0%</b>	<b>224,227</b>	<b>100.0%</b>	<b>3.7%</b>
White	177,520	82.1%	173,913	77.6%	-2.0%
Non-White	38,784	17.9%	50,314	22.4%	29.7%
Black	22,416	10.4%	28,482	12.7%	27.1%
Asian	6,860	3.2%	9,821	4.4%	43.2%
American Indian/Alaska Native	325	0.2%	481	0.2%	48.0%
Other (including multiracial)*	9,183	4.2%	11,530	5.1%	25.6%
Hispanic**	9,821	4.5%	14,706	6.6%	49.7%
<b>City of Harrisburg</b>	<b>49,528</b>	<b>100.0%</b>	<b>49,209</b>	<b>100.0%</b>	<b>-0.6%</b>
White	15,181	30.7%	17,178	34.9%	13.2%
Non-White	34,347	69.3%	32,031	65.1%	-6.7%
Black	25,957	52.4%	25,339	51.5%	-2.4%
Asian	1,709	3.5%	2,252	4.6%	31.8%
American Indian/Alaska Native	251	0.5%	238	0.5%	-5.2%
Other (including multiracial)*	6,430	13.0%	4,202	8.5%	-34.7%
Hispanic**	8,939	18.0%	10,735	21.8%	20.1%

\* 'Other' includes ACS Demographic variables Native Hawaiian/Pacific Islander, Some other race, and Two or more races.

\*\*Hispanic ethnicity is counted independently of race by the U.S. Census Bureau. Percentages for the race categories add to 100 percent, and should not be combined with the percent Hispanic. Similarly, the population totals for each geography equal the sum of all race categories, excluding Hispanic ethnicity.

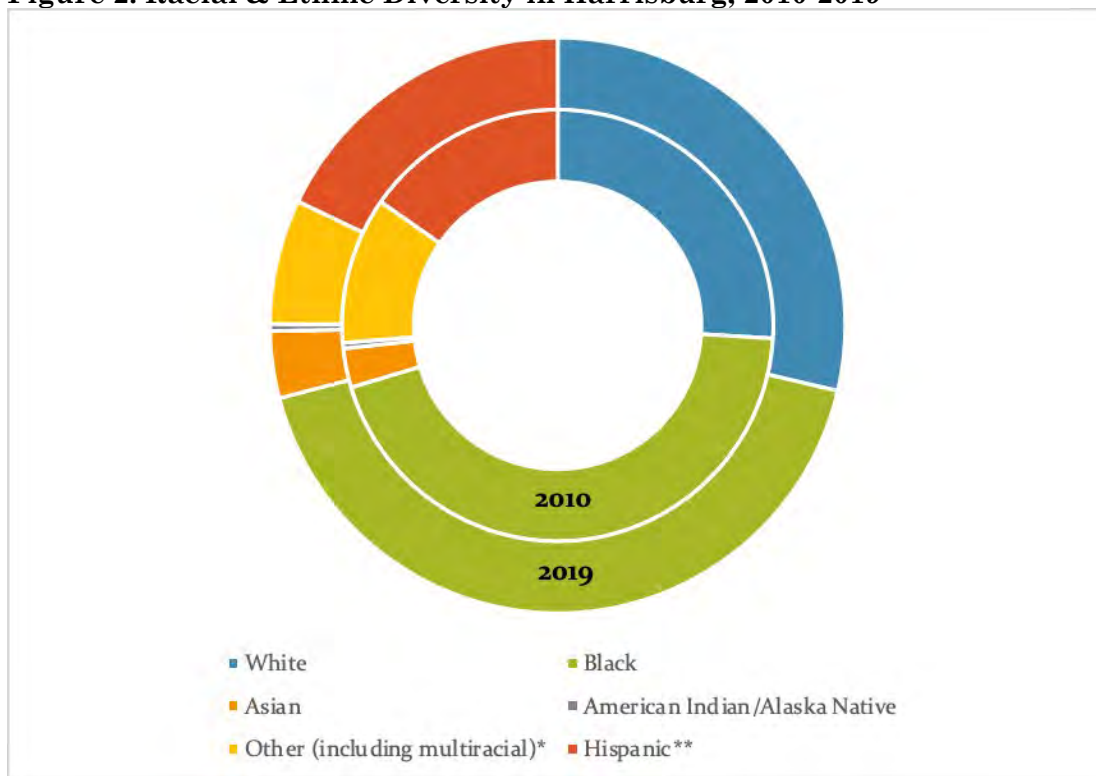
\*\*\*Urban County includes all County subdivisions except the City of Harrisburg, a separate entitlement area, and Washington Township, an opt-out community.

Source: U.S. Census Bureau, 2010 Decennial Census (SF1 P003, P004); 2019 ACS 5-Year Estimates (DP05)

Racial diversity in Harrisburg declined slightly between 2010 and 2019, though the City continues to be more diverse than the Urban County. Harrisburg’s proportion of non-White residents decreased by 6.7% between 2010 and 2019 primarily due to a substantial population decline of 34.7% among ‘Other’ races, including residents identifying as some other race or two or more races. The City’s Black/African American population also experienced a negative rate of growth (2.4%), decreasing the proportion of the City’s total population from 52.4% in 2010 to 51.5% Black/African American in 2019. Despite this overall decrease in the City’s non-White population, the Asian population in the City increased by 31.8% between 2010 and 2019.

In terms of ethnic diversity, which is counted independently of race, the rate of increase in Hispanic residents (20.1%) was much slower than in the Urban County (49.7%). However, residents of Hispanic ethnicity comprised 21.8% of the City’s total population in 2019, compared to 6.6% at the Urban County level.

**Figure 2: Racial & Ethnic Diversity in Harrisburg, 2010-2019**

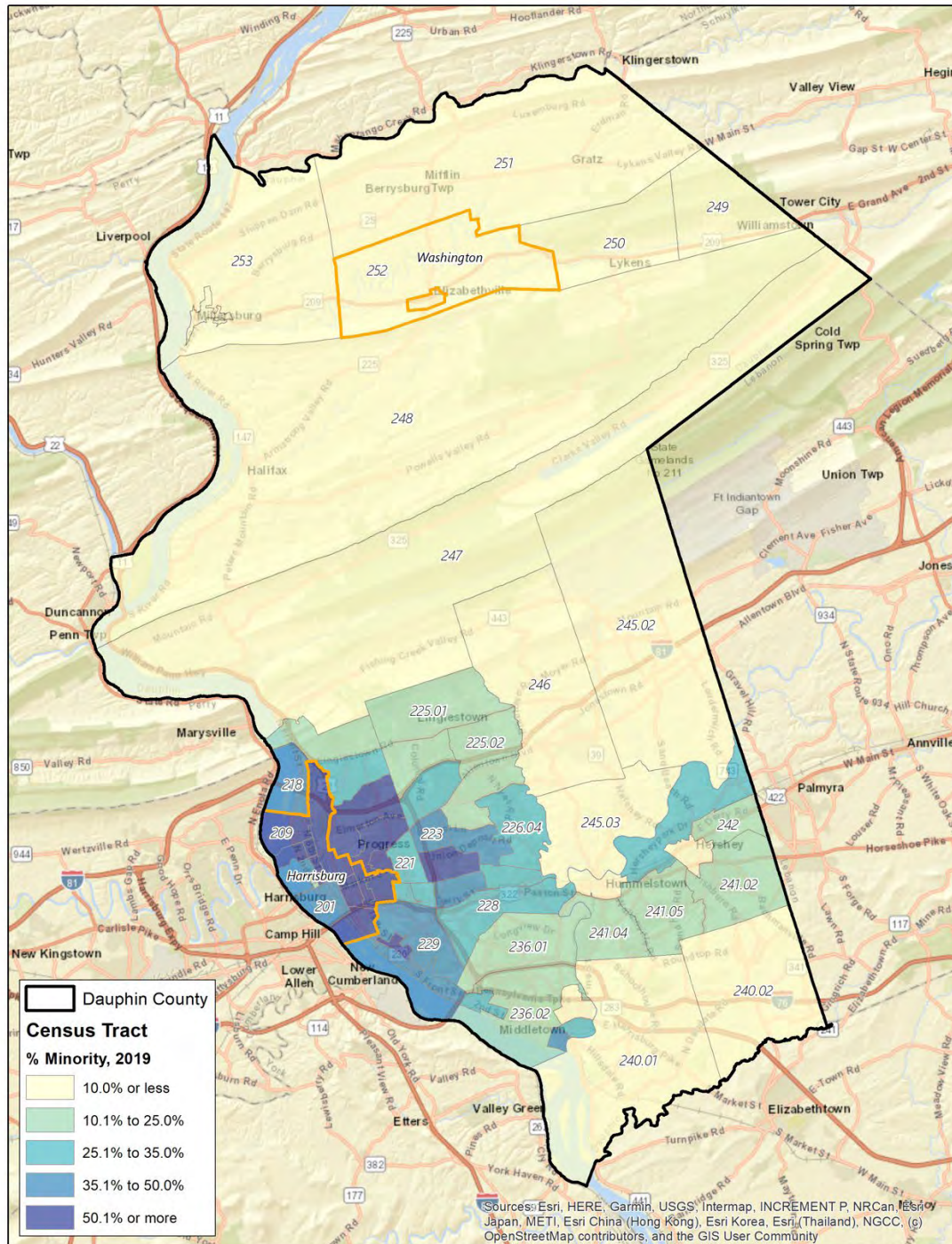


Source: U.S. Census Bureau, 2010 Decennial Census (SF1 P001); 2019 ACS 5 Year Estimates (DP05)



As in the prior AFH, there are geographic patterns by race and ethnicity; non-White racial minorities and Hispanic persons tend to reside in the southwest portion of Dauphin County with the highest concentrations centered in and around the City of Harrisburg.

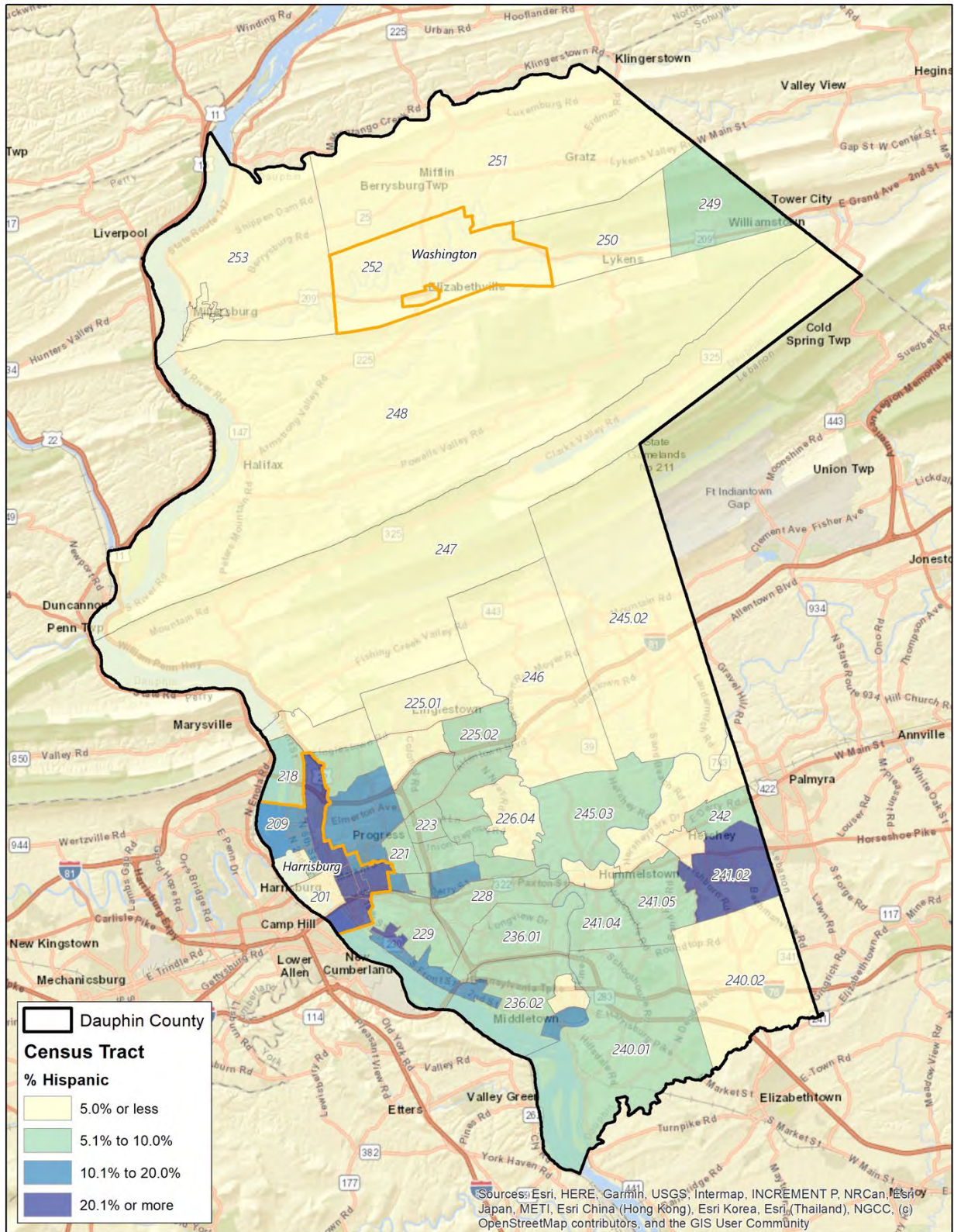
**Map 3: Racial Minorities (Non-White), 2019**



Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (DP05)



Map 4: Ethnic Minorities (Hispanic), 2019

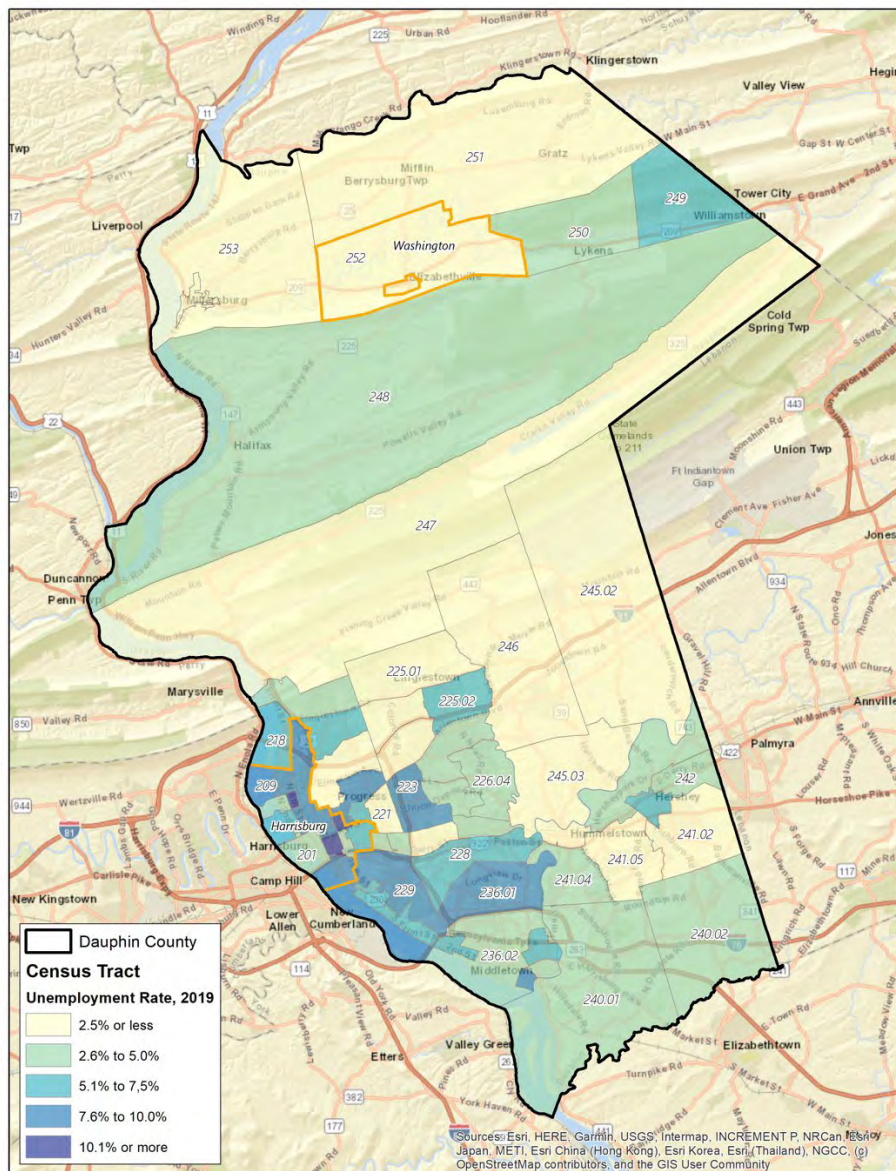


Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (DP05)



## Income, Unemployment, and Poverty

Employment greatly influences an individual's income, poverty status, and housing choice. Lower earnings due to unemployment and income disparities limit a household's ability to afford housing. The unemployment rate in Dauphin County was 4.7% in 2019, which was slightly lower than the Pennsylvania average of 5.3%. Unemployment rates varied throughout the County, with below-average rates in northern and central areas, and rates that were on-par with County unemployment levels throughout Halifax, Elizabethtown, Wayne, Jackson, Jefferson, and Lykens. The southern county, from South Hanover and Derry to Conewago and Londonderry at the County border, also had below- or at-average rates of unemployment, while the highest unemployment rates are found around the City of Harrisburg, Steelton, and Swatara. These are the same municipalities where higher rates of Black/African American and Hispanic residents are clustered.



Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (S2301)

***Despite overall declining unemployment rates across demographic groups between 2010 and 2019, racial minorities in Dauphin County continued to experience above-average rates of unemployment.***

The American Community Survey (ACS) provides detailed employment data by race, indicating differences in employment rates among demographic groups. In general, unemployment rates decreased across racial and ethnic groups between 2010 and 2019. However, racial minorities in Dauphin County continued to experience above-average rates of unemployment during this period. Black/African American residents had a rate of 15.6% unemployment in 2010-2014, falling to 10.2% in 2015-2019, yet remaining significantly higher than the County-wide unemployment rate of 4.7%. Further demonstrating this trend, the unemployment rate of residents identifying as two or more races decreased from 18.2% in 2014 to 9.8% in 2019. In contrast, unemployment among Dauphin County residents of Hispanic ethnicity declined from 15.2% to 4.8% in 2019, roughly consistent with the County-wide average unemployment rate.<sup>2</sup>

***In 2019, Conewago Township had the highest median income in Dauphin County at \$93,850. The lowest median incomes were found in the City of Harrisburg (\$39,685) and Steelton Borough (\$38,836), located just outside of Harrisburg.***

Household income is strongly related to housing choice, as it is one of several factors used to determine eligibility for a home mortgage loan or rental lease. Additionally, a lack of income inherently reduces the number of options a household has over where to live. Median household income in Dauphin County increased by just under 2% to \$60,715 in 2019, slightly lower than both the State median of \$61,744 and the national median of \$62,843. In 2019, Conewago Township had the highest median income of Dauphin County's 40 subdivisions at \$93,850. Despite an increase of over 11% between 2014 and 2019, the median income in the City of Harrisburg was approximately 55% lower than both the State and County, making it the second lowest median income in the County.<sup>3</sup>

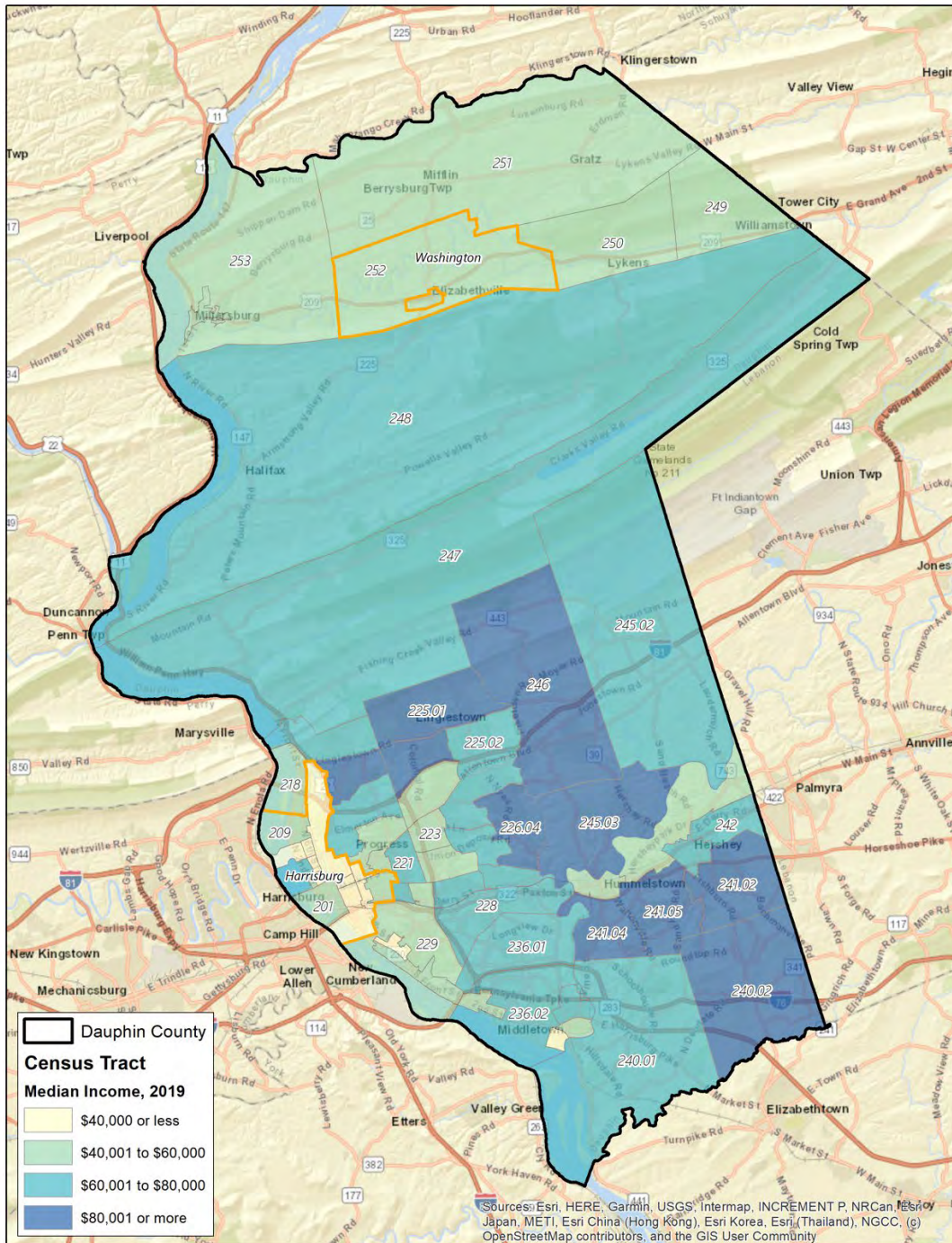
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<sup>2</sup> U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (S2301)

<sup>3</sup> U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (B19013)



Median household income varies geographically across the region. Incomes are generally higher in central and southern Dauphin County with the highest median incomes occurring in West Hanover, South Hanover, Lower Paxton, portions of Derry, and Conewago. The City of Harrisburg and surrounding areas of Penbrook, Steelton, Middletown, and portions of Lower Paxton tend to have the lowest median household incomes.



Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B19013)



*When adjusted for inflation, changes in real household income have varied by race/ethnicity.*

In Dauphin County, ‘Other’ races and Hispanic households experienced increases in median household income of over 20% from 2014 to 2019, while Black/African American households had a smaller increase of 5.3%. Despite the substantial growth, median incomes for Black/African American, Hispanic, and ‘Other’ races remained well below the Dauphin County median in 2019.

While Asian households saw virtually no change (0.1%) in income at the County level, median household income increased by more than 82% for Asian households residing in the City of Harrisburg between 2014 and 2019. Multi-racial City residents also experienced a substantial increase in income of 37.4%. The median incomes of Black/African American and Hispanic residents grew by 16.6% and 14.2%, respectively.

**Table 3: Median Household Income by Race/Ethnicity (2019 dollars)**

	2010-2014	2015-2019	Percent Change 2010-2019
<b>Dauphin County</b>	\$ 59,643	\$ 60,715	1.8%
White	\$ 66,220	\$ 66,873	1.0%
Black	\$ 39,879	\$ 41,998	5.3%
Asian	\$ 64,509	\$ 64,558	0.1%
American Indian/Alaska Native	\$ 48,708	\$ 36,518	-25.0%
Other (including multiracial)*	\$ -	\$ -	-
Native Hawaiian/Other Pacific Islander	\$ -	\$ -	-
Some Other Race	\$ 30,533	\$ 38,482	26.0%
Multiracial	\$ 41,489	\$ 56,713	36.7%
Hispanic	\$ 36,411	\$ 43,897	20.6%
<b>Harrisburg City</b>	\$ 35,647	\$ 39,685	11.3%
White	\$ 44,241	\$ 45,820	3.6%
Black	\$ 30,816	\$ 35,946	16.6%
Asian	\$ 28,281	\$ 51,563	82.3%
American Indian/Alaska Native	\$ 73,895	\$ -	-
Other (including multiracial)*	\$ -	\$ -	-
Native Hawaiian/Other Pacific Islander	\$ -	\$ -	-
Some Other Race	\$ 21,311	\$ 20,734	-2.7%
Multiracial	\$ 33,925	\$ 46,618	37.4%
Hispanic	\$ 28,591	\$ 32,656	14.2%
<b>Pennsylvania</b>	\$ 58,302	\$ 61,744	5.9%
White	\$ 61,828	\$ 65,306	5.6%
Black	\$ 35,790	\$ 38,560	7.7%
Asian	\$ 71,698	\$ 76,682	7.0%
American Indian/Alaska Native	\$ 37,433	\$ 40,622	8.5%
Other (including multiracial)*	\$ -	\$ -	-
Native Hawaiian/Other Pacific Islander	\$ 43,721	\$ 47,237	8.0%
Some Other Race	\$ 33,593	\$ 36,566	8.9%
Multiracial	\$ 41,318	\$ 48,713	17.9%
Hispanic	\$ 37,859	\$ 41,725	10.2%

An “-” entry indicates that ACS estimates were unavailable, either because no sample observations or too few sample observations were available to compute an estimate.

\* ‘Other’ includes ACS Demographic variables Native Hawaiian/Pacific Islander, Some other race, and Two or more races.

Source: U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (B19013)

***Black/African American and Hispanic households experienced lower incomes as well as higher rates of poverty than White residents in Dauphin County.***

Poverty is also strongly related to limited housing choice and disproportionately affects members of the protected classes. The federal poverty level in 2019 was defined as an annual income of \$25,750 for a family of four or \$12,490 for an individual.<sup>4</sup> The overall poverty rate in Dauphin County in 2019 was 12.3%.<sup>5</sup> This rate was consistent with the Pennsylvania average of 12.4%. The Urban County had an average poverty rate of 9.3%, lower than both the County and State averages. The City of Harrisburg's poverty rate of 26.2% was more than double the Dauphin County average, and nearly triple that of the Urban County. The City's above-average poverty rate correlates with the below-average median incomes discussed earlier in this section.<sup>6</sup>

***Black/African American persons are nearly three times more likely to be living below poverty level than their White counterparts and only slightly less likely to be living below poverty than Hispanic persons.***

In general, racial and ethnic minorities experience disproportionately higher rates of poverty when compared to their respective shares of the total population as a whole. At the Urban County level, non-White residents comprise 22.1% of the population for whom poverty status is determined, while accounting for 40.7% of the population in poverty. Similarly, Hispanic residents account for 6.5% of the Urban County population yet comprise approximately 12.8% of the total population for whom poverty status was determined.

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<sup>4</sup> U.S. Department of Health and Human Services (DHHS), Office of the Assistant Secretary for Planning and Evaluation. 2019 Poverty Guidelines. Accessed at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines/prior-hhs-poverty-guidelines-federal-register-references/2019-poverty-guidelines>

<sup>5</sup> Federal poverty guideline figures are not the figures utilized by the Census Bureau to calculate official poverty population figures. The guidelines are a simplification of the poverty thresholds for administrative purposes, such as determining financial eligibility for certain federal programs. The Census Bureau utilizes poverty thresholds, a slightly different version of the federal poverty measure used for statistical purposes.

<sup>6</sup> U.S. Census Bureau, 2019 ACS 5-Year Estimates (B17001)

**Table 4: Poverty Rate by Race/Ethnicity, 2019**

	Total Population for whom Poverty Status is Determined*		Population in Poverty	
	Number	Percent of Population	Number	Percent of Population in Poverty
<b>Dauphin County</b>	<b>271,057</b>	<b>100.0%</b>	<b>33,354</b>	<b>12.3%</b>
White	190,604	70.3%	15,950	47.8%
Non-White	80,453	29.7%	17,404	52.2%
Black	52,474	19.4%	12,644	37.9%
Asian	11,981	4.4%	1,151	3.5%
American Indian/Alaska Native	719	0.3%	155	0.5%
Other (including multiracial)**	15,279	5.6%	3,454	10.4%
Hispanic***	24,872	9.2%	6,407	19.3%
<b>Urban County****</b>	<b>220,281</b>	<b>100.0%</b>	<b>20,460</b>	<b>9.3%</b>
White	171,541	77.9%	12,143	59.3%
Non-White	48,740	22.1%	8,317	40.7%
Black	27,346	12.4%	5,266	25.7%
Asian	9,767	4.4%	965	4.7%
American Indian/Alaska Native	481	0.2%	114	0.6%
Other (including multiracial)**	11,146	5.1%	1,972	9.6%
Hispanic***	14,242	6.5%	2,615	12.8%
<b>Harrisburg City</b>	<b>48,580</b>	<b>100.0%</b>	<b>12,752</b>	<b>26.2%</b>
White	16,872	34.7%	3,670	28.8%
Non-White	31,708	65.3%	9,082	71.2%
Black	25,123	51.7%	7,373	57.8%
Asian	2,214	4.6%	186	1.5%
American Indian/Alaska Native	238	0.5%	41	0.3%
Other (including multiracial)**	4,133	8.5%	1,482	11.6%
Hispanic***	10,614	21.8%	3,792	29.7%
<b>Pennsylvania</b>	<b>12,380,284</b>	<b>100.0%</b>	<b>1,539,183</b>	<b>12.4%</b>
White	10,011,082	80.9%	972,867	63.2%
Non-White	2,369,202	19.1%	566,316	36.8%
Black	1,349,724	10.9%	350,457	22.8%
Asian	420,910	3.4%	58,438	3.8%
American Indian/Alaska Native	23,331	0.2%	5,730	0.4%
Other (including multiracial)**	575,237	4.6%	151,691	9.9%
Hispanic***	901,112	7.3%	253,077	16.4%

\* Total population data pertains only to those for whom poverty status was determined; therefore totals may not correspond to population totals in other tables.

\*\* 'Other' includes ACS Demographic variables Native Hawaiian/Pacific Islander, Some other race, and Two or more races.

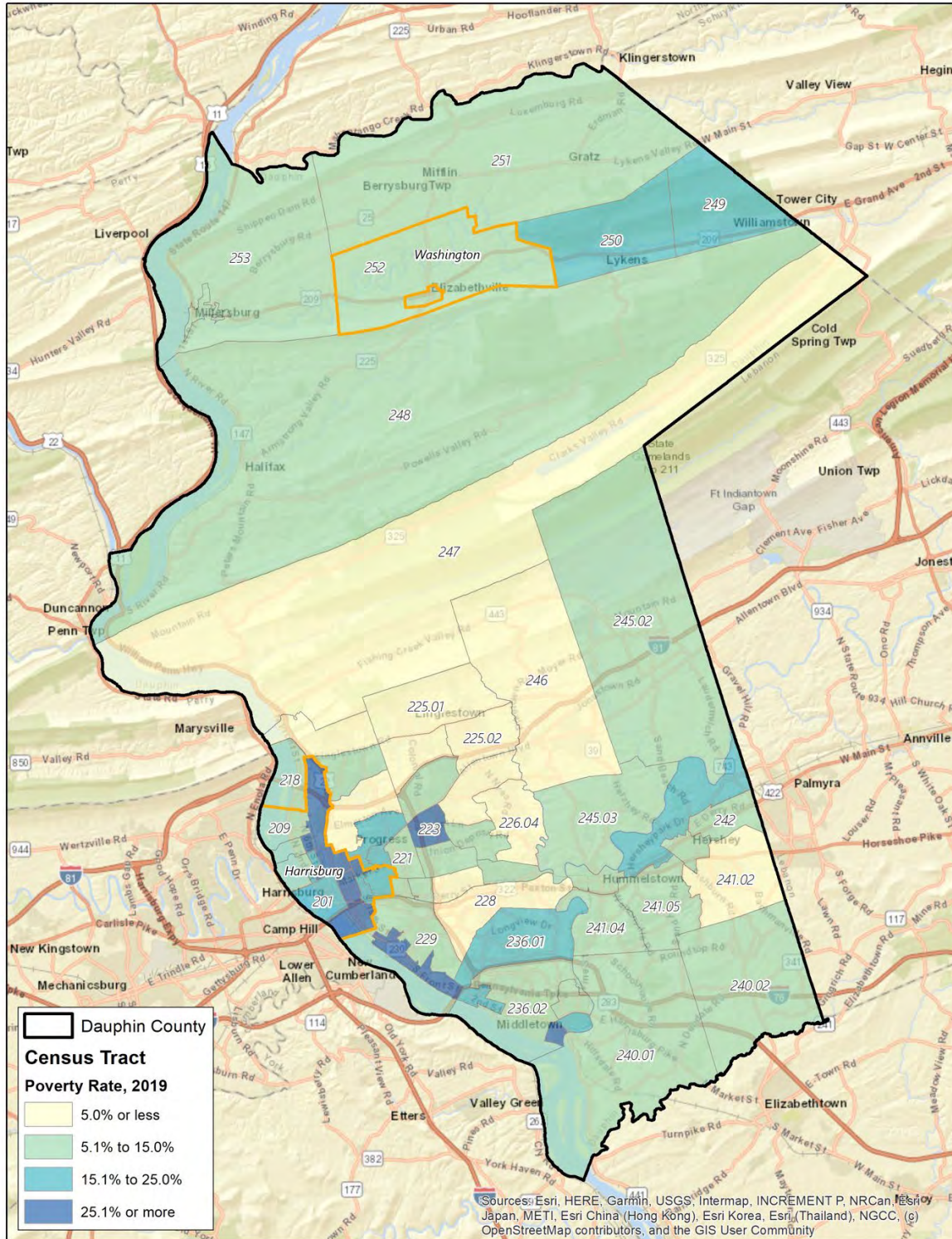
\*\*\* Hispanic ethnicity is counted independently of race by the U.S. Census Bureau. Percentages for the race categories should not be combined with the percent Hispanic. Similarly, the population totals for each geography equal the sum of all race categories, excluding Hispanic ethnicity.

\*\*\*\* Urban County includes all County subdivisions except the City of Harrisburg, a separate entitlement area, and Washington Township, an opt-out community.

Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B17001, B17001A-I)



Geographically, unemployment rates and poverty rates track follow the same pattern: areas around the City of Harrisburg, Steelton, Middletown, and portions of Lower Paxton tend to have higher rates of unemployment and poverty.



Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B17001)

There were significant differences in income and poverty rate by race and ethnicity. In Dauphin County, White and Asian residents had above-average incomes and below-average rates of poverty. White residents had the highest median household income (MHI) of \$66,873 and the lowest poverty rate of 8.4%. The MHI of Asian residents was \$64,558 with a below-average poverty rate of 9.6%.

*Lower median incomes and higher rates of poverty limit housing choice among Black/African American and Hispanic households in Dauphin County.*

In contrast, Black/African American and Hispanic households experienced lower incomes as well as higher rates of poverty than White residents at the County level. Median household income was \$41,998 for Black/African American Dauphin County residents and \$43,897 for Hispanic residents in 2019, both lower than the County MHI of \$60,715. The median Black/African American household in Dauphin County earned \$24,875 less than a White household. Similarly, the median Hispanic household earned \$22,976 less than a White household. Just over 8% of White residents were living in poverty in 2019 compared to 24.1% of Black/African American and 25.8% of Hispanic households. This reflects continued economic segregation within the Black/African American and Hispanic populations in Dauphin County.

## Racially/Ethnically Concentrated Areas of Poverty

HUD defines R/ECAPs as census tracts with a non-White population of at least 50% (and 20% outside of metropolitan/micropolitan areas) and a poverty rate that either exceeds 40% or is three times the average tract poverty rate for the metropolitan/micropolitan area, whichever is lower. By combining these data, it is possible to determine geographic patterns where there are concentrated areas of poverty among racial/ethnic minorities. Although ethnicity and race as defined by the US Census Bureau are not the same, this study uses rates of both non-White and Hispanic populations to map a single combined group of racial and ethnic concentrations. These are referred to collectively as "racially/ethnically concentrated areas of poverty," or R/ECAPs.

The thresholds for RCAPs in this analysis were set at **20% non-White or Hispanic** and a **25% or higher rate of poverty**. These thresholds are identical to those applied in the 2017-2021 Assessment of Fair Housing (AFH). The dataset utilized in the AFH R/ECAP calculation is no longer available; therefore, R/ECAP results for 2014 in the AI differ from the 2017-2021 AFH.

In 2014, two census tracts in the southwestern Dauphin County entitlement area (Urban County) had concentrations of both racial and ethnic minorities *and* households below the poverty line, thereby meeting HUD's thresholds. The first R/ECAP was Census Tract 222 located within the Borough of Penbrook, which had a non-White concentration of 41.0% and a 25.5% poverty rate. This census tract no longer meets R/ECAP thresholds in 2019. The second 2014 R/ECAP was within the Borough of Middletown; the racial minority concentration in Census Tract 237 was 34.8% with a 38.5% poverty rate. Census Tract 237 continues to be a racially/ethnically concentrated area of poverty in 2019, although the poverty level decreased by over 23%.

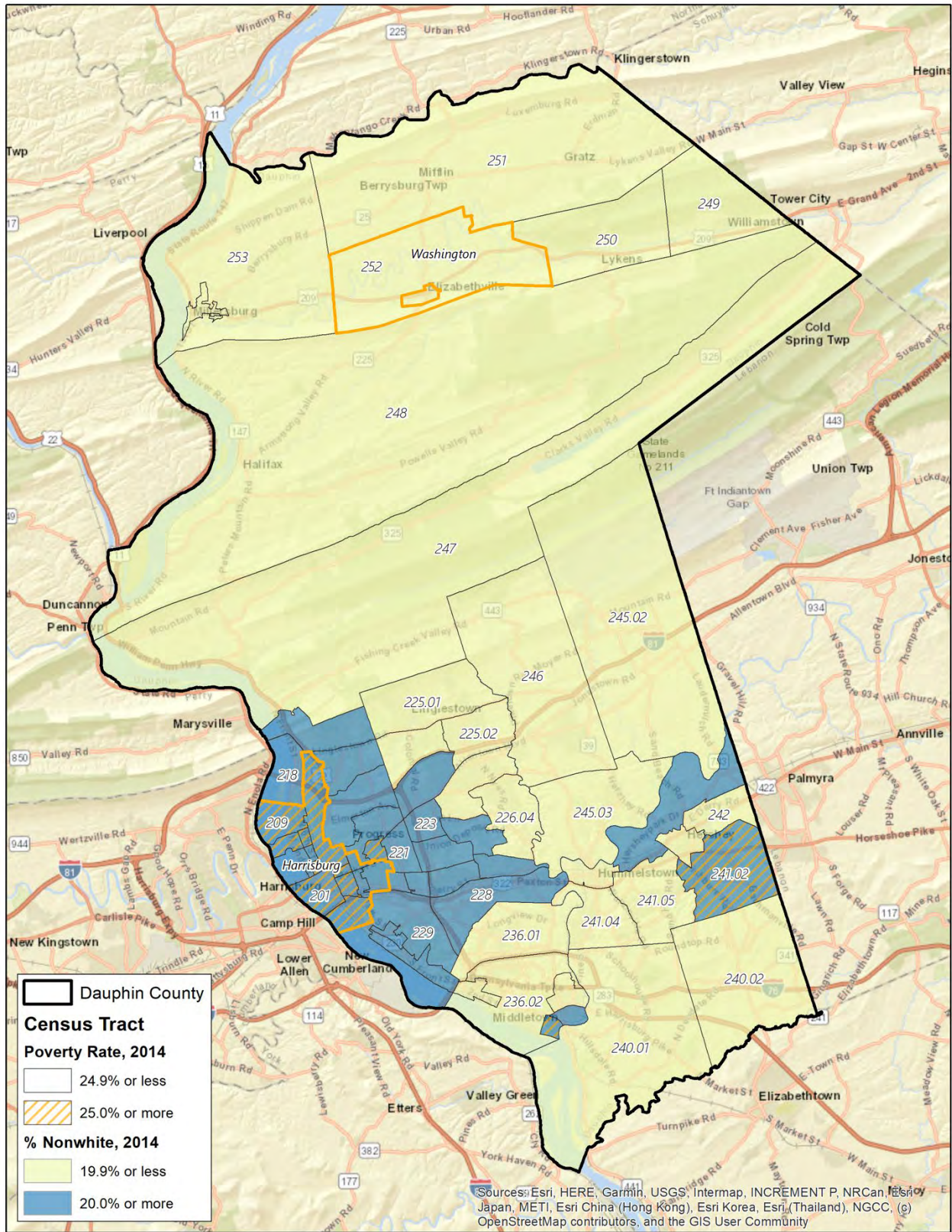
**Table 5: Racial and Ethnic Concentrations by Census Tract, 2014-2019**

Municipality	Census Tract	2014		2019	
		% Racial Concentration	% Poverty Concentration	% Racial Concentration	% Poverty Concentration
Penbrook	222	41.0	25.5	-	-
Lower Paxton	223	-	-	45.4	25.5
Steelton	233	-	-	65.0	25.4
Steelton	234	-	-	39.7	29.2
Middletown	237	34.8	38.5	37.9	29.4

Source: U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (DP05, B17001A-I)



Map 8: R/ECAPs, 2014



Source: U.S. Census Bureau, 2014 ACS 5-Year Estimates (DP05, B17001A-1)







## Dissimilarity Index

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Residential segregation is a measure of the degree of separation of racial or ethnic groups living in a neighborhood or community. Latent factors, such as attitudes, or overt factors, such as real estate practices, can limit the range of housing opportunities for minorities. A lack of racial or ethnic integration in a community may create other problems, such as reinforcing prejudicial attitudes and behaviors, narrowing opportunities for interaction, and reducing the degree to which community life is considered harmonious. Areas of extreme minority isolation often experience poverty and social problems at rates that are disproportionately high. Racial segregation has been linked to diminished employment prospects, poor educational attainment, increased infant and adult mortality rates and increased homicide rates.

Segregation can be measured using a statistical tool called the dissimilarity index.<sup>7</sup> This index measures the degree of separation between racial or ethnic groups living in a community. Since White residents are the majority in the Urban County, all other racial and ethnic groups were compared to the White population as a baseline. Dissimilarity index scores were determined for Black/African American, Asian, and Hispanic populations using Census Tracts in the Urban County.

The index of dissimilarity allows for comparisons between subpopulations (i.e., different races/ethnicities), indicating how much one group is spatially separated from another within a community. In other words, it measures the evenness with which two groups are distributed across the neighborhoods that make up a community. The index of dissimilarity is rated on a scale from 0 to 100, in which a score of 0 corresponds to perfect integration and a score of 100 represents total segregation. According to HUD, a score under 40 is considered low, between 40 and 59 is moderate, and above 60 is high segregation.

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<sup>7</sup> For a given geographic area, the index is equal to  $DI = \frac{1}{2} \sum_i^N \left| \frac{a_i}{A} - \frac{b_i}{B} \right|$ , where  $a_i$  is the group population of a sub-region (i.e. census tract),  $A$  is the group population in the whole region,  $b_i$  is the comparison group population in a sub-region, and  $B$  is the comparison group's population in the whole region.

**Table 6: Urban County Dissimilarity Index, 2014-2019**

	2014	2019	Percent Change
Asian	41.7	48.0	15.1%
Black	51.0	50.9	-0.2%
Hispanic*	40.6	34.2	-15.8%

Source: U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (DP05)

*Overall, the Urban County has moderate levels of segregation, though these levels changed between 2014-2019.*

In 2014, the Urban County had moderate levels of segregation among Black/African American, Asian, and Hispanic populations; Asian/White segregation increased 15.1% from 2014 to 2019 while Black/White segregation decreased by 0.2%. Hispanic segregation decreased by nearly 16% during this time; Dauphin County has a low level of segregation among Hispanic residents in 2019. A direct comparison of the current dissimilarity index and the indices from the 2017 AFH is not possible; the 2017 AFH utilized a tool created by HUD that is no longer available.

## Ancestry and National Origin

*Consistent with the 2017 AFH, India, Vietnam, China, and the Dominican Republic continue to be among the top countries for foreign-born County residents.*

It is illegal to refuse the right to housing based on place of birth or ancestry. Census data on native and foreign-born populations indicate that there are a total of 21,180 foreign-born persons residing in Dauphin County, of which 16,181 reside in the Urban County. Within Dauphin County and the Urban County, more than 50% of the foreign-born population originated from the ten countries listed below.

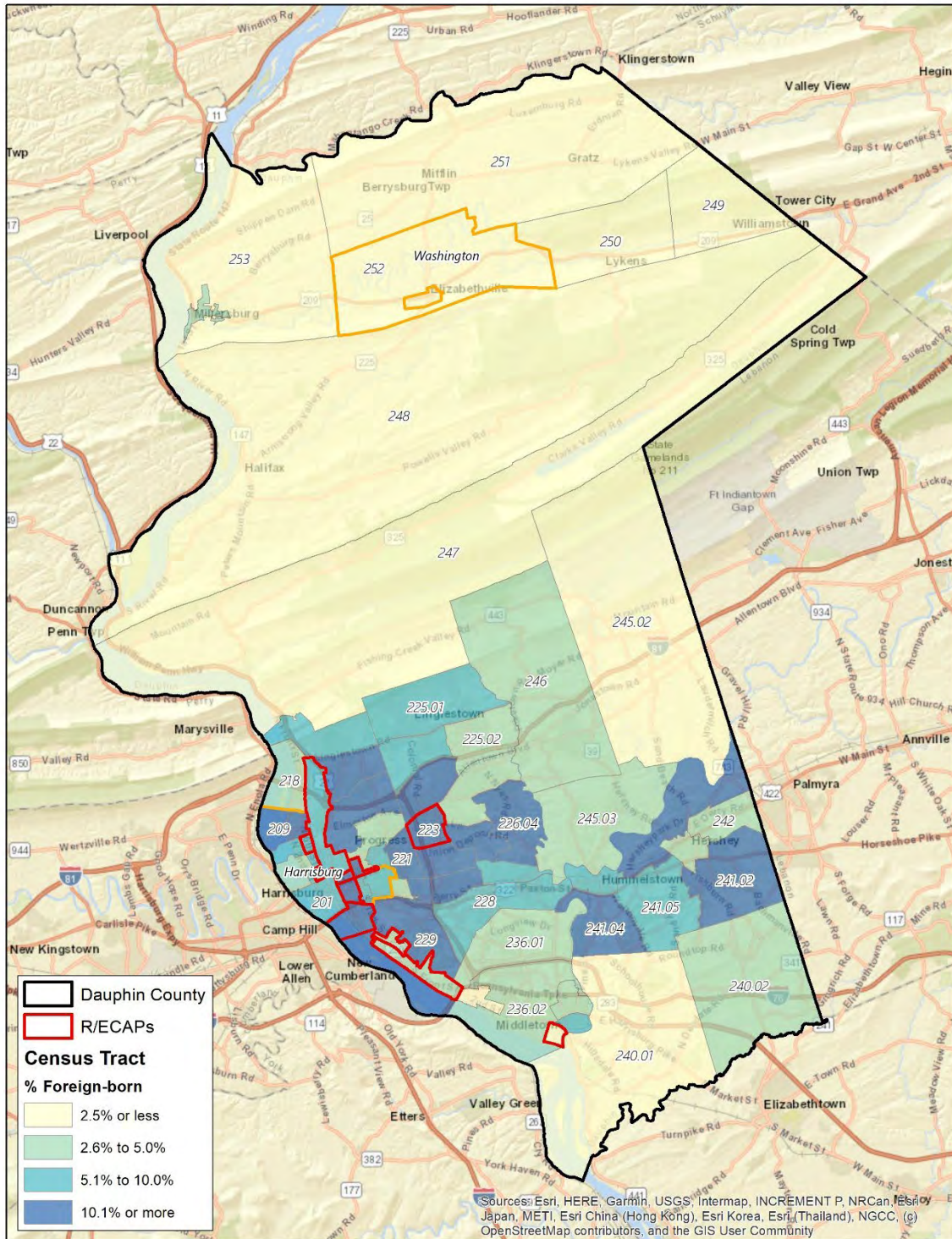
**Table 7: Countries of Origin for Foreign-born Residents**

Rank	Country of Origin	Population
<b>Dauphin County</b>		
1	India	1,980
2	Mexico	1,947
3	China	1,408
4	Nepal	1,330
5	Dominican Republic	1,260
6	Vietnam	1,122
7	Peru	576
8	United Kingdom	460
9	Cambodia	445
10	Germany	405
Rank	Country of Origin	Population
<b>Urban County</b>		
1	India	1,835
2	Mexico	1,509
3	China	1,308
4	Nepal	874
5	Vietnam	834
6	Dominican Republic	519
7	United Kingdom	417
8	Philippines	358
9	Germany	347
10	Cambodia	239

Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B05006)

The following map indicates the percentage of foreign-born residents in each census tract. Higher concentrations of foreign-born persons reside in Derry, Susquehanna, Lower Paxton, Steelton, and Swatara, including within the R/ECAPs located in Lower Paxton and Steelton.

**Map 10: Foreign-born Population, 2019**



Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B05006)



## Limited English Proficiency

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Persons with limited English proficiency (LEP) are defined as persons who have a limited ability to read, write, speak, or understand English. HUD uses the prevalence of persons with LEP to identify the potential for impediments to fair housing choice due to their inability to comprehend English. Persons with LEP may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. To assist these individuals, it is important that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent, and establishes policies to eliminate barriers.

*In the Urban County, Spanish or Spanish Creole is the language most often spoken by persons with LEP, which comprise 1.25% of the Urban County population.*

**Table 8: LEP by Language, 2015**

Rank	Language Spoken	Population	
		Number	Percentage of Total Population
<b>Dauphin County</b>			
1	Spanish or Spanish Creole	5,563	2.19%
2	Other Indic Languages	1,058	0.42%
3	Vietnamese	1,048	0.41%
4	Chinese	579	0.23%
<b>Urban County</b>			
1	Spanish or Spanish Creole	2,587	1.25%
2	Other Indic Languages	529	0.26%
3	Chinese	523	0.25%
4	Vietnamese	494	0.24%

Source: U.S. Census Bureau, 2015 ACS 5-Year Estimates (B16001)

Note: The American Community Survey has not released any updated data tables for persons with Limited English Proficiency since the 2011-2015 ACS.

*Because there are 2,587 persons with LEP who speak Spanish or Spanish Creole, this triggers the safe harbor threshold for translation of vital documents.*

## Disability

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As defined by the Census Bureau, a disability is a long-lasting physical, mental, or emotional condition that can make it difficult for a person to engage in activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

The Fair Housing Act prohibits discrimination based on physical, mental, or emotional disability, provided “reasonable accommodation” can be made. This may include changes to address the needs of persons with disabilities, such as adaptive structural changes (e.g.,

constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal).

*Dauphin County has a lower prevalence rate than Pennsylvania with approximately 12.4% of the population reporting one or more disabilities, compared to 14% at the state level.*

Among residents for whom disability status is determined, 12.4% of Dauphin County’s civilian, non-institutionalized population reported one or more disabilities in 2019, amounting to 33,781 people. The most common type of disability among persons 18 to 64 was an ambulatory disability, meaning difficulty moving from place to place that makes it impossible or impractical to walk as a means of transportation. Forty-two percent of disabled Urban County residents between ages 18 and 64 identified their disability as ambulatory, which translates to a need for accessible housing with universal design features. Many persons with disabilities, regardless of type, require access to adequate transportation systems and human services because their disability often makes it impossible or impractical to walk or drive as a means of transportation.

**Table 9: Disability Type, 2019**

	Dauphin County		Urban County		Harrisburg City	
	Number	Percent of Total Population	Number	Percent of Total Population	Number	Percent of Total Population
Hearing Difficulty	8,569	3.1%	7,295	3.3%	1,191	2.4%
Vision Difficulty	5,890	2.2%	4,192	1.9%	1,649	3.4%
Cognitive Difficulty	12,807	4.7%	9,336	4.2%	3,434	7.0%
Ambulatory Difficulty	16,928	6.2%	12,749	5.8%	4,092	8.4%
Self-Care Difficulty	5,742	2.1%	4,495	2.0%	1,213	2.5%
Independent Living Difficulty	11,586	4.3%	9,124	4.1%	2,404	4.9%

*Ambulatory difficulty was the most common type of disability among persons aged 18-64 and among the elderly aged 65 and over.*

While approximately 10.4% of Dauphin County’s population aged 18-64 have one or more disabilities (9.4% in the Urban County), the rate of disability increases to over 30% of the population aged 65 and older. Among those in the 65+ age bracket, ambulatory and independent living difficulties are the most common, experienced by over 63.0% and 40.1% of the elderly disabled population in the Urban County, respectively. Older individuals with these types of disabilities may need units without stairs or with accessibility modifications to allow aging in place.

**Table 10: Disability Type by Status by Age, 2019**

	Dauphin County		Urban County		Harrisburg City	
	Number	Percent of Population	Number	Percent of Population	Number	Percent of Population
<b>Total Population for whom Disability Status is Determined*</b>	272,284	100.0%	221,200	100.0%	48,894	100.0%
<b>Population Under 18</b>	61,998	22.8%	48,399	21.9%	13,122	26.8%
Without a Disability	58,174	93.8%	46,158	95.4%	11,559	88.1%
With One or More Disabilities**	3,824	6.2%	2,241	4.6%	1,563	11.9%
Hearing Difficulty	348	9.1%	215	9.6%	133	8.5%
Vision Difficulty	341	8.9%	209	9.3%	119	7.6%
Cognitive Difficulty	2,281	59.6%	1,339	59.8%	935	59.8%
Ambulatory Difficulty	323	8.4%	137	6.1%	186	11.9%
Self-Care Difficulty	531	13.9%	341	15.2%	190	12.2%
<b>Population Ages 18-64</b>	165,924	60.9%	133,866	60.5%	30,775	62.9%
Without a Disability	148,650	89.6%	121,300	90.6%	26,130	84.9%
With One or More Disabilities**	17,274	10.4%	12,566	9.4%	4,645	15.1%
Hearing Difficulty	2,863	16.6%	2,244	17.9%	614	13.2%
Vision Difficulty	3,042	17.6%	2,007	16.0%	1,007	21.7%
Cognitive Difficulty	7,389	42.8%	1,339	10.7%	935	20.1%
Ambulatory Difficulty	7,817	45.3%	5,277	42.0%	2,509	54.0%
Self-Care Difficulty	2,442	14.1%	1,830	14.6%	607	13.1%
Independent Living Difficulty	5,802	33.6%	4,457	35.5%	1,332	28.7%
<b>Population 65 and Older</b>	44,362	16.3%	38,935	17.6%	4,997	10.2%
Without a Disability	30,722	69.3%	27,287	70.1%	3,149	63.0%
With One or More Disabilities**	13,640	30.7%	11,648	29.9%	1,848	37.0%
Hearing Difficulty	5,358	39.3%	4,836	41.5%	444	24.0%
Vision Difficulty	2,507	18.4%	1,976	17.0%	523	28.3%
Cognitive Difficulty	3,137	23.0%	2,543	21.8%	579	31.3%
Ambulatory Difficulty	8,788	64.4%	7,335	63.0%	1,397	75.6%
Self-Care Difficulty	2,769	20.3%	2,324	20.0%	416	22.5%
Independent Living Difficulty	5,784	42.4%	4,667	40.1%	1,072	58.0%

\* Total population data pertains only to those for whom disability status was determined; therefore totals may not correspond to population totals in other tables.

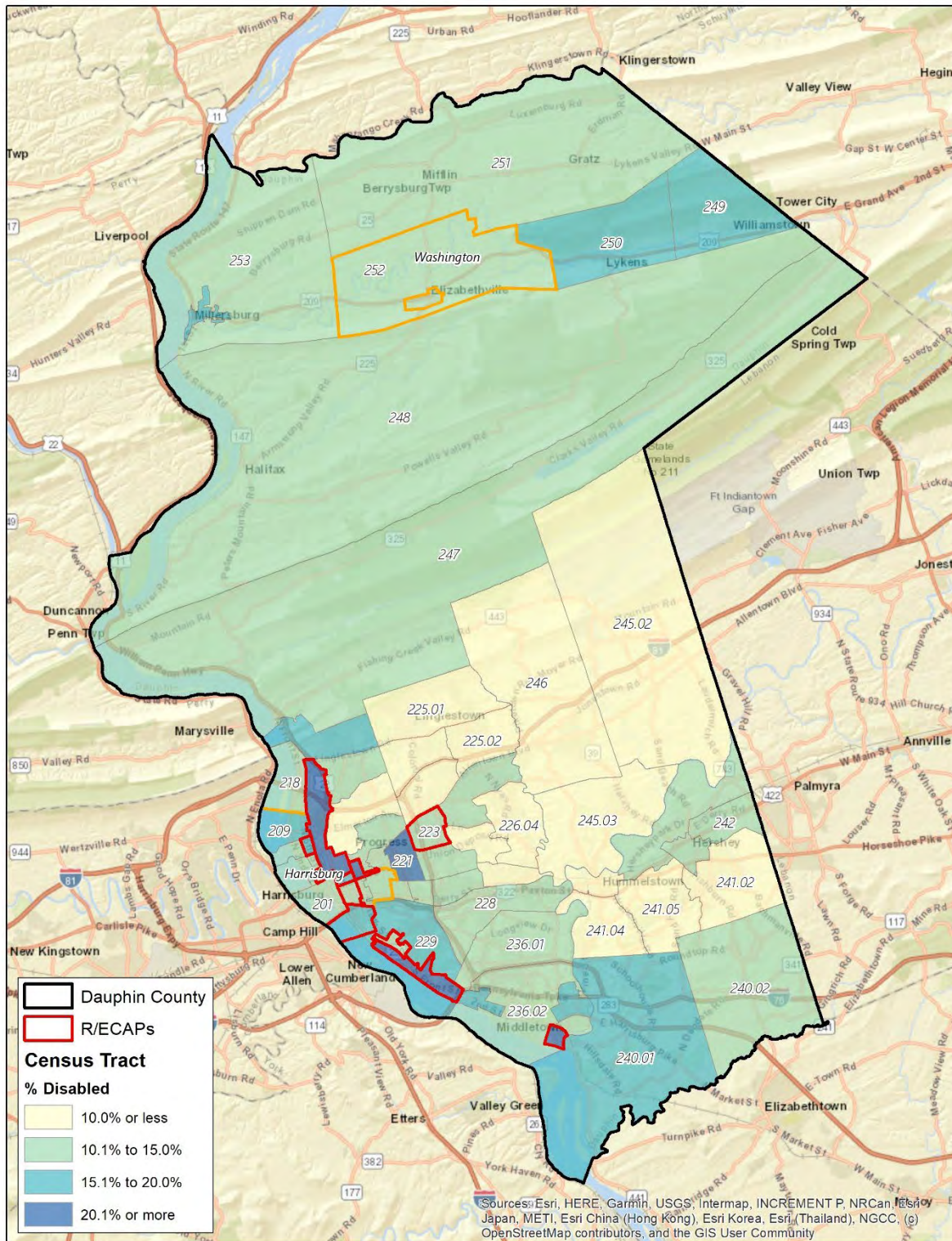
\*\* Disability status will not equal the sum of disability types due to persons reporting more than one disability. Similarly, the sum of percentages of each disability type will be greater than 100%.

Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (S1810)

Disabled residents tend to live in the northeastern Urban County – within Wiconisco, Lykens, and Williams – and along the southwestern border in R/ECAPs corresponding to Lower Paxton and Steelton.



Map 11: Disabled Population, 2019



Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (C18120, S1810)



*Among the civilian noninstitutionalized population between the ages of 18 and 64, there are significant differences in labor force participation rates among persons with and without a disability.*

Labor force participation rates in Dauphin County among persons with one or more disabilities was 28.9% compared to 69.8% among persons without a disability. Among those participating in the labor force, 11.6% of persons with disabilities are unemployed compared to 4.1% without a disability in 2019.<sup>8</sup>

*In Dauphin County, the median earnings among persons with disabilities was equivalent to 43% of the median earnings of persons without disabilities. As a result, persons with disabilities are almost twice as likely to live in poverty than persons without disabilities.*

Even in the absence of discrimination, people with disabilities often experience greater obstacles in securing affordable housing that is accessible due to the higher potential for lower wages and rates of employment. According to the National Organization on Disabilities, a significant income gap exists for people with disabilities given their lower rate of employment. Among persons aged 16 and older with earnings, the poverty rate is significantly higher for those with disabilities than those without. The poverty rate among persons with a disability was 17.7%, nearly double the 9.0% poverty rate experienced by persons without a disability. In 2019, the median earnings for persons with disabilities was \$26,740, equivalent to only 70% of the \$38,291 median earnings for persons without a disability.<sup>9</sup>

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<sup>8</sup> U.S. Census Bureau, 2019 ACS 5-Year Estimates (S2301, S1811)

<sup>9</sup> U.S. Census Bureau, 2019 ACS 5-Year Estimates (S1811)

## Household Type

The Census Bureau defines households as either family or non-family. Family households are married couples with or without children, single parents with children, and other families comprised of related persons. Non-family households are either single persons living alone or two or more non-related persons living together.

Title VIII of the Civil Rights Act of 1968 protects against gender discrimination in housing. Protection for families with children was added in the 1988 amendments to Title VIII. Except in limited circumstances involving elderly housing and owner-occupied buildings of one to four units, it is unlawful to refuse to rent or sell to families with children.

*Family households comprised the majority of Dauphin County households at 62.0% (63.4% for the Urban County) in 2019. This is a slight decrease from 2014 when family households comprised 63.0% of all households in Dauphin (65.1% in the Urban County).*

Between 2014 and 2019 the proportion of family households with children declined slightly. In 2014, 41.0% of all households were families with children residing in the Urban County, decreasing to 39.2% by 2019. Non-family households in the Urban County expanded from 34.9% in 2014 to 35.7% in 2019, mirroring national trends.

Inadequate childcare makes it more difficult for families with children to obtain employment, education, or job training. Stakeholders continued to cite a lack of affordable childcare options in Dauphin County. In 2019, 49.6% of Dauphin County's female-headed households with children were living below poverty compared to only 2.2% of married couples with children.

*Female-headed households with children often experience difficulty in obtaining housing as a result of lower incomes and higher expenses such as childcare.*

**Table 11: Households by Family Type, 2014-2019**

	Total Households	Family Households											Non-Family Households % of Total
		Married-Couple Family % of Total	Married-Couple Families			Other Family % of Total	Female-Headed Households			Male-Headed Households			
			#	With Children	Without Children		#	With Children	Without Children	#	With Children	Without Children	
<b>2014</b>													
Dauphin County	109,027	44.5%	48,527	37.2%	62.8%	18.5%	14,907	58.7%	41.3%	5,210	52.7%	47.3%	37.0%
Urban County*	87,881	49.7%	43,705	37.0%	63.0%	15.4%	9,620	55.3%	44.7%	3,914	50.7%	49.3%	34.9%
<b>2019</b>													
Dauphin County	112,212	44.0%	49,318	35.8%	64.2%	18.1%	15,255	52.8%	47.2%	5,032	51.0%	49.0%	38.0%
Urban County*	90,801	48.9%	44,392	36.0%	64.0%	15.4%	10,274	50.3%	49.7%	3,687	47.0%	53.0%	35.7%

\* Urban County includes all County subdivisions except the City of Harrisburg, a separate entitlement area, and Washington Township, an opt-out community.

Source: U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (B11001, B11003)

## Housing Profile

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### Key Findings

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- Pennsylvania's housing stock is relatively old with the median year of homes built in 1963; Dauphin County has a slightly newer housing stock with the median year of homes built in 1967.
- Between 2014 and 2019, 3,199 housing units were added to Dauphin County's overall housing inventory, of which 2,919 units were added in the Urban County.
- In 15 of the Urban County's 38 subdivisions, multi-family units comprised more than 20% of the housing stock.
- The average homeownership rate in Dauphin County is 63.2%, which was lower than the Urban County rate of 69.3%.
- There are variations in homeownership rates by racial/ethnic group. Black/African American, Asian, and Hispanic households are under-represented among Urban County homeowners.
- In 2019, the homeowner vacancy rate in Dauphin County was 1.6%, while the Boroughs of Halifax, Berrysburg, and Highspire had rates above 5%.
- Rental vacancy rates are generally higher than homeowner vacancy rates throughout Dauphin County.
- Between 2014 and 2019, the inflation-adjusted median housing value in Dauphin County declined by just over 4% while median gross rent (rent plus utility costs) and median household income increased by 2.0% and 1.6%, respectively.
- Despite roughly equivalent growth in median gross rent and median household income, occupied units renting for less than \$1,000 declined by just over 17% and units with monthly rent above \$1,000 increased by over 50%. This trend in rising rents means that it is becoming more expensive to live in the Urban County.
- Across Dauphin County, renters are more than twice as likely to be cost-burdened as homeowners; nearly 40% of renter-occupied households were cost-burdened in 2018 compared to 18.6% of owner-occupied households.
- Whether homeowners or renters, in general, racial and ethnic minorities are more likely to be cost-burdened than White households in Dauphin County. This pattern persists among renters with the exception of Hispanic renters, who have a lower rate of cost-burden than White renters.
- With the exception of Hispanic households, rates of severe cost-burden have increased across all races since the 2017 AFH.
- Consistent with the 2017 AFH, White and Asian households continue to have the lowest rates of severe cost-burden among all racial and ethnic groups. Black/African American and Hispanic residents experience the highest rates of severe cost-burden.



## Age of Housing Stock

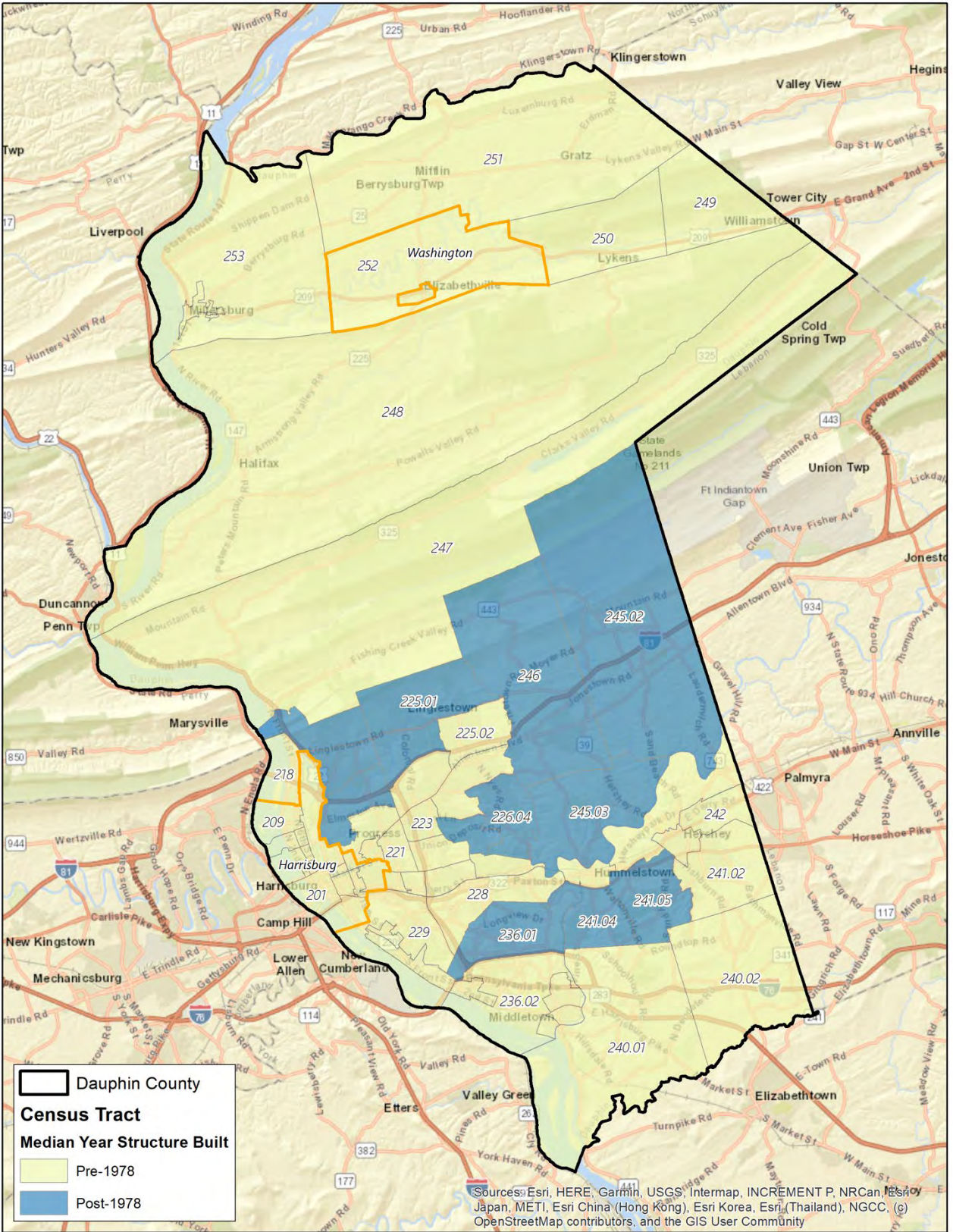
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Older homes typically need mechanical system and energy efficiency upgrades, which may not be financially feasible, particularly among low- and moderate-income households. As a result, high energy costs can contribute to cost burden. For persons with health conditions such as asthma, features such as excessive moisture and dampness, inadequate or poorly maintained heating and ventilation systems, and structural defects are associated with exposure to indoor asthma triggers.

Another significant concern is the presence of lead-based paint. In 1978, the federal government banned the use of lead-based paint in homes after studies showed that lead caused severe health problems, particularly among children under the age of six. The nervous systems of children could even be damaged before birth. Although lead-based paint is no longer on the market, many older homes still have lead-based paint on the walls and trim. Scraping paint and sanding old paint can release dust containing lead that, when inhaled, can be harmful.

*Pennsylvania's housing stock is relatively old with the median year of homes built in 1963; Dauphin County has a slightly newer housing stock with the median year of homes built in 1967.*

Homes tended to be oldest in the northern part of the County, including the Boroughs of Millersburg, Elizabeth, and Gratz, and along the southern border of Dauphin County, including the City of Harrisburg, and the Boroughs of Highspire, Middletown, and Royalton. (Median year-built data were not available for nine of the County subdivisions, including Steelton Borough.)



Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B25035)

## Housing Type

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*Between 2014 and 2019, 3,199 housing units were added to Dauphin County's overall housing inventory, of which 2,919 units were added in the Urban County.*

Despite population declines or modest growth in the majority of county subdivisions, this 3.1% increase in the Urban County housing supply was primarily a function of unit growth in the Townships of Lower Paxton (an R/ECAP), Lower Swatara, West Hanover, Swatara, and Londonderry, as well as Middletown Borough. These areas accounted for 77.1% of additional housing units in the Urban County. The greatest housing inventory losses occurred in Derry, Halifax, and Susquehanna Townships, which each lost more than 100 units.

*In 15 of the Urban County's 38 subdivisions, multi-family units comprised more than 20% of the housing stock.*

In 2019, single-family units comprised 75.6% of the housing stock in the Urban County, multi-family units comprised 21.2%, and mobile homes accounted for the remaining 3.1%. The highest proportions of multi-family units were found in the Boroughs of Penbrook (40.9%), Middletown (38.4%) (an R/ECAP), and Millersburg (37.5%). The City of Harrisburg's housing inventory had a higher proportion of multi-family units at 40.6%. Among Urban County subdivisions with minimum multi-family housing of at least 1,000 units are the Townships of West Hanover, Conewago, East Hanover, Londonderry, and Halifax. In each of these, multi-family units comprised less than 5% of the total inventories. Further, all subdivisions are predominantly (91% of the population or more in each subdivision) White, and each of these subdivisions have Median Household Income (MHI) in excess of the County MHI, except Halifax whose MHI is below the County MHI.



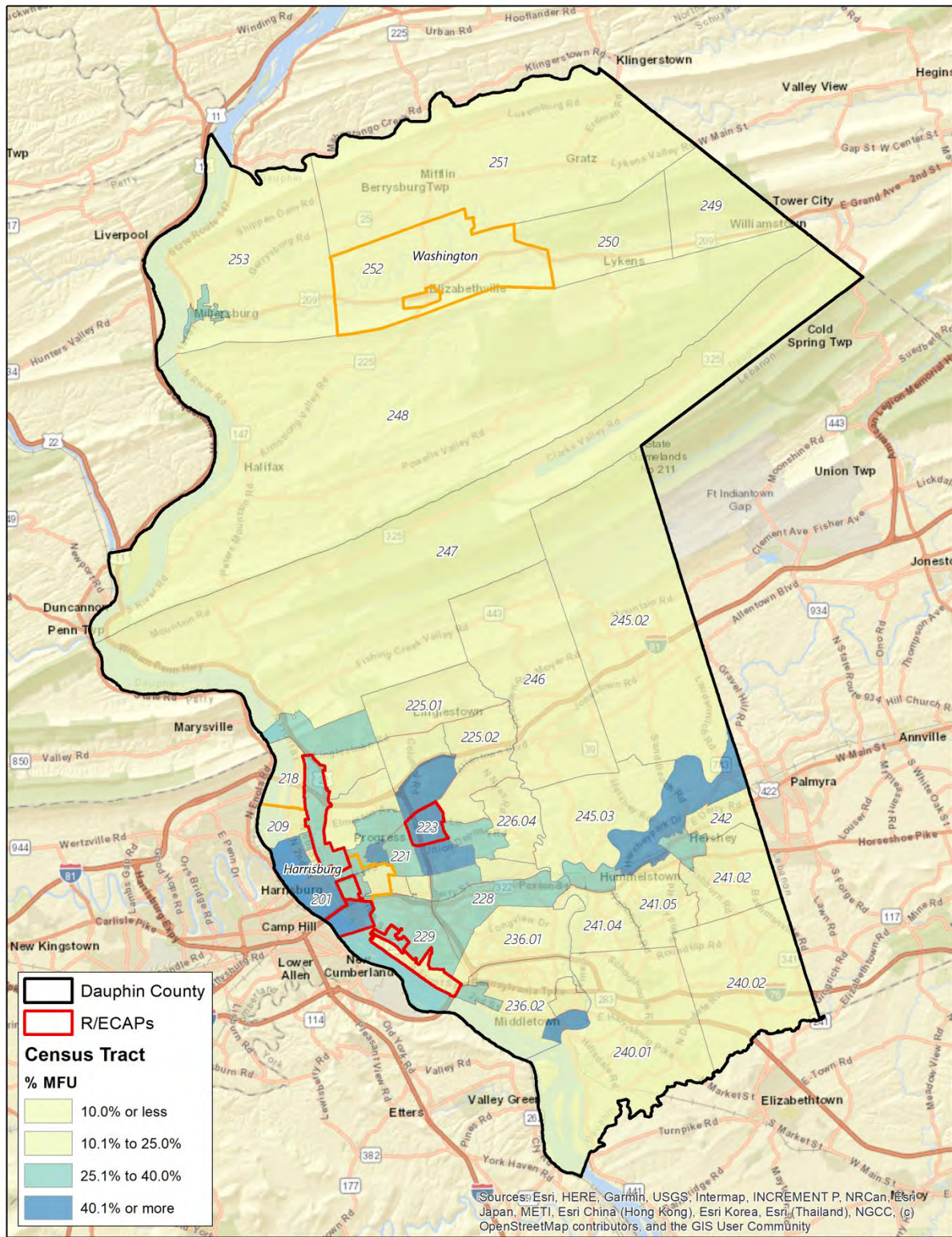
Table 12: Total Housing Units, 2014-2019

	2014	2019	% Change 2014-2019
<b>Dauphin County</b>	<b>121,125</b>	<b>124,324</b>	<b>2.6%</b>
Berrysburg Borough	190	166	-12.6%
Conewago Township	1,078	1,205	11.8%
Dauphin Borough	377	371	-1.6%
Derry Township	10,692	10,501	-1.8%
East Hanover Township	2,352	2,381	1.2%
Elizabethville Borough	723	702	-2.9%
Gratz Borough	377	336	-10.9%
Halifax Borough	405	443	9.4%
Halifax Township	1,670	1,503	-10.0%
<b>Harrisburg City</b>	<b>25,224</b>	<b>25,447</b>	<b>0.9%</b>
Highspire Borough	1,205	1,290	7.1%
Hummelstown Borough	2,037	2,214	8.7%
Jackson Township	810	770	-4.9%
Jefferson Township	181	205	13.3%
Londonderry Township	2,077	2,345	12.9%
Lower Paxton Township	21,201	21,794	2.8%
Lower Swatara Township	3,443	3,894	13.1%
Lykens Borough	912	959	5.2%
Lykens Township	473	544	15.0%
Middle Paxton Township	2,217	2,300	3.7%
Middletown Borough	4,213	4,461	5.9%
Mifflin Township	230	269	17.0%
Millersburg Borough	1,348	1,377	2.2%
Paxtang Borough	664	710	6.9%
Penbrook Borough	1,367	1,302	-4.8%
Pillow Borough	110	130	18.2%
Reed Township	108	103	-4.6%
Royalton Borough	506	544	7.5%
Rush Township	88	132	50.0%
South Hanover Township	2,574	2,714	5.4%
Steelton Borough	2,278	2,422	6.3%
Susquehanna Township	11,485	11,369	-1.0%
Swatara Township	9,641	9,942	3.1%
Upper Paxton Township	1,823	1,901	4.3%
<b>Washington Township</b>	<b>846</b>	<b>903</b>	<b>6.7%</b>
Wayne Township	508	527	3.7%
West Hanover Township	3,995	4,384	9.7%
Wiconisco Township	562	586	4.3%
Williams Township	505	514	1.8%
Williamstown Borough	630	664	5.4%
<b>Urban County*</b>	<b>95,055</b>	<b>97,974</b>	<b>3.1%</b>

\*Urban County includes all County subdivisions except the City of Harrisburg, a separate entitlement area, and Washington Township, an opt-out community.

Source: U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (DP04)





Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (DP04)

Table 13: Multi-Family Units, 2019

	Total Units	Multifamily Units	
		Number	Percentage
<b>Dauphin County</b>	<b>124,324</b>	<b>31,171</b>	<b>25.1%</b>
Berrysburg Borough	166	21	12.7%
Conewago Township	1,205	12	1.8%
Dauphin Borough	371	48	12.9%
Derry Township	10,501	2,495	23.8%
East Hanover Township	2,381	61	2.6%
Elizabethville Borough	702	189	26.9%
Gratz Borough	336	46	13.7%
Halifax Borough	443	114	25.7%
Halifax Township	1,503	66	4.4%
<b>Harrisburg City</b>	<b>25,447</b>	<b>10,323</b>	<b>40.6%</b>
Highspire Borough	1,290	424	32.9%
Hummelstown Borough	2,214	735	33.2%
Jackson Township	770	9	1.2%
Jefferson Township	205	0	0.0%
Londonderry Township	2,345	80	3.4%
Lower Paxton Township	21,794	5,820	26.7%
Lower Swatara Township	3,894	228	5.9%
Lykens Borough	959	208	21.7%
Lykens Township	544	0	0.0%
Middle Paxton Township	2,300	176	7.7%
Middletown Borough	4,461	1,711	38.4%
Mifflin Township	269	0	0.0%
Millersburg Borough	1,377	516	37.5%
Paxtang Borough	710	144	20.3%
Penbrook Borough	1,302	532	40.9%
Pillow Borough	130	8	6.2%
Reed Township	103	0	0.0%
Royalton Borough	544	64	11.8%
Rush Township	112	0	0.0%
South Hanover Township	2,714	388	14.3%
Steelton Borough	2,422	728	30.1%
Susquehanna Township	11,369	3,076	27.1%
Swatara Township	9,942	2,424	24.4%
Upper Paxton Township	1,901	151	7.9%
<b>Washington Township</b>	<b>903</b>	<b>32</b>	<b>3.5%</b>
Wayne Township	527	3	0.6%
West Hanover Township	4,384	54	1.2%
Wiconisco Township	586	15	2.6%
Williams Township	54	87	16.9%
Williamstown Borough	664	173	26.1%
<b>Urban County*</b>	<b>97,974</b>	<b>20,816</b>	<b>21.2%</b>

\*Urban County includes all County subdivisions except the City of Harrisburg, a separate entitlement area, and Washington Township, an opt-out community.

Source: U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (DP04)



## Housing Tenure

According to 2019 ACS 5-year Estimates, 69.3% of the Urban County’s occupied housing inventory of 90,801 units were owner-occupied, which was higher than the 63.2% rate in Dauphin County. Of the 62,888 owner-occupied units in the Urban County, 878 units or 1.4% were in multi-family structures. In contrast, the rental housing stock had much higher proportions of multi-family units; the Urban County had a total of 27,913 renter-occupied units, of which 63.7% were multi-family.

**Table 14: Housing Type by Tenure, 2019**

Municipality	Owner-Occupied			Renter-Occupied			% Renter-Occupied Multi-Family
	Total	Single Family	Multi-Family	Total	Single Family	Multi-Family	
Dauphin County	70,933	69,686	1,247	41,279	15,645	25,634	62.1%
<b>Urban County*</b>	<b>62,888</b>	<b>62,010</b>	<b>878</b>	<b>27,913</b>	<b>10,141</b>	<b>17,772</b>	<b>63.7%</b>
City of Harrisburg	7,322	6,953	369	13,221	5,391	7,830	59.2%

\*Urban County includes all County subdivisions except the City of Harrisburg, a separate entitlement area, and Washington Township, an opt-out community.

Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B25032)

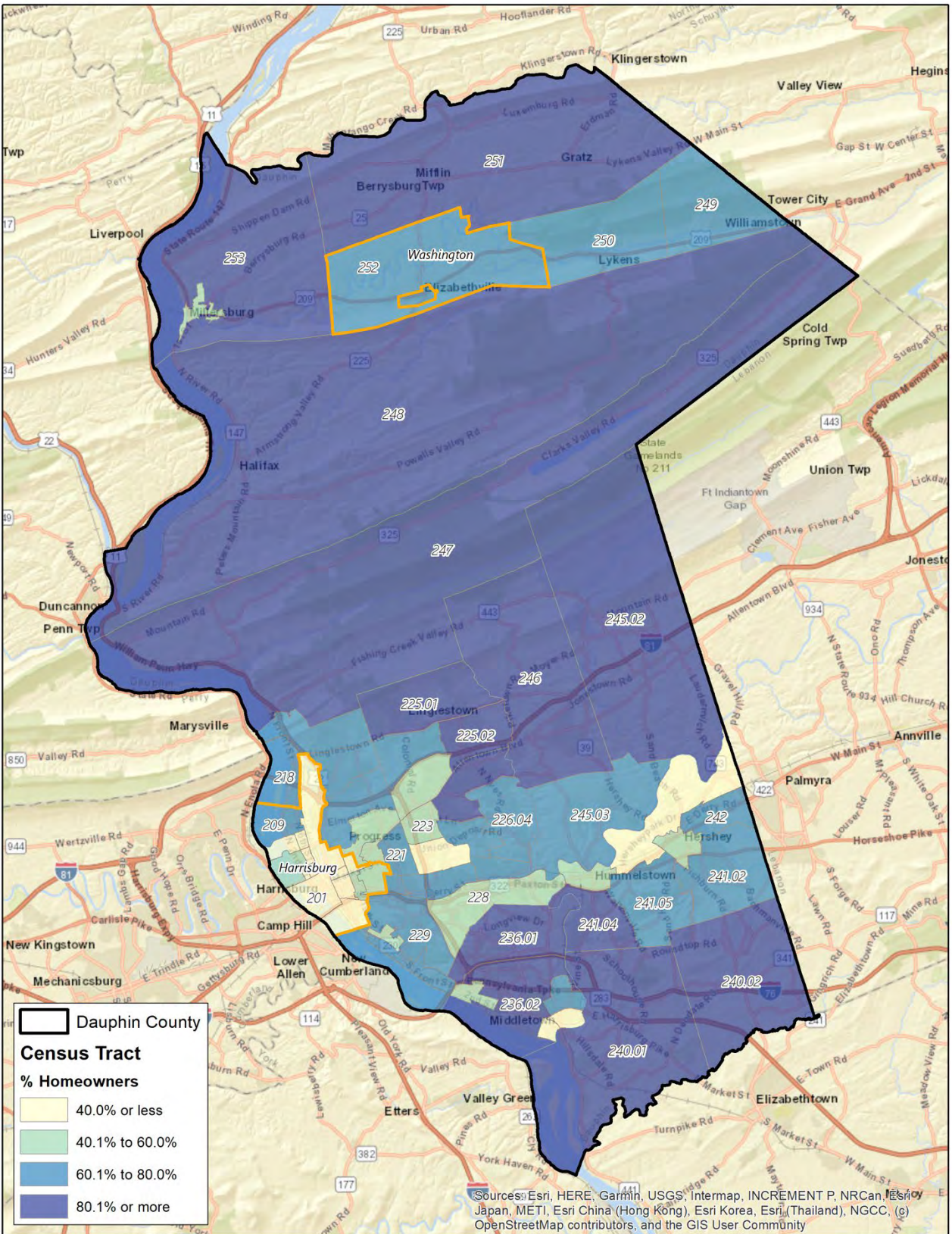
The value in home ownership lies in the accumulation of wealth as the owner’s share of equity increases with the property’s value. Paying a monthly mortgage instead of rent is an investment in an asset that is likely to appreciate. According to one study, “a family that puts 5 percent down to buy a house will earn a 100 percent return on the investment every time the house appreciates 5 percent.”<sup>10</sup>

*The average homeownership rate in Dauphin County is 63.2%, which was lower than the Urban County rate of 69.3%.*

Homeownership rates are generally high throughout Dauphin County. The Boroughs of Middletown (an R/ECAP), Penbrook, and Halifax had low rates of homeownership at or below 50%. The City of Harrisburg had the lowest homeownership rate overall at 35.6%.

<sup>10</sup> Kathleen C. Engel and Patricia A. McCoy, “From Credit Denial to Predatory Lending: The Challenge of Sustaining Minority Homeownership,” in Segregation: The Rising Costs for America, edited by James H. Carr and Nandinee K. Kutty (New York: Routledge, 2008) p. 82.

Map 14: Homeownership Rates, 2019



Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B25003)



*There are variations in homeownership rates by racial/ethnic group. Black/African American, Asian, and Hispanic households are under-represented among Urban County homeowners.*

Historically, minorities tend to have lower home ownership rates than Whites. In 2019 White households comprised 82.7% of all Urban County households and represented 89.3% of Urban County homeowners. Black/African American and Hispanic households accounted for 10.8% and 4.1%, respectively, of all Urban County households, yet only 5.9% of Black/African American households and 2.4% of Hispanic households own their homes. To a lesser degree, this pattern is also present for Asian households; 2.9% of homeowners were Asian, while comprising 3.2% of all Urban County households. Notably, homeownership rates among non-White households are high in the City of Harrisburg, an indication of greater opportunity for minority homebuyers than elsewhere in Dauphin County.

**Table 15: Tenure by Race/Ethnicity, 2019**

Municipalities	White		Black/African American		Asian		Hispanic	
	% Total HH	% Owners	% Total HH	% Owners	% Total HH	% Owners	% Total HH	% Owners
Dauphin County	75.1%	53.7%	17.7%	9.8%	3.3%	2.9%	6.4%	3.4%
<b>Urban County*</b>	<b>82.7%</b>	<b>89.3%</b>	<b>10.8%</b>	<b>5.9%</b>	<b>3.2%</b>	<b>2.9%</b>	<b>4.1%</b>	<b>2.4%</b>
City of Harrisburg	40.5%	47.0%	48.7%	44.5%	3.7%	3.1%	16.9%	12.7%

\*Urban County includes all County subdivisions except the City of Harrisburg, a separate entitlement area, and Washington Township, an opt-out community.

Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B25003)

## Vacancy Rates

*In 2019, the homeowner vacancy rate in Dauphin County was 1.6%, while the older Boroughs of Halifax, Berrysburg, and Highspire had rates above 5%.*

Vacancy rate, as defined by the American Community Survey, is the ratio of vacant available units to total units. Homeowner vacancy is the ratio of vacant (available for-sale and sold) housing units to the total number of vacant and owner-occupied housing units. Homeowner vacancy rates are generally low throughout the County, though there are higher rates of homeowner vacancy in the older Boroughs of Halifax (7.2%), Berrysburg (5.5%), and Highspire (5.2%). The City of Harrisburg was also among the highest rates at 4.7%. A vacancy rate of 2% indicates a healthy sales market with adequate inventory. The City of Harrisburg's high 4.7% vacancy rate reveals a potentially greater availability of homeownership opportunities for households in Dauphin County depending on the quality of the units.

*Rental vacancy rates are generally higher than homeowner vacancy rates throughout Dauphin County.*

Like homeowner vacancies, rental vacancies are the ratio of vacant available for-rent and rented unoccupied units to the total number of vacant available and rental-occupied housing units. A rental vacancy of 5-7% is considered healthy. Using 5% as the benchmark, Dauphin County is split between having an extremely competitive market in municipalities with higher MHIs and one with excess inventory in municipalities with lower MHIs and an older stock. Middle Paxton Township and Lykens Borough have the highest rental vacancy rates of 15.7% and 15.3%, respectively.<sup>11</sup> At the opposite extreme, West Hanover, Upper Paxton, and South Hanover Townships have rental vacancies of 0%.<sup>12</sup>

Half of all vacant units across the Urban County are vacant for reasons other than currently being for rent or sale, rented or sold but not occupied, or as a seasonal home. The category of "Other" vacant includes units held for occasional use by the owners, temporarily occupied by persons with usual residences elsewhere (e.g., short-term rentals), or vacant for other reasons (used as storage, intentionally held off-market, etc.).

**Table 16: Vacancy Status by Tenure, 2019**

	Dauphin County		Urban County		City of Harrisburg	
	#	%	#	%	#	%
<b>Total Vacant Units</b>	12,112	100%	7,173	100%	4,904	100%
For rent	2,692	22%	1,686	24%	1,006	21%
For sale	1,169	10%	782	11%	370	8%
Rented or sold, not occupied	1,002	8%	671	9%	331	7%
For seasonal, recreational, or occasional use	559	5%	444	6%	124	3%
Other Vacant	6,681	55%	3,590	50%	3,073	63%

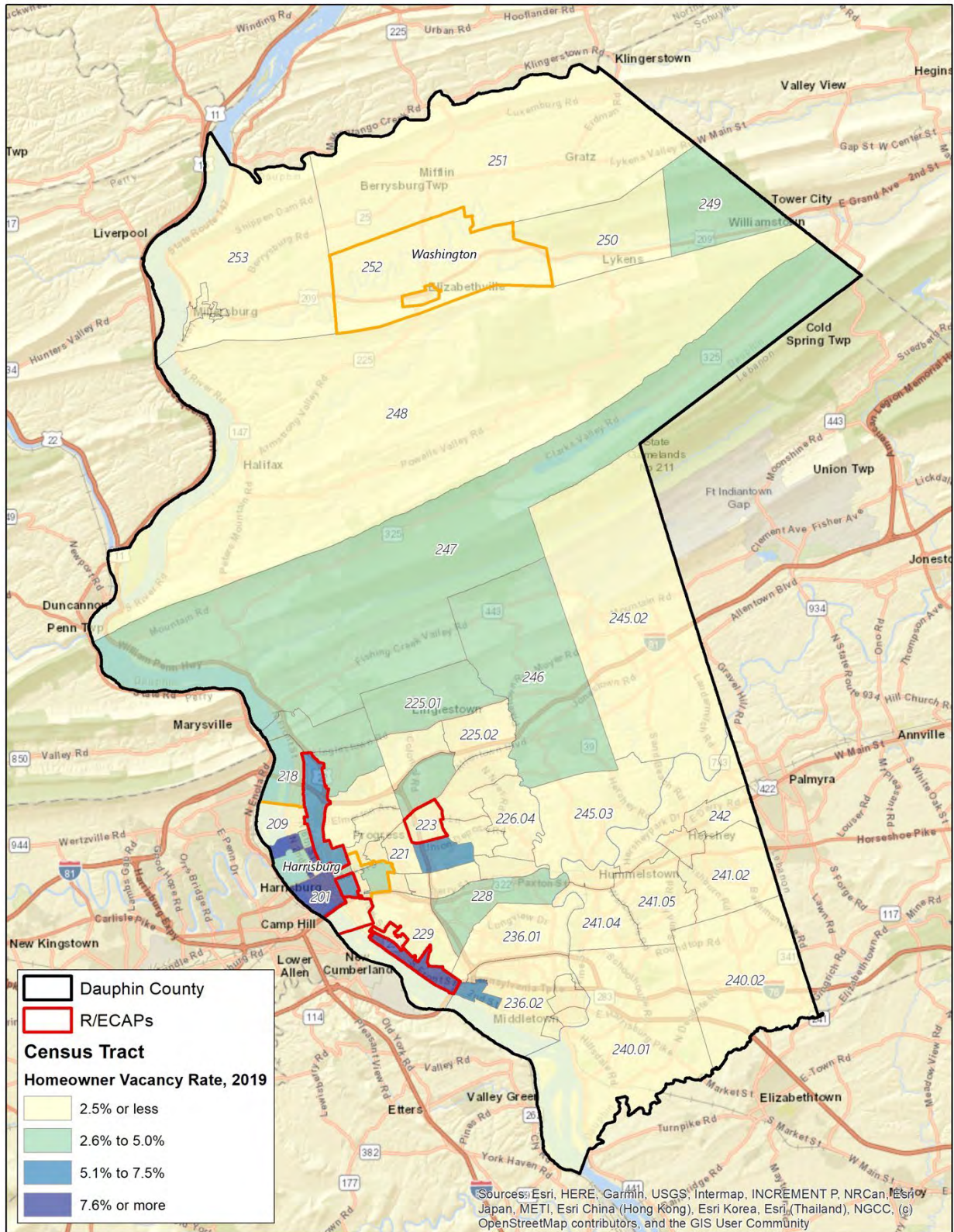
<sup>11</sup> Pillow Borough had the highest rental vacancy rate of all Dauphin County subdivisions at 19%; however, its total housing stock was only 130 units in 2019.

<sup>12</sup> U.S. Census Bureau, 2019 ACS 5-Year Estimates (DP04)

Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B25004)



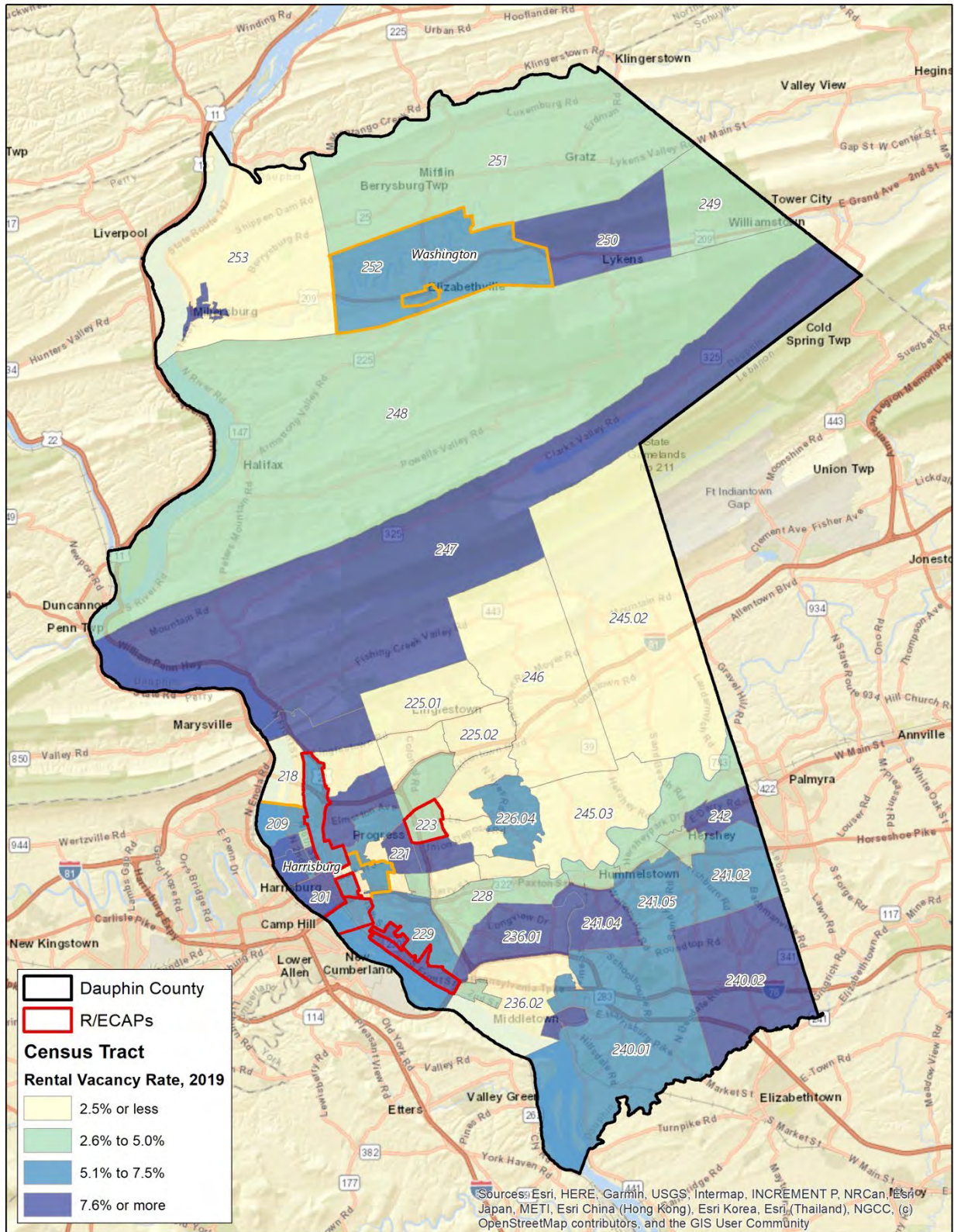
Map 15: Homeowner Vacancy Rates, 2019



Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (DP04)



Map 16: Renter Vacancy Rates, 2019



Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (DP04)

## Housing Affordability

Increasing housing costs are not a direct form of housing discrimination. However, a lack of affordable housing does constrain housing choice. Residents may be limited to a smaller selection of neighborhoods or communities because of a lack of affordable housing in other areas. Home values are often used as a proxy for other non-market goods affecting quality of life, such as accessibility to public transit and green space, growth potential in terms of population and development, quality of schools, and more.

*Between 2014 and 2019, the inflation-adjusted median housing value in Dauphin County declined by just over 4%, while median gross rent (rent plus utility costs) and median household income increased by 2.0% and 1.6%, respectively.*

Owner-occupied housing costs declined as household income increased making homeownership slightly more affordable for County residents in 2019. With gross rent and household income increasing at roughly equivalent rates, renting would seemingly be neither more nor less affordable for residents than in 2014.

**Table 17: Dauphin County Housing Affordability**

Dauphin County	2014	2019	% Change
Median Housing Value	\$ 175,146	\$ 167,900	-4.1%
Median Gross Rent	\$ 931	\$ 949	2.0%
Median Household Income	\$ 59,780	\$ 60,715	1.6%

All 2014 variables have been adjusted for inflation into 2019 dollars.

Source: U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (B25077, B25064, B19013)

*Despite roughly equivalent growth in median gross rent and median household income, occupied units renting for less than \$1,000 declined by just over 17% and units with monthly rent above \$1,000 increased by over 50%. This trend in rising rents means that it is becoming more expensive to live in the Urban County.*

**Table 18: Occupied Units by Monthly Rent in Urban County, 2014-2019**

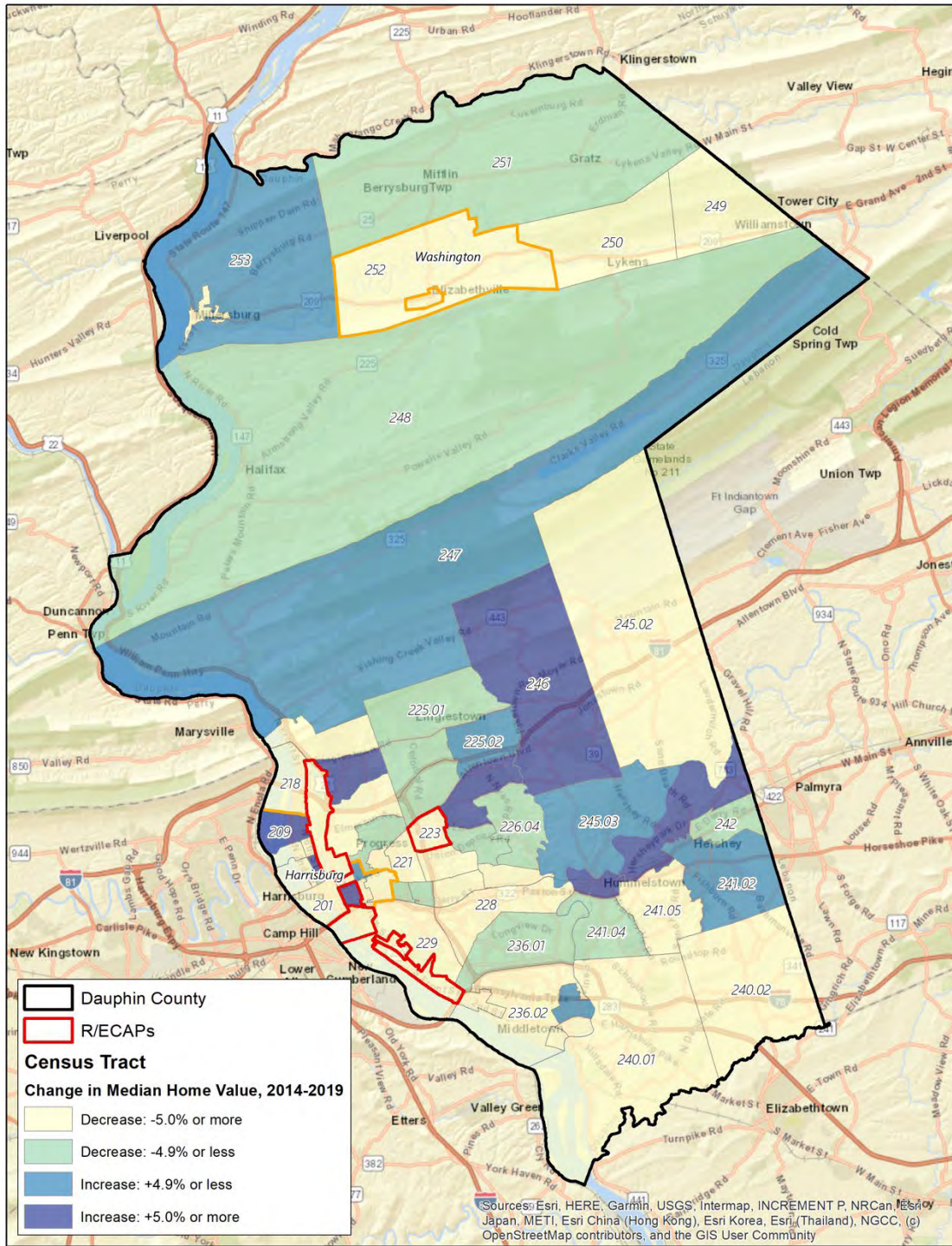
	2014-2019		2015-2019		Percent Change 2010-2019
	# Units	%	# Units	%	
<b>Renter-Occupied Units</b>	<b>25,213</b>	<b>100.0%</b>	<b>26,857</b>	<b>100.0%</b>	<b>6.5%</b>
Less than \$500	2663	10.6%	1,655	6.2%	-37.9%
\$500 to \$999	13,894	55.1%	12,074	45.0%	-13.1%
\$1,000 to \$1,499	6,820	27.0%	9,910	36.9%	45.3%
\$1,500 or more	1,836	7.3%	3,218	12.0%	75.3%
No rent paid*	1,153	4.6%	1,056	3.9%	-8.4%
Median Gross Rent (2019 dollars)	\$931		\$949		2.0%

\*No rent paid is not included in the number of renter-occupied units.

Source: U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (DP04)



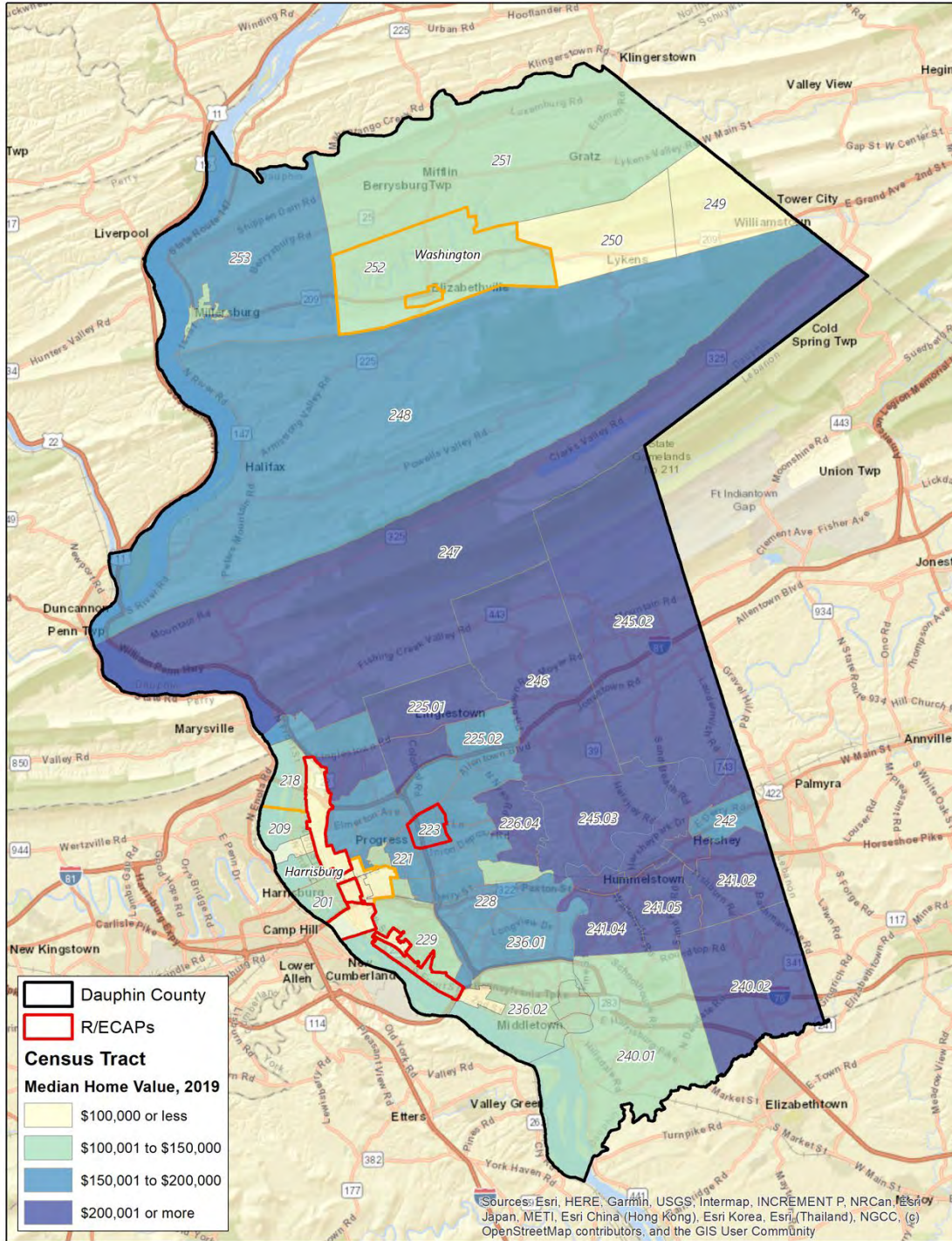
The following map indicates the change in median home values from 2014 to 2019. Home values generally increased in Upper Paxton, Middle Paxton, Rush, West Hanover, South Hanover, Middletown, and portions of Derry and Susquehanna. Median home values declined in the rest of the Urban County, including within R/ECAPs.



Source: U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (B25077)



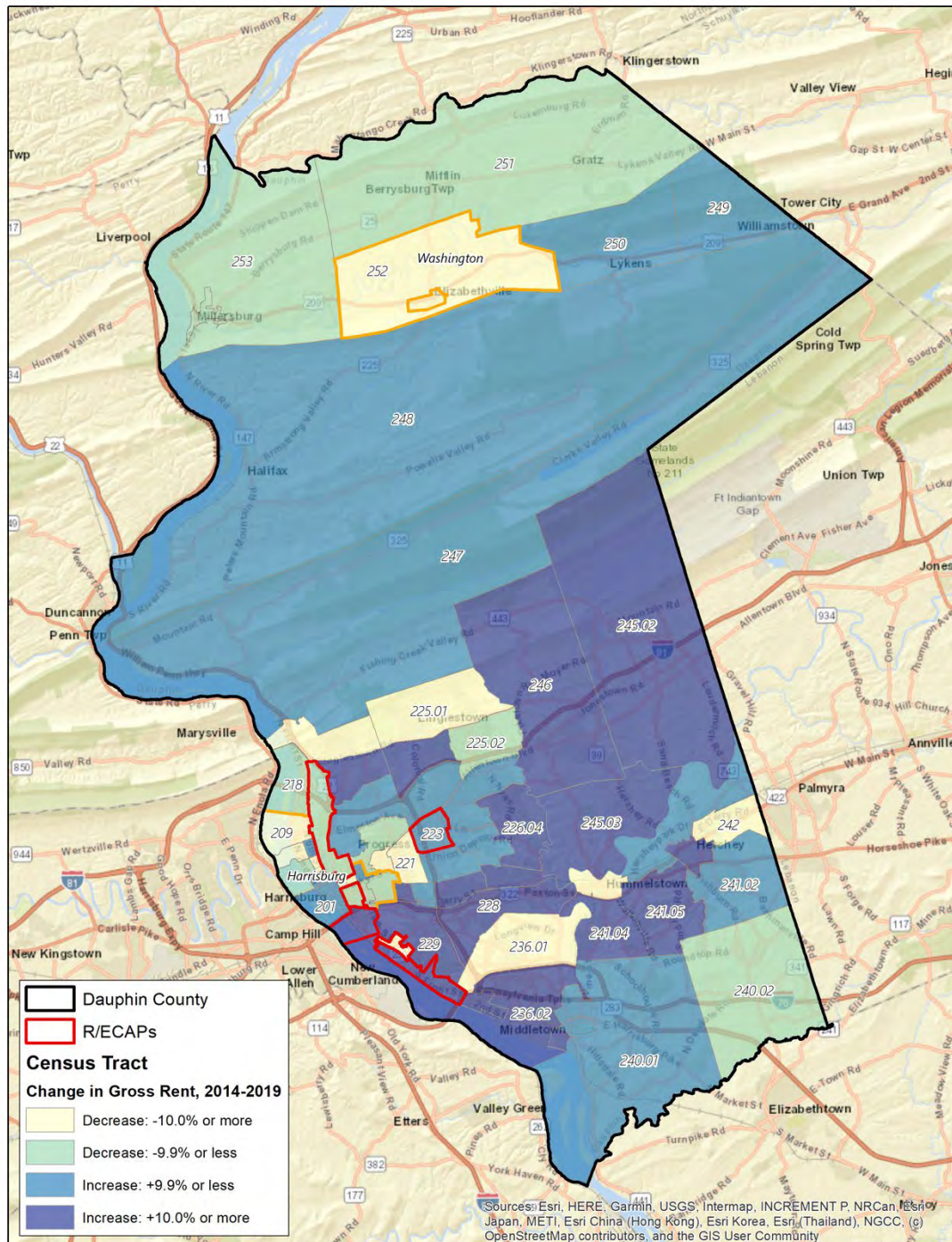
In general, the highest median home values are concentrated in the center of the Urban County, and the lowest median home values are located along the County's periphery to the northeast and southwest. The highest median home values tend to occur in areas with the lowest homeowner vacancy rates, in predominantly White census tracts and in areas with small or non-existent rental housing inventories.



Source: U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (B25077)



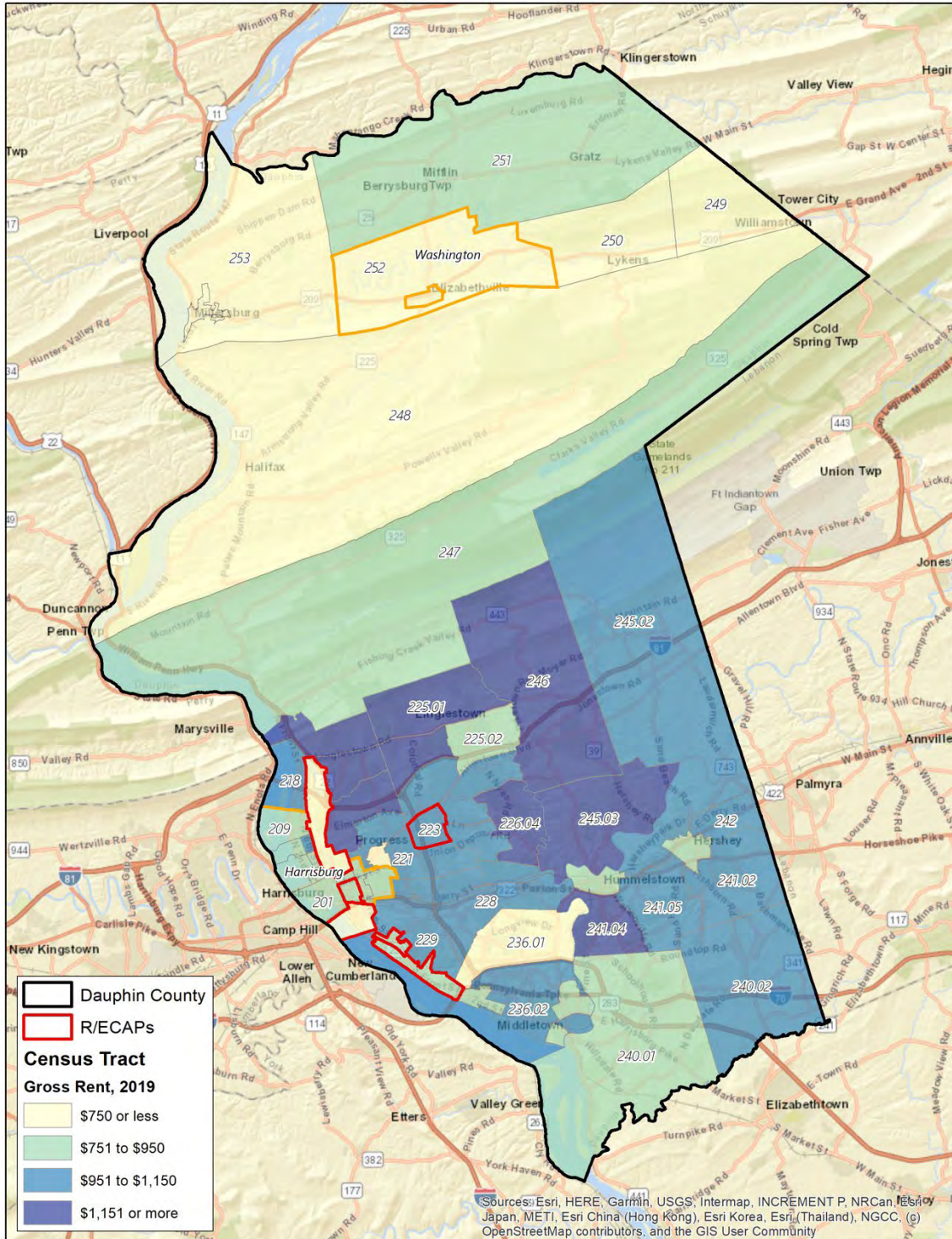
Within the rental market, there are inconsistencies in vacancy rate and changes in median gross rent. Lower vacancy rates tend to correspond with areas in which median gross rent increased, whereas declining median gross rent occurred in areas with higher vacancy rates.



Source: U.S. Census Bureau, 2014 and 2019 ACS 5-Year Estimates (B25064)



The highest median gross rents are concentrated in the southern County, while areas in the north tended to have lower median gross rents. With the exception of Lower Paxton, R/ECAPs were among the lower median rent areas.



Source: U.S. Census Bureau, 2019 ACS 5-Year Estimates (B25064)



## Cost Burden

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Cost burdened households are defined by HUD as households spending more than 30% of their monthly income on housing costs. Severely cost burdened households spend more than 50% of their income. Cost burden serves as an indicator of a homeowner's ability to afford monthly utilities, insurance, property maintenance and improvements. Among renters, it's a case of being able to afford monthly rent payments made on time. Regardless of tenure, as a household spends an increasing proportion of its income on housing costs, there is less disposable income available for other necessities such as groceries, health care, transportation, and childcare.

*Across Dauphin County, renters are more than twice as likely to be cost-burdened as homeowners; nearly 40% of renter-occupied households were cost-burdened in 2018 compared to 18.6% of owner-occupied households.*

The median renter household income in Dauphin County for 2019 was \$39,082, equivalent to only 51% of the median owner income of \$77,254. The maximum monthly gross rent a household would be able to afford at the median renter income without being cost-burdened was \$977, which was slightly higher than Dauphin County's actual median gross rent of \$949. This indicates that the median renter income is seemingly adequate to afford the median gross rent. However, this does not guarantee that units at or below median gross rent will be available and in livable condition.

As discussed in the prior section, there was a 17.1% decline in occupied units with monthly rents below \$1,000, and a 51.7% increase in occupied rental units costing more than \$1,000 per month. Consistent with growth in higher-priced rental-units in the Urban County, more renter-occupied households (38.3%) are cost-burdened compared to owner-occupied households (18.6%). A total of 13,150 homeowners and 15,745 renters in Dauphin County were cost-burdened.<sup>13</sup>

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<sup>13</sup> 2014-2018 Comprehensive Housing Affordability Strategy (CHAS)

*Whether homeowners or renters, in general, racial and ethnic minorities are more likely to be cost-burdened than White households in Dauphin County. This pattern persists among renters apart from Hispanic renters, who have a lower rate of cost-burden than White renters.*

**Table 19: Cost Burden Status by Race/Ethnicity and Tenure, 2018**

	Total Households		Cost Burdened Households			
			Owners		Renters	
	Owners	Renters	Number	Percentage	Number	Percentage
<b>Urban County</b>						
White, non-Hispanic	59,325	21,035	10,495	17.7%	7,835	37.2%
Black, non-Hispanic	6,315	12,090	1,645	26.0%	6,000	49.6%
Asian, non-Hispanic	1,855	1,665	470	25.3%	625	37.5%
Hispanic	2,335	5,225	445	19.1%	1,925	36.8%

Source: 2014-2018 Comprehensive Housing Affordability Strategy (CHAS)

*With the exception of Hispanic households, rates of severe cost-burden have increased across all races since the 2017 AFH.* Among White households, the rate of severe cost-burden increased slightly from 9.7% in 2017 to 10.0% in 2018. Asian and Black/African American households experienced more substantial increases with the rate of severe cost-burden for Asian households moving from 4.9% to 14.5% and increasing from 13.2% to 20.8% among Black/African American households. In contrast, severe cost-burden declined among Hispanic households from 18.3% in the 2017 AFH to 16.8%.

*Consistent with the 2017 AFH, White and Asian households continue to have the lowest rates of severe cost-burden among all racial and ethnic groups. Black/African American and Hispanic residents experience the highest rates.*

**Table 20: Cost Burden and Severe Cost Burden by Race/Ethnicity, 2018**

	Total Households	Cost Burdened Households			
		Cost Burden (30-50%)		Severe Cost Burden (> 50%)	
		Number	Percentage	Number	Percentage
<b>Urban County</b>					
White, non-Hispanic	80,360	10,260	12.8%	8,070	10.0%
Black, non-Hispanic	18,405	3,815	20.7%	3,830	20.8%
Asian, non-Hispanic	3,520	585	16.6%	510	14.5%
Hispanic	7,560	1,100	14.6%	1,270	16.8%

Source: 2014-2018 Comprehensive Housing Affordability Strategy (CHAS)

## Other Relevant Data

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### Communities of Opportunity

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A large body of social research has demonstrated the powerful negative effects of residential segregation on income and opportunity for minority families, which are commonly concentrated in communities “characterized by older housing stock, slow growth, and low tax bases – the resources that support public services and schools.” Households living in lower-income areas of racial and ethnic concentration have fewer opportunities for education, wealth building, and employment. The rationale for this analysis is to help communities determine where to invest housing resources by pinpointing the areas of greatest existing need. However, current evidence suggests that adding more subsidized housing to places that already have a high concentration of social and economic issues (i.e. R/ECAPs) could be counter-productive and not meet the spirit of the goals of HUD programs. This does not mean, however, that R/ECAPs should be ignored by communities. Residents in R/ECAPs still need services and high-quality places to live and stabilizing and improving conditions in the lowest-income neighborhoods remains a key priority for Dauphin County. Rather, investment should be balanced between existing R/ECAPs (improving the quality of life for residents who want to remain in their neighborhoods) and other communities that offer opportunities and advantages for families and individuals.

The Communities of Opportunity model is highly spatial and therefore map-based, generating a geographic footprint of inequality. The process of creating opportunity maps involves building a set of indicators that reflect local issues and are also based on research that validates the connections between the indicators and increased opportunity. The resulting maps allow communities to analyze opportunity, comprehensively and comparatively, to communicate who has access to opportunity-rich areas and who does not, and to understand what needs to be remedied in opportunity-poor communities. The combination of identifying R/ECAPs and Communities of Opportunity creates a holistic approach to community investment.

An Opportunity Index was developed to classify and visualize areas of opportunity for residents of Dauphin County. The Opportunity Index identifies areas in which new affordable housing developments may be more financially feasible in the long-term due to proximity to factors that allow residents to have successful access to employment, quality education, and a healthy environment. The data is linearly normalized to values between 0 and 1, after which census tracts are classified as having High Opportunity if they have a score above the median and Low Opportunity if they have a score below the median.



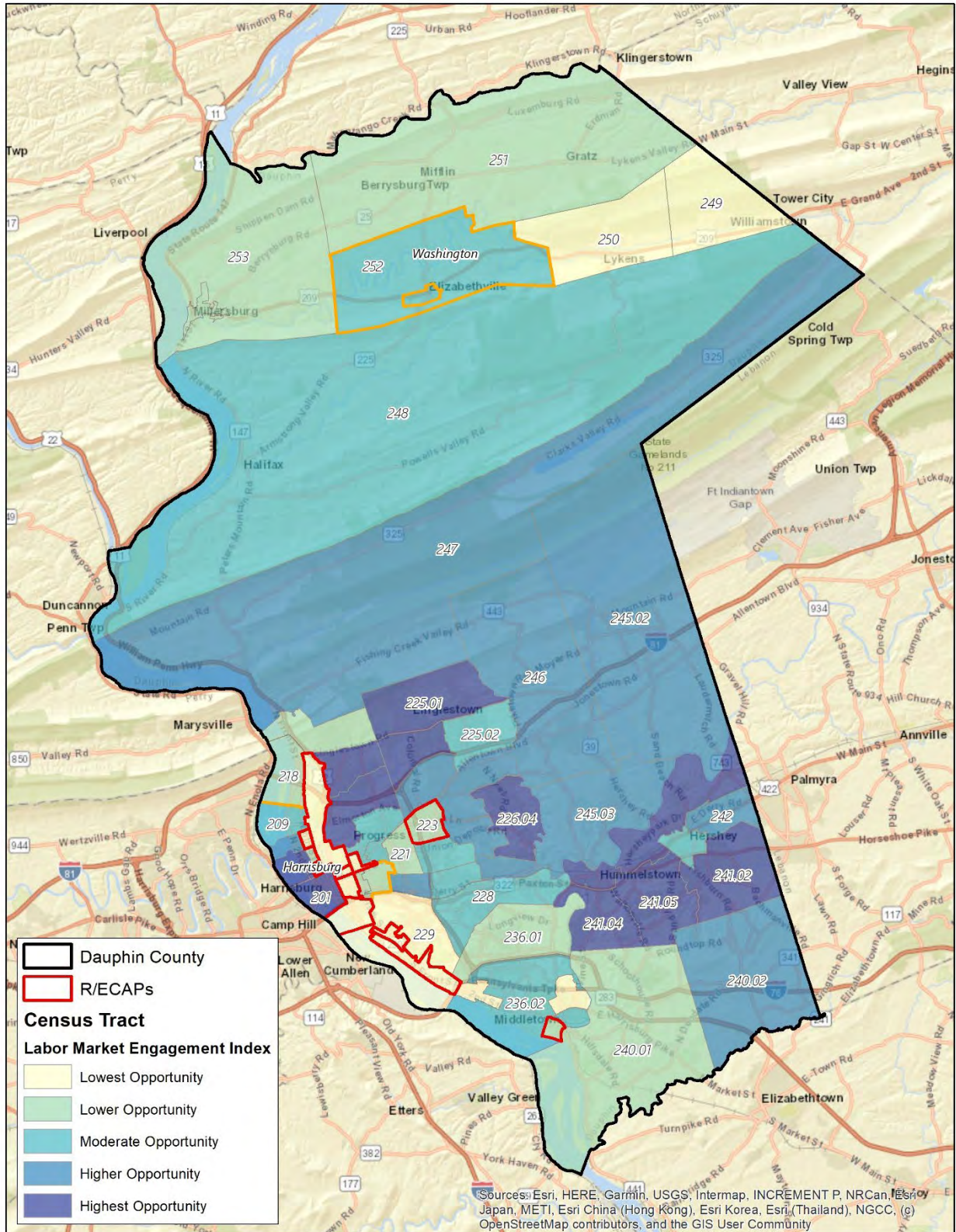
## Labor Market Engagement Index

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The Labor Market Engagement Index is a measure of the relative intensity of labor market engagement and human capital. The index is a combination of unemployment rates, labor force participation rates, mean commuting time, and percent of the population with at least a bachelor's degree within a census tract. Employment opportunities are necessary for individuals to afford stable housing. Labor force participation represents the amount of labor resources available for the production for goods and services. Mean commuting time indicates ease of access to centers of employment. The percent of the population with at least a bachelor's degree is used to estimate the availability of skilled labor.

Areas with higher levels of labor market engagement are found in the central and southern County from the subdivisions of Middle Paxton and Rush through Conewago. These areas tend to have higher prosperity and school proficiency scores and are predominantly White with low proportions of racial and ethnic minorities. Conversely, the lowest rates are found in the northern and southwestern portions of Dauphin County. The R/ECAPs are included in these areas of lower opportunity. Consistent with the 2017 AFH, the City of Harrisburg continues to have higher levels of opportunity despite high rates of poverty. This is due to the City being a large employment center.

Map 21: Labor Market Engagement Index

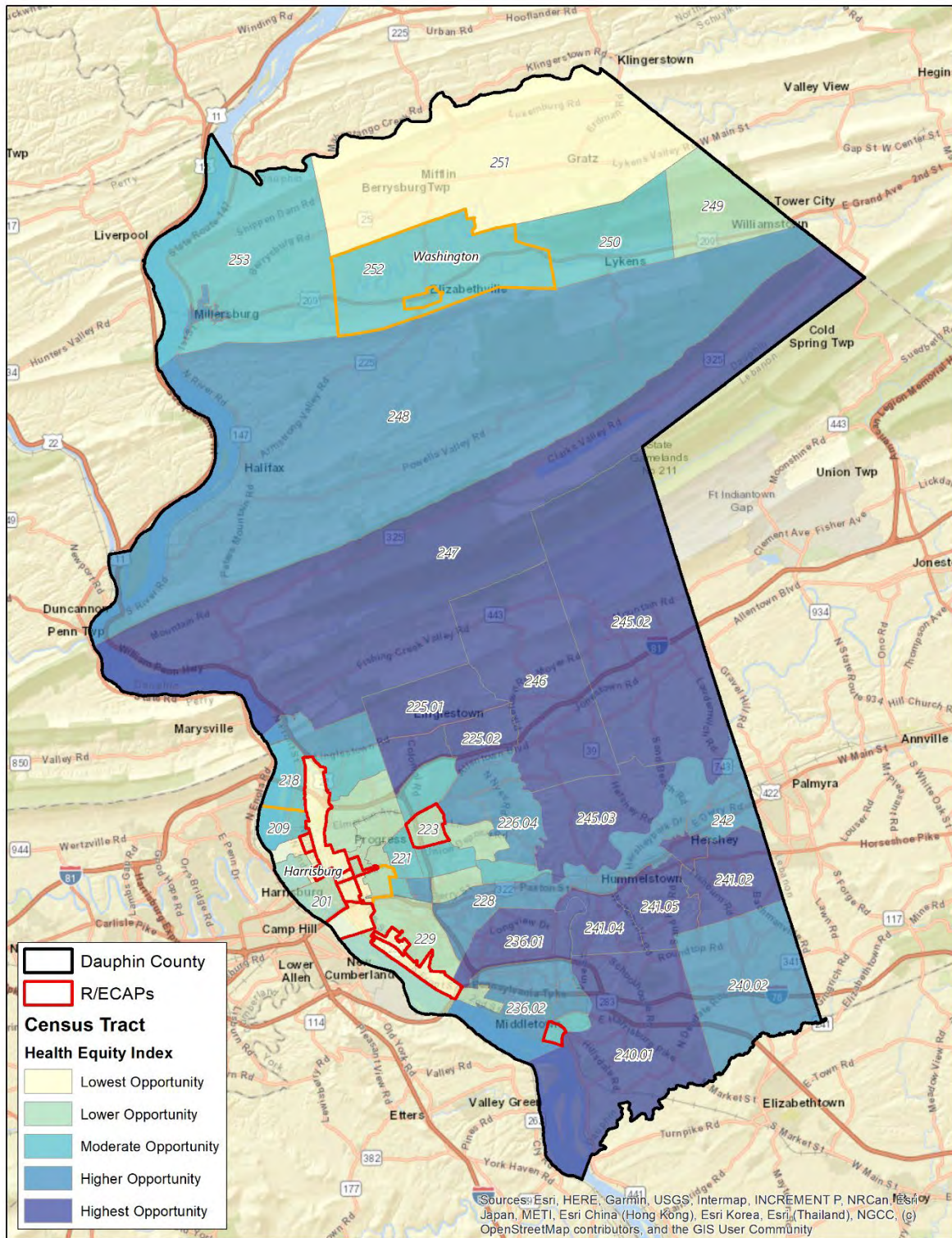


## Environmental Health Index

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The Environmental Health Index summarizes potential exposure to harmful toxins and access to health insurance and food at the census tract level. Toxins include carcinogenic, respiratory, and neurological hazards. Low food access was defined as the percentage of low-income individuals beyond a half-mile from a supermarket. Higher index values indicate less exposure to toxins harmful to human health and better access to food for low-income individuals and health insurance. Environmental hazards have an adverse effect on children's growth and development and can limit one's ability to work. Low-income and minority individuals are also found to be disproportionately affected by environmental hazards, perpetuating the lack of opportunity for vulnerable populations. The lowest environmental health scores are concentrated in the more rural County subdivisions of Mifflin and Lykens in the north as well as the designated R/ECAPs. These areas tend to have higher levels of poverty and, especially in the case of rural areas, are located far from grocery stores.



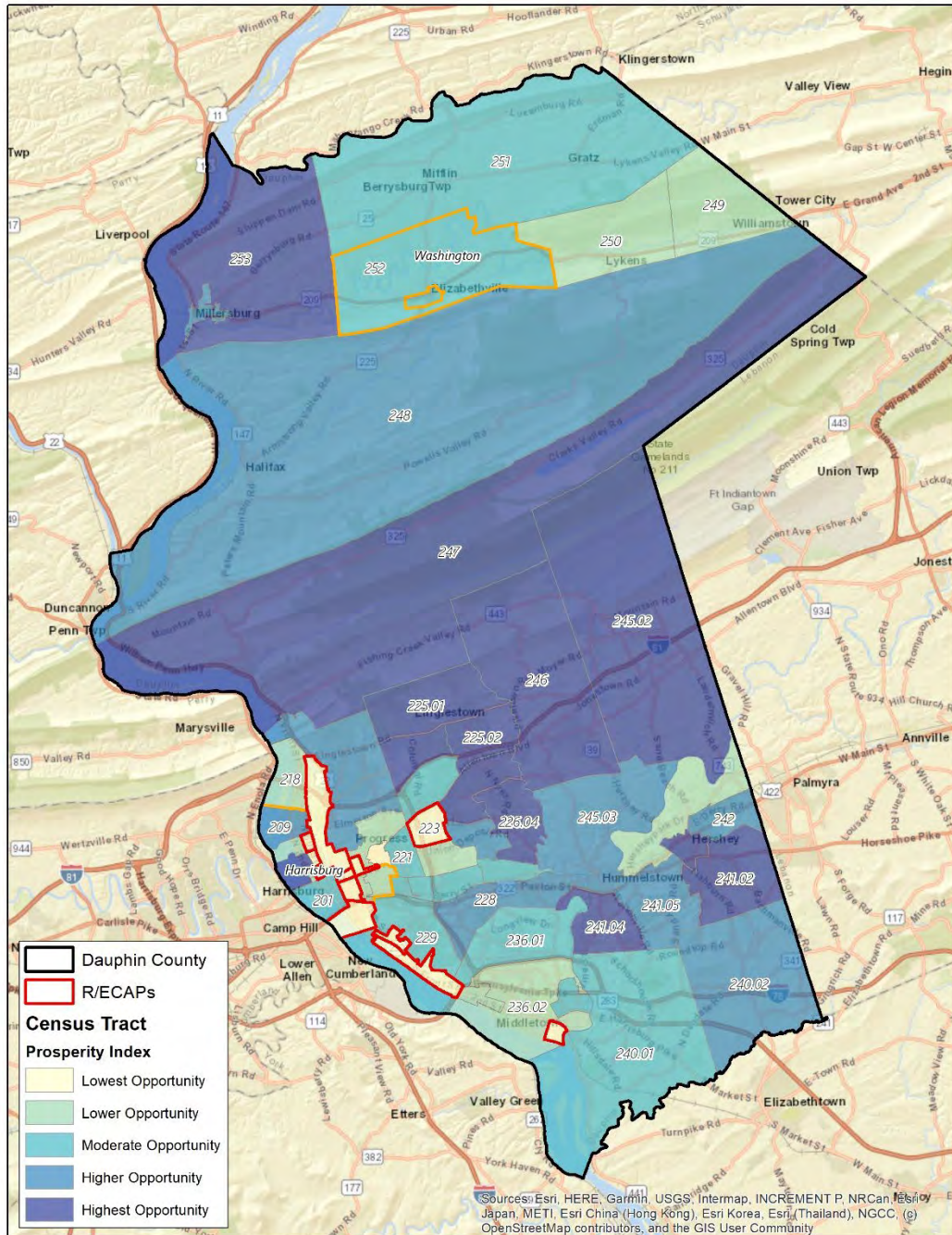




## Prosperity Index

This index is a combination of poverty rate and the percentage of households with children receiving public assistance. Public assistance includes Supplemental Security Income (SSI), cash public assistance income, or Food Stamps/SNAP. Poverty has lasting effects that can impact a wide range of factors, including public education primarily funded by the local community, job opportunities, and the ability to afford quality housing. The lowest Prosperity Index scores correspond with the designated R/ECAPs.

**Map 23: Prosperity Index**



## Transit Access Index

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Transit Access represents the ease with which people can access public transportation. According to the Federal Highway Administration (FHWA) under the US Department of Transportation, most people are willing to walk for five to ten minutes to a transit stop. FHWA uses these walking times as a proxy for distance, estimating accessible transit stops being one-quarter to one-half mile away from a pedestrian's starting point, typically their place of residence. To calculate accessibility, one-quarter mile and one-half mile buffers were placed around each transit stop to find the percentage of a census tract that is within walking distance to a transit stop. This percentage was averaged to produce the Transit Access Index.

Consistent with the 2017 AFH, the majority of the County is relatively uniform with low transit access scores. Expectedly, the City of Harrisburg has the best access to public transit with Capital Area Transit (CAT) concentrating most of its fixed-route bus services in and around the City. For this reason, the R/ECAPs have better access to public transit than most of the County.

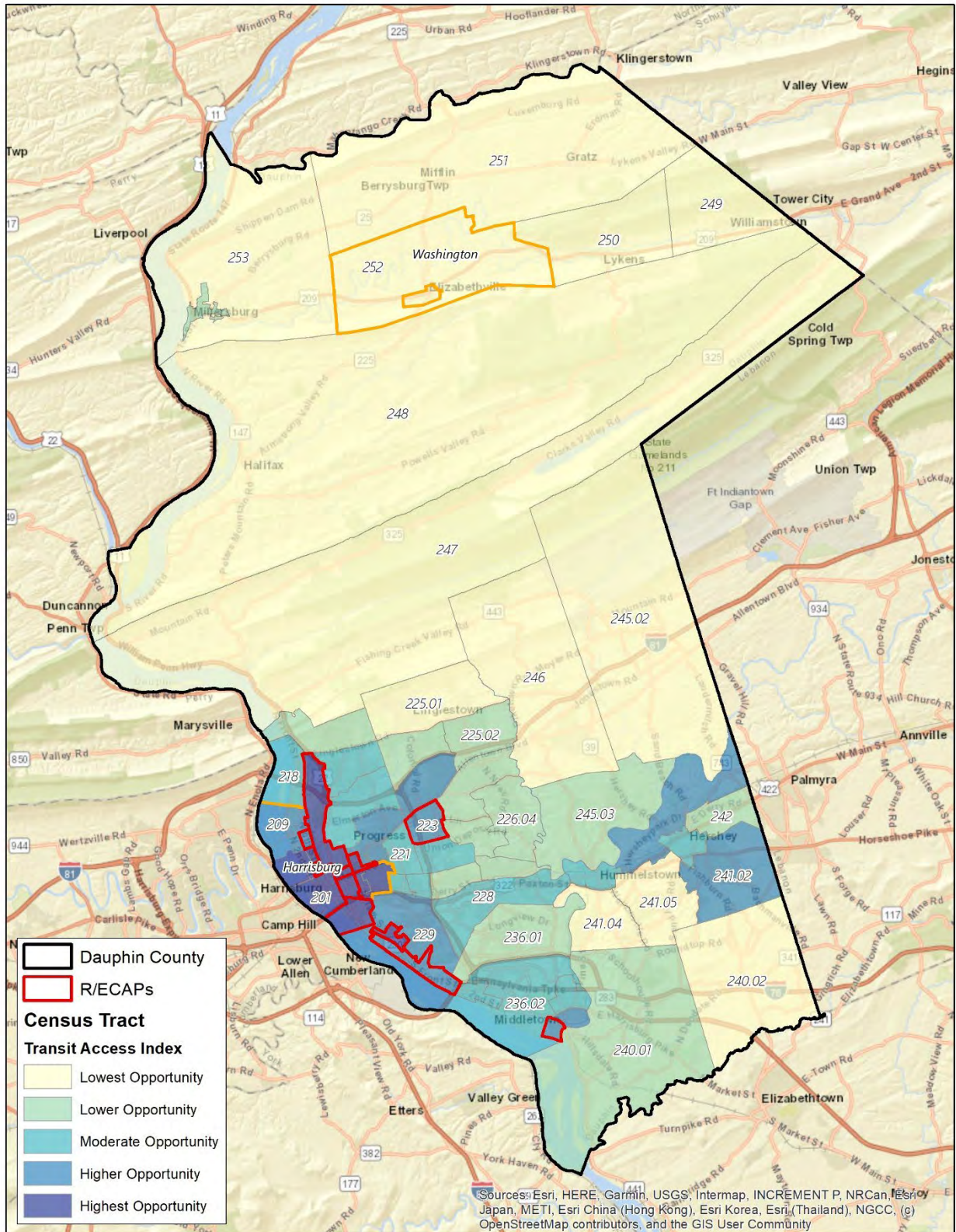
Stakeholders continued to report that lack of transit access outside of the immediate Harrisburg area continues to present barriers to employment and job access, particularly among second- and third-shift workers, childcare, affordable housing, workforce development initiatives, and attracting new businesses to the area. CAT's 2020 Network Redesign, State of the System Report, identified underserved areas in Steelton, Hummelstown/Hersey, and the northern county. To meet the higher demand in these areas, CAT has prioritized adding evening and weekend service to Hershey and exploring circulator service in northern Dauphin County.<sup>14</sup>

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<sup>14</sup> CAT 2020 Network Redesign, State of the System. (September, 2019). Accessed at: <https://www.cattransit.com/wp-content/uploads/sites/2/2020/07/Task-1.1-CAT-State-of-the-System.pdf>



Map 24: Transit Access Index



## School Proficiency Index

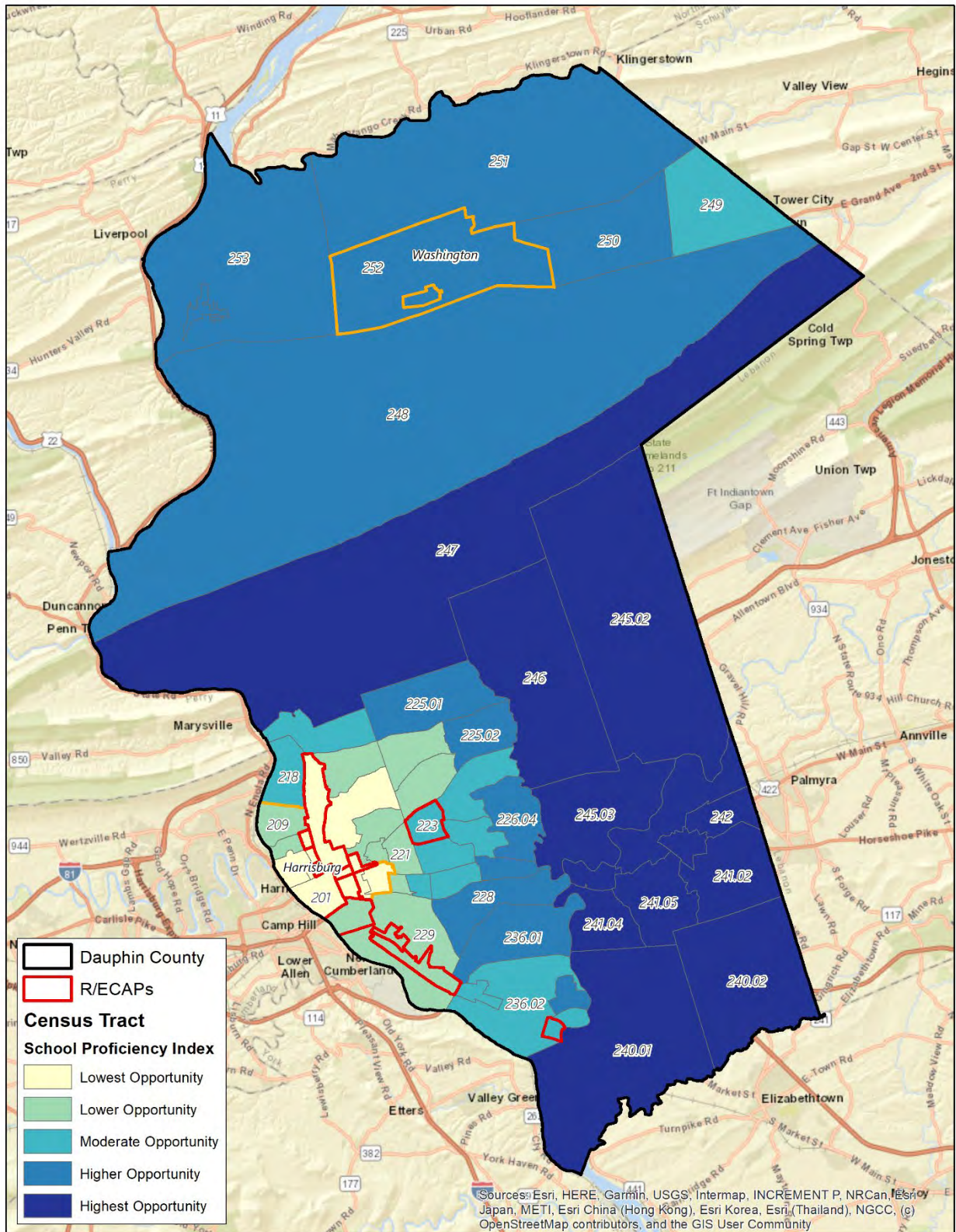
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The School Proficiency Index uses public school level data on the performance of students on state exams to describe which neighborhoods have high performing elementary and secondary schools nearby and which are near lower performing elementary schools. This data is supplied by the US Department of Education through ED Facts for the school year 2018-2019 providing the percentage of students in a school that scored at or above proficient, as defined by the Pennsylvania Department of Education. The index aggregates the percentage of proficient students at the school district level for Reading/Language Arts and Math assessments and normalizes these scores relative to other school districts within Dauphin County. Additionally, the disparity between the proficiency scores of economically disadvantaged students to the performance of all students at a particular school are also taken into account.

Generally, public schools in Dauphin County located further away from the City of Harrisburg are higher performing, while schools in the City of Harrisburg and surrounding areas, including Susquehanna, Penbrook, Paxtang, and Swatara, have lower performing schools. The proficiency of schools in the R/ECAPs also showed low performance.



Map 25: School Proficiency Index



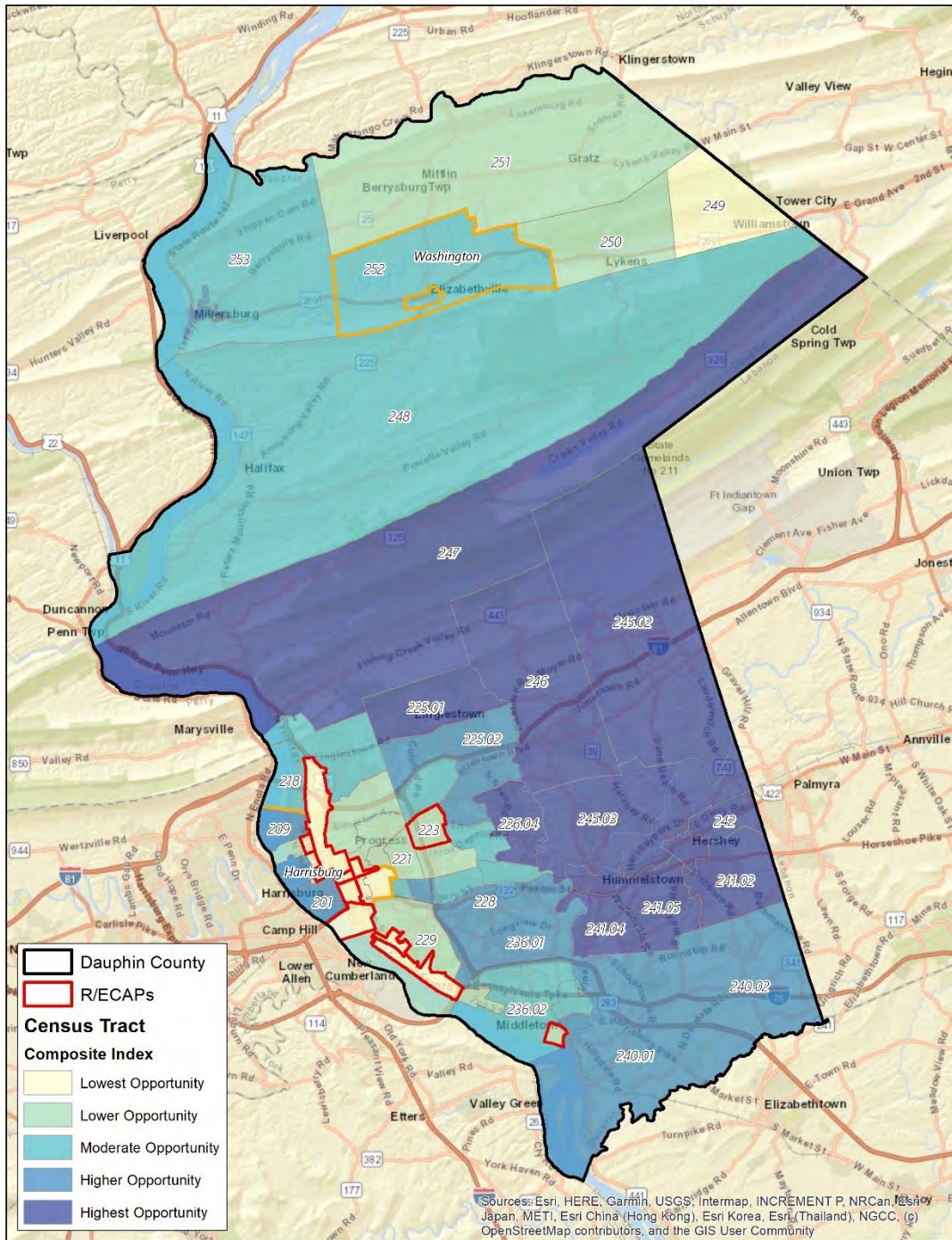


## Comprehensive Opportunity Index

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The results from the five sub-indices (labor market engagement, environmental health, prosperity, transit access, and school proficiency) were aggregated into one composite score, representing a Comprehensive Opportunity Index. The objective of the opportunity index is to identify places that are good locations for investment that might not have been selected through an R/ECAP analysis only. To that extent, it is important to look at where opportunity areas and the R/ECAPs defined for Dauphin County do and do not overlap.

Geographically, tracts with the highest opportunity scores are in the central and southeastern portions of the County. The lowest opportunity scores are located within R/ECAPs and surrounding areas as well as Williams Township in the northeast.



## Assisted Housing Location Patterns

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Housing programs serving very low- and low-income households have historically exacerbated concentrated poverty by requiring or permitting the location of assisted housing in low- and moderate-income neighborhoods. However, modern agencies are attempting to administer programs and housing to provide better opportunities for their clients. One way to utilize the Communities of Opportunity model is to evaluate the degree to which the Urban County's assisted housing investment has been made in higher opportunity areas. The assisted inventory includes rental properties funded through federal subsidy programs such as the Low-Income Housing Tax Credit (LIHTC) program, HOME, federal Housing Trust Fund, and other federal and State resources.

## CDBG and HOME Investment Programs

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Dauphin County addresses affordable housing needs primarily through its HOME Rehabilitation and First Time Homebuyer Programs and allocates CHDO operating and set-aside funds for future new construction of affordable housing.

The HOME Rehabilitation Program offers grants of up to \$30,000 to assist low-income homeowners with critical home repairs to ensure the health, safety, and welfare of occupants. Eligible repairs include energy efficiency improvements (i.e., replacement windows and doors), system upgrades (i.e., plumbing, electrical, and HVAC), roof repair and/or replacement, water heater replacement, lead, mold, or asbestos abatement, accessibility features for entering and exiting the home, or code violations. Between 2017-2020, a total of 32 housing units were rehabilitated County-wide (excluding Harrisburg). Most of these households resided in lower opportunity areas on the northern and southwestern portions of the Urban County.

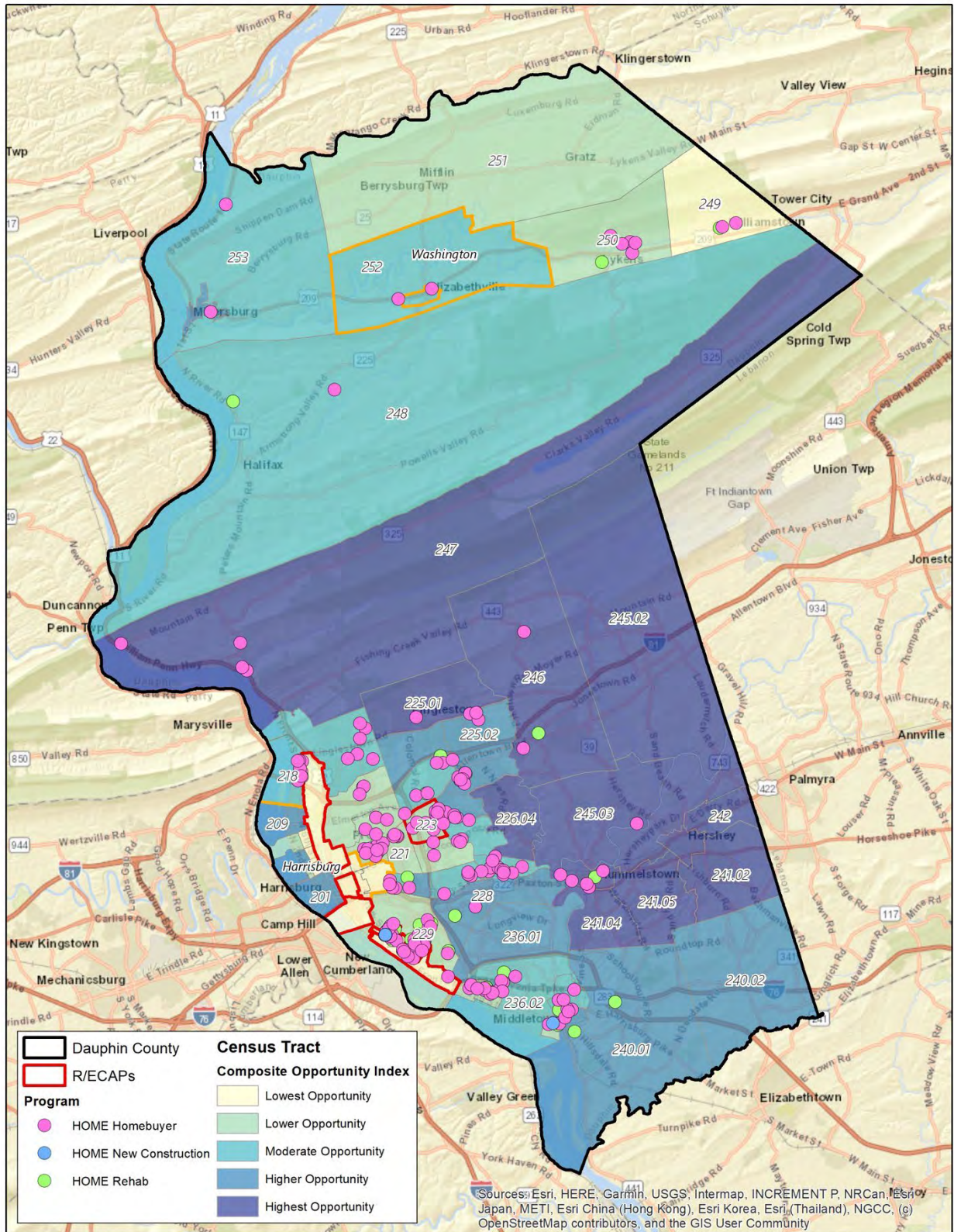
Tri-County Community Action's (TCCA) First-Time Homebuyer Program offers housing counseling and directly qualifies low-income households for down-payment and closing-cost assistance to increase access to affordable housing. A total of 177 LMI households achieved homeownership between 2017-2020. Excluding the City of Harrisburg, households assisted through the Homebuyer Program were predominantly located in areas of lower to moderate Composite Opportunity Index scores.

CHDO operating and set-aside funds are utilized for future new construction of affordable housing. Since the 2017 AFH, six out of an anticipated 12 affordable townhouse units have been completed in the Adams Street Redevelopment (formerly the Frank S. Brown Boulevard Project) in Steelton Borough. These units will be sold to low- and moderate-income persons/families.

The Cherry Orchard Place development was completed in 2021, providing 49 apartments for seniors aged 62 and older, including disabled individuals and qualified veterans requiring support services. The development has units set aside for households at 20% AMI, 50% AMI, 60% AMI, and six units are market rate. Five of the units are reserved for supportive housing of qualified veterans utilizing VASH Vouchers, and three units have Section 8 Project Based Vouchers.



Map 27: Urban County Housing Programs



Source: Dauphin County DCED

## Dauphin County Housing Authority

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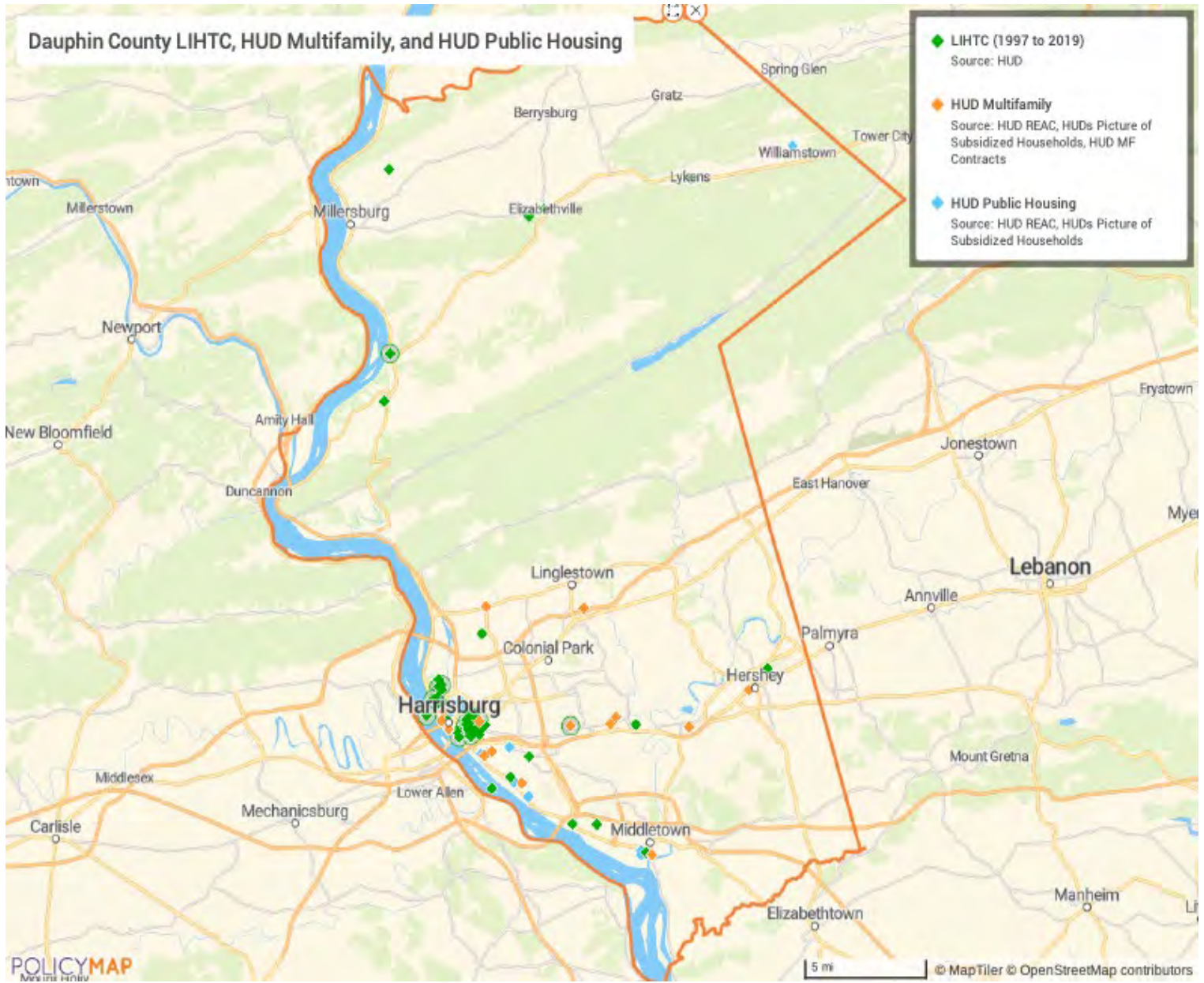
Public housing in Dauphin County is managed by the Housing Authority of the County of Dauphin. The Housing Authority of the County of Dauphin owns and manages more than 725 units throughout the County and administers 1,050 Housing Choice Vouchers, including VASH, Mainstream and Family Unification vouchers.

Maintaining trends identified in the 2017 AFH, HUD Multifamily, HUD Public Housing, and LIHTC developments generally follow population density patterns and are reasonably dispersed throughout the Urban County. This is consistent with the Housing Authority's ongoing policy to locate developments near commercial corridors, public transit, and other amenities. While five public housing and two LIHTC developments are within R/ECAPs, these areas have excellent access to public transit. All other multi-family, public housing, and LITHC units are in higher opportunity areas.

Stakeholders interviewed indicated that landlords are reluctant to accept vouchers, in part due to the stigma associated with the Section 8 Program. In addition, stakeholders reported that incentives are no longer adequate to encourage landlord participation in light of the potential to profit from the sale of a long-term rental units in a highly competitive real estate market. Larger real estate holding companies are purchasing properties that have consistently accepted vouchers; however, the new owners are not willing to maintain voucher acceptance, will not renew the leases of voucher holders, or will allow lease renewal with a substantial increase in monthly rent.



Map 28: Urban County HUD and LIHTC Developments, 2019



Source: Policy Map



## Period of Affordability

The following map reflects the distribution of assisted units throughout Dauphin County. These units are subject to income restrictions that keep them affordable for a finite period of time.

*Over the next 5-10 years, the Urban County could lose over one quarter (25.5%) of its assisted units as periods of affordability expire.*

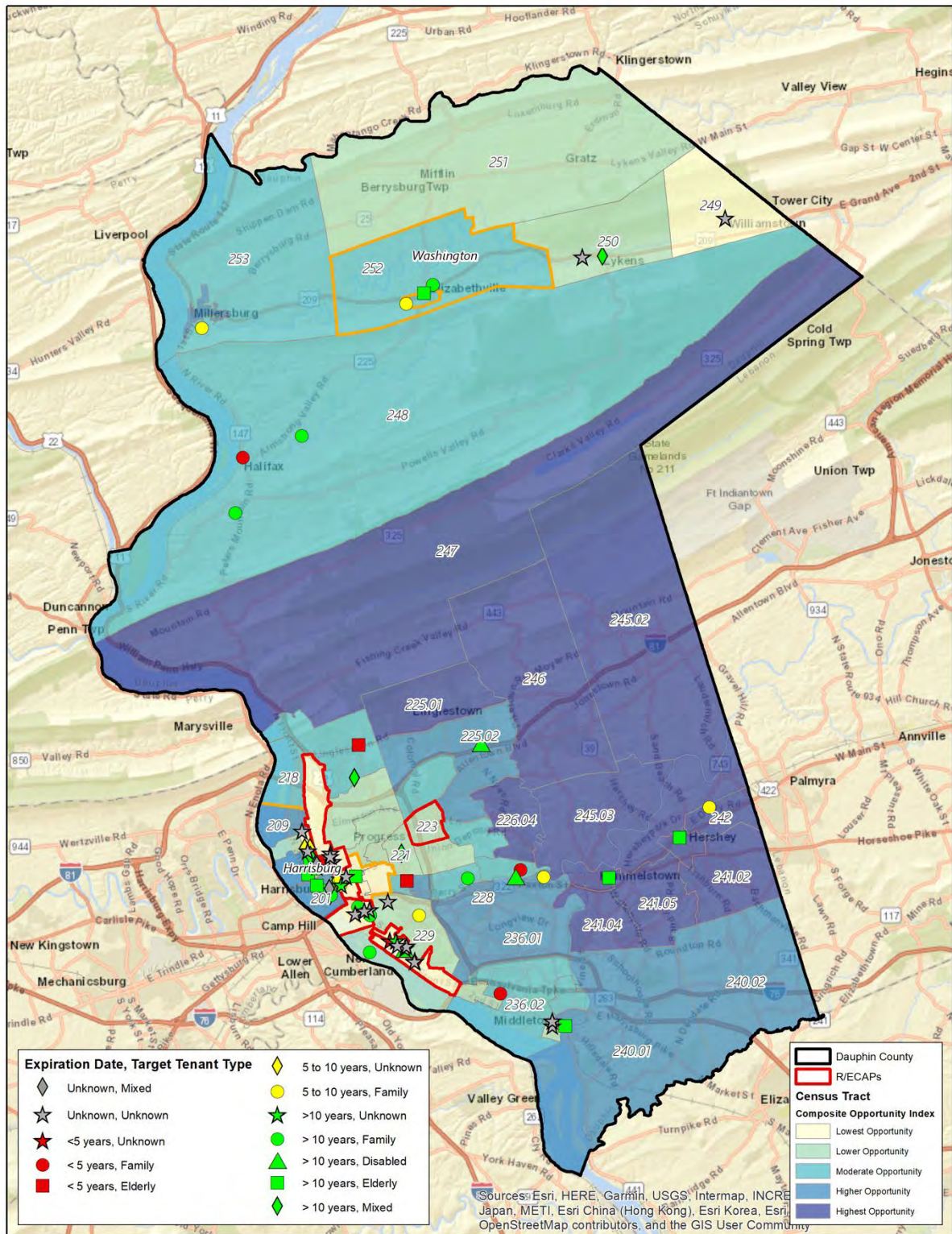
According to the National Housing Preservation Database, there are 2,752 affordable units throughout the Urban County. Six assisted properties consisting of 461 units are expected to have their periods of affordability expire within five years.

Name	City	Total Units
Springwood Glen Apartments	Middletown	58
Rutherford Park Townhouses	Hummelstown	85
Lead Monterey Group LLC 37	Steelton	1
Pheasant Hill	Harrisburg	172
Fairview Estates	Halifax	6
The Ecumenical Comm Phase III	Harrisburg	139
<b>Total Units Expiring within 5 Years</b>		<b>461</b>

An additional 240 units in four assisted properties will reach expirations in their periods of affordability within 10 years.

Name	City	Total Units
Greenfield Estates	Elizabethville	24
Hillside Heights	Millersburg	24
Willow Ridge Apartments	Hershey	60
Waterford at Summit View	Hummelstown	132
<b>Total Units Expiring within 10 Years</b>		<b>240</b>

Preservation of affordable units is more cost effective than the construction of new affordable units, so focusing on the renewal of these affordability restrictions will preserve a significant supply of affordable housing over the next five to ten years.



Source: National Housing Preservation Database, 2021

## Evaluation of the County's Current Fair Housing Legal Status

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Dauphin County residents can receive fair housing services from the Pennsylvania Human Relations Commission, HUD, and the Fair Housing Council of the Capital Region, Inc. This section summarizes fair housing statutes and organizations and analyzes the existence of fair housing complaints or compliance reviews where a charge of a finding of discrimination has been made.

### Fair Housing Statutes

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#### Federal Statutes

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Several federal statutes protect people from housing discrimination or from being denied participation in federally funded programs. These include:

- The federal **Fair Housing Act** protects people from discrimination when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities.
- Title VI of the **Civil Rights Act** of 1964 provides that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. Title VI applies to programs or activities receiving federal financial assistance from HUD.
- Section 504 of the **Rehabilitation Act** of 1973 prohibits discrimination on the basis of disability in any program or activity receiving federal financial assistance. Titles II and III of the Americans with Disabilities Act prohibit discrimination on the basis of disability in all programs, services, and activities of public entities and by private entities that own, operate, or lease places of public accommodation.
- Title I of Section 109 of the **Housing and Community Development Act** of 1974 prohibits discrimination on the basis of race, color, national origin, disability, age, religion, and sex within Community Development Block Grant (CDBG) programs or activities.

#### State Statute

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The Pennsylvania Human Relations Act (PHRA), as amended, makes it unlawful to discriminate against any person in a real estate transaction because of race, color, religion, sex (including sexual orientation and gender identity), national origin, handicap or disability, or familial status. The State also prohibits discrimination because of ancestry, age (40 and older), or 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.

#### County Statute

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Dauphin County adopted a Fair Housing Ordinance in December 2017. It provides the same protections included in the Federal Fair Housing Act and the PHRA. The ordinance is enforced by the local Fair Housing Officer and the Pennsylvania Human Relations Commission (PHRC).



## Fair Housing Entities

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### U.S. Department of Housing & Urban Development

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The Office of Fair Housing & Equal Opportunity (FHEO) of HUD administers federal laws and establishes national policies to ensure that all Americans have equal access to the housing of their choice. Housing discrimination complaints filed with HUD may be referred to the Pennsylvania Human Relations Commission for investigation.

### Pennsylvania Human Relations Commission (PHRC)

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The Pennsylvania Human Relations Commission is a “substantially equivalent agency” under HUD’s Fair Housing Assistance Program (FHAP). This means that HUD has determined that the Pennsylvania Human Relations Act provides rights, procedures, remedies and judicial review provisions that are substantially equivalent to the federal Fair Housing Act. As a result, HUD refers complaints of housing discrimination that it receives from Pennsylvania residents to PHRC for investigation.

As a FHAP agency, the Commission receives grant funding from HUD to assist in the enforcement of the federal Fair Housing Act. The Commission also receives some financial and operational assistance from HUD’s Fair Housing and Equal Opportunity office to enforce the State Fair Housing Act.

### Fair Housing Council of the Capital Region, Inc.

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Fair Housing Council of the Capital Region, Inc. is a non-profit housing counseling organization based in Harrisburg. The Council 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.

### Existence of Housing Discrimination Complaints

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A lack of filed complaints does not necessarily indicate a lack of housing discrimination. Some persons may not file complaints because they are not aware of how to go about filing a complaint or where to go to file a complaint. In a tight rental market, tenants avoid confrontations with prospective landlords. Discriminatory practices can be subtle and may not be detected by someone who does not have the benefit of comparing his treatment with that of another home seeker. Other times, persons may be aware that they are being discriminated against, but they may not be aware that the discrimination is against the law and that there are legal remedies to address the discrimination. Finally, households may be more interested in achieving their first priority of finding decent housing and may prefer to avoid going through the process of filing a complaint and following through with it. Therefore, education, information, and referral regarding fair housing issues remain critical to equip persons with the ability to reduce impediments.

### *Complaints to HUD and/or PHRC*

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Complaint data was requested from HUD on September 15, 2021. This data has not yet been received. Complaint data was also requested from PHRC on September 15, 2021, and this data has not been received.

## Public Sector Policy Review

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The analysis of impediments is a review of impediments to fair housing choice in the public and private sector. Impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices, or any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin. Policies, practices or procedures that appear neutral on their face, but which operate to deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status or national origin may constitute such impediments.

An important element of the AI includes an examination of public policy in terms of its impact on housing choice. This section evaluates the public policies in Dauphin County to determine opportunities for affirmatively furthering fair housing.

## Key Findings

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- Dauphin County allocates funds specifically for addressing fair housing issues.
- Zoning ordinances in seven of the eight analyzed jurisdictions in Dauphin County are at a higher risk for discrimination.
- Home mortgage data indicates that Black/African American and Hispanic applicants faced higher denial rates and lower approval rates than White applicants.

## CDBG and HOME Programs

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### *Dauphin County allocates funds specifically for addressing fair housing issues.*

Collectively, the CDBG and HOME programs are under the authority of the Community Planning and Development (CPD) division of the U.S. Department of Housing & Urban Development (HUD). Each year Dauphin County develops an Annual Action Plan to identify the eligible activities it will fund and implement with HUD CPD funds.

In the past decade, funding from HUD has decreased and regulations have required more administrative capacity. This results in entitlements needing to “do more with less”, including the goal of affirmatively furthering fair housing choice. This section analyzes the local policies in place that guide how the County affirmatively furthers fair housing as part of its funding decisions through the Annual Action Plan process.

### Funding Priorities

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Examining the amount of total annual allocations spent specifically on fair housing provides insight into how communities prioritize their commitment to affirmatively further fair housing. Such activities include fair housing planning, preparing an Analysis of Impediments to Fair Housing Choice, providing fair housing education and outreach for staff, sub-recipients and the general public, and using techniques like paired testing in the private rental market.

Dauphin County budgeted CDBG funds in the amount of \$24,500 in 2019 to conduct fair housing education and outreach. Unfortunately, due to COVID-19 requiring redirection of staff resources both at Dauphin County and the Housing Authority, 2020 and 2021 resources were not invested in this area. However, Dauphin County continues to work closely with the Housing Authority and Tri-County Regional Planning Commission to strengthen fair housing outreach and enforcement. According to stakeholders, fair housing education is impeded by a lack of resources—financial, human, and technical. In particular, stakeholders cited a need for additional housing counselors and fair housing education in bilingual/multi-lingual platforms.

Dauphin County continues to invest its CDBG and HOME dollars in existing programs that have aided in promoting affordable housing. With the use of HOME funds, Dauphin County addresses affordable housing needs by continuing to invest in the successful HOME Rehabilitation and First Time Homebuyer Programs. CDBG funds further support the Habitat for Humanity blight remediation program and the Fair Housing Council's Housing Counseling Services Program. These programs dovetail with construction of new affordable housing to meet the goal of providing and advancing homeownership and housing of LMI families.

### Project Selection

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Communities can implement their commitment to affirmatively further fair housing through an application process that favors projects that expand fair housing choice. The County requires CDBG and HOME applicants to certify that they will comply with Fair and Affordable Housing policies for low- and moderate-income persons and families and assist the County or its agencies in promoting fair and affordable housing.



Dauphin County has a set-aside for CHDO operating expenses, as well as set-aside funds for future new construction of affordable housing. While the County does not have an affordable housing location policy, geography is a primary criterion for qualifying projects each year. CDBG and HOME funds are allocated to benefit as many communities as possible, while ensuring a balance of applicants from underserved areas throughout Dauphin County.

## Monitoring

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Entitlements can ensure that sub-recipients affirmatively further fair housing by requiring and enforcing compliance with fair housing statutes through sub-recipient agreements.

DCED Office staff evaluate sub-recipients' programmatic and fiscal management policies utilizing the HUD Monitoring Desk Guide and conduct annual on-site monitoring of CDBG and HOME sub-recipients. Dauphin County follows its Monitoring Plan which outlines the timing and procedures for monitoring all federal grant funded activities. All public infrastructure improvement projects and housing projects are monitored regularly during and after construction, including compliance monitoring by a third-party entity, Herbert, Rowland, and Grubic, Inc.

Once awarded, Dauphin County requires subrecipients to include a detailed budget including sources and uses of funds for the total project which is included as an exhibit in their subrecipient agreement. As part of monitoring, Dauphin County reviews subrecipient budgets and financials to ensure matching sources of funds are accurately budgeted, expended, and accounted for. The County conducts subrecipient orientations where cost principles, financial management, and proper budget management, including sources and uses of funds, are reviewed with subrecipients. Additionally, sub-recipients are required to provide periodic reports on their achievement of contractual objectives.

## Language Access Plan

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To improve public safety, health, convenience, comfort, and general welfare of all residents, a language access plan is necessary for individuals who are non-English speaking or have limited English proficiency (LEP) to access available services.

Local jurisdictions are advised to conduct a four-factor analysis to ensure meaningful access to services for LEP persons. The four factors include:

- The number or proportion of persons with LEP served or encountered in the eligible service population
- The frequency with which persons with LEP come into contact with the program
- The nature and importance of the program, activity, or service provided
- The resources available and costs to the service provider

Translation of vital documents would be required for any language groups that reach the LEP threshold of 5%, and at least partially, for languages that reach the safe harbor threshold of 1,000 persons.

In the Urban County, Spanish or Spanish Creole is the language most often spoken by persons with LEP, which comprise 1.25% of the Urban County population. Because there

are 2,587 persons with LEP who speak Spanish or Spanish Creole, this triggers the safe harbor threshold for translation of vital documents.

## Comprehensive Plan

The Pennsylvania Municipalities Planning Code (MPC) defines a “County Comprehensive Plan” as “a land use and growth management plan prepared by the county planning commission and adopted by the county commissioners which establishes broad goals and criteria for municipalities to use in preparation of their comprehensive plan and land use regulation.” All comprehensive plans must include background studies, community development goals and objectives, and a plan or plans for future actions and alternative actions regarding the various components (such as future land use, housing, transportation, and community facilities). HUD entitlements are required to include a housing element in their comprehensive plan but may substitute their Consolidated Plan to meet this obligation.<sup>15</sup>

The County’s Comprehensive Plan was adopted in 2017 and is organized around five goals:

1. Manage growth toward areas with existing or planned public facilities and services;
2. Promote the use of planning and stormwater best management practices (BMPs);
3. Promote the creation of livable, sustainable communities;
4. Promote economic development in conjunction with regional needs; and
5. Integrate land use with transportation and other public infrastructure.

To aid in achieving these goals, the plan includes several implementation strategies, a number of which have a positive effect on housing choice and access to opportunity. These strategies are listed below:

- Help build cooperative relationships between new housing developers, local municipal governments and other key stakeholders
- Identify and inventory substandard housing as a tool to improve public and private sector programs to upgrade existing housing quality and value, including rehabilitation, adaptive re-use, clearance of substandard and blighted structures, as well as construction of infill housing
- Provide for emergency housing needs, provided they are not used as substitutes for permanent housing or as long-term solutions
- Identify areas within existing infrastructure service areas with excess capacity and provide the tools necessary to enable infill and redevelopment
- Coordinate with public and private transportation providers in the development of a transit development plan for Dauphin County that addresses traditional public transit services along with on-demand and other specialized transportation needs
- Promote and seek to enhance ridesharing, vanpools, and similar services provided through the Susquehanna Regional Transportation Partnership (SRTP)

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<sup>15</sup> Pennsylvania Department of Community and Economic Development. (2020). *The Comprehensive Plan in Pennsylvania, Planning Series #3*. <https://dced.pa.gov/download/planning-series-03-the-comprehensive-plan-in-pennsylvania/?wpdmdl=56210&ind=1600884098345>

- Encourage infill development and mixed-use development through model ordinances and educational outreach
- Identify and address handicapped accessibility limitations throughout the transportation system
- Evaluate localized needs and regulations to ensure that healthcare and daycare facilities are readily accessible to all residents
- Evaluate localized needs and opportunities to provide adequate access to health food for county residents
- Participate in the development and applicable portions of the implementation of future updates of the Regional Community Health Needs Assessment, and
- Facilitate cooperative interaction between the county, municipalities and school districts to discuss opportunities for adequate funding and improved educational opportunities.

Generally, the County's comprehensive plan promotes a range of housing densities and types and supports mixed use developments, providing for greater housing choice and access to opportunity.



## Zoning Risk Assessment

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Local zoning ordinances are an important tool that communities can use to regulate land use and guide development. Given that zoning ordinances govern the location and characteristics of various land uses, they have the potential to limit or expand fair housing choice. Many common fair housing zoning issues are interrelated with affordable housing issues. Because members of the protected classes are disproportionately affected by a lack of affordable housing, zoning that effectively restricts affordable housing development can be an impediment to fair housing choice as well.

Dauphin County, through the TCRPC Attainable Housing Work Group, has completed an analysis and ranking of all 39 municipalities relative to strength of affordable housing in zoning ordinances. The workgroup is made up of over 30 stakeholders representing municipal government, private development, higher education, the Commonwealth of Pennsylvania, Dauphin County, the Housing Authority of Dauphin County, and nonprofit, affordable housing developers. The analysis of municipal zoning is currently being finalized, and a preliminary report was not available at the time of this AI. Consequently, zoning ordinances from eight municipalities in Dauphin County were reviewed to identify zoning policies that may potentially impede housing choice and affordability. 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.

## Benchmarking

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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 indicators are based on best practices and recommendations from HUD's fair housing resource guides. The full set of criteria includes:

1. Defines "family" inclusively, without a cap on the number of unrelated persons and with a focus on functioning as a single housekeeping unit
2. Defines "group home" for persons with disabilities or similarly named land use compared to single family dwellings
3. Allows up to six unrelated people with disabilities to reside in a group home without requiring a special use/conditional use permit or public hearing
4. Regulates the siting of group homes as single-family dwelling units without an additional regulatory provision
5. Has a "Reasonable Accommodation" provision or allows for persons with disabilities to request reasonable accommodation/modification to regulatory provisions

6. Permits multi-family housing of more than four units per structure in one or more residential zoning districts by-right
7. Does not distinguish between “affordable housing/multi-family housing” (i.e., financed with public funds) and “multi-family housing” (i.e., financed with private funds)
8. 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. Permits manufactured and modular housing on single lots like single family dwelling units
10. Provides residential zoning districts with minimum lot sizes of one-quarter acre or less
11. Does not include exterior design/aesthetic standards for all single-family dwelling units regardless of size, location, or zoning district

Each criterion was assigned one of two values. A score of “1” means that the criterion applies to the zoning ordinance – i.e., the impediment was not present in the ordinance or that the positive measure was in place. A score of “2” means that the criterion does *not* apply to the zoning ordinance – i.e., the impediment was present or that the positive measure was not.

Score	Implication
11-12	Ordinance is at LOW risk relative to discriminatory provisions for housing and members of the protected classes.
13-14	Ordinance is at MODERATE risk relative to discriminatory provisions for housing and members of the protected classes.
15 and above	Ordinance is at HIGH risk relative to discriminatory provisions for housing and members of the protected classes.

## Summary of Key Findings

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*Based on an analysis of zoning ordinances in eight jurisdictions in Dauphin County, the majority are at a higher risk for discrimination due to:*

- 1) Restrictive definition of ‘family’ that places a cap on the number of unrelated persons.** Present in 6/8 reviewed ordinances, restrictive definitions of family may impede unrelated individuals from sharing a dwelling unit, limiting the housing choice of non-traditional families who may be living together for economic purposes. This cap can also impede the development of group homes, effectively restricting housing choice for the disabled.
- 2) Additional conditions imposed on group homes that are not executed against all residential uses in the zoning district.** Present in 6/8 reviewed ordinances, such conditions or restrictions are an impediment to the siting of group homes, restrict housing choice for persons with disabilities, and are inconsistent with the Fair Housing Act.
- 3) Limiting the location of mobile/manufactured homes to areas other than those where single-family housing is permitted.** Present in 3/8 reviewed ordinances, restrictions on mobile homes may disproportionately impact members of the protected classes by limited a low-cost housing option.

The majority of the County subdivisions reviewed were moderate-risk, while Londonderry Township, Highspire Borough, and Upper Paxton Township are classified as high risk in this assessment. South Hanover Township was the only reviewed jurisdiction with a low-risk for discriminatory provisions.

Score	County Subdivision
12	South Hanover Township
13	Lower Paxton Township
13	Swatara Township
14	Lower Swatara Township
14	East Hanover Township
15	Londonderry Township
15	Highspire Borough
16	Upper Paxton Township



It is important to consider that a low score does not guarantee a zoning ordinance's fairness as the analysis does not address the issue of availability, suitability, or development potential of sites. A high benchmark score does not necessarily reflect a high probability of real-world impediments to fair housing choice. Nor does a low score mean that impediments are unlikely to happen. The scores primarily serve as a point of reference to judge a particular code against some of the most common zoning provisions that restrict fair housing choice for members of the protected classes.

Each zoning ordinance that was inspected had some level of mixed results. Most of the ordinances reviewed utilized a restrictive definition of family and lacked a reasonable accommodation provision for persons with disabilities. Only East Hanover, Lower Paxton, and Swatara Townships possess zoning ordinances that include reasonable accommodation provisions. However, none of the ordinances reviewed made a distinction between affordable housing financed with public funds and privately financed market-rate units. Higher density multi-family units were permitted by right in at least one residential district throughout, and smaller lot sizes were also present in all reviewed ordinances. Full details on how the scoring criteria were applied in all jurisdictions appear in the Zoning Appendix.

### *Definition of Family*

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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 that limit their housing choice. Restrictions in the definition of family typically cap the number of unrelated individuals that can live together. The restrictions can impede the development of group homes, effectively impeding housing choice for the disabled. Caps on unrelated individuals residing together may be warranted to avoid overcrowding, thus creating health and safety concerns. Most ordinances that were reviewed placed a cap on the number of unrelated persons in its definition of "family" – only Lower Swatara and South Hanover did not.

### *Group Homes*

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The most common affirmative language in the current analysis were favorable definitions and resident limits for family care facilities and group homes, which are required by State law. Group homes are residential uses that do not adversely impact a community. Efforts should be made to ensure group homes can be easily accommodated throughout a community under the same standards as any other residential use for persons without disabilities. Of particular concern are those that serve members of the protected classes such as people with disabilities. Because a group home for people with disabilities, as defined by the federal Fair Housing Act, serves to provide a non-institutional experience for its occupants, imposing additional and burdensome conditions are contrary to the purpose of a group home. More importantly, the restrictions, unless executed against all residential uses in the zoning district, are an impediment to the siting of group homes, restrict housing choice for persons with disabilities, and are inconsistent with the Fair Housing Act. Only South Hanover and Lower Swatara Townships had favorable definitions and resident limits for group homes without imposing additional conditions.

## *Manufactured Homes*

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Adopting an inclusive definition of a mobile home as a single-family dwelling encourages a varied housing stock, advancing choice. Defining the use differently or restricting its location to areas other than those where single-family housing is permitted does not specifically impede housing choice by members of the protected classes. However, there is a correlation between low-income households and members of the protected classes. By limiting a low-cost housing option, restrictions on mobile homes may disproportionately impact members of the protected classes. In three of the eight zoning ordinances reviewed – Lower Swatara, Londonderry, and Highspire-- manufactured homes are only permitted in mobile home parks or residential mobile home districts.

## *Permitted Residential Lot Sizes and Types*

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A lack of affordable housing may impede housing choice by members of the protected classes as they are often also in low-income households. Excessively large lot sizes may deter development of affordable housing. A balance should be struck between areas with larger lots and those with smaller lots that will more easily support the creation of affordable housing. All of the ordinances reviewed included residential zones permitting dwellings on less than  $\frac{1}{4}$  acre in lot size.

## Results by Municipality

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### **Upper Paxton Township**

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***Upper Paxton Township received the highest score in the zoning risk assessment, placing it at a higher risk of restricting housing choice for members of the protected classes.***

- Upper Paxton’s zoning ordinance caps the number of unrelated persons and excludes family care and group care facilities from the definition of family. Beyond this exclusion, the ordinance does not contain a reasonable accommodation provision.
- Group homes, emergency housing, homeless shelters, and transitional or supportive housing are not permitted uses in any categories. This means that these types of housing are only allowed through a special exception use permit or a zoning amendment.
- The Township’s ordinance created a separate multi-family, residential zoning district that severely limits the location of this type of housing that is permitted by-right.

## Highspire Borough

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*With the second highest score in the zoning risk assessment, Highspire Borough is at a higher risk for discrimination than six of the other municipalities reviewed.*

- Emergency housing, homeless shelters, and transitional or supportive housing are not permitted uses in any categories and are only allowed through a special exception use permit or a zoning amendment. This is also the case with manufactured/modular housing and mobile home parks.
- In addition to dispersal requirements for group homes, Highspire requires that a detailed statement of intent be filed with the Borough: “The statement shall identify how said use satisfies a demonstrative need and shall be conducted in a responsible manner without detriment to surrounding properties and neighborhood.”<sup>16</sup>
- Highspire’s additional restrictive elements are comparable to other ordinances in the County, such as capping the number of unrelated persons in its definition of “family” and lacking a reasonable accommodation provision.

## Londonderry Township

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*Based on a review of its zoning ordinance, Londonderry Township is at a higher risk for discrimination due to restrictive elements that are comparable to other ordinances reviewed in the Urban County.*

- Some of Londonderry’s restrictive elements are consistent with zoning ordinances reviewed throughout the County, including a cap on the number of unrelated persons in its definition of “family” and lacking a reasonable accommodation provision.
- Group homes with more than five unrelated persons with disabilities, emergency housing/homeless shelters, and transitional housing or permanent supportive housing facilities are restricted exclusively to non-residential zoning districts. This is also true of mobile homes, which are permitted only in specifically zoned mobile-home residential areas. These types of restrictions placed the Township at a higher risk of restricting housing choice than most of the municipalities that were reviewed.

## East Hanover Township

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*East Hanover Township’s zoning ordinance was found to be at a moderate risk of discrimination, despite being one of the few municipalities with a reasonable accommodation provision.*

- Comparable to other ordinances reviewed, the Township’s ordinance utilizes a restrictive definition of family, and emergency housing, homeless shelters, and transitional or supportive housing are only allowed through a special exception use permit or a zoning amendment.

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<sup>16</sup> Borough of Highspire. (2011). Zoning Ordinances: Part 14-6, Specified Criteria. Accessed at: <http://www.highspire.org/images/zoneord/zopart14.pdf>



- Group homes with up to 4 unrelated persons with disabilities are permitted by right, while 4-6 residents require a special exception. In addition, group homes in East Hanover are subject to additional regulatory provisions.

### Lower Swatara Township

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*In addition to restrictive elements that are common across the municipalities reviewed, Lower Swatara Township defines and regulates group homes as institutional facilities rather than single-family dwelling units, placing the ordinance at moderate risk for discrimination by impeding housing choice for the disabled.*

- Lower Swatara Township was one of the few ordinances that utilized an inclusive definition of family, while being the only municipality reviewed that regulated group homes (family care/group care within the ordinance) as institutional facilities rather than single-family dwelling units.
- The Township's additional restrictive provisions were consistent with the other ordinances reviewed: the ordinance did not contain a provision for reasonable accommodation, manufactured/modular housing was restricted to mobile home parks, and emergency housing, homeless shelters, and transitional or supportive housing are only allowed through a special exception use permit or a zoning amendment.

### Lower Paxton & Swatara Townships

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*The zoning ordinances of Lower Paxton and Swatara Townships were placed at a moderate risk of discrimination due to a restrictive definition of family, additional conditions imposed on groups homes, and a special exception use permit is required for emergency housing, homeless shelters, and transitional or supportive housing.*

### South Hanover Township

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*Of the eight zoning ordinances reviewed, South Hanover Township's was at the lowest risk of discrimination. The Township's restrictive elements included a lack of reasonable accommodation provision, and emergency housing, homeless shelters, and transitional or supportive housing require a special exception use permit or zoning amendment.*

## Building, Occupancy, Health and Safety Codes

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From a regulatory standpoint, local government measures define the range and density of housing resources that can be introduced in a community. Housing quality standards are enforced through the local building code and inspections procedures. The Commonwealth of Pennsylvania uses the Uniform Construction Code (UCC). However, many townships, boroughs and cities in Pennsylvania have amendments to the commonwealth's Uniform Construction Code (UCC) that impose additional requirements to those contained in the state law and the adopted building codes. In 1999, the legislature gave each municipality the choice to opt-in or opt-out of administering and enforcing the UCC. About 92% of Pennsylvania municipalities chose to opt-in, meaning they are responsible for enforcing UCC building codes through municipal building officials or contracts with certified third-party agencies. Each opt-in municipality must have a single, designated Building Code Official, who is the person ultimately responsible for building code enforcement in that municipality. In opt-out municipalities, it is the responsibility of the building owner to obtain a permit from a certified third-party agency.<sup>17</sup> All 40 of Dauphin County's subdivisions chose to opt-in.

Accessible design and construction requirements are necessary to make public and common use spaces and facilities accessible and safe to everyone. This gives people with disabilities greater freedom of choice to choose where they live. The Fair Housing Act requires all "covered multifamily dwellings" to be accessible to and usable by people with disabilities. Here, covered multifamily dwellings are defined as buildings containing four or more units, either with all ground floor units or at least one elevator. The following seven accessibility standards are required by the Fair Housing Act for these dwelling units:

- An accessible building entrance on an accessible route
- Accessible common and public use areas
- Usable doors (usable by a person in a wheelchair)
- Accessible route into and through the dwelling unit
- Light switches, electrical outlets, thermostats, and other environmental controls in accessible locations
- Reinforced walls in bathrooms for later installation of grab bars
- Usable kitchens and bathrooms

Additionally, it is unlawful to refuse to make reasonable accommodations that allow for a person with a disability equal opportunity to use and enjoy their home.

Building design and construction standards in Pennsylvania more than adequately implements accessible measures for people with disabilities by utilizing the UCC, which also incorporates International Building Code 2015, for their construction, rehabilitation, and maintenance regulations. State building regulations were last updated in 2019. Chapter 11, International Building Code 2018 Accessibility Requirements, determines the design and construction of facilities for accessibility for individuals with disabilities. These standards almost meet all the accessibility requirements outlined by the Fair Housing Act.

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<sup>17</sup> Pennsylvania Department of Labor and Industry. (2021). *Uniform Construction Code - Municipal Code Changes*. Accessed at: <https://www.dli.pa.gov/ucc/Pages/Municipal-Code-Changes.aspx>

Sections 1104 and 1105 detail requirements for accessible routes entrances, including access to common and public use areas. At least one accessible route within the site shall be provided from public transportation stops, accessible parking, accessible passenger loading zones, and public streets or sidewalks to the accessible building entrance served. The minimum width of the accessible path must be 48 inches minimum. Accessible routes are required within and between almost all sites, including commercial buildings with five or more tenants, healthcare providers, transportation facilities, airports, and any government building. Exceptions to providing accessible routes are provided if the site does not provide any pedestrian access or if the area of a floor or mezzanine is below 3,000 square feet. Recreational facilities must also provide accessible features to all spaces except for swimming pools.

Section 1107 describes accessibility requirements for dwelling units and sleeping units. All public spaces serving dwelling units shall be accessible, including bathrooms, kitchens, living and dining areas, and any connected exterior spaces. General exceptions to providing accessible units include structures without elevator services for units on upper floors, site impracticality (e.g., high grade slopes), or structures where the lowest floor of a building without elevator service are at or above design flood elevation.

Section 1109.13 describes controls, operating mechanisms, and hardware such as switches that control lighting and ventilation and electrical convenience outlets. These features are required to be accessible with some exceptions:

- If the operable parts are intended for use only by service or maintenance personnel
- Receptacles serving a dedicated use where two or more outlets are provided in a kitchen above a length of countertop that is uninterrupted by a sink or appliance, one outlet shall not be required to be accessible.
- Floor electrical receptacles
- HVAC diffusers
- For redundant light switches, one control is not required to be accessible
- Access doors or gates in barrier walls and fences protecting pools, spas and hot tubs

Section 1109.2 requires toilet room and bathing rooms to be accessible. Exceptions to providing accessible bathrooms include:

- Toilet rooms or bathing rooms accessed only through a private office, not for common or public use and intended for use by a single occupant
- Where multiple single-user toilet rooms or bathing rooms are clustered at a single location, at least 50% must be accessible
- Where no more than one urinal is provided in a toilet room or bathing room, the urinal is not required to be accessible.
- Toilet rooms or bathing rooms that are part of critical care or intensive care patient sleeping rooms serving accessible units are not required to be accessible.

While it may be implied, there is not a clear requirement for providing reinforced walls for reasonable accommodation installations, such as later installation of grab bars. Clarity on reasonable accommodation requirements may provide greater housing opportunities for persons with disabilities.



## Anti-Displacement Plan and Relocation Plan

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Anti-displacement and Relocation Plans serve to advance the interests of lower-income individuals and households at risk of displacement due to neighborhood changes in various sectors, such as housing, businesses, and infrastructure. The plan must be compliant with HUD regulation 24 CFR § 42 and 24 CFR § 570 outlining plans and strategies for addressing displacement. As a recipient of CDBG and HOME funds, the Urban County has a residential anti-displacement and relocation assistance plan in place for demolition and acquisition activities.

The plan makes clear that the County will identify the reasonable steps to minimize the displacement of persons from their homes as a result of an assisted project. Notice of Relocation will be provided by public notice.

All low- and moderate-income dwellings that are converted or demolished will be replaced and displaced households will be appropriately relocated. All replacement housing units will maintain an affordability period of no fewer than three years and comply with HOME and CDBG guidelines.

In accordance with 24 CFR § 42.350, relocation assistance for eligible individuals and households are limited to moving expenses, homeowner replacement housing payment, or tenant replacement housing payment in the form of rental assistance or down payment assistance. The Plan does not provide a clear definition of comparable replacement dwellings regarding environmental conditions and location in respect to public services, utilities, and place of employment.

The Plan does not include contacts for complaints and appeals related to eligibility for assistance due to displacement, and the appropriate procedure is not incorporated into the document. Any person who believes he/she has been displaced for a federally assisted project may file a written appeal with the County. If the displaced person is still not in agreement with the determination, the County may direct the person to the local HUD Office of Community Planning and Development.

## Private Sector Policy Review

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In addition to the public sector policies that influence fair housing choice, there are private sector policies that can influence the development, financing, and advertising of real estate. In this section of the AI, mortgage lending practices and high-cost lending practices are analyzed.

### Home Mortgage Lending

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Under the terms of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.), any commercial lending institution that makes five or more home mortgage loans must report all residential loan activity to the Federal Reserve Bank under the terms of the Home Mortgage Disclosure Act (HMDA). The HMDA regulations require most institutions involved in lending to comply and report information on loans denied, withdrawn, or incomplete by race, sex, and income of the applicant. The information from the HMDA statements assists in determining whether financial institutions are serving the housing needs of their communities. The data also helps to identify possible discriminatory lending practices and patterns.

The most recent HMDA data available for Dauphin County is from 2018 to 2020. Reviewing this data helps to determine the need to encourage area lenders, other business lenders, and the community at large to actively promote existing programs and develop new programs to assist residents in securing home mortgage loans for home purchases. The data focuses on the number of homeowner mortgage applications received by lenders for home purchase of one- to four-family dwellings and manufactured housing units. The information provided is for the primary applicant only. Co-applicants were not included in the analysis. In addition, where no information is provided or categorized as not applicable, no analysis has been conducted due to lack of information.

*Home mortgage data indicate that Black/African American and Hispanic applicants faced higher denial rates and lower approval rates than White applicants.*

Denial rates for Black/African Americans and Hispanics were 29.3% and 26.5%, respectively, compared to a 15.7% denial rate for Whites. The overall denial rate in Dauphin County was 15.9%. (Analysis of other races is not included due to small sample sizes.)

Table 21: Dauphin County Home Mortgage Data, 2018-2020

	Total Applications		Originated		Approved Not Accepted		Denied		Withdrawn/Incomplete	
	#	%	#	%	#	%	#	%	#	%
<b>Loan Purpose</b>										
Home purchase	17,736	41.6%	10,928	61.6%	357	2.0%	1,413	8.0%	2,050	11.6%
Home Improvement	4,086	9.6%	2,220	54.3%	227	5.6%	1,255	30.7%	370	9.1%
Refinancing	12,017	28.2%	6,778	56.4%	381	3.2%	1,977	16.5%	2,271	18.9%
Other Purpose/Not Applicable	8,836	20.7%	3,975	45.0%	264	3.0%	2,139	24.2%	1,422	16.1%
<b>Loan Type</b>										
Conventional	32,193	75.4%	18,946	58.9%	1,022	3.2%	5,557	17.3%	4,389	13.6%
FHA	6,628	15.5%	2,989	45.1%	125	1.9%	801	12.1%	992	15.0%
VA	3,428	8.0%	1,732	50.5%	79	2.3%	406	11.8%	691	20.2%
FSA/RHS	426	1.0%	234	54.9%	3	0.7%	20	4.7%	41	9.6%
<b>Property Type</b>										
One to four-family unit	41,870	98.1%	23,573	56.3%	1,155	2.8%	6,503	15.5%	6,012	14.4%
Manufactured housing unit	535	1.3%	124	23.2%	56	10.5%	254	47.5%	79	14.8%
Multifamily	270	0.6%	200	74.1%	18	6.7%	30	11.1%	22	8.1%
<b>Applicant Race</b>										
American Indian/Alaska Native	89	0.2%	67	75.3%	4	4.5%	58	65.2%	24	27.0%
Asian	2,526	5.9%	1,383	54.8%	43	1.7%	383	15.2%	433	17.1%
Black/African American	3,254	7.6%	1,664	51.1%	110	3.4%	954	29.3%	616	18.9%
Native Hawaiian/Two or more races	720	1.7%	36	5.0%	2	0.3%	18	2.5%	10	1.4%
White	27,270	63.9%	17,453	64.0%	887	3.3%	4,287	15.7%	3,903	14.3%
Not available	8,816	20.7%	3,298	37.4%	183	2.1%	1,087	12.3%	1,127	12.8%
Hispanic*	1,410	3.3%	708	50.2%	43	3.0%	374	26.5%	242	17.2%
<b>Total</b>	<b>42,675</b>	<b>100%</b>	<b>23,901</b>	<b>56.0%</b>	<b>1,229</b>	<b>2.9%</b>	<b>6,784</b>	<b>15.9%</b>	<b>6,113</b>	<b>14.3%</b>

Note: Percentages in the Originated, Approved Not Accepted, Denied, and Withdrawn/Incomplete categories are calculated for each line item with the corresponding Total Applications figures. Percentages in the Total Applications categories are calculated from their respective total figures. \*Hispanic ethnicity is counted independently of race.

Source: Consumer Financial Protection Bureau, 2018-2020 HMDA



## High-Cost Lending Practices

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The widespread housing finance market crisis of 2007-2009 brought a new level of public attention to lending practices that victimize vulnerable populations. Subprime lending, designed for borrowers who are considered a credit risk, increased the availability of credit to low-income persons. At the same time, subprime lending often exploited borrowers, piling on excessive fees, penalties and interest rates that make financial stability difficult to achieve. Higher monthly mortgage payments make housing less affordable, increasing the risk of mortgage delinquency and foreclosure and the likelihood that properties will fall into disrepair.

Some subprime borrowers have credit scores, income levels and down payments high enough to qualify for conventional, prime loans, but are nonetheless steered toward more expensive subprime mortgages. This is especially true of minority groups, which tend to fall disproportionately into the category of subprime borrowers. The practice of targeting minorities for subprime lending qualifies as mortgage discrimination.

Since 2005, Housing Mortgage Disclosure Act (HMDA) data has included price information for loans priced above reporting thresholds set by the Federal Reserve Board. This data is provided by lenders via Loan Application Registers and can be aggregated to complete an analysis of loans by lender or for a specified geographic area. HMDA does not require lenders to report credit scores for applicants, so the data does not indicate which loans are subprime. It does, however, provide price information for loans considered “high-cost.”

A loan is considered high-cost if it meets one of the following criteria:

- A first-lien loan with an interest rate at least three percentage points higher than the prevailing U.S. Treasury standard at the time the loan application was filed. The standard is equal to the current price of comparable-maturity Treasury securities.
- A second-lien loan with an interest rate at least five percentage points higher than the standard.

Not all loans carrying high APRs are subprime, and not all subprime loans carry high APRs. However, high-cost lending is a strong predictor of subprime lending, and it can also indicate a loan that applies a heavy cost burden on the borrower, increasing the risk of mortgage delinquency.

For this analysis, lower income households include those with incomes between 0% and 80% of median family income (MFI), while upper-income households include those with incomes above 80% MFI. Information was provided in HMDA for only 10 high-cost originated loans, and 17,951 loans were marked as ‘NA’. The very small sample size made an analysis of high-cost lending for this period statistically insignificant. This could be an issue with the HMDA dataset; however, it is more likely that lenders are not reporting the information needed to calculate the rate-spread for mortgage loans.

## Impediments & Conclusions

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Several impediments to fair housing choice were identified and are described below, most of which were identified in the previous AFH. The impediments are carried over because they are still relevant today. Based on these impediments, a Fair Housing Action Plan with recommendations to be undertaken by Dauphin County and its collaborating partners over the next five years was developed and is described in the final section of this analysis.

**Impediment:** Consistent with the 2017 AFH, assisted housing generally follows population density patterns and is reasonably dispersed throughout the Urban County; however, a lack of affordable, accessible housing within high opportunity areas remains a barrier that disproportionately affects members of the protected classes.

- Both Dauphin County and HACD have made measurable progress in creating accessible, affordable housing options since the 2017 AFH. Even so, it is clear that the supply of accessible housing still does not satisfy demand. In fact, the County noted in its 2020 Annual Action Plan that 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.
- The housing stock tends to be deteriorating and in need of rehabilitation, particularly among the more affordable units. Older units built prior to 1978 tended to be in the northern part of the County, including the Boroughs of Millersburg, Elizabethville, and Gratz, and along the southern border of Dauphin County, including the City of Harrisburg, and the Boroughs of Highspire, Middletown, and Royalton. Units built prior to 1978 are likely to have lead paint, which poses a health risk to occupants, particularly those who are not yet school-aged.

**Goal:** *Maintain the creation and preservation of affordable housing development in higher opportunity areas as a County-wide priority.*

**Impediment:** Zoning ordinances for municipalities within the Urban County continue to restrict housing choice for members of the protected classes. This jeopardizes Dauphin County's ability to affirmatively further fair housing.

- The TCRPC Attainable Housing Work Group has completed an analysis and ranking of all 39 municipalities relative to strength of affordable housing in zoning ordinances. While the report is being finalized, only eight municipalities were determined to have adequate zoning for promoting affordable housing.

- Of the eight ordinances reviewed in the zoning risk assessment, the AI found that the majority are at a higher risk for discrimination due to:
  - 1) ***Restrictive definition of ‘family’ that places a cap on the number of unrelated persons.*** Present in 6/8 reviewed ordinances, restrictive definitions of family may impede unrelated individuals from sharing a dwelling unit, limiting the housing choice of non-traditional families who may be living together for economic purposes. This cap can also impede the development of group homes, effectively impeding housing choice for the disabled.
  - 2) ***Additional conditions imposed on group homes that are not executed against all residential uses in the zoning district.*** Present in 6/8 reviewed ordinances, such conditions or restrictions are an impediment to the siting of group homes, restrict housing choice for persons with disabilities, and are inconsistent with the Fair Housing Act.
  - 3) ***Limiting the location of mobile/manufactured homes to areas other than those where single-family housing is permitted.*** Present in 3/8 reviewed ordinances, restrictions on mobile homes may disproportionately impact members of the protected classes by limited a low-cost housing option.
- In cases where the TCRPC and/or the AI determines that local rules are inconsistent with fair housing laws, Dauphin County, through the TCRPC Attainable Housing Work Group, will inform community leaders and suspend the award of County-administered competitive federal funds until problem issues are adequately addressed.

***Goal: Implement the municipal zoning analysis findings of TCRPC Attainable Housing Work Group and the AI.***

***Impediment:*** Members of the protected classes are more likely to have lower incomes, higher unemployment rates and higher poverty rates. Limited housing choice restricts access to community assets for members of the protected classes.

- Members of the protected classes tend to have lower incomes and higher unemployment rates than their counterparts, which reduces housing choice.
- Moderate levels of segregation exist in Dauphin County and members of the protected classes are more likely to live in R/ECAPs as housing is more affordable.
- Poverty has lasting effects that can impact a wide range of factors, including public education primarily funded by the local community, job opportunities, and the ability to afford quality housing.
- While fair housing and affordable housing are distinct from each other, there is a link when affordable housing is not located throughout a jurisdiction, including in higher opportunity areas, housing choice is restricted.

***Goal: Remove barriers to accessing community assets for members of the protected classes.***



**Impediment:** Fair housing education and outreach efforts are not adequately meeting need.

- 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 paired testing, and work to promote a mutual understanding of diversity among residents.
- Underfunding of fair housing agencies in Dauphin County is an ongoing issue; insufficient resources make affirmatively furthering fair housing through enforcement, investigation, and outreach extremely difficult.

**Goal:** *Increase the level of fair housing knowledge and understanding among housing developers, real estate professionals, elected officials, and the general public.*

**Goal:** *Strengthen fair housing education, investigation, enforcement, and operations.*

**Impediment:** Members of the protected classes are disproportionately denied mortgages in the private sector.

- Homeownership has historically been a way for a family to create generational wealth, which allows those families additional opportunities such as accessing equity to pay for higher education or start a business. Increasing homeownership rates among members of the protected classes can assist in wealth-building.
- Non-White households were less likely to be homeowners than White households.
- Home mortgage data indicate that Black/African American and Hispanic applicants faced higher denial rates and lower approval rates than White applicants.

**Goal:** *Increase the competitiveness of mortgage applications among members of the protected classes.*

## Fair Housing Action Plan

Based on the identified impediments to fair housing choice, the following Fair Housing Action Plan has been developed. The format of this chart should more easily facilitate the completion of the county's Annual Plan and CAPER documents. Each year during the Annual Plan process, the county will identify the strategies it will undertake to affirmatively further fair housing. At the end of each program year, progress made toward achievement of the strategies will be reported in the county's CAPER.

Action Description	Timeframe				
	2022	2023	2024	2025	2026
<b>Goal 1: Increase the amount of affordable housing in areas with higher access to opportunity.</b>					
Include a map of the Comprehensive Opportunity Index in its local HOME application process and strongly encourage development of new affordable housing in areas of higher opportunity and/or outside of R/ECAPs.	●	●	●	●	●
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.	●	●	●	●	●
Incorporate project scoring sheets into CDBG and HOME application evaluation process to quantify the degree to which projects work to AFFH.	●	●	●	●	●
Coordinate with the Tri-County Regional Planning Commission to institute an evaluation of the impact on fair housing choice for every residential development proposal.		●	●	●	●
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.		●	●	●	●
Within one 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.	●	●	●	●	●

Action Description	Timeframe				
	2022	2023	2024	2025	2026
<b>Goal 2: Implement municipal zoning analysis findings of the TCRPC Attainable Housing Work Group and the AI.</b>					
Where the AI and/or the TCRPC Attainable Housing Work Group determines that local municipal zoning ordinances 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.	●	●	●	●	●
<b>Goal 3: Remove barriers to accessing community assets for members of the protected classes.</b>					
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.		●	●	●	●
Within the 2022-2026 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.		●	●	●	●
Prioritize transit coverage over ridership to improve transit access for persons with mobility limitations and extend access for more lower income individuals seeking employment opportunities outside of their neighborhoods.	●	●	●	●	●
<b>Goal 4: Increase the level of fair housing knowledge and understanding among housing developers, real estate professionals, elected officials, and the general public.</b>					
Within six months, create a page on the County's website for fair housing information and resources for how to report suspected discrimination, and update the webpage as needed.	●	●	●	●	●
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 providing fair housing education to these organizations and 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.		●	●	●	●
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 regular efforts of the County and HACD.			●	●	●



Action Description	Timeframe				
	2022	2023	2024	2025	2026
<b>Goal 5: Strengthen fair housing education, investigation, enforcement, and operations.</b>					
Prepare a Language Access Plan based on the results of the Four-Factor Analysis conducted for the Urban County.	●				
Revise the Anti-Displacement and Relocation Plan to incorporate the following: 1) Provide a clear definition of comparable replacement dwellings regarding environmental conditions and location in respect to public services, utilities, and place of employment. 2) Include contacts for complaints and appeals related to eligibility for assistance due to displacement, as well as the appropriate procedure.	●				
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.		●			
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.	●	●	●	●	●
<b>Goal 6: Increase the competitiveness of mortgage applications among members of the protected classes.</b>					
Continue to support homebuyer education and financial literacy efforts, particularly for R/ECAP residents, racial and ethnic minorities, and persons with LEP.	●	●	●	●	●

## Participation Appendix

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Many housing, social service agencies, and other organizations serving Dauphin County were consulted during the development of this AI. In addition, the County a series of stakeholder interviews and a public meeting October 20 and 27. Stakeholders included affordable housing providers, homeless assistance providers, health and human service providers, economic development groups, broadband service providers, and several municipal representatives.

Dauphin County developed an online survey to assess the housing and community development needs of the City. The survey was available beginning on September 28 through November 5, 2021. The survey was advertised through the County's official webpages as well as departmental social media accounts and printed flyers that were distributed at in-person interviews and public meetings. A total of 15 participants completed surveys as part of the process. Due to low response rate, analysis was not conducted.

# Citizen Participation

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## Stakeholder Participation

Many housing, social service agencies, and other organizations serving Dauphin County were consulted during the development of this Consolidated Plan. Although they provided information and context that was invaluable to the planning process, there are other stakeholders who did not participate but whom the County encourages to participate in its CDBG and HOME programs. This list is a sample of the agencies and individuals from whom the County will regularly solicit feedback.

- Tri-County Regional Planning Commission
- Dauphin County Housing Authority
- Capital Area Coalition on Homelessness
- Mental Health/Autism/Developmental Programs
- Dauphin County Human Services
- Habitat for Humanity of Greater Hbg Area
- Tri-County Community Action Commission
- Hamilton Health Center
- Shalom House
- YWCA
- American Red Cross
- Salvation Army
- East Shore YMCA
- Self-Determination Housing Project
- Mid-Penn Legal Services
- Center for Employment Opportunities
- Tri-County Housing Development Corporation
- Latino Hispanic American Community Center
- Northern Dauphin County Human Services Center
- CREDC
- Dauphin County Public Works
- Dauphin County Parks & Recreation
- Dauphin County Emergency Management
- Dauphin County Area Agency on Aging



## Stakeholder Interviews

M&L conducted a series of stakeholder interviews and a public meeting on behalf of the County on October 20 and 27. We met with affordable housing providers, homeless assistance providers, health and human service providers, economic development groups, broadband service providers, and several municipal representatives.

A summary of the comments related to the housing, community and economic development needs of the County that were identified over the course of our meetings is included below.

## Municipal Infrastructure and Blight Remediation

- Heavy rain events will cause flooding of roadways and homes; some municipalities in the lower part of the County are interested in a buyout program. FEMA/PEMA has been used to buyout in the past. Generally older housing stock sits on these parcels now, and are reconsidering participating in a buyout program. End use would be demo and maintain as green space.
- Adequacy and capacity of stormwater infrastructure is also a concern in these parts of the County that are downhill from other communities in the County. High rates of storms create surface flooding and the same areas consistently flood and endanger vehicular traffic that happen upon surface flooding quickly and unexpectedly. 100-year storms are now 5-year storms.
- Undersized piping in addition to the high rate of storms causes basement flooding in the County's housing stock.
- In more rural areas of the County, public infrastructure to encourage development will be a need.
- ADA equipment for parks.
- The County as a whole is characterized by an aging housing stock.
- High rates of rental housing create undesirable environment for young families. There is a parking shortage in Middletown Borough, with some vacant lots that were bought out under FEMA programs, but cannot be paved for off-street parking.
- Code enforcement to identify illegal rentals and property maintenance code violations would be helpful. As well, resources to assist property owners and the Borough to incentivize property maintenance. High costs of demolition often leave the Borough at a loss or with significant blighted housing stock.
- High cost of electric heating burdens households. Resources are needed to upgrade to more efficient heating infrastructure.
- Dauphin County administers the land bank demo fund, which is typically leveraged with other funding sources to acquire and demolish blighted properties.
- Aging infrastructure includes sewer and sidewalks, water and recreation facilities in some areas of the County.
- Incentives for developing affordable housing should be explored to allow developers to make money while building affordable housing.
- The County offers first time homebuyer program that provides down payment assistance for first time homebuyers, which often acts as a barrier for buying.
- Comcast is currently exploring expansion of broadband infrastructure in northern, rural areas of County. They've applied for federal funding through NTIA and the high speed broadband program, and has sought emergency connectivity funds (construction and service) Internet Essentials program offered by Comcast-families that receive any kind of federal assistance or subsidy can purchase a low-cost internet package.

- Municipal policing is a challenge for small communities and comprises over 50% of the general fund budget. There are some communities in favor of regionalizing, but others oppose this idea due to challenges in equitably distributing the cost and consistent application and enforcement of individual community ordinances.

### Affordable/Accessible Housing

- Where the housing is located compared to where amenities (employment, schools, other life supports) are located creates a barrier for people to stay in their home/housing. There is a NIMBY issue that prevents development of affordable housing in certain areas. Without infrastructure of coordinated transportation and consistent routes, placing housing near jobs is a need.
- There is a general lack of accessible units. Subsidized units typically have more accessible units than private market units (for instance those rented to voucher holders). There is a growing trend that there are multiple physical impairments that require accessible units. In some instances, these people end up in hotels because there is no other accessible place for them to locate.
- The Housing Authority does not keep a separate waiting list for accessible units, though applicant households needing an accessible unit get a disability preference. Sometimes PHA will house persons in non-accessible units, and make modifications. The same is not as common for private units that get voucher subsidy.
- Age of housing stock and inability of older or aging households to maintain the home is a growing trend. Disrepair escalates to the point of being uninhabitable (waterline breaks, roofing, flooring). At the beginning of the pandemic, water arrears presented problems with shutoffs leading to uninhabitable declaration.
- Creation of incentives for people who are doing well to upsize to create unit availability for ELI and VLI
- Availability of larger units to support larger families, as well as housing for single men, is a consistent challenge. Unaccompanied adults are a large subset of persons in need of units. One bedroom and efficiency units comprise most of the need of folks on waiting lists for housing vouchers.
- Cost burden and severe cost burden are prevalent, particularly for single adults.
- There is a shortage of landlords willing to participate in the Housing Choice Voucher program. This has been a trend that started before the pandemic but has certainly exacerbated since the pandemic. There is a stigma associated with the Section 8 program, but even incentives aren't enough to encourage participation because of the housing/real estate market and property owners' ability to profit off the sale of a home that has been a long-term rental unit in the County. This is true of all voucher programs, including 811, ERAP, VASH. Requests for porting throughout the state are also experiencing this.
- There is a trend of larger real estate holding companies buying up properties that have consistently accepted vouchers, but new ownership will no longer accept vouchers, will not renew leases of voucher holders, or will renew at an exponential price increase.
- Homeless shelters are seeing an increase in the number of voucher holders in the shelter because they cannot find housing or landlords that will accept a voucher. Long term rentals (10+ years) are being turned over/sold to new owners who aren't willing to maintain as a unit that accepts vouchers.
- There is a need for units for populations that are above the income limits to qualify for a subsidy but who cannot afford market or fair market rent.
- There is sometimes a trend where the middle class will displace ELI and VLI households out of units affordable to them and are living in units that are more than affordable for their income bracket. To

be affordable to VLI/ELI, units almost always require subsidy. Even LIHTC and other subsidized developments aren't helpful because in order to cash flow, the rent is beyond the means. Deep subsidies to those units as well as vouchers are needed to make them affordable to the lowest income populations.

- Need for one bedrooms creates unintended consequence of forcing people into unlicensed boarding homes. Even those rents become prohibitive, and the units often don't meet housing codes.
- Persons currently receiving assistance under the Emergency Rent and Utility Assistance Program are generally households earning less than \$25,000/year, and all have children (usually multiple children). Even for these households that are working, rents in the 1200-1400/month range are not sustainable.
- Some employers are buying property in areas where there are distribution centers and deducting housing costs from employees' pay; due to transportation barriers, developers are also building close to where employees can either get to work or more easily access/transportation. These are often not located to other services or amenities.
- There are a number of units at risk of losing affordability status. The County should consider options to preserve the affordability of units with expiring subsidy.

#### *Barriers to Production*

- Unprecedented time relating to material costs; The average increase in cost to develop a single family home is \$35,000 increase in cost to develop average single family home; this is coming down, but there are still significant cost increases.
- Even still, the costs to rehabilitate still exceed costs to build new, even with high price of land included in new developments.

#### *Homeless Needs*

- Eviction prevention programs are needed to prevent homelessness, coupled with case management services at DOJ to assist in applying for emergency rental assistance.

#### *Housing Counseling/Fair Housing Education*

- More case management and fair housing education are needed, preferably in a bilingual/multilingual format.
- There is a shortage of housing counselors in the County; this education should also be made available in bilingual/multilingual platforms. Startup costs to be trained/certified as housing counselor are high. PHFA recommends CDBG, PHARE, or local (perhaps Act 137 or gaming revenues) to front start-up costs for new counselors.



## Economic/Workforce Development

- Small Business development presents a unique challenge in that many small businesses come to the Chamber or CREDC not fiscally ready for the next step. They don't have resources or systems in place to generate profit & loss statements or balance sheets. Resources are available through the SBDC and SCORE, but are rarely taken advantage of, and this is true for both existing and new small businesses. Outreach and education are necessary to connect small businesses with these resources.
- Park and recreation resources and improvements can help to attract businesses, increase property values and promote tourism. The County's park/recreation department has an employment deficit and is seeking opportunities to engage diverse communities in training and education in how parks and programming are developed and maintained.
- A holistic, grassroots approach to engaging and maintaining a workforce is required. Developing trusted sources and resources in a community is important in order to offer assistance, guidance and other resources to promote workforce training and development initiatives.
- Making connections between employers and employees is critical, as is fostering and supporting a good work ethic, soft skills, job readiness skills, etc. Often these needs are overshadowed by a greater need for transportation to and from a workplace.
- Top industries in the County that experience workforce shortages include manufacturing, logistics/distribution, trades, and technology (programming, Cyber security, IT Management, Business systems). It is expected that 2500-3000 jobs will be available in the Central PA region, centered in Hbg. These positions are specialized and require a degree or certificate of some type. The Service industries continue to struggle likely due to poor working conditions, and the pay is not what people are looking for.
- Childcare continues to present challenges and barriers to employment. Positions in manufacturing, logistics and healthcare fields are 24/7 positions and childcare is not readily available for those that work a second or third shift position. Additionally, households receiving assistance for childcare costs are reluctant to accept more hours/income for fear of losing that assistance. Locating day/child care facilities near employment centers, as well as an emerging (national) trend to subsidize childcare are attempts to encourage people to go back to the workplace.
- Particularly during the pandemic, people are/were getting paid to stay home, which acts as a deterrent to getting employment. Renewing job ethics and workplace readiness education could be helpful in getting folks back to work.
- Parents are focusing on where their children are getting their education and are making sacrifices to live in "better" school districts. Households are willing to pay more, work multiple jobs, endure cultural barriers, etc. in order to ensure their children have access to good education and be in proximity to employment, childcare, other amenities.
- Supply of existing housing stock is insufficient to meet the demand of larger employers coming to the area. Barriers to creating new housing include insufficient open space to create units. Immediate barriers include price of raw materials and a shortage of construction labor to build units. Construction companies have more work than they can currently complete and are reluctant to take on more. Across CREDC's catchment area, there are 48 ongoing housing projects, the just can't come online fast enough.
- It is expected that over the next three to five years, another 300-500 jobs will be brought to the region; however, there are unlikely to be enough units for housing. There are transportation barriers—available land for housing is not in the immediate vicinity of where businesses are expected to locate.

- Barriers to business attraction include a lack of available open space, particularly on industrial sites. Where there are large (20+ acres) sites, either a warehouse is currently located there, or will be located there in the future. This freezes out manufacturing, food production and other industries interested in coming to the area. When businesses do find a spot to locate, the infrastructure is not there (water, sewer, gas, other utilities). What are ways the County can reserve space for these “other” things, if that is a priority for the community?
- Consider the needs of a changing workforce—businesses that choose to operate exclusively remotely but workers may want temporary office space/equipment, social interaction, shared workspace/incubation space. As large shopping centers continue to vacate, how can those spaces be used effectively to serve the needs of a workforce.
- Consider workforce development initiatives that meet people where they are—transportation to a training site or job site is often a challenge. How can education/training programs come to where people are living and can access resources, but also consider where those jobs will be and how they can be accessed. A particular challenge with construction trades is that contractors are usually willing to train, but then workers can’t get to job site, and job sites move—how are people going to get to employment opportunities?
- ESL support is limited.

## Homeless/Special Needs Housing

- CACH agencies lack time and resources to do extensive planning to pursue additional resources, grants, etc. Efforts to education and expand the knowledge that the coalition exists will help spur joint efforts and how to leverage public funding for housing/services. There is a large desire to do something about homelessness, but haven’t been able to organize that effort well enough to build capacity for significant initiatives. Identifying developers that are interested in doing something more broadly beneficial for the community rather than making a profit. Communities that have been most effective at combatting homelessness have been able to effectively engage private sector.
- The CoC is currently engaging healthcare agencies to determine how to integrate HMIS data with hospital data; UPMC has street outreach person that goes out with street outreach team. CACH agencies are aggressively pursuing respite care; need housing for recovery rather than going home to an unsafe environment.
- Prepared Renters Education Program (PREP) is pre-requisite for landlord mitigation participation.
- Coordinated Entry effort over last year and a half has been challenging due to the pandemic. CE continues to get better data and have more direct contact with persons experiencing homelessness than prior to being in effect. The primary entry point designed to be 211 (24/7 availability); initial screening for eligibility for CE services; move along to fuller assessment of what needs are; HELP ministries (physical access point, but pandemic made this not a truly feasible option, though they are available to assist); third area of connection—Street Outreach coordinated/conducted by Valley Youth House and Christian Churches United will conduct screening/assessment. Anyone entering shelter has assessment performed.
- The use of coordinated entry provides case management teams across providers a baseline of where to start looking for housing options; what interventions are most appropriate/qualified for once they enter shelter. There are limited housing options, particularly during the pandemic that have challenged Coordinated Entry.

- The private housing market tight. Combination of limited inventory, landlords' ability to get higher rent from non-voucher holders, landlords' ability to sell the unit to non-voucher landlords, and general high demand. The eviction moratorium contributed to lack of supply.
- LL/tenant mediation services would be helpful by opening lines of communication; some landlords would be open to conversation and help as needed where others would not. Education for the community on how to access services would also be beneficial and help some households waiting until the last minute to ask for help.
- Eviction mediation program that may help stabilize housing for persons—how to access funding for rental assistance or other barriers that people are facing that are preventing them from not being able to pay their rent.
- Additional stability services and after-care programs are needed to help avoid recidivism and returns to shelter.
- Some new initiatives for special needs include a tiny home village for Veterans, which would create a community for Veterans to support each other; rapid rehousing for domestic violence victims; expansion of the thrive model and shared housing, both for unaccompanied youth; Shalom House looking to reconstruct sanctuary of vacant church to housing. All of these initiatives lack financial resources to come to fruition.
- CACH agencies working with Capital Area Rental Property Owners Association (CARPOA) to develop landlord recruitment and incentive program. Incentives include damage/risk mitigation (to be provided at time of lease signing as form of "extra" security deposit); sign on bonuses and longer term subsidies.
- There is not enough in the way of service providers; new CMs, build resume and turnover. Can't be as competitive as other employers in terms of salary
- Barriers to housing include income and how to grow earned income. Unaccompanied adults on waiting list for housing, but also families are single parent families (one income) that are often crippled by other life expenses coupled with unaffordable housing. Childcare and transportation are barriers to obtaining and maintaining employment. Another barrier includes zoning (particularly in the City of Harrisburg) ordinance that prohibits more than two unrelated persons living in the same unit, regardless of number of bedrooms. SROs and other shared housing options are helpful tools in that HUD assistance may be used to provide subsidy to folks living there.
- Increasing costs of heating and other utility costs may put a number of households at risk; even with LIHEAP, how many people are going to be able to maintain housing and/or recovery from a financial hit such as increased utility costs.
- Generally, pre-pandemic, families approaching HELP office for shelter would likely be able to find something, and it was unlikely that if they couldn't be accepted into shelter, it was unlikely they would be on the street. Now that is not the case—family/other supports reluctant to allow more people into the home during the pandemic and there is an increase in the number of cases presenting to the shelter that if they can't be accepted, they'll be living in their car. Unaccompanied youth do double up a lot with friends, other family, etc.

*CACH committee needs/priorities:*

1. Shelter Care Services (low demand shelter for men and families) (can get construction funding, but no funding for the operations, shelter, CDBG for City and County is limited –Continuum of Care—County ESG funding?)
2. Supportive Housing (stability case management) any type of Supportive Housing
3. Coordinated entry

4. Case management coordination
5. Eviction prevention with eviction mediation

## Broadband Infrastructure

- Federal/State funding sources coming in for broadband; the County has identified several areas where the need for new infrastructure is needed/most cost effective to install.
- There are dozens of providers available in the region (Comcast, Verizon, local phone companies/DSL/FIOS), most people get from cable modems; wireless providers are also active in broadband service.
- Pockets of communities in rural areas where choice is more limited. If no cell service and no broadband, availability becomes a challenge.
- Most people don't consider smart phone as broadband provider.
- If there are alternatives to cable modem, why not use them (they may be more affordable). Satellite service can provide access where cell phone service is hard to get; however, be thoughtful about number of people to be impacted by investment. The most cost effective: methodology is to extend existing infrastructure to capture new subdivisions.
- New infrastructure bill subsidizes subscription for people below 200% of FPG—some people may not sign up

## Public Needs Meeting

Two virtual public hearings were held on October 18, 2021 and October 25, 2021. An in-person meeting was not feasible before submission due to the ongoing COVID-19 pandemic and local public health guidance discourage the gathering of large in person groups. These public hearings were advertised in the Patriot News in accordance with the County's approved Citizen Participation Plan. Persons with disabilities and LEP persons were provided opportunity to participate and comment.

## Summary of Survey Responses

Dauphin County developed an online survey to assess the housing and community development needs of the City. The survey was available beginning on September 28 through November 5, 2021. The survey was advertised through the County's official webpages as well as departmental social media accounts and printed flyers that were distributed at in-person interviews and public meetings.

## Survey Results

A total of 15 participants completed surveys as part of the process. Due to low response rate, analysis was not conducted.



Advertisements & Sign-in Sheets

# **HOUSING AND NEIGHBORHOOD DEVELOPMENT**

**2022**  
-  
**2026**

## **FIVE YEAR CONSOLIDATED PLAN & 2022 ANNUAL ACTION PLAN**

### **PUBLIC HEARING**

**WEDNESDAY, OCTOBER 18TH, 2021 10:00 AM**

[HTTPS://GLOBAL.GOTOMEETING.COM/JOIN/386534885](https://global.gotomeeting.com/join/386534885)

**OR**

**WEDNESDAY, OCTOBER 25TH, 2021 6:00 PM**

[HTTPS://GLOBAL.GOTOMEETING.COM/JOIN/899337365](https://global.gotomeeting.com/join/899337365)



**DAUPHIN COUNTY**

**MIKE PRIES - CHAD SAYLOR - GEORGE P. HARTWICK III**

**YOUR OPINION MATTERS!  
TAKE OUR SURVEY NOW**

[HTTPS://WWW.SURVEYMONKEY.COM/R/PWQVFJD](https://www.surveymonkey.com/r/PWQVFJD)

QUESTIONS? CONTACT: DOUG BROWN, DEPUTY DIRECTOR  
DAUPHIN COUNTY OFFICE OF COMMUNITY & ECONOMIC  
DEVELOPMENT

E: [DBROWN@DAUPHINC.ORG](mailto:DBROWN@DAUPHINC.ORG)

P: 717-780-6253

# HOUSING AND NEIGHBORHOOD DEVELOPMENT

**2022**

-

**2026**

## FIVE YEAR CONSOLIDATED PLAN & 2022 ANNUAL ACTION PLAN

### STAKEHOLDER WORKSHOPS

**OCTOBER 20, 2021- 10:00 AM**  
**MUNICIPAL INFRASTRUCTURE AND**  
**BLIGHT REMEDIATION**

[HTTP://GLOBAL.GOTOMEETING.COM/JOIN/828087645](http://global.gotomeeting.com/join/828087645)

TOPICS INCLUDE COMMUNITY/NEIGHBORHOOD INFRASTRUCTURE NEEDS; CODE ENFORCEMENT/BLIGHT REMEDIATION; BROADBAND INFRASTRUCTURE NEEDS; DISASTER RESILIENCE/HAZARD MITIGATION.

**OCTOBER 20, 2021- 2:00 PM**  
**AFFORDABLE/ ACCESSIBLE HOUSING**

[HTTP://GLOBAL.GOTOMEETING.COM/JOIN/501702373](http://global.gotomeeting.com/join/501702373)

TOPICS INCLUDE BARRIERS TO ACCESSING AND DEVELOPING AFFORDABLE UNITS; NEED FOR CERTAIN TYPES/SIZE OF UNITS; FAIR HOUSING EDUCATION/ OUTREACH NEEDS; BARRIERS TO HOUSING CHOICE; QUALITY OF EXISTING AFFORDABLE HOUSING STOCK.

**OCTOBER 27, 2021- 10:00 AM**  
**ECONOMIC DEVELOPMENT/ ACCESS**  
**TO JOBS AND OPPORTUNITY**

[HTTPS://GLOBAL.GOTOMEETING.COM/JOIN/865797781](https://global.gotomeeting.com/join/865797781)

TOPICS INCLUDE WORKFORCE DEVELOPMENT; TRANSPORTATION NEEDS; JOB CREATION/ RETENTION; BUSINESS ATTRACTION/ RETENTION STRATEGIES; INFRASTRUCTURE TO SUPPORT BUSINESSES DEVELOPMENT.

**OCTOBER 27, 2021- 2:00 PM**  
**HOMELESS/ SPECIAL NEEDS**

[HTTP://GLOBAL.GOTOMEETING.COM/JOIN/621057349](http://global.gotomeeting.com/join/621057349)

TOPICS INCLUDE NEED FOR/ QUALITY OF EMERGENCY SHELTER; AVAILABILITY OF SUPPORTIVE HOUSING; SERVICES AVAILABLE AND GAPS IN SERVICE FOR PERSONS EXPERIENCE OR AT-RISK OF HOMELESSNESS.



**DAUPHIN COUNTY**

**MIKE PRIES - CHAD SAYLOR - GEORGE P. HARTWICK III**

**YOUR OPINION MATTERS!**  
**TAKE OUR SURVEY NOW**

[HTTPS://WWW.SURVEYMONKEY.COM/R/PWQVFJD](https://www.surveymonkey.com/r/PWQVFJD)

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P: 717-780-6253

# F A Q SHEET



*Dauphin County invites your participation in the development of its 2022-2026 Consolidated Plan, the 2022 Annual Action Plan, and an Analysis of Impediments to Fair Housing, which identifies fair housing issues and recommends solutions.*

## What is the Analysis of Impediments to Fair Housing Choice?

Called an AI for short, it is a planning document that analyzes how well the County is expanding housing choice among members of the protected classes. Barriers to housing choice will be identified and an Action Plan will include strategies to eliminate these barriers.

## What is fair housing?

It is an individual's right, established by federal law more than 50 years ago, to choose housing free from discrimination based on personal characteristics that have nothing to do with housing. Under federal law, it is the right to choose housing without regard to a person's race, color, national origin, religion, sex, disability, and familial status. Under Pennsylvania law, it is the right to choose housing without regard to a person's age (40+), pregnancy and ancestry. Persons who are protected from discrimination by fair housing laws are referred to as members of protected classes.

## What does fair housing mean for me as a County resident?

Fair housing focuses on keeping your housing or search for housing free from discrimination. It also includes having access to community assets such as employment, public transit, safe neighborhoods, quality schools—all the things that contribute to a good quality of life.

## Why is the County preparing this document?

Annually, Dauphin County receives funding from the U.S. Department of Housing & Urban Development (HUD) to carry out affordable housing and community development projects that benefit low- and moderate-income residents. HUD requires the County to certify that it will "affirmatively further fair housing". The County can comply with this obligation by demonstrating it (1) implements its housing programs without discrimination against members of protected classes and (2) works to expand access to community assets for all residents.

## How can I participate in this process?

There are several ways you can provide input. These are listed on the back of this sheet.

## Who can I contact for more information?

If you have any questions contact Doug Brown, Deputy Director, Dauphin County Office of Community & Economic Development by phone at 717-780-6253 or [dbrown@dauphinc.org](mailto:dbrown@dauphinc.org).



# ONLINE SURVEY

Take our survey at <https://www.surveymonkey.com/r/PWQVFJD> by October 31, 2021.

# PUBLIC MEETINGS

Attend one of the following public meetings:

Wednesday, October 18th, 2021, at 10:00 AM

<https://global.gotomeeting.com/join/386534885>

Wednesday, October 25th, 2021, at 6:00 PM

<https://global.gotomeeting.com/join/899337365>



Dauphin County provides its programs and services in a nondiscriminatory manner and is an Equal Opportunity Employer. The County also encourages minority and women-owned businesses to submit bids and proposals for CDBG Program and HOME Program contracts. For further information and for language translation services, contact Doug Brown, Deputy Director, Dauphin County Office of Community & Economic Development by phone at 717-780-6253.

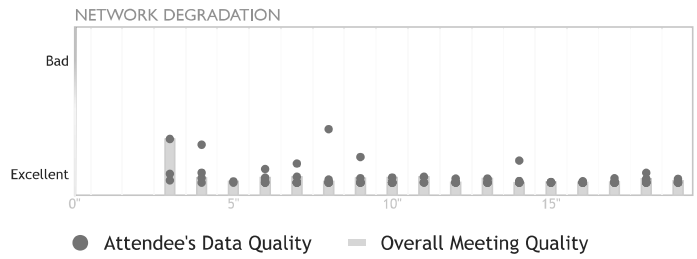
# Dauphin County Public Needs Meeting

ID: 386534885, Max Participants: 9

10/18/2021

9:58 AM - 10:18 AM 20 min

Features Used:



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PSTN	+15705566380	-	-	9:57 AM - 10:11 AM 15 min	▼
VOIP	Bill Wasielewski	Philadelphia	-	9:59 AM - 10:18 AM 20 min	▼
VOIP	Brown, Doug	Harrisburg (Downtown Harrisburg)	-	9:59 AM - 10:18 AM 20 min	▼
VOIP	Debra Laudenslager ~ Dauphin County	-	-	9:59 AM - 10:18 AM 20 min	▼
VOIP	Eleanor Brunner	-	-	9:59 AM - 10:18 AM 20 min	▼
VOIP	Kate Molinaro (Organizer) billw@mandl.net	Philadelphia	-	9:59 AM - 10:18 AM 20 min	▼
VOIP	LaCresha Davenport (Harrisburg Habitat)	-	-	10:00 AM - 10:18 AM 18 min	▼
VOIP	Lexi Passaro apassaro@dauphinc.org	Linglestown (Lower Paxton Township)	-	9:59 AM - 10:18 AM 20 min	▼
VOIP	Todd Laudenslager todd_laudenslager@comcast.net	Round Hill	-	10:11 AM - 10:18 AM 7 min	▼

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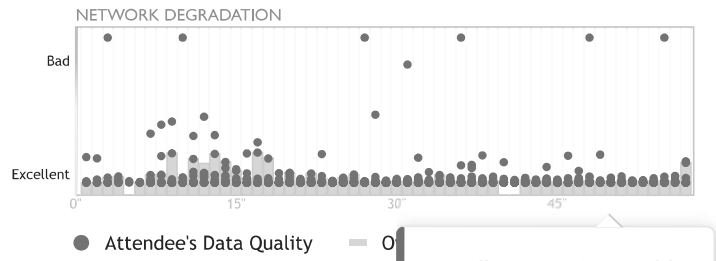
# Dauphin Co Stakeholder Session 1

ID: 828087645, Max Participants: 33

10/20/2021

9:56 AM - 10:54 AM 58 min

Features Used:



	Name	Location	Webcam Resolution	Join & Leave Times	
PSTN	+17177980620	-	-	9:58 AM - 10:54 AM 56 min	▼
VOIP	Amy Burrell- Royalton	-	360 x 201	9:56 AM - 10:53 AM 58 min	▼
VOIP	April Rudick arudick@dauphinc.org	Harrisburg (Downtown Harrisburg)	-	9:58 AM - 10:02 AM 4 min	▼
VOIP	April Rudick arudick@dauphinc.org	Harrisburg	-	10:07 AM - 10:45 AM 38 min	▼
VOIP	Betsy McBride EMcBride@LowerSwatara.org	Linglestown (Lower Paxton Township)	-	9:59 AM - 10:54 AM 55 min	▼
VOIP	Bill W.	New York	-	9:56 AM - 10:53 AM 58 min	▼
	Bonnie Kent	-	-	9:59 AM - 9:59 AM 1 min	▼
VOIP	Bonnie Kent	-	-	10:00 AM - 10:54 AM 54 min	▼
VOIP	Brown, Doug	Harrisburg (Downtown Harrisburg)	640 x 360	9:58 AM - 10:44 AM 46 min	▼
VOIP	Debra Laudenslager ~ Dauphin County	-	-	9:56 AM - 10:54 AM 58 min	▼
	Eleanor Brunner	Mountain View	-	9:56 AM - 10:54 AM 58 min	▼

PSTN	Name Jeanette Crabb lykensbro@comcast.net	Location	Webcam Resolution	9:56 AM - 10:54 AM Join & Leave Times 38 min	▼
	Joseph Hogarth manager@penbrook.org	Linglestown (Lower Paxton Township)	-	10:00 AM - 10:51 AM 51 min	▼
VOIP	Julie Seeds middlepaxtontwp@comcast.net	Lawrence Park	-	10:09 AM - 10:54 AM 45 min	▼
VOIP	Justin Conner	-	-	9:59 AM - 10:54 AM 55 min	▼
VOIP	Justin DePasqua jdepasqua@lowerpaxton-pa.gov	Harrisburg	-	9:56 AM - 10:52 AM 57 min	▼
VOIP	Kari Smith	Philadelphia	640 x 360	10:04 AM - 10:54 AM 50 min	▼
VOIP	Kate Molinaro (Organizer) billw@mandl.net	Philadelphia	-	9:57 AM - 9:58 AM 2 min	▼
VOIP	Kate Molinaro (Organizer) billw@mandl.net	Philadelphia	-	9:58 AM - 10:54 AM 56 min	▼
	Kate Molinaro (Organizer) billw@mandl.net	Philadelphia	-	9:56 AM - 10:54 AM 58 min	▼
VOIP	Kayla Buker mbborough@comcast.net	Millersburg	-	10:03 AM - 10:54 AM 51 min	▼
VOIP	Ken Klinepeter	Linglestown (Lower Paxton Township)	1280 x 720	10:03 AM - 10:54 AM 51 min	▼
VOIP	Kristen Ritchey kristen_ritchey@comcast.com	Linglestown (Lower Paxton Township)	-	10:00 AM - 10:54 AM 54 min	▼
VOIP	LaCresha Davenport LDavenport@harrisburghabitat.org	Harrisburg	-	9:56 AM - 10:54 AM 58 min	▼
VOIP	Lynn Wuestner lwuestner@southhanover.org	Linglestown (Lower Paxton Township)	-	9:56 AM - 10:54 AM 58 min	▼



VOIP	Name Name mstonbraker@highspire.org	Location Location	Webcam Resolution	Join & Leave Times 33 min	▼
VOIP	<b>Patrick Bosworth</b>	Steelton	-	9:56 AM - 10:54 AM 58 min	▼
VOIP	<b>Randle Yeager</b> ryeager@dauphinc.org	-	480 x 270	10:00 AM - 10:53 AM 53 min	▼
VOIP	<b>Serina Gaston</b> sgaston@harrisburghabitat.org	Harrisburg	-	9:56 AM - 10:54 AM 58 min	▼
VOIP	<b>Stu Tri County Community Action (they/them)</b> cstewart@CAC.local	Linglestown (Lower Paxton Township)	1280 x 720	9:58 AM - 10:17 AM 20 min	▼
VOIP	<b>Stu Tri County Community Action (they/them)</b> cstewart@CAC.local	Linglestown (Lower Paxton Township)	-	10:17 AM - 10:50 AM 33 min	▼
VOIP	<b>Theresa Eberly</b> teberly@hummelstown.net	-	-	9:58 AM - 10:54 AM 56 min	▼
VOIP	<b>Todd Laudenslager</b> todd_laudenslager@comcast.net	Forked River	-	9:57 AM - 10:54 AM 57 min	▼

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# Dauphin County Stakeholder Session 2

ID: 501702373, Max Participants: 31

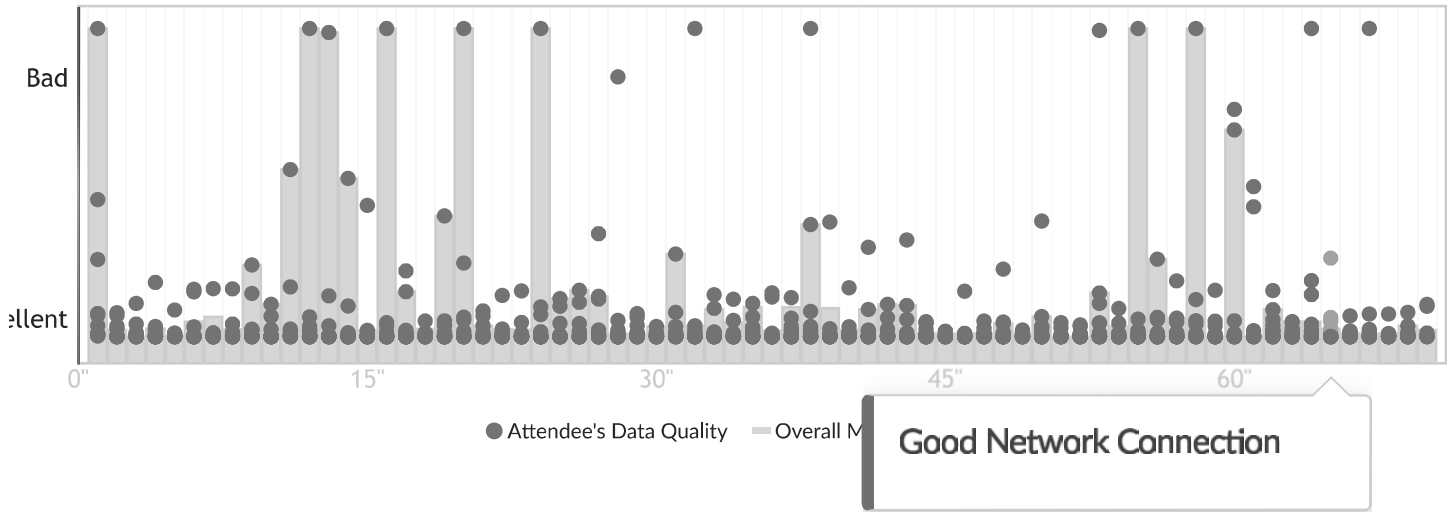
10/20/2021

1:59 PM - 3:10 PM 71 min

### Features Used:



## NETWORK DEGRADATION



PSTN	
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Location	-
Webcam Resolution	-
Join & Leave Times	1:58 PM - 3:10 PM 72 min
Average Quality	-
▼	

PSTN	
Name	+17178188039
Location	-
Webcam Resolution	-
Join & Leave Times	1:56 PM - 2:08 PM 12 min
Average Quality	-
▼	

PSTN	
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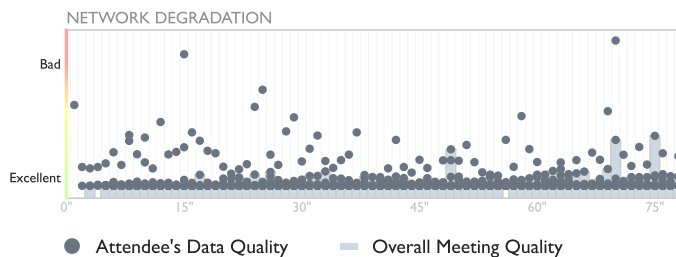
# Dauphin County Stakeholder Session 3

ID: 865797781, Max Participants: 17

10/27/2021

9:58 AM - 11:17 AM 79 min

Features Used:



	Name	Location	Webcam Resolution	Join & Leave Times	
PSTN	+17178188039	-	-	11:09 AM - 11:09 AM 1 min	▼
VOIP	Anthea Stebbins	-	360 x 201 ⓘ	9:59 AM - 11:05 AM 67 min	▼
VOIP	Brown, Doug	Harrisburg (Downtown Harrisburg)	1280 x 720	9:58 AM - 11:17 AM 79 min	▼
VOIP	Christian Fonseca itdepartment@lowerpaxton-pa.gov	Harrisburg	1280 x 720	9:59 AM - 11:17 AM 78 min	▼
VOIP	Debra Laudenslager ~ Dauphin County	-	-	9:59 AM - 11:17 AM 78 min	▼
VOIP	Eleanor Brunner	-	-	9:59 AM - 11:17 AM 78 min	▼
VOIP	Gloria	Harrisburg	-	10:12 AM - 11:17 AM 65 min	▼
VOIP	Kari Smith	Philadelphia	-	9:58 AM - 11:17 AM 79 min	▼
VOIP	Kate Molinaro (Organizer) billw@mandl.net	Philadelphia	-	9:58 AM - 11:17 AM 79 min	▼
VOIP	Kent, Bonnie	Elizabethville	-	10:18 AM - 11:13 AM 55 min	▼

	Name	Location	Webcam Resolution	Join & Leave Times	
VOIP	<b>Rasha A. Jones</b> Rasha.Jones@use.SalvationArmy.org	-	-	10:01 AM - 11:17 AM 76 min	▼
	<b>Serina Gaston</b> sgaston@harrisburghabitat.org	Harrisburg	-	10:03 AM - 10:04 AM 1 min	▼
VOIP	<b>Serina Gaston</b> sgaston@harrisburghabitat.org	Harrisburg	-	10:04 AM - 10:11 AM 7 min	▼
	<b>Serina Gaston</b> sgaston@harrisburghabitat.org	Harrisburg	-	10:11 AM - 11:17 AM 66 min	▼
VOIP	<b>Shaun Donovan</b>	Linglestown (Lower Paxton Township)	1280 x 720	9:59 AM - 11:16 AM 77 min	▼
VOIP	<b>Susan Woska / YWCA</b> swoska@ywcahbg.org	Harrisburg	-	10:01 AM - 11:17 AM 76 min	▼
	<b>Terri Redmond</b> MSantor@phfa.org	Linglestown (Lower Paxton Township)	-	10:02 AM - 11:17 AM 75 min	▼

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Note: this report cannot be used for billing purposes.

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# Dauphin County Stakeholder Session 4

ID: 621057349, Max Participants: 12

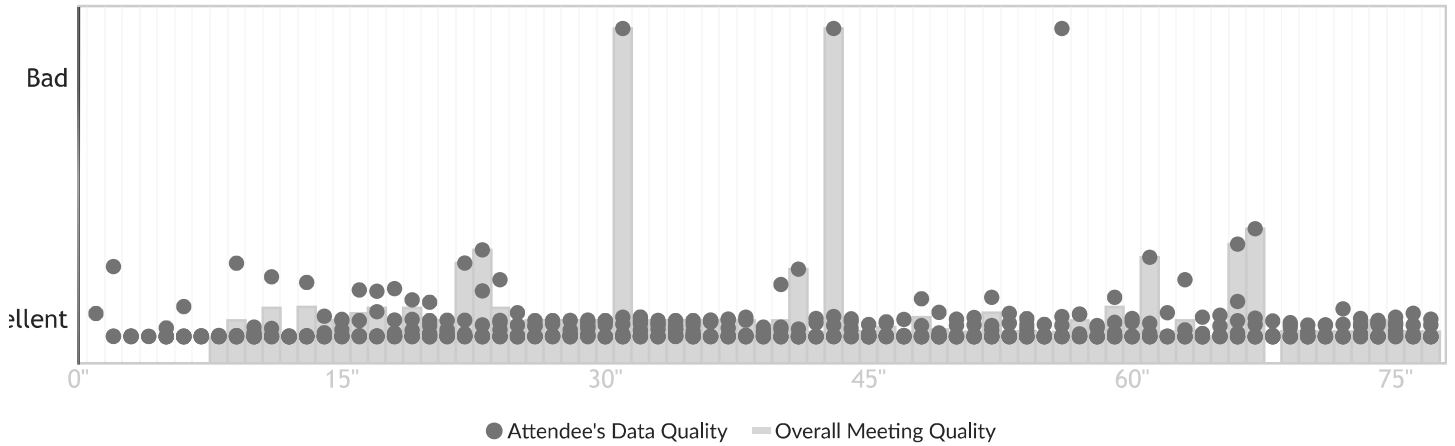
10/27/2021

1:58 PM - 3:16 PM 78 min

### Features Used:



## NETWORK DEGRADATION



PSTN	
Name	<b>+17173299305</b>
Location	-
Webcam Resolution	-
Join & Leave Times	<b>1:56 PM - 3:16 PM</b> 81 min
Average Quality	-
▼	

PSTN	
Name	<b>Bonnie Kent</b>
Location	-
Webcam Resolution	-
Join & Leave Times	<b>2:06 PM - 3:16 PM</b> 70 min
Average Quality	-
▼	

VOIP	

# Dauphin County Public Needs Meeting 2

ID: 899337365, Max Participants: 5

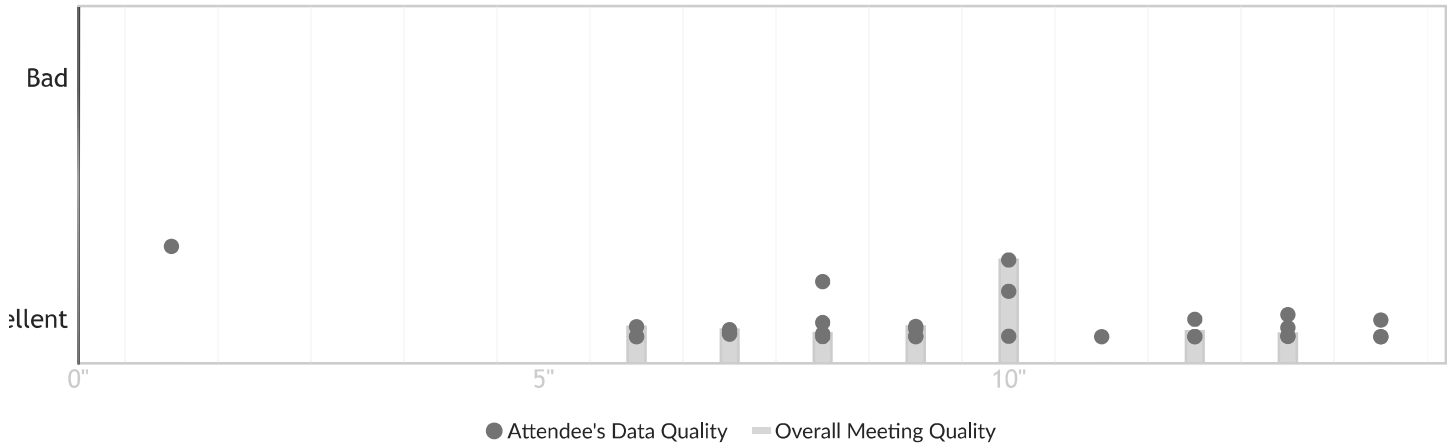
10/25/2021

5:57 PM - 6:11 PM 15 min

### Features Used:



## NETWORK DEGRADATION



VOIP	
Name	Bill Wasielewski
Location	New York
Webcam Resolution	-
Join & Leave Times	5:57 PM - 6:11 PM 15 min
Average Quality	-
▼	

VOIP	
Name	Brown, Doug
Location	Harrisburg (Downtown Harrisburg)
Webcam Resolution	-
Join & Leave Times	5:57 PM - 6:11 PM 15 min
Average Quality	-
▼	

## Zoning Appendix

### Highspire Borough

Date of Ordinance: Amended 11/15/2011, Definitions enacted 06/19/2012

Accessed at: <http://www.highspire.org/index.php/borough-offices/codes-zoning/ordinances-directory>

Scoring: 1 – Low risk for discrimination, Regulatory Provision Present

2 – High risk for discrimination, Regulatory Provision not Present

Zoning Ordinance Regulatory Provision	Score	Notes
<p>1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit</p> <p><i>Ex: Two or more persons who live in the same dwelling unit and function as a single housekeeping unit</i></p>	2	<p>2-19, FAMILY: One or more persons related by blood, marriage, legal guardianship, licensed or court-appointed foster care or legal adoption, including any domestic servants or gratuitous guests thereof, who maintain one common household and reside in one dwelling unit; or <b>no more than four (4) persons who are not related to each other by blood</b>, marriage, legal guardianship, licensed or court-appointed foster care, or legal adoption. A roomer, boarder or lodger is not considered a family member; any number of persons possessing a handicap within the meaning of the Fair Housing Act (42 USC Section 3602(h), or successor legislation) who reside in one dwelling unit and live and cook together as a single housekeeping unit. This term shall also include the number(s) of unrelated persons defined by and <b>consider those living in a Group Care and Group Home.</b></p>
<p>2. Ordinance defines “group home” or similarly named land use as “a single family dwelling unit”</p>	1	<p>14-6, F(6) Occupants of the group home facility shall live as a family unit.</p> <p>See also definition of group home in (3) below.</p> <p>2-18 DWELLING, UNIT: One or more rooms used for living and sleeping purposes and having a kitchen(s) with fixed cooking facilities, toilet and bathroom facilities and <b>arranged for occupancy by not more than one family.</b></p>
<p>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</p>	1	<p>2-24, GROUP HOME: A <b>dwelling</b> inhabited by <b>not more than eight (8)</b> handicapped persons, as identified and provided for by the Fair Housing Act and this chapter. This definition does not include persons occupying a hotel, motel, bed and breakfast, halfway house, boarding house, treatment center or institution. A group home involves persons functioning as a <b>common household unit</b>, providing non-routine support services and oversight to persons who need such assistance to avoid being placed within an institution because of physical disability, old age, or mental retardation/developmental disability, or that the applicant proves to the satisfaction of the Zoning Officer meets the definition of “handicap”, as defined by applicable federal law.</p>
<p>4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions</p>	2	<p>14-6, F(1) Whenever a party or parties seeks to occupy a dwelling or other building as a group home facility, the party or parties shall file a detailed statement of intent with the Borough describing the proposed use of the dwelling or building. Such statement shall detail the proposed number and nature of the anticipated occupants. The statement shall identify how said use satisfies a demonstrative need and shall be conducted in a responsible manner without detriment to surrounding properties and neighborhood.</p>

		14-6, F(2) No portion of a group home shall be located within five hundred (500) feet of another group home facility, group care facility, half way house and/or treatment center, but in no case shall be located within the same block.
5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions	2	None found.
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	1	6-3 Forward, Permitted use tables DWELLING, MULTI-FAMILY/APARTMENT: A building designed, occupied and used by three (3) or more families living independently of each other, wherein each dwelling unit or apartment shall contain its own private bath and kitchen facilities. Includes apartment houses/homes. (i.e. three [3] or more dwelling units on one [1] lot.)
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)	1	Does not distinguish based on search of ordinance.
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	2	6-3 Forward, Permitted use tables Emergency housing, homeless shelters, and transitional or supportive housing are not permitted uses in any categories. This means that these types of housing are only allowed only through a special exception use permit.
9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units	2	6-3 Forward, Permitted use tables Manufactured/modular housing is not listed as a permitted use in any category. This means that these types of housing are only allowed only through a special exception use permit, as are mobile home parks.
10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	1	[¼ acre = 10,890 sq. ft or less] 7-3, RL single fam 3,500 sq ft. / RM single fam 3,000-4,000 sq ft.
<b>Highspire Borough TOTAL SCORE</b>	<b>15 HIGH</b>	



## Upper Paxton Township

Date of Ordinance: Supp 22, Feb 2020

Accessed at: <https://upperpaxtontwp.org/gencode/Chapter%2027%20-%20Zoning.pdf>

Scoring: 1 – Low risk for discrimination, Regulatory Provision Present  
2 – High risk for discrimination, Regulatory Provision not Present

Zoning Ordinance Regulatory Provision	Score	Notes
1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit <i>Ex: Two or more persons who live in the same dwelling unit and function as a single housekeeping unit</i>	2	27:21 FAMILY — A single individual doing his/her own cooking and living upon the premises as a separate housekeeping unit, or <b>no more than three unrelated individuals</b> doing their own cooking and living together upon the premises as a separate housekeeping unit in a domestic relationship based upon birth, legal marriage or other domestic bond. This definition <b>does not include</b> a collective body of persons occupying a hotel, dormitory, lodge, boardinghouse/ rooming house, family care/group care facility, commune or institution.
2. Ordinance defines “group home” or similarly named land use as “a single family dwelling unit”	2	Group home is not defined, but family care/group care are specifically excluded from family definition in (1) above.
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	2	27: 51, Uses Table Group homes are not permitted uses in any categories. This means that these types of housing are only allowed only through a special exception use permit.
4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	1	Group home is not defined or included within the ordinance, except that family care/group care are specifically excluded from family definition in (1) above.
5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions	2	None found.
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	2	Separate multi-family residential zoning district that is <u>extremely</u> limited subset of residential suburban. Zoning map: <a href="https://upperpaxtontwp.org/docs/UpperPaxtonZoning_2019.pdf">https://upperpaxtontwp.org/docs/UpperPaxtonZoning_2019.pdf</a>  27:225 Table of Zoning Map Amendments (27-1901) Ord. No. 5-14-2003 and Ord. No. 8-13-2003: All parcels designated as RM were moved back to RS.
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)	1	Does not distinguish based on search of ordinance.
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	2	27: 51, Uses Table Emergency housing, homeless shelters, and transitional or supportive housing are not permitted uses in any categories. This means that these types of housing are only allowed only through a special exception use permit.
9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units	1	27: 51, Uses Table – Permitted in RS and RM, and within mobile home parks in RMP areas.

<p>10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less</p>	<p>1</p>	<p>[¼ acre = 10,890 sq. ft or less]  Res. Suburban min. lot size = 12,000 sq. ft., also applies to sf detached in Res. Multifamily  Multifam housing types, except sf-detached (above), are between 4,000-6,000 sq. ft  * <b>Note that RM Zoning area is extremely limited.</b></p>
<p><b>Upper Paxton Township  TOTAL SCORE</b></p>	<p>16  <b>HIGH</b></p>	

## Londonderry Township

Date of Ordinance: Updates through 05/21 for all ordinances

Accessed at: <https://ecode360.com/11770456>

Scoring: 1 – Low risk for discrimination, Regulatory Provision Present

2 – High risk for discrimination, Regulatory Provision not Present

Zoning Ordinance Regulatory Provision	Score	Notes
1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit <i>Ex: Two or more persons who live in the same dwelling unit and function as a single housekeeping unit</i>	2	Part 3, Definitions: FAMILY One or more persons occupying one single dwelling unit and maintaining one common household unit, <b>not including more than five persons</b> who are not related to each other by blood, official foster relationship, marriage or adoption, or occupants of a club, <b>institutional use</b> , facility that's primary purpose is to house persons who have been adjudicated through the criminal justice system, and fraternity, lodging or boarding house. <b>The term "family" may specifically include a maximum of five unrelated persons living within a permitted group home.</b>
2. Ordinance defines “group home” or similarly named land use as “a single family dwelling unit”	1	Yes, per definition in (1) above.
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	2	Per definition in (1) above, ordinance limited to 5 unrelated persons. More than 5 unrelated persons meets the definition of institutional use, per (8) below.
4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	1	No additional provisions identified.
5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions	2	None found.
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	1	Part 7, R2 - multi-family residential, suburban category.
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)	1	Does not distinguish based on search of ordinance.
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	2	Part 10, Section 1002 – Permitted Uses: Convalescent homes and public or private hospitals, and group homes are a permitted use in Planning Research District only.  Ordinance defines these types of facilities under Part 3, Definitions INSTITUTIONAL USE: Any use dedicated to public care and/or service of including but not limited to those within the following classifications: 1. Residential institutions: includes but is not limited to dormitories, homeless shelters, orphanages, and community care facilities for handicapped individuals, as defined in Title VIII of the Civil Rights Act of 1968, as amended, by the Fair Housing Act of 1988, housing more than five individuals.

9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units	2	Permitted only in specifically zoned mobile home-residential areas. Part 6, Section 602 – R1 Permitted Uses: Single-family detached dwellings, with the exception of mobile homes, as defined in Part 3 hereof. Part 7, Section 702 – R2 Permitted Uses, references R1 permitted uses.
10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	1	[¼ acre = 10,890 sq. ft or less] Part 6, Section 604 (2) Area Regulations – R1 (Single-family Country): Min. lot size 1 acre Part 7, Section 704 (2) Area Regulations – R2 (Multi-family Suburban): Min. lot size per single-family detached, two-family detached or single-family semidetached dwelling unit 1 acre or 15,000 sq ft with public water/sewer service provided <b>Part 7, Section 704 (4) Area Regulations</b> – R2 (Multi-family Suburban): The lot area per single-family attached dwelling unit shall be a minimum of 3,000 square feet for interior units and 5,250 square feet for end units.
<b>Londonderry Township TOTAL SCORE</b>	<b>15 HIGH</b>	



## East Hanover Township

Date of Ordinance: 12/4/19

Accessed at:

[https://www.easthanovertwpdcpa.org/sites/g/files/vyhlf6586f/uploads/zoning\\_ordinance\\_2019-06.pdf](https://www.easthanovertwpdcpa.org/sites/g/files/vyhlf6586f/uploads/zoning_ordinance_2019-06.pdf)

Scoring: 1 – Low risk for discrimination, Regulatory Provision Present  
2 – High risk for discrimination, Regulatory Provision not Present

Zoning Ordinance Regulatory Provision	Score	Notes
1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit <i>Ex: Two or more persons who live in the same dwelling unit and function as a single housekeeping unit</i>	2	Article 15, Definitions (p.166): Family. One or more individuals related by blood, marriage, civil union or adoption (including persons receiving formal foster care) or <b>4 or fewer unrelated individuals</b> who maintain a common household, occupy shared kitchen and living spaces and live within one dwelling unit. A family <b>shall also expressly include numbers of unrelated persons provided by the Group Home provision of Section 1306.02</b> residing within a licensed group home, as defined herein.
2. Ordinance defines “group home” or similarly named land use as “a single family dwelling unit”	1	Article 15, Definitions (p.167): Group Home. A dwelling unit... Article 15, Definitions (p.166): Dwelling unit. A single habitable living unit occupied by only one “family.” See definition of family in (1) above.
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	2	Article 6, Specific Uses (p. 76) 32(c). Group Homes: In a residential district, a Group home shall include the housing of a maximum of 4 unrelated persons by right and <b>up to 6 unrelated persons by special exception</b> . In a commercial or industrial district, a Group Home shall include the housing of a maximum of 8 unrelated persons.
4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	2	Addn. regulatory provisions included in Article 6, Specific Uses (p. 76-77) 32
5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions	1	Article 14, Administration (p. 155): Section 1411(D)(5) – Persons with Disabilities including reasonable accommodation.
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	1	Article 3, Allowed uses – Residential (p. 6), permitted in village residential (VR)
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)	1	Does not distinguish based on search of ordinance.
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	2	Article 4, Allowed Uses – Non-residential (p.19) Temporary/Emergency shelter is only permitted in non-residential zoning districts by special exception. Emergency housing, homeless shelters, and transitional or supportive housing are not permitted uses in any categories. This means that these types of housing are only allowed only through a special exception use permit.

9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units	1	Article 3, Allowed uses – Residential (p. 6), Permitted in all zoning areas
10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	1	[¼ acre = 10,890 sq. ft or less] Article 5, Dimensional Requirements in each District (p.30 forward) Medium Density Residential, Townhouses and Apts are avg. 10,000 sq. ft.
<b>East Hanover Township TOTAL SCORE</b>	14 <b>MODERATE</b>	

## South Hanover Township

Date of Ordinance: Amended through 2021

Accessed at: <https://ecode360.com/34457097>

Scoring: 1 – Low risk for discrimination, Regulatory Provision Present

2 – High risk for discrimination, Regulatory Provision not Present

Zoning Ordinance Regulatory Provision	Score	Notes
1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit <i>Ex: Two or more persons who live in the same dwelling unit and function as a single housekeeping unit</i>	1	27-203 Definitions, FAMILY A single individual doing his/her own cooking and living upon the premises as a separate housekeeping unit or <b>a collective body of persons</b> doing their own cooking and living together upon the premises as a separate housekeeping unit in a domestic relationship based upon birth, legal marriage or other domestic bond. This definition does not include a collective body of persons occupying a hotel, dormitory, lodge, boarding/rooming house, commune or institution.
2. Ordinance defines “group home” or similarly named land use as “a single family dwelling unit”	1	27-203 Definitions, GROUP HOME The use of any lawful <b>dwelling unit</b> which meets all the following criteria: 1. Involves the care of no more than the maximum number of persons permitted consistent with the minimum area requirements of the BOCA National Property Maintenance Code, 1996 Edition, § PM-405.0, "Occupancy Limitations," as the same may be amended from time to time, but, in no event, <b>no more than six persons regardless of the size and dimensions of the dwelling unit.</b> <b>2. Involves persons functioning as a common household.</b> 3. Involves providing nonroutine support services and oversight to persons who need such assistance to avoid being placed within an institution, because of physical disability, old age, mental retardation or other "handicap" as defined by applicable federal law. 4. Does not meet the definition of "boarding house," "institutional care facility" or "lodging house." 5. Does not involve the housing or treatment of persons who could be reasonably be considered a threat to the physical safety of others.
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	1	Yes – See definition in (2) above.
4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	1	No additional regulatory provisions found.
5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions	2	Not found.

6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	1	27-702 Residential Multifamily, permitted uses 27-802 Residential Village District, permitted uses
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)	1	Does not distinguish based on search of ordinance.
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	2	Emergency housing, homeless shelters, and transitional or supportive housing are not permitted uses in any categories. This means that these types of housing are only allowed only through a special exception use permit.
9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units	1	22-702 Location of mobile homes. [Ord. No. 74-1977, § 703, 7/12/1977] Mobile homes shall be permitted to be placed upon land other than in a mobile home park following removal of the tongue and the installation of full skirting around the mobile home and upon the compliance with the same provisions and restrictions of this chapter that are placed upon the erection of a single-family dwelling on the same parcel of land.
10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	1	[¼ acre = 10,890 sq. ft or less] Ordinance No. 3-2021: Amendment to RM, Section 27-705 Residential multifamily 6,000 sq. ft. min. 27-805 Residential Village District, Lot area – 4,500 sq. ft. for apartments up to 7,200 sq. ft. for single-family detached
<b>South Hanover Township TOTAL SCORE</b>	<b>12 LOW</b>	



## Lower Swatara Township

Date of Ordinance: Enacted in 1993 with updates through 7/7/21

Accessed at: <https://ecode360.com/LO3632>

Scoring: 1 – Low risk for discrimination, Regulatory Provision Present

2 – High risk for discrimination, Regulatory Provision not Present

Zoning Ordinance Regulatory Provision	Score	Notes
<p>1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit</p> <p><i>Ex: Two or more persons who live in the same dwelling unit and function as a single housekeeping unit</i></p>	1	<p>27-203 Definitions, FAMILY</p> <p>A single individual doing his/her own cooking and living upon the premises as a separate housekeeping unit, or <b>a collective body of persons</b> doing their own cooking and living together upon the premises as a separate housekeeping unit in a domestic relationship based upon birth, legal marriage or other domestic bond. <b>This definition does not include a collective body of persons occupying a hotel, dormitory, lodge, boarding/rooming house, commune or institution.</b></p>
<p>2. Ordinance defines “group home” or similarly named land use as “a single family dwelling unit”</p>	2	<p>27-203 Definitions, FAMILY-CARE FACILITY</p> <p>An <b>institutional facility</b> providing shelter, counseling and other rehabilitative services in a family-like environment for <b>four to eight residents</b>, plus such minimum supervisory personnel as may be required to meet standards of the licensing agency. Residents under supervisory care may not be legally related to the facility operators or supervisors and, by reason of mental or physical disability, chemical or alcohol dependency, or family or school adjustment problems, require a minimal level of supervision but do not require medical or nursing care or general supervision.</p> <p>27-203 Definitions, GROUP CARE FACILITY – Same definition as above, but for 9-15 residents</p> <p>Group homes are regulated as institutional facilities, not as single-family dwelling units.</p>
<p>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</p>	1	<p>Yes, see (1) above.</p>
<p>4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions</p>	1	<p>Group homes are regulated as institutional facilities, not as single-family dwelling units; however, there are no additional regulatory provisions imposed.</p>
<p>5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions</p>	2	<p>Not found.</p>
<p>6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right</p>	1	<p>Yes – Res. Multifamily (RM)</p>
<p>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)</p>	1	<p>Does not distinguish based on search of ordinance.</p>

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	2	Emergency housing, homeless shelters, and transitional or supportive housing are not permitted uses in any categories. This means that these types of housing are only allowed only through a special exception use permit.
9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units	2	Prohibited in RS, RU, RM districts (Permitted uses under each district type) Permitted only in Residential Mobile home district.
10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	1	[¼ acre = 10,890 sq. ft or less] 27-605, Lot Area Residential Urban District 27-704, Lot Area Residential Multifamily District Both RU and RM have min. lot. req. for single-family detached of 10,000 sq. ft. for lots provided with both public sewage and water. Min lot req is 2,400 sq. ft. for townhomes, and 4,000 sq. ft. for apartments.
<b>Lower Swatara Township TOTAL SCORE</b>	<b>14 MODERATE</b>	

## Swatara Township

Date of Ordinance: enacted 7/27/2010

Accessed at: <https://ecode360.com/11636509>

Scoring: 1 – Low risk for discrimination, Regulatory Provision Present

2 – High risk for discrimination, Regulatory Provision not Present

Zoning Ordinance Regulatory Provision	Score	Notes
1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit <i>Ex: Two or more persons who live in the same dwelling unit and function as a single housekeeping unit</i>	2	One or more individuals related by blood, marriage or adoption (including persons receiving formal foster care) or <b>up to three unrelated individuals</b> who maintain a common household and live within one dwelling unit. A "family" shall also expressly include numbers of unrelated persons, provided by the group home provisions of § 295-62, residing within a licensed group home, as defined herein. Through those provisions and § 295-13D(5), the Township's intent is to comply with the Federal Fair Housing Act, as amended.
2. Ordinance defines “group home” or similarly named land use as “a single family dwelling unit”	1	A dwelling unit operated by a responsible individual, family or organization with a program to provide a supportive living arrangement for individuals where special care is needed by the persons served due to age or emotional, mental, developmental or physical disability. This definition shall expressly include facilities for the supervised care of persons with disabilities subject to protection under the Federal Fair Housing Act,[9] as amended. Group homes must be licensed where required by any appropriate government agencies, and a copy of any such license must be delivered to the Zoning Officer prior to the initiation of the use. A. Group homes shall be subject to the same limitations and regulations by the Township as the type of dwelling unit they occupy.
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	1	295-62 A group home shall include the housing of a maximum of six unrelated persons, except:
4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	2	Addn. provisions per 295-62
5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions	1	Yes – 295-13, Zoning Hearing Board – (D)(5)
6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	1	295-28, Use regulations – RM and RML permitted use
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)	1	Does not distinguish based on search of ordinance.
8. Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing or permanent	2	295-28, Use regulations Emergency housing, homeless shelters, and transitional or supportive housing are not permitted uses in any categories. This

supportive housing facilities exclusively to non-residential zoning districts		means that these types of housing are only allowed only through a special exception use permit.
9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units	1	295-72 Mobile/manufactured home 295-28, Use regulations
10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	1	295 Attachment 2 – Table of Area, Yard, and Building Req. RS Single-family detached, min lot area 10,000 sq ft with public water and sewer services RML Single-family detached 6,000 sq ft; Townhomes and apartments 2,800 sq ft Accessed at: <a href="https://ecode360.com/attachment/SW2044/SW2044-295b%20Dimensional%20Req%20in%20Each%20Dist.pdf">https://ecode360.com/attachment/SW2044/SW2044-295b%20Dimensional%20Req%20in%20Each%20Dist.pdf</a>
<b>Swatara Township TOTAL SCORE</b>	13 <b>MODERATE</b>	



## Lower Paxton Township

Date of Ordinance: Enacted 2006 and amended through 11/18/08

Accessed at: <https://www.lowerpaxton-pa.gov/175/Zoning-Ordinance>

Scoring: 1 – Low risk for discrimination, Regulatory Provision Present

2 – High risk for discrimination, Regulatory Provision not Present

Zoning Ordinance Regulatory Provision	Score	Notes
<p>1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit</p> <p><i>Ex: Two or more persons who live in the same dwelling unit and function as a single housekeeping unit</i></p>	2	<p>Family. One or more individuals related by blood, marriage or adoption (including persons receiving formal foster care) or <b>up to 4 unrelated</b> individuals who maintain a common household and live within one dwelling unit. <b>A family shall also expressly include numbers of unrelated persons provided by the Group Home provision of Section 402 residing within a licensed group home, as defined herein.</b> Through those provisions and Section 111.D.5, the Township’s intent is to comply with the Federal Fair Housing Act, as amended.</p>
<p>2. Ordinance defines “group home” or similarly named land use as “a single family dwelling unit”</p>	1	<p>Group Home. A dwelling unit operated by a responsible individual, family or organization with a program to provide a supportive living arrangement for individuals where special care is needed by the persons served due to age, emotional, mental, developmental or physical disability. This definition shall expressly include facilities for the supervised care of persons with disabilities subject to protection under the Federal Fair Housing Act as amended.</p> <p>See also residential uses table.</p>
<p>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</p>	1	<p>(402) A Group Home shall include the housing of a maximum of 6 unrelated persons, except:</p>
<p>4. Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions</p>	2	<p>402 Addn. Requirements – 23. Group Homes</p>
<p>5. Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation / modification to regulatory provisions</p>	1	<p>111.D Yes</p>
<p>6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right</p>	1	<p>306.B.1 Allowed uses in primarily residential zoning districts (p. 3-6) Permitted in R3</p>
<p>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)</p>	1	<p>Does not distinguish based on search of ordinance.</p>
<p>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</p>	2	<p>306.B.1 Allowed uses in primarily residential zoning districts Emergency housing, homeless shelters, and transitional or supportive housing are not permitted uses in any categories. This means that these types of housing are only allowed only through a special exception use permit.</p>

9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units	1	202 Definitions (p. 2-8), mobile/manufactured home included under single family. 402 Addn. Requirements – 32. Mobile/Manufactured Home: Installed on an individual lot or within a mobile/manufactured home park
10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	1	3-23,24 Dimensional Requirements in each district R2 min avg lot area 8,000 -10,000 sq ft depending upon dwelling type R3 multi-family min avg lot area 5,000 sq ft
<b>Lower Paxton Township TOTAL SCORE</b>	13	<b>MODERATE</b>