

LANCASTER COUNTY & CITY



2021

Analysis of Impediments to Fair Housing Choice

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Analysis of Impediments to Fair Housing Choice Lancaster County and City of Lancaster, Pennsylvania Table of Contents

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I. Introduction to the Analysis of Impediments to Fair Housing Choice

The Fair Housing Act of 1968 mandates that the U.S. Department of Housing and Urban Development (HUD) “affirmatively further fair housing” through its funded programs. HUD in turn requires funding recipients (such as the City of Lancaster and the County of Lancaster) to conduct fair housing planning to take proactive steps that will reduce discrimination in housing markets and lead to better living conditions for minority groups and vulnerable populations.

HUD mandates that each jurisdiction receiving HUD funds must complete an *Analysis of Impediments to Fair Housing* (AI) to analyze a series of fair housing issues, identify contributing factors and impediments and most importantly, identify meaningful actions to create a more integrated community with improved access to opportunity for all.

In 2016, HUD launched a new approach to identify fair housing challenges, called the *Assessment of Fair Housing* (AFH). This approach encouraged communities to embrace a more comprehensive planning process, focusing on economic, as well as housing barriers. In January 2018, HUD suspended the AFH requirements, reverting to the AI approach. This was done to give communities more time to adjust to the new AFH format.

This Analysis of Impediments (AI) is an update of Lancaster City and Lancaster County’s Plan published most recently in 2013. The purpose of the AI is for Lancaster County (County) and the City of Lancaster (City) to evaluate the housing characteristics, to identify blatant or defacto impediments to fair housing choice. It will also establish a strategy for the expansion of fair housing opportunities throughout the county and city.

Lancaster County and the City of Lancaster are proceeding with a multi-jurisdictional AI that includes many aspects of the AFH process. The overall goal of this approach is to help communities improve economic conditions for all residents.

The Housing and Community Development Act of 1974, the National Affordable Housing Act, as amended, along with the McKinney-Vento Homeless Assistance Act, as amended, govern the administration of Community Development Block Grant Program (CDBG), HOME Investment Partnership Program (HOME), and Emergency Solutions Grant (ESG) and require participating jurisdictions to certify that they will affirmatively further fair housing. This means the jurisdictions will:

1. Conduct an analysis of impediments to fair housing choice,
2. Take appropriate actions to overcome the effects of impediments identified through that analysis, and
3. Maintain records reflecting the analysis and actions.

An AI is a review of impediments or barriers that impede fair housing choice and will provide a basis for fair housing planning, provide essential information to housing stakeholders and assist in building public support for fair housing efforts.

The legislative basis for HUD's review of fair housing practices in communities that receive federal funds is the Civil Rights Act of 1968. An amendment to Title VIII of the Civil Rights Act was later passed; this amendment, known as the Fair Housing Act of 1988, expanded the scope of coverage of the law to include, as protected classes, families with children and persons with disabilities.

The Fair Housing Act covers most housing. However, in some circumstances, the Act exempts the following:

1. Owner-occupied buildings with not more than four units,
2. Single family housing sold or rented without the use of a broker, and
3. Housing operated by organizations or private clubs that limit occupancy to members.

Impediments to fair housing choice are defined as any actions, omissions, or decisions taken because of race, color, religion, gender, disability, familial status, or national origin that restrict housing choice or the availability of housing choice.

A. Methodology

HUD requires that an AI include:

1. An analysis of demographic, income, housing and employment data;
2. An evaluation of the fair housing complaints filed in the jurisdiction;
3. A discussion of impediments, if any, in:
 - a. The sale or rental of housing
 - b. Provision of brokerage services
 - c. Financing
 - d. Public policies
 - e. Administrative policies for housing and community development activities that affect fair housing resources;
 - f. Assessment of current fair housing resources; and
 - g. Conclusions and recommendations.

The AI utilizes publicly available data from several sources, including:

1. Census and other demographic data;
2. Consolidated Plan and associated planning documents;
3. Fair housing complaint data from HUD;
4. Information from Lancaster Housing Opportunity Partnership's (LHOP) Housing Equity and Equality Institute (HEEI);
5. Internet resources; and
6. Local resources.

In addition to the identification of impediments, jurisdictions are required to develop methods to address the issues that limit the ability of residents to rent or own housing, regardless of their inclusion in a protected class.

Fair housing choice is defined as the “ability of persons, regardless of race, color, religion, gender, national origin, familial status, or handicap, of similar income levels to have available to them the same housing choices.” The AI encompasses the following five areas:

1. The sale or rental of dwellings (public or private),
2. The provision of housing brokerage services,
3. The provision of financing assistance for dwellings,
4. Public policies and actions affecting the approval of sites or other building requirements used in the approval process for the construction of publicly assisted housing, and,
5. The administrative policies concerning community development and housing activities, which affect opportunities for minority households to select housing inside or outside areas of minority concentration.

In a Final Rule, effective March 5, 2012, HUD implemented a policy to ensure that its core programs are open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status. HUD implemented this policy in reaction to evidence that lesbian, gay, bisexual and transgender (LGBT) individuals and families are being arbitrarily excluded from housing opportunities in the private sector. This final rule prohibits discrimination against these groups by any housing provider receiving HUD funding and those who are insured by the Federal Housing Administration, including lenders.

The Pennsylvania Human Relations Act, as amended, prohibits housing discrimination based on race, color, sex, religion, national origin, ancestry, handicap or disability, guide dogs, support animals, age (40 and above), pregnancy, familial status (families with children under the age of 18), use of a guide or support animal due to blindness, deafness, or physical disability or the disability of an individual with whom the person is known to have a relationship or association. Pennsylvania’s law differs primarily in that the age category is lowered to 40 years of age.

B. Development of the Plan

In partnership with the City, the Redevelopment Authority created an AI Planning Committee that guided the development of the AI. It consisted of the following participants:

- Susannah Thorsen, City of Lancaster
- Adrian Garcia, Lancaster Housing Opportunity Partnership (now employed at the Pennsylvania Human Relations Commission)
- Britany Mellinger, Director, Housing Equity and Equality Institute, Lancaster Housing Opportunity Partnership (LHOP)
- Emma Hamme, Lancaster County Planning Commission (now employed at the City of Lancaster)
- Jo Raff, Community Basics, Inc.
- Aimee Tyson, Lancaster County Redevelopment Authority

Special thanks to Rose Long of the Lancaster County Planning Commission for providing much of the data in this report.

The Planning Committee, the Data Collection Committee and the Outreach Committee all began meeting in the summer of 2019 and worked through early 2020. Then the world changed due to the COVID-19 pandemic in March 2020. Both the City and the County were focused on administering the federal CARES funds to address critical crisis needs and the plan was stalled. Our country is seeing the light at the end of the tunnel with the distribution of vaccines. While most residents are still seeing the dire impact of the pandemic on their lives, their housing and their incomes; federal, state and local resources have been distributed to attempt to meet the need. Eviction moratoriums were put in place by the federal, state and local governments to keep people in their homes.

Pre-COVID, the Redevelopment Authority and the City of Lancaster completed a comprehensive review of demographics for the County and the City including but not limited to population, housing, income and employment. Public policies were also reviewed to determine if a disparate impact was created for fair housing. The AI Planning Committee analyzed the demographic information and public policies to finalize the list of impediments to fair housing. Given the massive upheaval caused by the virus, most of the data collected before the pandemic is irrelevant. However, it is the best we have. The AI Planning Committee has attempted to supplement the pre-COVID data with recent information but that too is limited and not necessarily a predictor of the future housing dynamics.

Citizen Participation

The Outreach Committee met with various social service entities to discuss the issue of impediments to fair housing at the following dates and locations:

July 25, 2019 – Columbia Connections

August 28, 2019 – Together Initiative Network

September 24, 2019 – Elanco Community Collaboration

October 7, 2019 – Elizabethtown Area Hub

October 8, 2019 – Northern Hub

November 18, 2019 – Homeless Service Provider Network

November 21, 2019 – Solanco Family Life Network

December 6, 2019 – Coalition for Sustainable Housing

In the Fall of 2019, the Outreach Committee created and distributed a survey for social service professionals that work with vulnerable clients to obtain feedback on housing choices. A summary of responses is included in the Appendix.

Comment boxes were set up at libraries and social service agencies to allow citizens to provide input on what prevents them from living where they want to live. A summary of comments is included in the Appendix.

The Analysis of impediments to Fair Housing was released on February 12, 2021 along with an “Citizen Summary”. The notification of its release was made on www.lchra.com, www.cityoflanasterpa.com, partner websites, Facebook pages and the local newspaper (LNP) and Lancasteronline.com. The County and City held a virtual public hearing on March 2, 2021. A more informal virtual meeting was held on March 4, 2021, 2021 to obtain feedback on the plan from the landlords, service providers and general community members. The recorded meeting was then posted on Facebook to obtain further comments by those that were unable to attend the virtual meeting.

C. Definitions

1. Consolidated Plan

The Consolidated Plan is designed to help states and local jurisdictions to assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions. The consolidated planning process serves as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from three HUD formula block grants programs: CDBG, HOME, and ESG.

2. Cost burdened

Families that pay more than 30 percent of their income for housing are considered cost burdened and may have difficulty affording necessities such as food, clothing, transportation, and medical care.

3. Disability

Federal laws define a person with a disability as “Any person who has physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such an impairment.”

4. Housing Need

Housing needs are defined as households with any housing problems such as a cost burden greater than 30% of income and/or overcrowding and/or without complete kitchen or plumbing facilities.

5. Impediments

Defined as: any actions, omissions, or decisions taken because of color, race religion, gender, disability, familial status, or national origin that restrict housing choice or the availability of housing choice.

6. Infrastructure

The term infrastructure refers to the substructure or underlying foundation or network used for providing goods and services; especially the basic installations and facilities on which the continuance and growth of a community, State, etc. depend. Examples include roads, water systems, communications facilities, sewers, sidewalks, cable, wiring, schools, power plants, and transportation systems.

7. Protected Class

Classes of the population that are protected under the Federal Fair Housing Act are: race, color, religion, gender, national origin, disability (added in 1988), and familial status (having children under 18 in a household, including pregnant women, added in 1988).

8. Publicly Supported Housing

The monthly cost to the tenants is subsidized by federal state or other programs including but not limited to Housing Choice Vouchers, Section 811 Vouchers, etc.

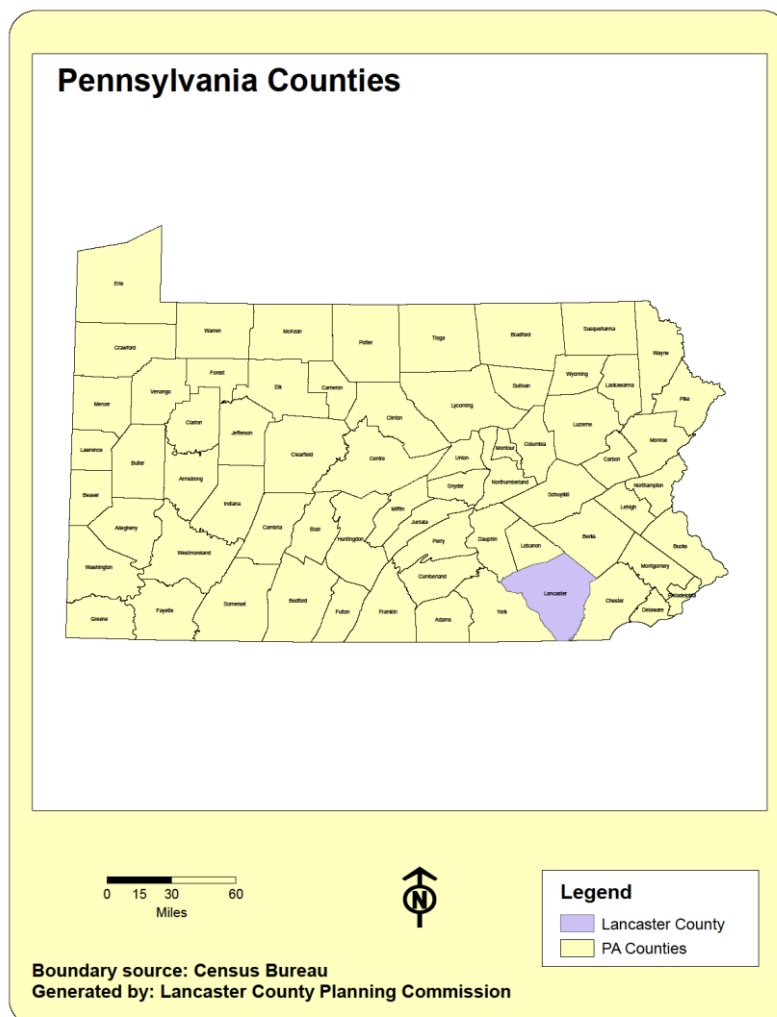
II. Data Analysis

A. Background Information – Understanding the social, racial, economic and other characteristics of a population, as well as how those characteristics change over time, is crucial to evaluating current and future housing needs. Analyzing demographic trends can indicate places or people who may not be served by the housing market and who need assistance or intervention. The goal of data analysis is to inform future strategies to increase access to housing opportunities by all residents.

1. Overview of Lancaster County and City of Lancaster

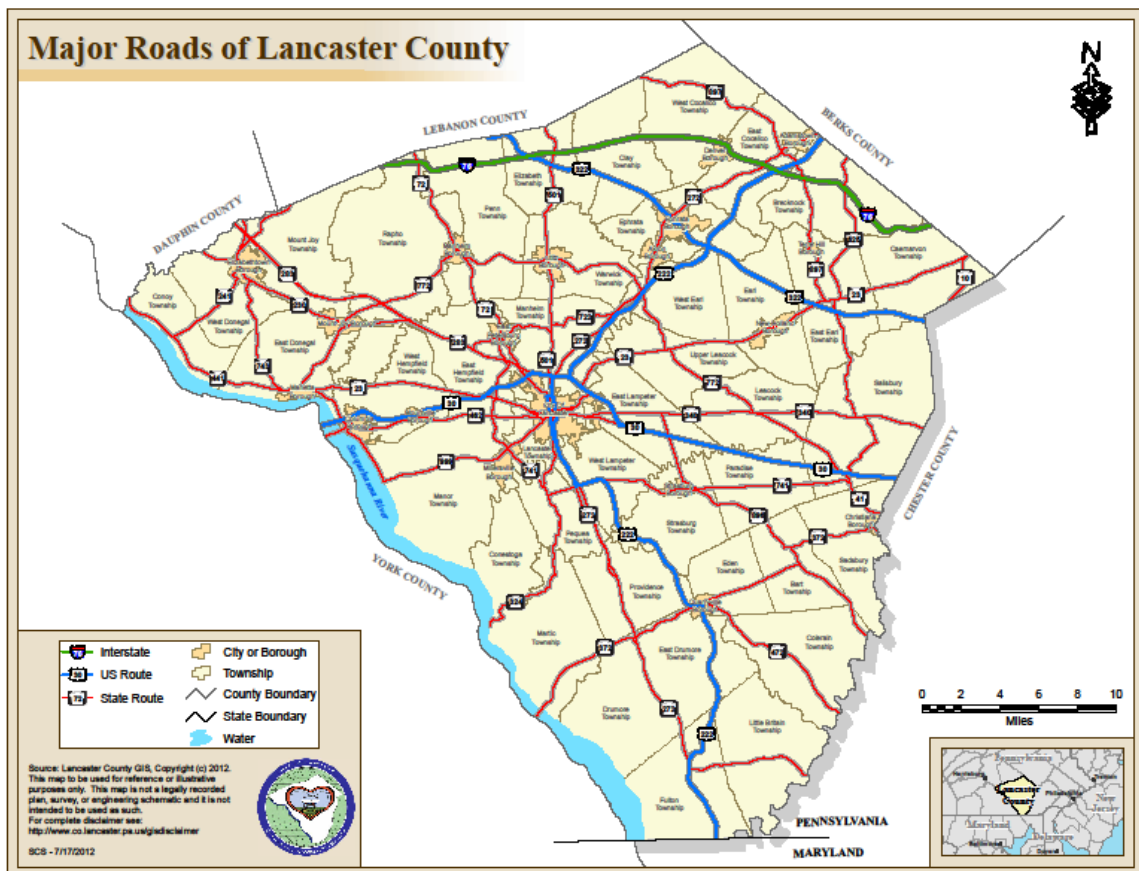
Lancaster County is in south central Pennsylvania and is bordered by York, Dauphin, Lebanon, Berks and Chester counties. The county also borders the State of Maryland to the south. It is 984 square miles and with the City of Lancaster, forms the Lancaster Metropolitan Statistical Area (MSA). The city of Lancaster is 7.3 square miles.

Figure 1. Pennsylvania Counties



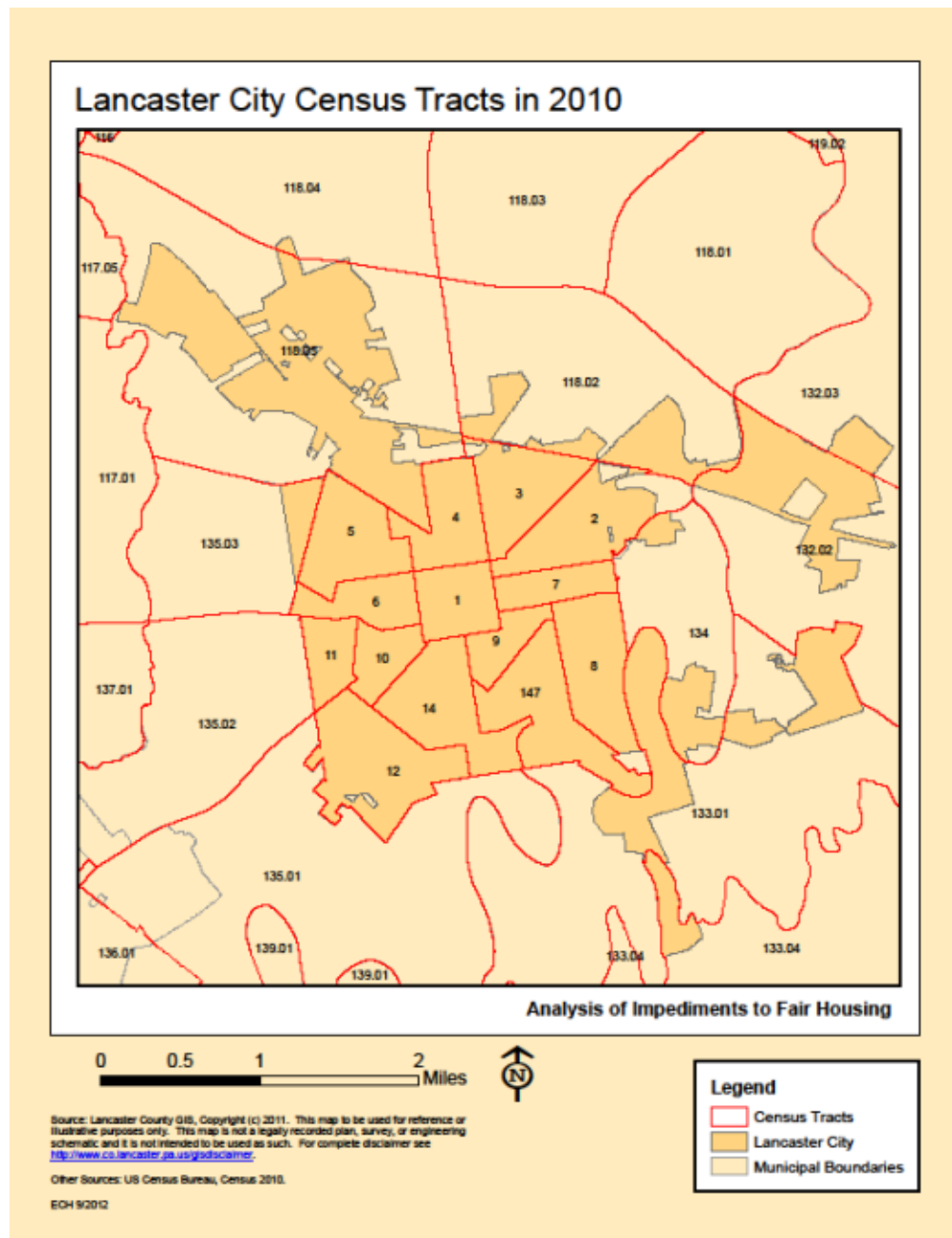
Lancaster County is bisected to the north by the Pennsylvania Turnpike (Interstate 76) and through the middle by US Route 30 (Lincoln Highway). Route 283 runs through the northwestern part of the County and Route 322 runs in the northeast. Route 222 runs north and south through the county. Figure 3 illustrates these and other major travel routes in the County.

Figure 3. Major Transportation Routes in Lancaster County



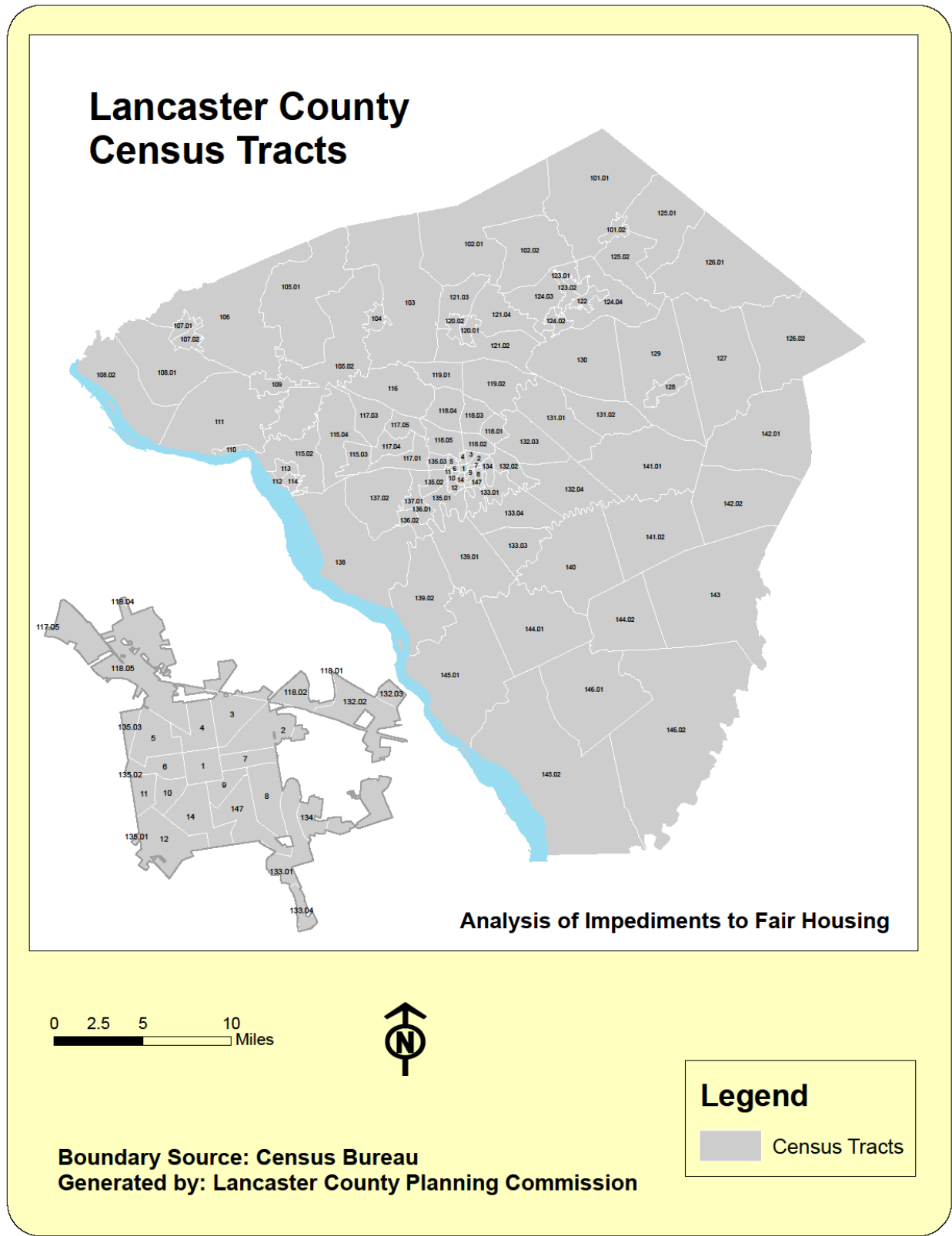
Data for the County and City is frequently made available through the Census in geographic areas called census tracts. Figure 4 is a map of the census tracts in the City.

Figure 4. Lancaster City Census Tracts



Source: Lancaster County GIS; U.S. Census Bureau, 2010 Census

Figure 5. Census Tracts in Lancaster County



2. Demographic Data

a. Population

The 2013-2017 American Community Survey (ACS) 5-Year Estimates indicate that Lancaster County's population is 536,494.

Table 1. Municipal Population in Lancaster County

Municipality	2010	ACS Estimate	Percent Change	Municipality	2010	ACS Estimate	Percent Change
Adamstown Borough	1,772	2,196	24%	Lititz Borough	9,369	9,269	-1%
Akron Borough	3,876	3,975	3%	Little Britain Township	4,106	4,217	3%
Bart Township	3,094	3,286	6%	Manheim Borough	4,858	4,881	0%
Brecknock Township	7,199	7,432	3%	Manheim Township	38,133	39,568	4%
Caernarvon Township	4,748	4,794	1%	Manor Township	19,612	20,571	5%
Christiana Borough	1,168	954	-49%	Marietta Borough	2,588	2,615	1%
Clay Township	6,308	6,780	7%	Martic Township	5,190	5,232	1%
Colerain Township	3,635	3,808	5%	Millersville Borough	8,168	8,366	2%
Columbia Borough	10,400	10,430	0%	Mount Joy Borough	7,410	8,071	9%
Conestoga Township	3,776	3,866	2%	Mount Joy Township	9,873	10,790	9%
Conoy Township	3,194	3,418	7%	Mountville Borough	2,802	2,848	2%
Denver Borough	3,861	3,877	0%	New Holland Borough	5,378	5,445	1%
Drumore Township	2,560	2,631	3%	Paradise Township	5,131	5,513	7%
Earl Township	7,024	7,177	2%	Penn Township	8,789	9,337	6%
East Cocalico Township	10,310	10,460	1%	Pequea Township	4,605	4,752	3%
East Donegal Township	7,755	8,202	6%	Providence Township	6,897	6,991	1%
East Drumore Township	3,791	3,849	2%	Quarryville Borough	2,576	2,736	6%
East Earl Township	6,507	6,792	4%	Rapho Township	10,422	11,654	12%
East Hempfield Township	23,522	24,218	3%	Sadsbury Township	3,395	3,483	3%
East Lampeter Township	16,242	16,942	4%	Salisbury Township	11,062	11,385	3%
East Petersburg Borough	4,606	4,528	-2%	Strasburg Borough	2,809	2,907	3%

Municipality	2010	ACS Estimate	Percent Change	Municipality	2010	ACS Estimate	Percent Change
Eden Township	2,094	2,039	-3%	Strasburg Township	4,182	4,282	2%
Elizabeth Township	3,886	3,963	2%	Terre Hill Borough	1,295	1,359	5%
Elizabethtown Borough	11,545	11,579	0%	Upper Leacock Township	8,708	8,879	2%
Ephrata Borough	13,394	13,785	3%	Warwick Township	17,783	18,474	4%
Ephrata Township	9,400	10,189	8%	West Cocalico Township	7,280	7,412	2%
Fulton Township	3,074	3,159	3%	West Donegal Township	8,260	8,645	5%
Lancaster City	59,322	59,556	0%	West Earl Township	7,868	8,193	4%
Lancaster Township	16,149	17,038	6%	West Hempfield Township	16,153	16,426	2%
Leacock Township	5,220	5,479	5%	West Lampeter Township	15,209	15,791	4%

Source: Census 2010 and 2013-2017 ACS 5-Year Estimates

Relying on percent change by municipality can be misleading. For example, Adamstown saw a 24% increase in population; however, it was only a net gain of 424 people. Ephrata Township saw an increase of 789 people and only had a percent increase of 8%.

While the percent change has grown steadily over the past three decade, the numeric increased remain at approximately 40,000 additional residents per decade.

Claritas, a data resource used by the Lancaster County Planning Commission, projects that by 2024 the population for Lancaster County will be 561,092 or 2.43% which indicates a reduction in population growth rates from previous projections. Claritas also projects that the City of Lancaster will grow by 1.51% in 2024 which is a slowing of growth rates from previous years.

Interpretation 1: The County and City are growing although at a slower rate than in previous years. More people required an increased emphasis on education about fair housing and increased access to persons with questions about fair housing.

b. Households and Families

There were an estimated 198,565 households in Lancaster County according to the 2013-2017 ACS 5-Year Estimates. The household size is slightly higher than the state at 2.64 persons per household but on par with the United States.

There are 139,173 families in Lancaster County; the average family size is 3.15.

Table 2. 2019 Estimated Households by Household Size for Lancaster County and City

Household Size	Lancaster City		Lancaster County	
	Number	Percent	Number	Percent
1 Person Household	7,356	32.37	50,713	24.67
2 Person households	6,349	27.94	72,912	35.47
3 Person Households	3,515	15.47	32,755	15.93
4 Person Household	2,714	11.94	26,562	12.92
5 Person Household	1,449	6.38	12,368	6.02
6 Person Household	733	3.23	5,428	2.64
7 or more person Household	607	2.67	4,842	2.36

Source: Claritas

Claritas estimates that the average household size in 2019 was 2.6 for the County and 2.55 for the City of Lancaster.

Claritas projects that the number of households in Lancaster County will rise to 211,073 in 2024 which is a 2.67% increase over the estimated number in 2019 of 205,580. Claritas projects that the number of households in the City of Lancaster will rise to 23,152 in 2024 which is 1.89% higher than the 2019 estimate of 22,723.

Table 3. 2019 Estimated Households by Presence of Own Children

	Lancaster City		Lancaster County	
	Number	Percent	Number	Percent
	13,112		143,716	
Married Couple, own children	2,868	21.87%	46,044	32.04%
Married-Couple, no own children	3,996	30.48%	69,858	48.61%
Male Householder, own children	720	5.49%	4,163	2.90%
Male Householder no own children	677	5.16%	3,941	2.74%
Female Householder, own children	3,143	23.97%	11,339	7.89%
Female householder, no own children	1,708	13.03%	8,371	5.82%

Interpretation 2: It is significant that the 2019 Estimates from Claritas show a significant difference between the City and the County in the percent of Female Householders with their own children. Lancaster City is estimated to have 23.97 % of householders headed by females with their own children while the County shows only 7.89 of the same. Not surprisingly, there is a significant difference between the percent of married-couple families with their own children in the City (21.87%) than the County (32.04%). The presence of

children is a protected class so information and education on this issue may be needed more in the City than in the County.

c. Age Distribution

Lancaster County has 6.5% of its residents under the age of 5; 23.5 of its population is under the age of 18. Residents over the age of 65 comprised 17.9% of the population. These percentages are comparable to the state and nation.

The total percent by category shown below is similar to the percentages shown in the 2010 Census.

Table 4. Lancaster County Residents by Age

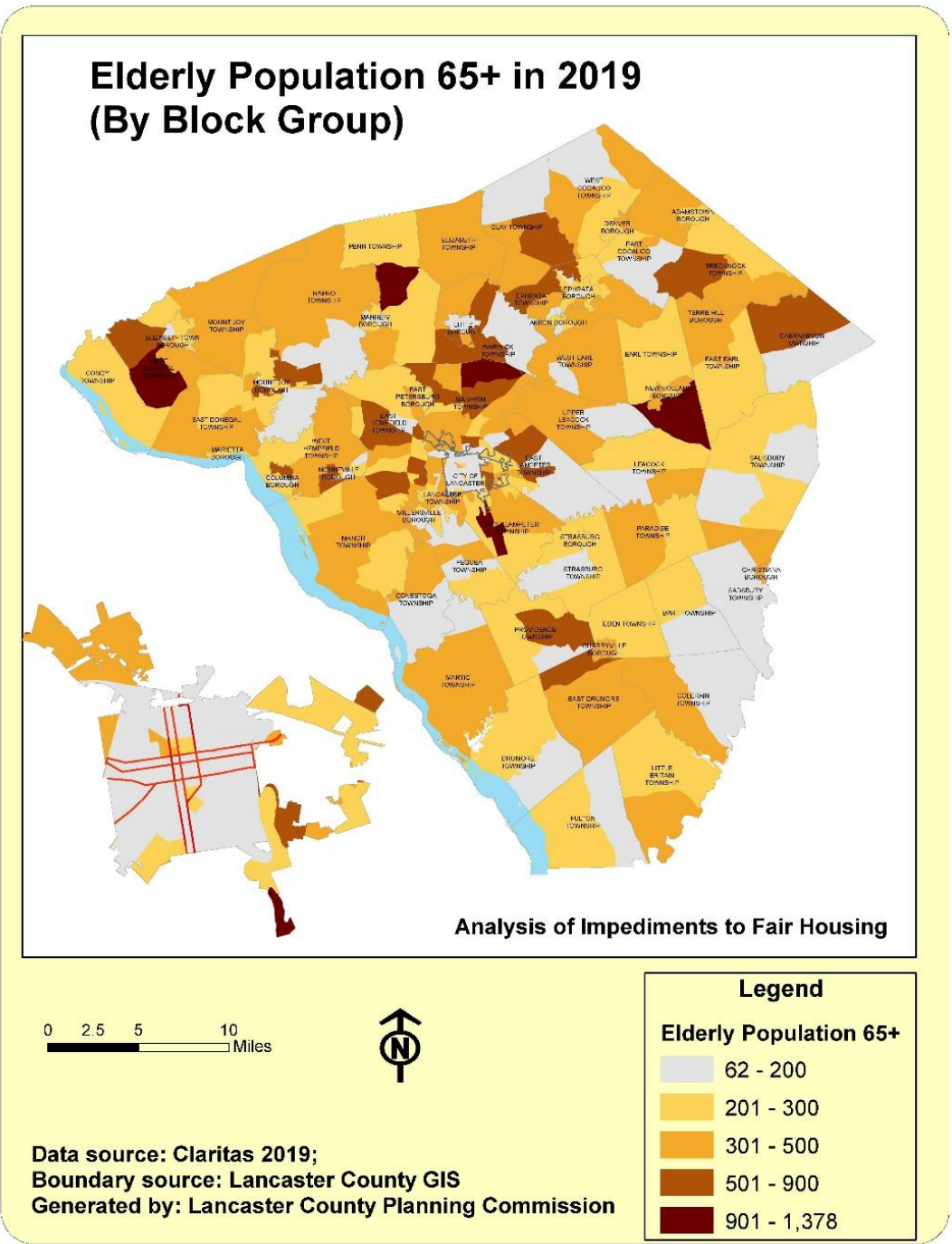
Category	Age	Number	Percent	Total Percent
Children	Under 5 years	35,700	6.7%	6.7%
School Age	5-9 years	36,933	6.9%	20%
	10-14 years	34,301	6.4%	
	15-19 years	36,468	6.8%	
Young Adult	20-24 years	35,344	6.6%	31%
	25-29 years	35,732	6.7%	
	30-34 years	32,731	6.7%	
	35-39 years	30,462	6.1%	
	40-49 years	30,496	5.7%	
Middle Age	45-49 years	32,806	6.1%	26%
	50-54 years	36,622	6.8%	
	55-59 years	36,266	6.8%	
	60-64 years	32,800	6.1%	
Elderly	65-69 years	27,769	5.2%	15%
	70-74 years	19,911	3.7%	
	75-79 years	15,640	2.9%	
	80-84 years	1,242	2.3%	
	85+ years	14,271	2.7%	
Total		536,494		

Source: 2013-2017 ACS 5-Year Estimates

Claritas estimates that the 2019 median age for Lancaster County was 38.67 versus the City at 33.69 and the 2019 estimated average age for the County was 39.80 versus the City at 35.60. clearly the City residents are generally younger overall. Claritas projects that by 2024 the median age for the City will be 35.3 and the median age for the County will be 38.98 both showing an increasingly aging population.

The map below may be deceiving as the concentrations are generally due to retirement communities such as Masonic Village and Willow Valley.

Figure 6. Concentration of the Elderly Population



Interpretation 3: An increase in the older population raises the potential of age discrimination in housing which is a protected class. Fair housing education may need to be targeted to this issue to prevent housing discrimination. A high number of older residents impacts the housing needs related to affordability, accessibility, and the need for health services.

d. Religion

The Association of Religion Data Archives shows that as of 2010, the ten largest Religious Bodies in Lancaster County by Number of Adherents were as follows:

Table 5. Religious Bodies in Lancaster County by Number of Adherents

Religious Body	Adherents
Catholic Church	51,292
Non-denominational	43,103
United Methodist	28,676
Amish	26,270
Lutheran	22,429
Mennonite	15,225
Church of the Brethren	8,968

Source: Association of Religion Data Archives, County Membership Report, 2010

The County has a large number of Anabaptist groups which include Amish, Mennonite, and Brethren due to its historical roots as a center of immigration in the late 1700's from areas now known as Germany.

When it comes to discrimination in the rental housing market, it should be noted that the religion of the landlord is often a determinant in situations of discrimination. Some landlords feel that renting to an unmarried couple, an unmarried mother with children or two unmarried individuals in a relationship, etc. is against their religion. Information should continue to be provided to landlords to make it clearly understood that these forms of discrimination are illegal.

Interpretation 4: Religion is a protected class for fair housing. Knowing the predominant types of religions helps to target fair housing education efforts.

e. National Origin and Linguistic Isolation

Housing cannot be refused based on a person's birthplace, ancestry, nor can housing providers refuse to access to persons based on their inability to read, write, speak or understand English. Residents with Limited English Proficiency (LEP) can face obstacles in finding housing which is why recipients of federal funds must ensure that LEP citizen are provided access to housing.

According to the 2013-2017 ACS Estimates, Lancaster County has 26,202 residents or 4.8% of the population that are foreign born. Of the 26,202; 55% are naturalized citizens.

Lancaster County has a lower percent of foreign-born persons from 2013-2017 (4.8%) than Pennsylvania (6.6%) or the United States (13.4%).

Table 6. Limited English-Speaking Households

Languages	Households	Limited English-Speaking Households
Spanish	15,443	3,086
Other Indo-European Languages	12,892	2,116
Asian and Pacific Island Languages	2,675	749
Other Languages	1,241	265
Total Households	198,565	6,216

Source: 2013-2017 American Community Survey 5-Year Estimates (S1602)

Claritas estimates that in 2019 the estimated population over age 5 speak mostly English in the home (83.98% in the County and 63.89% in the City). However, a significant difference is shown in the percent of residents that speak Spanish at home; 29.74% of City residents speak Spanish at home while 6.77% of County residents speak Spanish at home. In fact, the estimates show that more people living in the County speak IndoEuropean Languages at home than Spanish (7.03% versus 6.77% respectively).

Lancaster County has a significantly higher percent of residents that speak a language other than English at home at 16.7% compared to Pennsylvania but lower than the percent of similar persons in the United States (21.3%).

In Lancaster County, the largest percentage of people show an ancestry from Germany, likely a result of the “Pennsylvania Dutch” influence. In the City of Lancaster, the largest percentage of people show an ancestry from Other ancestries or unclassified ancestry. German ancestry in the City is 12.43% compared to 27% in the County.

There are several nonprofit and faith-based organizations that work with refugees from many different countries to help in their resettlement in Lancaster County and City.

The Lancaster Chamber recently released a report entitled *Strengthening the Workforce by Welcoming Immigrant Contributions: Facts and Strategies*. This document discussed the efforts in the county will the refugee population. Another source of information on refugees in the County is <https://www.dhs.pa.gov/refugeesinpa/Pages/Facts.aspx>

Interpretation 5: Significantly more City residents speak Spanish at home than the County as a whole (29% versus 6.7%). This shows a need for fair housing education targeted in several languages, most importantly in Spanish.

f. Race and Ethnicity

According to QuickFacts from the Census.gov, Lancaster County is predominantly White residents(89.8%) which is slightly higher than the state (81.8%) but significantly higher than the nation (76.5%). Claritas estimates that in 2019 Lancaster County's population of White residents is 85.94% with the population of Black residents estimated to be 4.29%. Other races and multiple races are all estimated to be less than 5%.

Lancaster County has a significantly lower percent of residents that are Black or African American than the State or nation. (Lancaster County 5.2%; Pennsylvania 12%; United States 13.4%)

Lancaster County has a higher percent of Hispanic residents than the State (10.8% versus 7.6%) but less than the nation (18.3%). Claritas estimates that in 2019, 10.93% of the County population is Hispanic. Claritas estimates that in 2019 Hispanic residents comprise 45.21% of the City's population.

The racial breakdown in Lancaster County is proportionally similar to the breakdown indicated in the 2010 Census.

Table 7. Racial Breakdown in Lancaster County

Race	Persons	Percent
White	475,145	89%
Black or African American	22,900	4%
American Indian and Alaskan Native	826	<1%
Asian	11,493	2%
Native Hawaiian and Other Pacific Islander	53	<1%
Some Other Race	15,070	3%
Two or More Races	11,007	2%
Total	536,494	

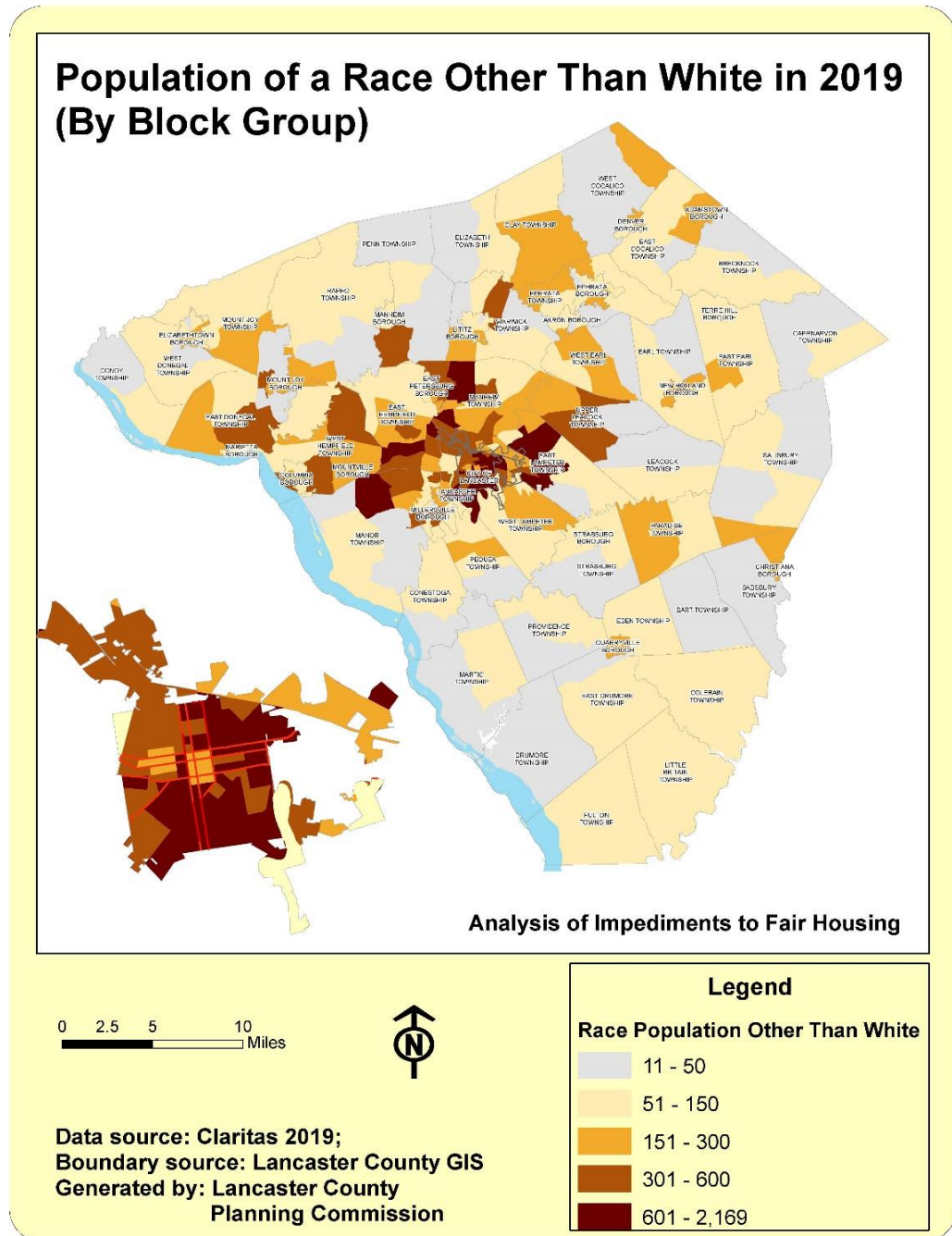
Table 8. Racial Breakdown in the City of Lancaster

Race	Persons	Percent
White	35,694	60%
Black or African American	10,440	18%
American Indian and Alaskan Native	129	<1%
Asian	2,369	4%
Native Hawaiian and Other Pacific Islander	0	0%
Some Other Race	8,169	14%
Two or More Races	2,755	5%
Total	59,556	

Claritas estimates that the highest percent of Asian residents in originate from Vietnam in both the City and County.

Of the estimated 536,494 persons residing in Lancaster County 53,792 or 10% are Hispanic or Latino residents. Of the 59,556 persons living in the City of Lancaster 23,036 or 38% are Hispanic or Latino residents. In both the County and the City, the majority of Hispanic residents originate from Puerto Rico (66.81% and 74.06% respectively). The majority of Hispanic residents in both the County and the City identify their race as with White Alone or Some Other Race.

Figure 7. Population of a Race Other Than White in 2019



Minority Concentrations

HUD defines areas of racial or ethnic concentration as geographic areas where the percentage of a specific minority or ethnic group is *10 percentage points higher* than a jurisdiction's overall percentage.

Lancaster City was the only municipality that showed a minority concentration for Blacks or African Americans. However, if broken down by Census Tracts, there are several more areas of minority concentration.

There are a handful of census tracts that show a minority concentration:

- The following Census tracts showed proportions greater than 10 percentage points higher than the County proportion for Blacks or African Americans: 1, 2, **3, 7, 8, 9, 10, 11, 12**, 112. Most of these tracts (identified in bold) are in the City of Lancaster.
- Census Tract 118.05 showed a disproportionally high percent of persons identifying themselves as two or more races (12%).
- Census Tract 135.01 showed a higher than the County proportion for "Some Other Race."
- Census tract 147 shows a concentration of 10 percent points higher than the County proportion at 31% of the tract comprised of Black or African Americans. This tract also shows a disproportionally high percent of persons described as "Some Other Race" at 18%.

There is little change in the figures by municipality since the data was collected in 2010.

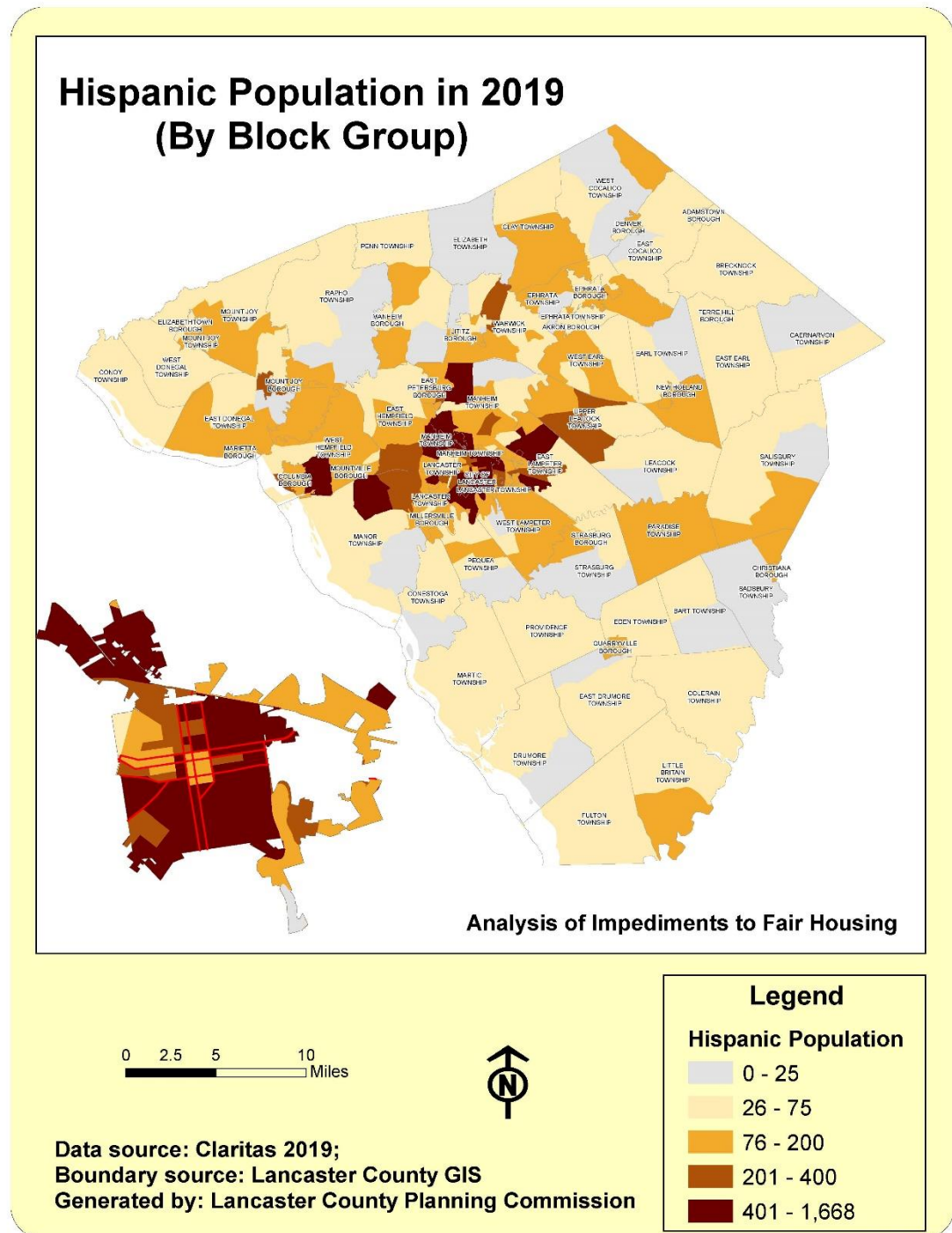
Interpretation 6: The City of Lancaster has a higher concentration of census tracts with minority concentrations. This shows a need for fair housing education in the City of Lancaster to ensure that people of color reside predominantly in the City by choice and not by systematic segregation.

Ethnicity

Hispanics/Latinos represent 11% of the population in Lancaster County. The following census tracts exceed that percent by more than 10%:

- All Census Tracts in the city of Lancaster (1, 2, 3, 6, 7, 8, 9, 11, 11, 12, 14, 118.05 and 147)
- 134
- 135.01
- 141.01

Figure 8. Hispanic Population in 2019 in Lancaster County By Block Group



Interpretation 7: The majority of Hispanics in Lancaster County are concentrated in the City of Lancaster. This shows a need for fair housing education in the County to ensure that Hispanics reside predominantly in the City by choice and not by systematic segregation.

g. Persons with Disabilities

Persons with disabilities are protected by six (6) standards of accessibility:

- The Fair Housing Act- refers to accessibility in buildings built after March 31, 1991 and includes four or more units.
- Americans with Disabilities Act (ADA) – refers to ADA standards of accessibility in places of public accommodation and commercial facilities.
- Uniform Federal Accessibility Standards – refers to accessibility standards for facility accessibility by people with motor and sensory disabilities for Federal and federally funded facilities.
- Section 504 (see below)
- Visitability Standards – refers to housing designed so that it can be lived in or visited by people with disabilities.
- Universal Design – refers to the design of products and environments to be useable by all people, to the greatest extent possible, without adaptation or specialized design.

Section 504 of the Rehabilitation Act is a national law that protects qualified individuals from discrimination based on their disability. The nondiscrimination requirements of the law apply to employers and organizations that receive any federal financial assistance. Section 504 forbids organizations and employers from excluding or denying individuals with disabilities an equal opportunity to receive program benefits and services. Individuals with disabilities have the right to participate in, and have access to, program benefits and services.

Under Section 504, individuals with disabilities are defined as a person with a physical or mental impairment which substantially limits one or more major life activities. People who have a history of or are regarded as having a physical or mental impairment that substantially limits one or more major life activities are also covered. Major life activities include care for one's self, walking, seeing, hearing, speaking, breathing, working, performing manual tasks, and learning. Some examples of impairments which may substantially limit major life activities, even with the help of medication or aids/devices are: AIDS, alcoholism, blindness or visual impairment, cancer, deafness or hearing impairment, diabetes, drug addiction, heart disease, and mental illness.

The Americans with Disabilities Act gives civil rights protections to individuals with disabilities like those provided to individuals based on race, color, gender, national origin, age, and religion. It guarantees equal opportunity for individuals with disabilities in public accommodations, employment, transportation, State and local government services, and telecommunications.

In addition to accessibility guidelines, the Fair Housing Act also ensures that people with disabilities have the right to request the reasonable modifications to their dwellings that are needed to fully use and enjoy their housing. These modifications can create viable housing options that would be otherwise inaccessible for persons with disabilities.

According to Census.gov QuickFacts, 8.0 % of Lancaster County residents under the age of 65 have a disability, which is similar to the United States but lower than Pennsylvania (9.6%).

According to www.disabilitystatistics.org, the 2017 ACS shows that in Pennsylvania, the overall percent of people with a disability of all ages was 14.2% and that persons with disabilities ages 21-64 are estimated to have an annual household income of \$44,900 in Pennsylvania. The same source estimates that people with disabilities in Pennsylvania have a poverty rate of 28%. The 2017 ACS also estimates that the employment rate for persons with disabilities in Pennsylvania was 37.1%.

In Lancaster County, Pennsylvania, among the civilian noninstitutionalized population in 2013-2017, 11.7% reported a disability according to the ACS. The likelihood of having a disability varied by age - from 4.4% of people under 18 years old, to 9.5% of people 18 to 64 years old, and to 31.1% of those 65 and over.

Table 9. Disability Type by Age in Lancaster County

Disability Type	Age	With a disability	Percent
Hearing disability		20,655	3.8%
	Under 18	886	.7%
	18-64	5,649	1.8%
	65+	14,120	15.6%
Vision		10,524	2%
	Under 18	397	.3%
	18-64	4,683	1.5%
	65+	5,444	6%
Cognitive		23,308	4.7%
	Under 18	4,224	4.6%
	18-64	13,144	4.1%
	65+	5,940	6.6%
Ambulatory		28,934	5.8%
	Under 18	542	.6%
	18-64	12,382	3.9%
	65+	16,010	17.7%
Self-care difficulty		9,536	1.9%
	Under 18	931	1%
	18-64	4,672	1.5%
	65+	3,933	4.4%
Independent living difficulty		20,771	5.1%
	18-64	11,005	3.5%
	65+	9,766	10.8%

Source: 2017 ACS 1-Year Estimates

Interpretation 8: People with disabilities are a protected class under fair housing laws. Most fair housing complaints are filed by people with disabilities which can be viewed as a positive situation. It may show that people with disabilities are aware of their rights and are willing to file complaints when those rights have been violated. However, relying on the number of complaints as a sign of the degree of discrimination may not be accurate. It may be a situation that can be resolved by increased education toward landlords to help them understand issues such as reasonable accommodation. Focus on education efforts concerning fair housing and person with disabilities should continue.

h. Income

The median household income in 2017 dollars 2013-2017 for Lancaster County was \$61,492 which is higher than the Pennsylvania median household income of \$56,951 and the United States at \$57,652. However, the per capita income in the past 12 months (in 2017 dollars) for 2013-2017 was \$29,280 for Lancaster County which is lower than the Pennsylvania per capita income for the same period (\$31,476) and the United States (\$31,177).

According to the 2013-2017 ACS 5-Year Estimates, the municipalities with the three (3) lowest median household incomes are:

- Lancaster City (\$40,805)
- Columbia Borough (\$40,982)
- Manheim Borough (\$49,871)

According to the same source, the municipalities with the three highest median household incomes are:

- Elizabeth Township (\$80,966)
- Sadsbury Township (\$77,321)
- Adamstown Borough (\$76,759)

The Lancaster County Profile from the PA Center for Workforce & Analysis lists Lancaster County's Per Capita Personal Income as \$49,207 compared to PA's Per Capita Person Income of \$53,300.

Table 10. Median Family Income by Race for Lancaster County and City of Lancaster

Race	Lancaster County	Lancaster City
All Races	\$68,937	\$35,313
White	\$71,484	\$38,491
Black	\$38,399	\$29,557
Asian	\$70,479	\$40,697
Two or More	\$42,287	\$27,500

Source: 2011-2015 ACS Selected Economic Characteristics (DP03)

According to Claritas, the 2019 Estimated Average Household Income for county residents was \$85,434 and for the City was \$55,444. Also, according to Claritas, the 2019 Estimated Median Household Income for county residents was \$66,927 and for the City was \$42,154.

Table 11. Estimated 2019 Median Household Income by Single Classification Race

Race	Lancaster County	Lancaster City
White Alone	\$69,851	\$49,168
Black Alone	\$40,725	\$35,702
American Indian and Alaskan Native Alone	\$54,669	\$48,448
Asian Alone	\$77,235	\$58,564
Other Race Alone	\$36,119	\$29,157
Two or More Races	\$54,666	\$41,843
Hispanics of Any Race	\$40,648	\$31,896

Source: Claritas

Table 12. Percent Change in Median Family Income by Race since 2006-2010 ACS 5-Year Estimates

Race	Lancaster County	Lancaster City
All Races	7%	-6%
White	8%	-4%
Black	-5%	-17%
Asian	10%	-21%
Two or more	20%	67%

The Median Family Income for Hispanics/Latinos of any race in Lancaster County is \$32,206. Claritas projects that in 2024 the Median household income for City residents will be \$46,247 compared to the estimated amount in 2019 of \$42,154. Claritas projects that in 2024 the Median household income for County residents will be \$73,439 compared to the estimated amount in 2019 of \$66,927.

Table 13. 2019 Income Limits for Lancaster County Metropolitan Statistical Area Used for Programs Funded through the US Department of Housing and Urban Development

Number of Persons in Family	Very Low Income (30% of MFI)	Low Income (50% of MFI)	Moderate Income (80% of MFI)
1	\$16,000	\$26,700	\$42,700
2	\$18,300	\$30,500	\$48,800
3	\$20,600	\$34,300	\$54,900
4	\$22,850	\$38,100	\$60,950
5	\$24,700	\$41,150	\$65,850
6	\$26,550	\$44,200	\$70,750
7	\$28,350	\$47,250	\$75,600
8	\$30,200	\$50,300	\$80,500

To calculate the income limits for families with more than 8 members, 8% of the four-person base should be added to the eight-person income limit. For example, the nine-person limit equals 140 percent (132+8) of the relevant four-person income limit. All income limits are rounded to the nearest \$50.

Source: US Dept. of Housing and Urban Development

Interpretation 9: Members of protected classes tend to have lower incomes which affect their ability to have fair housing choices. While having a low income is not automatically an impediment to fair housing choice there is a clear connection.

Lancaster County has a lower percent of persons living in poverty (9.9%) than Pennsylvania (12.5%) or the United States (12.3%).

Claritas estimates that in 2019 7.01% of families live below the federal poverty line while 22.26% of City families live below the poverty line. Even more compelling is that only 5.24% of County families with children live below the poverty line while 19.01% of City families with children live below the poverty line.

According to the 2013-2017 ACS 5-Year Estimates, the census tracts with the highest population of persons living below poverty level are:

- 1, 2, 3, 5, 7, 8, 9, 10, 11, 14 and 147 (all located within the city of Lancaster)
- 112
- 114
- 136.02

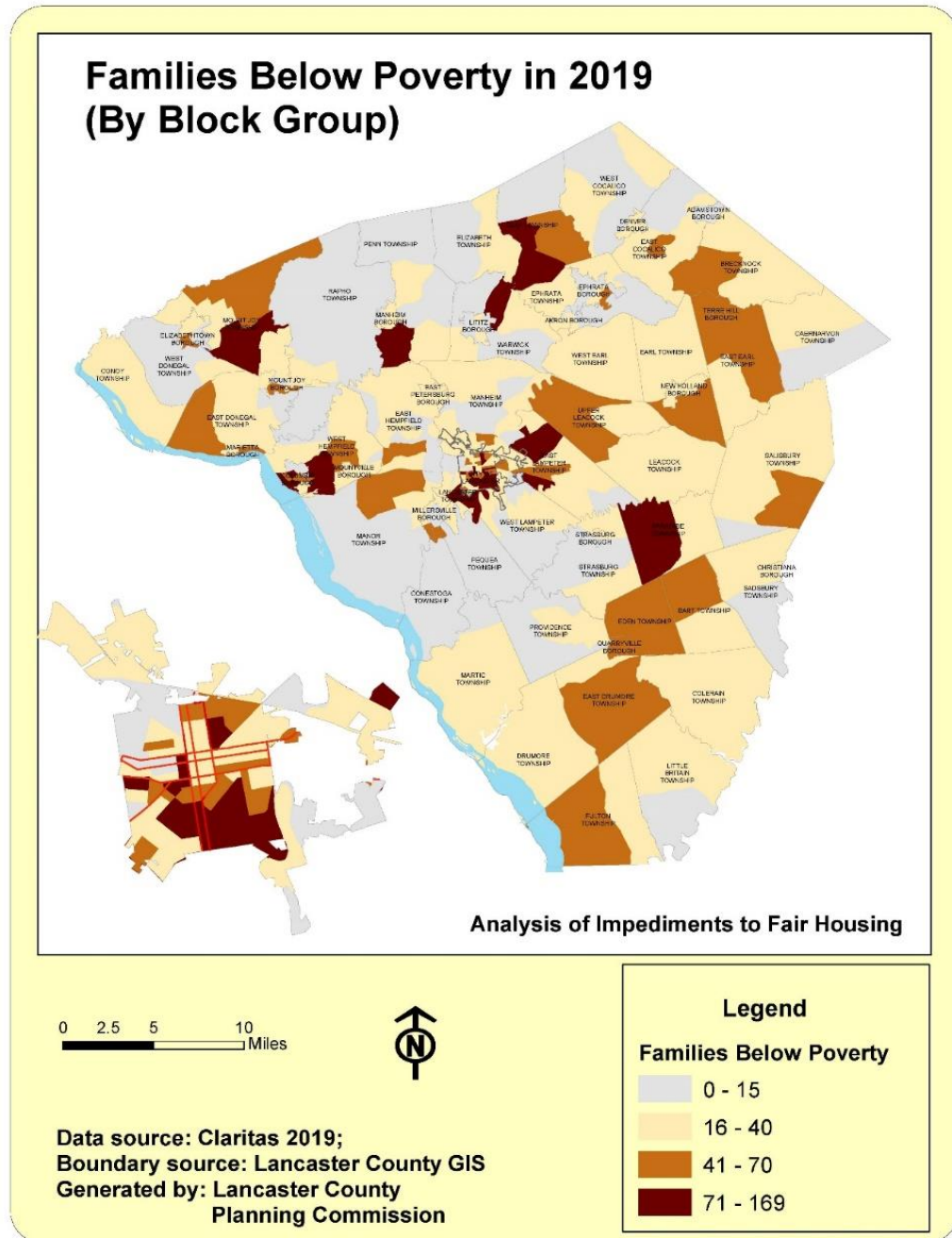
According to the same sources, the municipalities with the highest percent of persons living below the poverty level are:

- Lancaster City (26%)
- Columbia Borough (20%)
- Millersville Borough (20%)

Other municipalities that have a higher percent of persons living below the poverty line than the county as a whole (10%) are:

- | | |
|------------------------------|------------------------------|
| • Colerain Township 11% | • Manheim Borough 11% |
| • Conoy Township 16% | • Marietta Borough 16% |
| • Earl Township 11% | • Mount Joy Township 11% |
| • East Lampeter Township 12% | • Mountville Borough 18% |
| • Eden Township 13% | • Paradise Township 17% |
| • Ephrata Borough 11% | • Providence Township 14% |
| • Fulton Township 11% | • Upper Leacock Township 14% |
| • Lancaster Township 13% | • West Earl Township 12% |

Figure 9. Families Below Poverty Level in 2019



The National School Lunch Program (NSLP) is a federally assisted meal program operating in public and nonprofit private schools and residential childcare institutions. It provides nutritionally balanced, low-cost or free lunches to children each school day. Children from families that are 185% of Poverty Guidelines are eligible for the Reduced School Lunch Program while children from families that are 130% of Poverty Guidelines are eligible for the free lunch program.

Table 14 below shows the percentage of students eligible for the Free/Reduced School Lunch Program in Lancaster County School Districts. Like the population in poverty, the highest percent for the program was in the City of Lancaster/Lancaster Township and Columbia.

Table 14. 2018 Free and Reduced Cost Lunch Programs in Lancaster County by School District

School District	Total Enrollment	Eligible for Free lunch	Eligible for Reduced	Free/Reduced Enrollment
Cocalico	3,072	867	193	34%
Columbia Borough	1,397	1,383	0	99%
Conestoga Valley	4,912	1,510	261	36%
Donegal	2,908	983	142	38%
Eastern Lanc. Co	3,105	1,014	182	38%
Elizabethtown Area	3,571	852	135	27%
Ephrata Area	4,173	1,500	248	42%
Hempfield	7,000	2,194	326	36%
Lampeter Strasburg	3,066	617	92	23%
Lancaster	11,102	11,102	0	100%
Manheim Central	2,127	636	128	36%
Manheim Township	6,168	1,699	263	32%
Penn Manor	5,438	2,051	304	43%
Pequea Valley	1,515	685	92	51%
Solanco	3,052	1,282	174	47%
Warwick	4,001	1,118	148	32%
Total	66,607	29,493	2,688	48.3

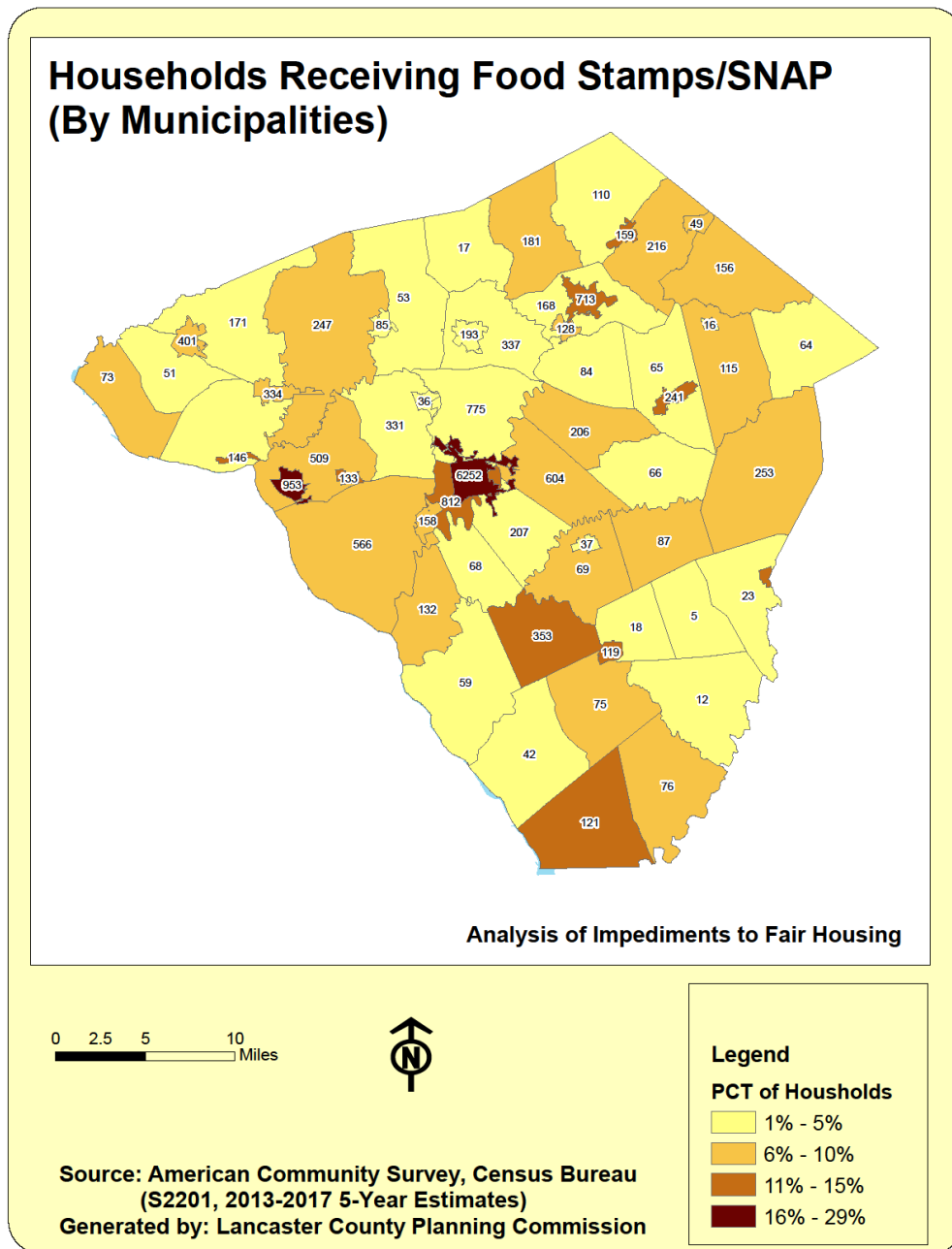
Source: National School Lunch Program Reports, U.S. Department of Education

The 2013-2017 ACS 5-Year Estimates provides information on the number of households in each municipality that received Food Stamps/SNAP Benefits. The percent of County Households receiving SNAP benefits was 9%. The following municipalities indicated percentages higher than 11%:

- Columbia Borough 22%
- Ephrata Borough 12%
- Fulton Township 13%
- Lancaster City 29%
- Lancaster Township 12%
- Marietta Borough 13%
- Providence Township 12%
- Quarryville Borough 12%

Interpretation 10: Poverty restricts housing choice. Families and children living in poverty may hesitate to assert their housing rights for fear of retaliation by the landlord. With vacancy rates so low and the supply of affordable housing scarce, poor households are often caught in a vicious cycle of lacking the financial means to move and feeling that they have no choice but to remain in unsafe housing.

Figure 10. Households Receiving Food Stamps/SNAP Benefits by Municipality



i. Employment Data

Lancaster County generally has one of the lowest unemployment rates in the State due to its diverse economic base.

Occupations and industries in the County

There are five (5) categories of Occupation according to the 2013-2017 ACS 5-Year Estimates:

- Management, Business, Science and Arts
- Service
- Sales and Office
- Natural Resources, Construction, Maintenance
- Production, Transportation, Material Moving

The highest percent of occupations in Lancaster County are in Management, Business, Science and Arts (33%) followed by Sales and Office (23%). East Hempfield Township has the highest percent of persons working in Management, Business, Science and Arts occupations (45%). Manheim Borough and Millersville Borough are tie for the highest percent of residents working in Service occupations. Clay Township and West Hempfield Township are tied for the highest percent of residents working in Sales and Office occupations. Bart Township has the highest percentage of persons working in Natural Resources, Construction and Maintenance (30%). Terre Hill Borough has the highest percentage of persons working in Production, Transportation, and Material Moving (29%).

Employed persons over the age of 16 in City of Lancaster comprise the following percentages of occupations:

- 26% Management, Business, Science and Arts
- 23% Service
- 21% Sales and Office
- 7% Natural Resources, Construction, Maintenance
- 23% Production, Transportation, Material Moving

Table 15. Companies with the Top Ten Largest Number of Employees

	Company Name
1.	LGH Penn Medicine
2.	Mutual Assistance Group
3.	Nordstrom Inc
4.	Dart Container Corporation
5.	County of Lancaster
6.	Lancaster School district
7.	Masonic Villages
8.	Giant Food Stores
9.	LSC Communications
10.	Federal Government

Source: Quarterly Census of Employment and Wages, Pennsylvania Department of Labor and Industry, Center for Workforce Information & Analysis

The unemployment rate in Lancaster County as of October 2019 was 3.5% which is slightly lower than the unemployment rate for PA at 4.2%.

The mission of the Lancaster County Workforce Investment Board (WIB) is to coordinate, develop, and maintain an effective and responsive system of programs and services that integrates the needs of employers for an ample and productive workforce with the needs of County residents for meaningful work that enhances their quality of life. The WIB oversees the PA CareerLink of Lancaster County, which is located at 1016 North Charlotte Street, Lancaster, PA. PA CareerLink is the connecting link between hundreds of County residents that come to the PA CareerLink weekly to search for jobs, upgrade their skills, and look for new careers and County businesses that want to hire them.

The 2018 High Priority Occupations for Lancaster County indicates that the occupations with the highest number of annual job openings are listed below.

Table 16. 2018 High Priority Occupations for Lancaster County

Occupations	Number of Annual Openings	Annual Average Salary
Nursing Assistants	171	\$30,740
Registered nurses	146	\$63,430
Heavy & Tractor-Trailer Truck Drivers	126	\$43,880
Customer Service Representatives	110	\$35,750
Licensed Practical & Licensed Vocational Nurses	105	\$45,330

Table 17. Wages for Specific Occupations in Lancaster County

Occupation	Median Hourly Wage	Mean Hourly Wage	Annual Mean Wage
Total All Occupations	\$ 17.49	\$ 21.61	\$ 44,960
Management	\$ 46.86	\$ 53.58	\$ 111,440
Business and Financial	\$ 29.67	\$ 33.17	\$ 69,000
Computer and Mathematical	\$ 32.14	\$ 34.78	\$ 72,350
Architecture and Engineering	\$ 34.42	\$ 36.57	\$ 76,060
Life, Physical and Social Science	\$ 23.18	\$ 26.69	\$ 55,520
Community and Social Service	\$ 19.56	\$ 21.25	\$ 44,200
Legal	\$ 24.54	\$ 29.56	\$ 61,490
Education, Training and Library	\$ 24.49	\$ 25.31	\$ 52,630
Art, Design, Entertainment, Sports, & Media	\$ 18.37	\$ 20.45	\$ 42,530
Healthcare Practitioners and Technical	\$ 31.72	\$ 38.93	\$ 80,980
Healthcare Support	\$ 15.00	\$ 16.37	\$ 34,040
Protective Service	\$ 18.89	\$ 22.52	\$ 46,840
Food Prep & Serving-related	\$ 10.59	\$ 11.45	\$ 23,810
Building and Grounds Cleaning and Maintenance	\$ 12.27	\$ 13.31	\$ 27,680
Personal Care and Service	\$ 11.56	\$ 12.60	\$ 26,200
Sales and Related	\$ 12.59	\$ 18.66	\$ 38,810
Office and Administrative Support	\$ 16.42	\$ 17.43	\$ 36,250
Farming Fishing and Forestry	\$ 13.61	\$ 14.40	\$ 29,960
Construction and Extraction	\$ 20.81	\$ 21.95	\$ 46,650
Installation, Maintenance and Repair	\$ 21.54	\$ 22.37	\$ 46,530
Production	\$ 18.11	\$ 19.09	\$ 39,710
Transportation and Material Moving	\$ 15.50	\$ 16.91	\$ 35,170

Source: Bureau of Labor Statistics, May 2018 Metropolitan and Nonmetropolitan Area Occupational Employment and Wage Estimates Lancaster PA MSA

Interpretation 11: Lancaster County has a diverse economic base which protects it from swings in the economy. However, as in other communities across the country, incomes are not keeping pace with the increase in housing costs. This disparity limits housing choice.

C. Housing Data

1. Tenure

There are 208,751 total housing units in Lancaster County according to the Census Bureau's 2013-2017 American Community Survey 5-Year Estimates. Of these housing units, 68.2% are owner-occupied which is similar to the PA percent of tenure.

Claritas estimates that in 2019, the percent of homeowners in the County is 68.45% and the percent of renters is 31.55. this contrasts with the percent of homeowners in the city (43.88%) and the percent of renters 56.12%).

According to the 2010 Census, Blacks had a rate of homeownership of 35% compared to Whites which was 71%. Persons who list their race as Other had a homeownership rate of 29% while persons of two or more races had a homeownership rate of 41%. Asians had a homeownership rate of 68%.

Table 18. Housing Tenure by Race/Ethnicity for Lancaster County and City

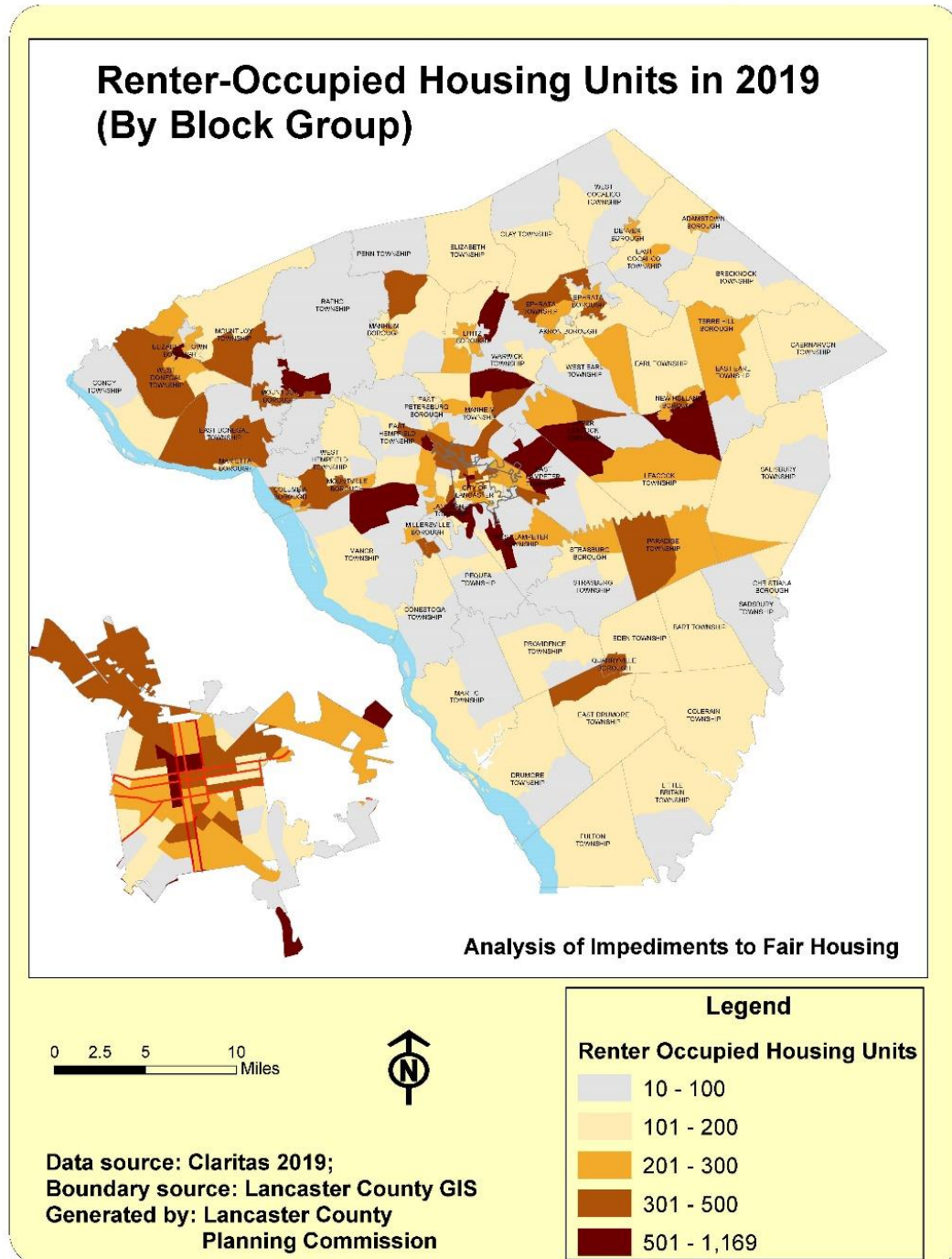
	Lancaster County				Lancaster City			
	Homeowners		Renters		Homeowners		Renters	
Race/Ethnicity	#	%	#	%	#	%	#	%
White Non-Hispanic	119,195	75%	40,224	25%	125,815	73%	45,140	27%
Black, non-Hispanic	935	33%	1,870	66%	1,720	31%	3,775	69%
Hispanic	2,559	41%	3,628	59%	4,410	33%	8,825	66%
Asian, Non-Hispanic	1,583	76%	484	24%	1,975	75%	675	25%
Native American, Non-Hispanic	79	42%	110	58%	90	41%	130	59%
Other, Non-Hispanic	786	65%	417	35%	830	55%	685	45%
Total Household Units	125,160	73%	46,769	27%	134,845	69%	59,235	31%

**Data presented are numbers of households not individuals*

Source: CHAS data

Interpretation 12: Homeownership rates by race and ethnicity vary greatly. While incomes by race and ethnicity are generally lower, it is disconcerting that access to financing for non-whites and Hispanics for homeownership may be an impediment.

Figure 11. Renter-Occupied Housing Units in 2019



2. Type of Housing

Table 19. Units in Structures in Lancaster County

Type of Housing Units	Estimate	Percent
Total Housing Units	208,751	
1 unit detached	114,939	55.1%
1-unit attached	42,764	20.5%
2 units	7,303	3.5%
3-4 units	9,651	4.6%
5-9 units	9,165	4.4%
10-19 units	6,189	3.0%
20 or more units	10,601	5.1%
Mobile home	8,084	3.9%
Boat, RV, van, etc.	55	<1%

Source: 2013-2017 ACS 5-Year Estimates

Interpretation 13: The housing stock in Lancaster County is predominantly 1 unit detached. Multi-family housing often represents an affordable housing option for households with lower incomes, which means that its concentration in limited geographic areas such as the city of Lancaster and boroughs is potentially problematic from a housing choice perspective. More variety in the cost of housing throughout the County helps to avoid housing impediments.

3. Age of Housing

As shown in the table below, the housing stock in Lancaster County is old with 43% of housing units built prior to 1969. Over 117,731 housing units were built before 1980 indicates a high likelihood that they contain lead-based paint.

Table 20. Year Housing Units were Built in Lancaster County

Years Housing Units Built	Estimate	Percent
Total Housing Units	208,751	
Built 2014 or later	1,712	.8%
Built 2010 to 2013	5,300	2.5%
Built 2000 to 2009	24,595	11.8%
Built 1990 to 1999	29,715	14.2%
Built 1980 to 1898	29,698	14.2%
Built 1970 to 1979	25,548	12.2%
Built 1960 to 1969	17,931	8.6%
Built 1950 to 1959	19,642	9.4%
Built 1940 to 1949	8,890	4.3%
1939 or earlier	45,720	21.9

Source: 2013-2017 ACS 5-Year Estimates

The majority of housing units in Lancaster County are heated by electricity, utility gas and fuel oil.

Interpretation 14: An old housing stock raises concerns about proper maintenance and the need to address lead-based paint hazards. Because old houses are more likely to have lead hazards and because lower income households are more likely to live in older housing, there is a high concern about lead based paint hazards, especially in young children. While it is required for landlords to disclose the possibility of lead-based paint hazards to tenants, not all landlords are compliant. Poor households may be constrained in their ability to find and afford rental housing that does not have lead hazards.

4. Cost Burden

The 2013-2017 ACS 5-Year Estimates indicates that 40.9% of Lancaster County residents pay more than 35% of their income on housing costs.

Table 21. Demographics of Households with Severe Housing Cost Burden

Households with Severe Housing Cost Burden	Lancaster County			Lancaster City		
Race/Ethnicity	# with severe cost burden	# Households	% with severe cost burden	# with severe cost burden	# Households	% with severe cost burden
White Non-Hispanic	18,332	159,376	11.5%	20,035	170,960	11.7%
Black, non-Hispanic	540	2,791	19.3%	1,420	5,474	25.9%
Hispanic	1,283	6,152	20.9%	3,365	132,45	25.4%
Asian, Non-Hispanic	141	2,055	6.9%	205	2,649	7.7%
Native American, Non-Hispanic	120	188	63.8%	115	224	51.3%
Other, Non-Hispanic	230	1,200	19.2%	350	1,518	23.1%
Total	20,646	171,929	12%	25,490	194,080	13.1%
Household Type and Size						
Family Households, <5 people	8764	106528	8.23	10920	116530	9.37
Family Households, 5+ people	1718	17992	9.55	2209	20254	10.91
Non-family households	10094	47353	21.3	12355	57295	21.56

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

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

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

Source: CHAS

The 2013-2017 ACS 5-Year Estimates show that 19.2% of homeowners in Lancaster County that pay 35% or more on housing costs; however, 40.9% of renters pay 35% or more on housing costs. According to the same source, the median rent paid in Lancaster County was \$957.

In Lancaster County, 26,221 households or 13% are estimated to have a Severe Cost Burden (paying more than 50% of their income on housing) according to the 2013-2017 ACS 5-Year Estimates. The 2011-2015 ACS shows 26,175 households with a severe housing cost burden. For renters, the majority (52%) of households with a severe housing cost burden earn less than 30% area median family income for the area. For homeowners, 39% of households with a severe housing cost burden earn less than 30% area median family income.

The 2011-2015 ACS shows 32,555 homeowner households with at least 1 of 4 housing problems (incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room and cost burden greater than 30%) and 30,090 renter households with at least one of 4 housing problems. The same data source also shows that 12,940 homeowner households that experience a severe housing problem with at least 1 of 4 severe housing problems; while 17,580 renter households experience a severe housing problem with at least 1 of 4 severe housing problems.

Interpretation 15: The higher incidence of cost burden among Blacks and Hispanics is indicative of a potential fair housing problem. A severe housing cost burden often means that households are stuck in housing that may not be safe nor is their stability in that unit. People with severe housing cost burden are at higher risk of eviction. The higher percent of severe housing cost burden in the City is worrisome as well.

Table 22. Demographics of Households with Disproportionate Housing Needs in Lancaster County

Disproportionate Housing Needs	Lancaster County		
Race/Ethnicity	# with Problems	# Households	% with Problems
White Non-Hispanic	47,970	159,376	30.10%
Black, non-Hispanic	1,305	2,791	46.76%
Hispanic	2,963	6,152	48.16%
Asian, Non-Hispanic	752	2,055	36.59%
Native American, Non-Hispanic	135	188	71.81%
Other, Non-Hispanic	499	1,200	41.58%
Total	53,649	171,929	31.20%
Family Households, <5 people	25,757	106,528	24.18%
Family Households, 5+ people	6,814	17,992	37.87%
Non-family households	21,061	47,353	44.48%
Households Experiencing Any of 4 Severe Housing Problems			
	# with severe Problems	# Households	% with severe Problems
White Non-Hispanic	21,341	159,376	13.39%
Black, non-Hispanic	588	2,791	21.07%
Hispanic	1,468	6,152	23.86%
Asian, Non-Hispanic	334	2,055	16.25%
Native American, Non-Hispanic	120	188	63.83%
Other, Non-Hispanic	295	1,200	24.58%
Total	24,099	171,929	14.02%

Table 23. Demographics of Households with Disproportionate Housing Needs in Lancaster City

Disproportionate Housing Needs	Lancaster City		
Race/Ethnicity	# with Problems	# Households	% with Problems
White Non-Hispanic	51,760	170,960	30.28%
Black, non-Hispanic	2,910	5,474	53.16%
Hispanic	7,080	13,245	53.45%
Asian, Non-Hispanic	1,010	2,649	38.13%
Native American, Non-Hispanic	155	224	69.20%
Other, Non-Hispanic	715	1,518	47.10%
Total	63,615	194,080	32.78%
Household Type and Size			
Family Households, <5 people	30,075	116,530	25.81%
Family Households, 5+ people	7,930	20,254	39.15%
Non-family households	25,615	57,295	44.71%
Households Experiencing Any of 4 Severe Housing Problems.			
	# with severe Problems	# Households	% with severe Problems
White Non-Hispanic	23,200	170,960	13.57%
Black, non-Hispanic	1,525	5,474	27.86%
Hispanic	3,875	13,245	29.26%
Asian, Non-Hispanic	435	2,649	16.42%
Native American, Non-Hispanic	120	224	53.57%
Other, Non-Hispanic	420	1,518	27.67%
Total	29,560	194,080	15.23%

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

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

Source: CHAS

5. Cost of Housing

A lack of affordable housing puts constraints on housing choice. Residents may be limited to fewer neighborhoods because of a lack of affordable housing elsewhere. There is a limited inventory of housing at lower price ranges.

The 2013-2017 ACS 5-Year estimates show that there were 1,684 Vacant-for-sale-only and sold, not occupied housing units at the time of data collection. Most homes available for data at the time of data collection were above \$125,000.

The 2013-2017 ACS 5-Year Estimates indicates that the mean value of owner-occupied housing units is \$193,000. The same data source indicates that the median gross rent was \$957.

Claritas estimates that in 2019 the median value of all owner-occupied housing units in the County was \$217,228 and the median value in the City was \$123,485.

The Lancaster County Association of Realtors indicates that the median home sale in May 2020 was \$229,900, up 7% from May 2019. First-time home buyers are finding it difficult to find affordable housing options. Even working families who qualify for the Lancaster Housing Opportunity Partnership's Homebuyers Program are increasingly having a difficult time finding homes within their price range.

Table 24. Rental Housing Pricing

Units Renting for:	Lancaster County
Less than \$500	3,510
\$500-\$699	23,667
\$700-\$999	24,090
\$1,000 or more	9,263

Source: ACS 2019 1-Year Estimates, Table CP04

The National Low-Income Housing Coalition provides annual information on the affordability of rental units relative to income information. Below is a table showing the hourly wage a Full-time employee must earn in order to afford specific bedroom sizes.

Table 25. Housing Wage

Bedroom Size	Housing Wage	Annual Income Needed to Afford
0-BR	\$13.92	\$28,960
1-BR	\$16.71	\$34,760
2-BR	\$20.98	\$43,640
3-BR	\$26.65	\$55,440
4-BR	\$28.37	\$59,000

HUD releases Fair Market Rents to be used for federal programs such as the Housing Choice Voucher Program (Section 8) and the Community Development Block Grant (CDBG) program. The FMR's are intended to represent modest cost rental housing. For purposes of comparison they are shown below:

Table 26. Fiscal Year 2020 Fair Market Rents Lancaster Metropolitan Statistical Area

Efficiency	1-BR	2-BR	3-BR	4-BR
\$684	\$812	\$1,021	\$1,293	\$1,383

Interpretation 16: The cost of housing can present an impediment for those with lower incomes. Since people of color, people with disabilities and other protected classes tend to have lower income, the cost of housing, both homeowner and rental, limits housing choice.

6. Vacancy

The 2013-2017 5-Year Estimate show that there were 10,186 vacant housing units; 2607 were for rent, 690 were rented but not occupied

Table 27. Vacancy Status in Lancaster County

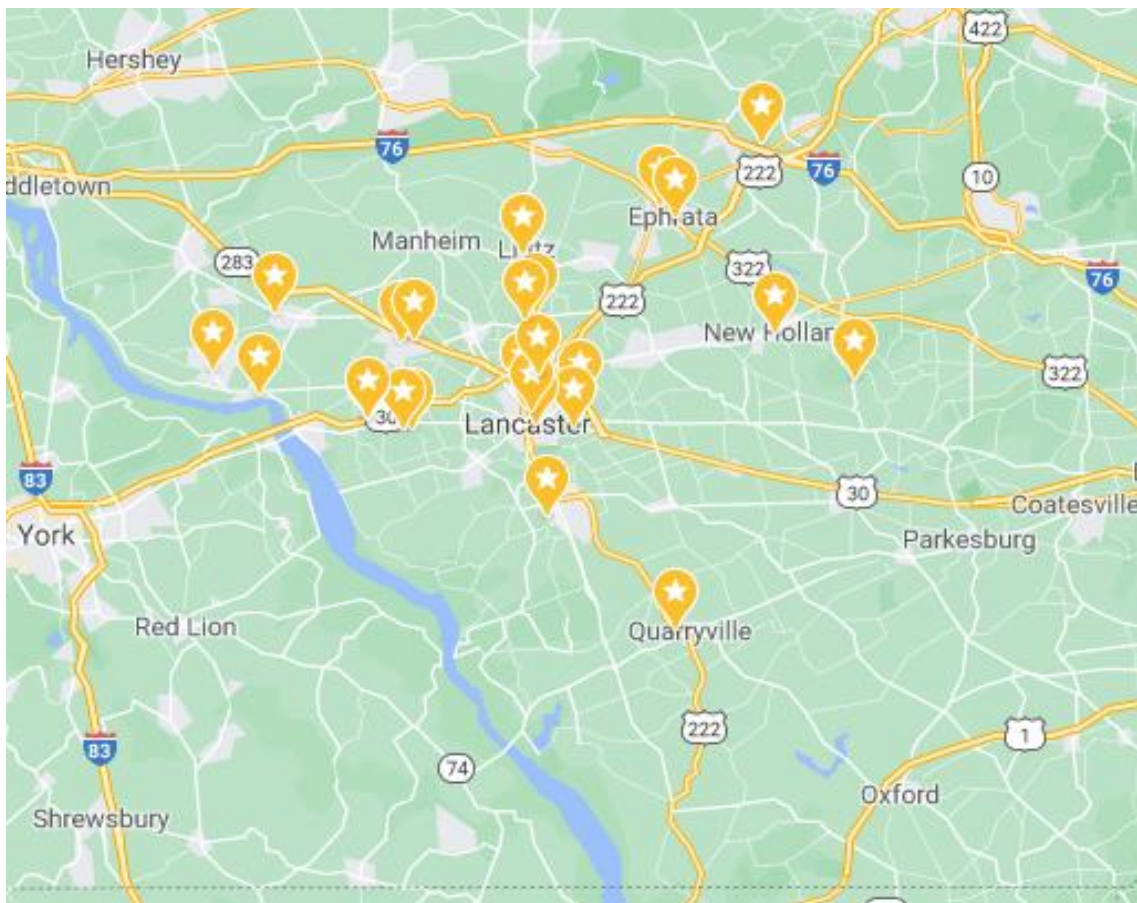
Lancaster County		
	Estimated number	Percent
Total	10,186	
For Rent	2,607	26%
Rented, not occupied	690	7%
For sale only	1,151	11%
Sold, not occupied	533	5%
For seasonal, recreational or occasional use	839	8%
For migrant workers	0	0%
Other vacant	4,366	43%

The 2013-2017 ACS 5-Year Estimates stated of the 208,751 housing units, 4.9% were vacant. The vacancy rate for homeowners was .8% and the rental vacancy rate was 3.9%.

Interpretation 17: A very low vacancy rate limits opportunity for persons to move where they may wish to live. Low vacancy rates can also increase the housing demand and therefore the cost of housing, which is an impediment to housing choice for all income levels.

7. Subsidized/Assisted Housing

Figure 12. Map of Subsidized Housing Developments in Lancaster County



The Lancaster County Housing Authority does not own any public housing; however, the Lancaster City Housing Authority owns 564 units of public housing as shown in the table below. The City Housing Authority also administers 845 Housing Choice vouchers (Section 8).

The Lancaster County Housing Authority administers approximately 735 Housing Choice Voucher Program (Section 8) for participants in the County, outside of the City of Lancaster. Households with a Housing Choice Voucher search for and sign leases for privately-owned housing. The Housing Authority also administers the “Mod Rehab” program which provides 102 units of affordable housing. There are 22 units of project based rental assistance for persons with mental health disabilities which are administered by the Housing Authority. The County Housing Authority does not own any public housing.

Beginning in late 2021, the Lancaster County Housing Authority will institute a “lottery” from a list of applicants on a waiting list. The waiting list will be opened for two weeks to online applicants only, through the Authority’s website. Software design will ensure that only complete applications are accepted. 500 applicants will be chosen by a “black box” lottery meaning there will be no human intervention in the process. Staff will review the list of 500 and eliminate ineligible applications. The resulting waiting list is anticipated to be about 300 households. As the County Housing Authority has vouchers available, applications will be pulled from the waiting list in the random order established by the lottery. This process is very similar to the procedure followed by the Lancaster City Housing Authority.

The Lancaster County Housing Authority works to ensure equal opportunity and affirmatively further fair housing by:

1. Undertaking affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, gender, familial status, and disability. The County Housing Authority will continue to work closely with LHOP’s HEEI and will continue to partner with a coalition of local agencies working to remove barriers to housing choice.
2. Undertaking affirmative measures to provide a suitable living environment for families living in subsidized housing, regardless of race, color, religion, national origin, gender, familial status, and disability. The County Housing Authority will continue its working relationship with HEEI to educate and assist landlords and management companies on fair housing issues.
3. Undertaking affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required. In addition to efforts noted have, the County Housing Authority will work with:
 - United Disabilities Services
 - County Behavioral Health and Developmental Services and
 - Vision Corp

The Lancaster City Housing Authority’s Public Housing Developments are listed below.

Table 28. City of Lancaster Public Housing Developments

Housing Development	Family Units	Elderly Units	Total
Susquehanna Court	55	20	75
Scattered Sites	96	0	96
Franklin Terrace	108	16	124
Church Street Towers	0	100	100
Farnum Street East	0	169	169
Total	259	305	564

Although the Lancaster County Housing Authority does not own public housing, it has provided funding for the construction of many housing developments in the County, often in conjunction with the Low-Income Housing Tax Credit Program. These housing developments often provide lower income residents the ability to live in integrated and affordable housing as supported by the chart below showing the racial and ethnic composition of selected developments.

Table 29. Selected Subsidized Developments in Lancaster County by Racial Composition

Development	Area	White	Black	Other	Declined to report	Hispanic (any Race)
Brunswick Farms	Mountville	28	16	10	2	34
Country Club	Lancaster	47	22	6	8	52
3 Center Square	Maytown	16	3	2	0	6
Park Avenue	Lancaster City	18	5	1	0	6
Ephrata Family Hsg.	Ephrata	8	0	1	0	4
Golden Triangle	Manheim Twp.	34	12	8	0	24
Marietta Senior	Marietta	46	7	0	0	2

Source: Community Basics, Inc. 2019

Both the Lancaster City Housing Authority and the Lancaster County Housing Authority offer a housing preference for persons experiencing homelessness. For every 5 Vouchers issued on the waiting list one Voucher will be offered to someone experiencing homelessness. The Lancaster County Homelessness Coalition will make referrals for the available Vouchers.

Table 30. Lancaster County Housing Authority Program Participants; Voucher and Mod Rehab Programs

	Persons	Percent
Race		
White	705	78%
Black	179	20%
American Indian	3	.4%
Asian	4	.4%
Pacific Islander	0	
Other	9	1%
Ethnicity		
Hispanic	399	44%
Non-Hispanic	501	56%
Other		
Elderly	170	19
Disabled	427	47

As part of the briefing provided to new Voucher recipients, the Lancaster County Housing Authority also conducts activities to affirmatively further fair housing by counseling tenants as to location of units outside of areas of poverty and assisting them to locate these units.

Fair housing training was provided to the Lancaster County Housing staff most recently in August 2019 by LHOP's HEEI.

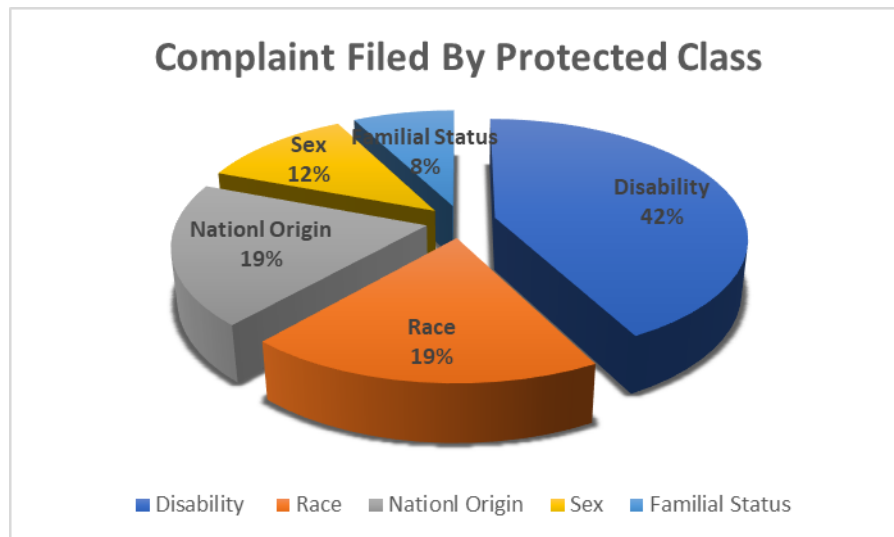
The Lancaster City Housing Authority is committed to providing reasonable accommodations to persons with disabilities. Within their developments there are 44 units that are wheelchair accessible, 15 units that are designed for persons with hearing disabilities and 12 units designed for persons with vision disabilities.

Interpretation 18: The housing assistance by the Lancaster City Housing Authority and the Lancaster County Housing Authority are critically important to those who are currently being served. However, there are thousands more in the City and County that need the assistance but cannot access it due to budget constraints and closed waiting lists.

III. Evaluation of Current Fair Housing Legal Status

A. Existence of Fair Housing Complaints

LHOP's Housing Equality and Equity Institute (HEEI) provides a list of fair housing complaints from 2016 to April 2019. Details of those complaints are shown below.



As shown in the pie chart, the majority of fair housing complaints involved the protected class of persons with disabilities (11) followed equally by race and national origin (5 each). The remaining five (5) complaints involved gender and familial status. Of the 26 fair housing complaints filed in Lancaster County since 2016, nine (9) were from City residents and 17 were from County residents. Two (2) of these were retaliation complaints. Most complaints were filed by persons that are White, four (4) were filed by Blacks and eight (8) were filed by persons that are Hispanic. As a result of mediations and conciliations done by LHOP's HEEI, seven (7) evictions were prevented and six (6) disabilities were accommodated.

The Pennsylvania Human Relations Commission (PHRC) is tasked to enforce state laws that prohibit discrimination under the Pennsylvania Human Relations Act. The Pennsylvania Human Relations Act was created in 1955 and amended in 1997; the Act prohibits certain discriminatory practices because of race, color, religious creed, ancestry, age, or national origin by employers, employment agencies, and labor organizations. This Act additionally created the PHRC in the Governor's Office and defined its powers. PHRC's mission is to "promote equal opportunity for all and enforce Pennsylvania's civil rights laws that protect people from unlawful discrimination."

PHRC is located in Harrisburg. The organization investigates employment and housing discrimination complaints on behalf of the US Equal Opportunity Commission (EEOC) and the US Dept. of Housing and Urban Development (HUD), respectively. PHRC continues to operate its Fair Housing Hotline (1-855-866-5718), which was established in 2013 and refers callers to the appropriate PHRC housing investigator or to

the appropriate agency when the call is not related to discrimination. The toll-free hotline has helped ensure faster processing of housing complaints and faster relief to discrimination victims.

B. Public Sector

1. Funding

- a. Community Development Block Grant Program (CDBG) – Lancaster County Redevelopment Authority administers the CDBG funds from HUD that are provided to the County of Lancaster. The City of Lancaster receives CDBG funds directly from HUD.

In 2019, the County of Lancaster will receive \$2,820,212 in CDBG funds; \$1,681,158 in HOME Investment Partnership (which is also used in the city of Lancaster); and \$242,965 in emergency solutions Grant Funds. These funds are supplemented with 1,000,000 in Program income and reprogrammed funds (funds unspent from prior years). The goals for these funds are:

- Create affordable rental units
- Create affordable owner units
- Rehabilitate existing renter units
- Rehabilitate existing owner units
- Reduce the number of blighted properties
- Support water, sewer, neighborhood street improvements, and public facilities
- Assist first time homebuyers
- Support housing services
- Support rapid rehousing services and emergency shelter activities

The City of Lancaster will receive an entitlement amount of \$1,660,779 in CDBG funds and \$142,487 in Emergency Solutions Grant (ESG) funds. The goals for these funds are:

- Provide decent affordable rental and owner-occupied housing for low- and very-low income persons
- Upgrade public infrastructure and facilities in income-eligible areas
- Provide human services for low- and very-low income City residents
- Improve accessibility for person with disabilities
- Support emergency shelters and improve support services for persons experiencing homelessness.

Lancaster County allocates funds from its Affordable Housing Trust Fund (AHTF) to encourage affordable housing development throughout the county. The Pennsylvania Optional County Affordable Housing Trust Funds Act of 1992 (Act 137) allows counties to raise revenues for affordable housing efforts by increasing the fees charged by the Recorder of Deeds Office for recording deeds and

mortgages. Lancaster County initiated its AHTF in 1994. In 2018, the County received \$354,361 in recording fees. These revenues are used to cover the required 25% match for the County's HOME Program, if needed and to provide funds to the Lancaster Housing Opportunity Partnership (LHOP) to expand housing opportunities in the County and City.

b. Continuum of Care

The Lancaster County Homelessness Coalition is the lead agency in Lancaster County and City for activities designed to resolve and prevent homelessness. Referred to as LancoMyHome, the Coalition oversees the coordinated entry system for persons seeking homeless services in Lancaster County. LancoMyHome also administers HUD funding for rapid rehousing financial assistance. LancoMyHome also completed a Strategic Plan which addressed many other related activities to prevent homelessness and assistance to help persons maintain housing.

c. Low Income Housing Tax Credit

The Tax Reform Act of 1986 includes Section 42 of the Tax Code, the Low-Income Housing Tax Credit Program. The Tax Credit program provides a tax incentive to owners of affordable rental housing. The incentive is an annual tax credit (a dollar for dollar reduction in the taxpayer's federal taxes) earned in the initial ten years following the time when the units are placed in service, assuming program requirements are met. A developer markets or "syndicates" the credits allocated to the development to investors whose contributions are used as equity in the developers' financing plan. The Pennsylvania Housing Financing Agency (PHFA) has been designated as the allocating agency for Pennsylvania. The PHFA continues to be a major source of financing for projects in Lancaster County for acquisition, rehabilitation, construction and preservation of affordable housing. The County also encourages developers to apply to the Federal Home Loan Bank of Pittsburgh which provides low-cost funding and opportunities for affordable housing and community development to 317-member financial institutions in Delaware, Pennsylvania, and West Virginia.

2. Planning, Zoning and Building Codes

The Commonwealth of Pennsylvania is structured so that municipalities have the power to establish zoning and land development plans. Each municipality's regulations and ordinances govern the type of housing that may be constructed, the density of housing and the various residential uses in a community. Local officials in each municipality determine the community's commitment to housing goals and objectives. The Lancaster County Planning Commission (LCPC) is an advisory body that reviews all proposed amendments and new municipal zoning ordinances;

however, it lacks the power to reject or amend zoning ordinances. When proposed regulations are found to be potentially inconsistent with the Fair Housing Act, LCPC continues to advise municipalities with municipal solicitors about ways to eliminate discriminatory effects.

The *2013 Analysis of Impediments to Fair Housing Choice* highlighted the potential barriers for the siting of group homes. The Lancaster County Planning Commission undertook a review of the zoning provisions related to group homes in 18 of the county's 60 municipalities. Each municipality adopts its own zoning code and is responsible for its own land use decisions; the Lancaster County Planning Commission is an advisory governmental body only and does not have jurisdiction over municipal land use regulations.

The surveyed municipalities are representative of the County, including 6 urban, 3 suburban, and 9 rural or semi-rural municipalities. The survey did not include a review of amendments that have not been codified, thus it is possible that some updates are not reflected in this review.

The goals of the survey were to A) see whether ordinance provisions related to group homes had changed at all since the 2013 AI review, and B) to identify any new or persistent zoning barriers to group homes.

Because the Fair Housing Act is constantly being interpreted and reinterpreted by the courts as it relates to zoning, it is important to note that there are no clear-cut answers, and any answers are subject to change. Thus, the findings are merely intended to draw attention to any *potential* conflicts with the Fair Housing Act, with the understanding that municipalities should always seek the advice of their solicitors when acting on fair housing issues.

Findings

Since the previous review of municipal zoning regulations related to group homes undertaken as part of the 2013 AI, there have been some important improvements. Though there are still potential barriers to group homes in some municipal regulations, overall the trend has been positive.

The first positive trend in Lancaster County group home regulations is towards specific citation of the Fair Housing Act in group home definitions. This is an important acknowledgement that municipalities are aware of the FHA and recognize their obligation to make reasonable accommodations. Of the ten communities that defined group home as a separate term, four referenced the FHA in the definition, typically stating that it was the intent of the municipality to comply with the intent of the FHA. Of the twelve communities that included group homes within the definition of family, nine referenced the FHA in the definition.

Another trend is the inclusion of group homes in the definition of family. This is important because it means that group homes are permitted just like a family, in any type of dwelling unit, wherever dwelling units are permitted. Twelve of the eighteen municipalities included a group home definition within the family definition.

There has also been improvement in how group homes are permitted. In municipalities where group homes are still defined as a separate use, a majority allow group homes as a use permitted by right –meaning the use may be approved administratively and does not require a public hearing or adherence to additional standards and criteria. Only three municipalities still allow the use as a special exception, which opens the use up to public scrutiny and additional criteria. The majority of municipalities also allow group homes in all zoning districts where other housing types are permitted.

Unlike the previous survey of municipal ordinances, none of the ordinances had requirements for minimum distances between group homes.

Though most trends are positive, there are still a handful of communities that apply additional standards to group homes that are not applicable to other dwelling types, such as requiring: group home registration or notification, additional parking, periodic inspections, or minimum staffing levels. Because such standards are generally not applicable to other housing types or family-occupied dwellings, municipalities should be sure to review them with their solicitors to ensure there is no discriminatory intent or practices that result in disparate impact.

Group homes are arguably less of an issue now than they have been in the past. The first reason is because regulations have been adjusted to be more consistent with the FHA, allowing group homes in a manner more similar to other family households. The second reason is a shift in best practices away from group home settings, and towards independent living situations.

Since many very low-income people are unable to afford an apartment or house on their own, an increased number of households are sharing housing. This has had created some resistance by zoning officers who enforce zoning ordinances concerning the number of unrelated people in one unit. This could limit housing opportunities for low- and very low-income persons in obtaining and maintaining affordable housing.

3. Property Taxes

Taxes have an impact on housing affordability. Many people in protected classes have low incomes. While not an impediment to fair housing choice specifically, real estate taxes can affect the location where people live. In Pennsylvania, property

taxes are comprised of county, municipal and school district taxes. The Lancaster County Property Assessment Office assesses real estate within the county for local property tax levy. The real estate tax is the primary source of revenue for county government. The County Treasurer is responsible for collecting taxes on approximately 130,000 of the 185,000 taxable properties in Lancaster County. Lancaster County currently collects taxes for 40 out of 60 taxing districts throughout Lancaster County. The Treasurer collects delinquent real estate taxes for the County as well as for each municipal tax for those districts that do not have an independently elected tax collector. The Treasurer's Office does not collect current taxes for any school district in Lancaster County. Lancaster County completed a countywide reassessment that became effective January 1, 2018. Assessed values are based on property market values as of January 1, 2018. The predetermined ratio is 100%.

In the City, owners of real estate pay a property tax to the County, the City, and the school district. Each of these three taxing bodies has a different rate that is set by their respective elected officials. The County Commissioners set the tax rate for property taxes paid to the County; the Mayor and City Council set the tax rate paid to the city; and the school board set the rate for property taxes paid to the school district lived in (School District of Lancaster and in the annexed areas, Conestoga Valley or Lampeter Strasburg).

The amount of property tax paid is based on the County's assessed value of real property that one owns. The assessed value of each property is not the same as the market value of each home. The market value is the value of the property, if one were to sell it.

One of the factors people consider when choosing where to purchase a home is the millage rate. Property tax rates are calculated in mills and are based on millage rates. A mill is equal to \$1 in taxation for every \$1,000 of assessed value of each real estate property.

The largest variance in millage rates occurs in school districts. The municipalities with the three highest school millage rates are:

- Columbia Borough (26.46)
- Christiana Borough and Sadsbury Township (25.6 mills)
- City of Lancaster/Lancaster Township (21.8734)

The municipalities with the highest overall millage rates are:

- Columbia Borough (37.3710)
- City of Lancaster (36.4844)
- Christiana Borough (32.182)

4. Affirmative Marketing Policy

The County Redevelopment Authority required owners of HOME-assisted units to certify that they will exercise Affirmative Fair Housing Marketing of vacant units and all other rehabilitated units in a property when they become vacant as described in 24 CFR 92.351(b) as amended. The County Redevelopment Authority also requires owners of subsidized housing to prepare, provide and maintain an approved Affirmative Fair Housing Marketing Plan. All rental housing developments that are funded with HOME funds are monitored every three years. During the monitoring, staff reviews the development's Affirmative Fair Housing Marketing Plan. However, almost all subsidized housing developments in Lancaster County have waiting lists; one senior housing development waiting list has over 200 applicants and stopped taking applications.

5. Public Transportation

As in years past, most workers in Lancaster County drive alone to their place of employment (79%). Only 9% of workers in Lancaster County carpool to their jobs. 5% of employed individuals work from home. Less than 1% of workers use public transportation, while 4% walked to work and 2% used some other form of transportation. (2013-2017 ACS 5-Year Estimates)

Claritas estimates that in 2019 9.18% of County residents did not have a vehicle while 22.1% of City residents did not have a vehicle.

Access to reliable transportation has a strong bearing on where people can live. Mass transit is rarely able to fully serve the needs of commuters. Transportation infrastructure is a determinate of where low-income housing tax credit developments are sited which impacts the location of publicly supported housing.

In Lancaster County, public transportation is provided by South Central Transit Authority which provides service in Lancaster and Berks counties. SCTA offers fixed bus routes and shared ride service. During fiscal year 2019 there were 1,778,283 rides provided on the fixed route buses and 291,921 rides provided under Shared Ride service. Both were increases over the prior two years.

Households without a vehicle are predominantly low-income households. Households without a vehicle generally have a difficult time accessing jobs and services, especially in rural areas such as the southern part of Lancaster County. Access to public transportation is critical to these households. Employment is more challenging to obtain and maintain without easy access to public transportation.

The lack of fixed route services to the southern portion of the County creates a problem for residents without a vehicle. There are few employment opportunities within a distance not necessitating a car. However, an Environmental Justice Analysis report (available at <https://lancastercountyp planning.org/DocumentCenter/View/1243/EJ-Analysis-Full-report-FINAL>) shows that transportation investments are being made in areas where both low income and racially diverse populations reside. The report shows that public transportation in Lancaster County does serve the highest poverty and most diverse areas, thus serving the most amount of people possible.

6. Policies Affecting the Location of Subsidized Housing

The larger subsidized housing projects involve Low Income Housing Tax Credits (LIHTC) which is allocated by the Pennsylvania Housing Finance Agency (PHFA). Their policies have a significant impact on the siting of these developments. Developers seeking tax credits must follow the 2019-2020 Allocation Plan established by PHFA. The criteria upon which applications are judged include situations and conditions that are generally unavailable to the rural areas of the County. Lancaster County is included in the Urban Pool; however, there are many areas of the county, such as the southern portion of the county that are very rural in nature and as such are unable to obtain points under the Allocation Plan for selection criteria including access to public transportation and access to community services, close proximity to employment, health and retail establishments and hospitals. This puts applications for affordable housing subsidized by LIHTC at a disadvantage.

7. Accessibility of Residential Housing Stock

The federal Section 504 contains design requirements applicable to federally funded new construction of public housing or assisted housing with five or more units in the same project constructed after July 1988. It states that certain percentages of the housing must be fully accessible to persons with physical impairments (5%) and visual impairments and/or hearing impairments (2%). As can be seen below, the County exceeds these requirements in its assisted housing units.

Table 31. Publicly Supported Housing in Lancaster County by Number and Type of Accessible Units

Project Name	Total Number of Units	Handicap Accessible	Handicap Adaptable	Hearing and Vision	Hearing/Vision Adaptable
3 Center Square Apts.	23	3	3	3	0
Cloister Heights Apts.	15	1	5	1	5
Country Club Apts.	95	10	17	4	0
Dial Apts.	40	4	36	2	38
East King Street Apts.	8	3	0	0	0
Fairview Meadows Apts.	60	60	0	0	0
Fordney Road Apts.	15	7	0	0	0
Golden Triangle Apts.	58	6	16	2	0
Heatherwoods Apts.	56	3	24	1	0
Landisville II	24	7	0	7	24
Larkspur Apts.	29	2	0	1	0
Manor Heights Apts.	70	8	4	2	0
Marietta Senior Apts.	56	6	50	6	50
Mountain View Apts.	36	4	36	5	36
Park Avenue Apts.	24	4	0	4	0
Willows at Landisville	60	6	12	2	60
Walnut Street Apts.	18	2	16	2	16
Westminster Place Apts.	61	8	53	3	58
Totals	748	144	272	45	287

It is not possible to know definitively the number of private homes that are accessible.

C. Private Sector

1. Real Estate Practices

The Lancaster County Association of Realtors (LCAR) has over 1,500 members committed to providing buyers and sellers with knowledgeable, ethical and competent agents. The LCAR website contains a section on Fair Housing including links to HUD's Accessibility Guidelines; Fair Housing and Equal Opportunity; Filing a complaint; Persons with disabilities; National Fair Housing advocate and the Landlord Tenant Act. LCAR advocates at all levels of government on behalf of consumers and Realtors for affordable housing and balanced land-use public policy. The LCAR website states "The Association subscribes to the code for equal opportunity and believes that it can best be accomplished through leadership, education, and mutual cooperation. Members are accepted without regard to race, color, religion, sex, handicap, familial status or national origin."

All Realtors must abide by the *Code of Ethics and Standards of Practice* which includes in Article 10 “Realtors shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, national origin, sexual orientation, or gender identity. “

2. Advertising – Newspaper and Social Media

Increasingly, rental units are advertised online and through social media and significantly less so in local newspapers. In March of 2018, HUD charged Facebook with violating the Fair Housing Act. HUD alleged that Facebook's targeted advertising platform violates the Fair Housing Act. By restricting who can view housing ads, HUD alleges that FaceBook is encouraging, enabling and causing housing discrimination. Because FaceBook mines users' personal data and uses characteristics of protected classes to determine who can view housing ads, even if it is not the advertiser's intent to discriminate. It could be possible for a landlord to exclude members of protected classes (parents, people with disabilities, etc.) FaceBook had previously entered into a settlement with civil rights groups including the National Fair Housing Alliance, the American Civil Liberties Union, the Communications Workers of America to charge its microtargeting ad system for job, housing and loan advertisements.

HUD also began reviewing Twitter's and Google's ad practices as part of housing discrimination probe. Currently the companies ask advertisers to comply with fair housing laws and non-discrimination policies when selecting their ads; however, there is little oversight.

3. Private Financing

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). Most institutions involved in lending are required by HMDA regulations to comply and report information on:

- Loans denied
- Withdrawn, or
- Incomplete.

The National Community Reinvestment Coalition (NCRC) completed a report for Lancaster County analyzing data from the 2017 HMDA; 2018 FFIEC Small Business Lending; and June 2018 FDIC Branch Summary of Deposits. The analysis includes a 2015-2017 Denial Disparities by Race chart that shows how likely it is that a person of color would be denied a home purchase loan in comparison to a white borrower. A 1.0x would mean that a borrower has the same chance of being denied as a white non-Hispanic borrower. However, a 2.0x would suggest that a

borrower is twice as likely to be denied a loan as a white borrower. The methodology shows that low- or moderate-income Black borrowers have a disparity rating of 1.5x and low- or moderate-income Hispanic borrowers have a 1.4x change of denial. Interestingly, middle- or upper-income borrowers that are Hispanic have a 1.9x rating compared to a 1.2x rating for middle- or upper-income borrowers that are Black. Middle- or upper-income borrowers that are Asian have a 1.4x rating.

HMDA data for 2017 shows that denial rates for Blacks and Hispanics hover around 25% while the denial rates for White were 15%.

4. Foreclosures

While the foreclosure rate in Pennsylvania is at its lowest level since before the recession, it still has one of the highest rates in the country. In Lancaster County, the foreclosure rate declined 31% since 2016. In 2017, there were 1,054 foreclosures in Lancaster County which translates to one for every 195 houses. (Source: ATTOM Data Solutions). Foreclosures are often purchased by property owners who can put the properties back into productive use. Those that are not financially viable are frequently referred to the Lancaster County Land Bank for acquisition. Those foreclosed properties that are in deteriorated states are often referred to the Lancaster County Vacant Property Reinvestment Board for a blight determination. This formal declaration of blight enables the Lancaster County Redevelopment Authority to acquire the properties by eminent domain and sold to developers that can rehabilitate the property for productive use.

5. Alternatives to Eviction

With the moratorium on evictions due to the pandemic, many landlords are opting to refuse to renew leases to remove a non-paying tenant and obtaining a paying tenant. While this is legal, it becomes a method to avoid the purpose of the eviction moratorium which is to keep people in their homes.

D. Identification of Impediments to Fair Housing Choice

- Ongoing need for education and information due to increased population. As cited in the beginning of this document, there is projected to be approximately 25,000 additional people in Lancaster County by 2024. The additional people may need education and information about fair housing. Additionally, it is highly likely that there will be new elected officials at the municipal level that may not be aware of the fair housing requirements. For these reasons, ongoing education and information is important to prevent the impediments to fair housing choice.

- Community opposition – While there have been instances of opposition to affordable housing in Lancaster County, there have also been instances where affordable housing was built with little or no opposition. The affordable housing developers in Lancaster County have become adept at informing neighbors of proposed developments and addressing any legitimate concerns of infrastructure, screening, traffic patterns, etc. However, there sometimes remains an individual or two that continue to oppose affordable housing in general. During the planning for the creation of The Willows in Landisville, an individual repeatedly threatened to sue in order to block the development. The development was built and there appears to be no negative effects on the community.

There have been situations where it is difficult to decipher if the opposition is based on legitimate concerns or a smokescreen to prevent affordable housing. In 2016, Community Basics, Inc, an affordable housing developer, proposed a development of 138 apartments in six buildings; 111 apartments would be built with the assistance of the Low-Income Housing Tax Credit. Those units would have below market rents affordable to low income workers. The development was a part of a larger development plan that included a mix of single-family homes and multi-family dwellings. The site of the proposed development in Salisbury Township was zoned for industrial use. Neighbors expressed concern about the water table, traffic and the rural character of the municipality. Salisbury Township Zoning Hearing Board denied a special exception request for the creation of affordable housing because it wanted the land to remain zoned for industrial use. The developer contended that the lack of public water made other sites zoned for multi-family development unfeasible. The Township Supervisors states that residents “may not like this type of housing in their backyards.” After expending over \$100,000 in legal and consultant fees and foreseeing an unsuccessful outcome, the developer abandoned the plan for multi-family housing and chose to sell the 105 acres.

- Lack of community revitalization strategies

Several communities have revitalization strategies but are more often hampered but sufficient funding and private partnerships to implement the strategies.

- Lack of private investments in certain neighborhoods – The Lancaster County Redevelopment Authority and other partners continue their Borough Revitalization initiative to spur economic development in the 15 small boroughs in Lancaster County. Affordable housing is often more readily available in boroughs and by boosting economic development efforts, residents can live in a vibrant community, sometimes without relying on a car for employment.

- Lack of regional cooperation
As noted previously, Pennsylvania is a Commonwealth which means that the smallest unit of government has the authority on issues of land use, zoning, and code enforcement. While Lancaster county Redevelopment Authority is involved with the South Central Assembly to be a part of regional initiatives, it remains challenging to work regionally.

- Location and type of affordable housing

There is an overall lack of affordable housing, but the location and type of the existing affordable housing is an acceptable mix of urban and small boroughs. There is disagreement over whether there is more merit to locating new affordable housing in rural areas to provide access to low income residents; however, most funders prefer to site affordable housing near transportation routes to enable residents to use mass transit. Because there is little transportation to the southern part of the County, there has not been any new publicly supported affordable housing in that area for two decades.

- Occupancy codes and restrictions – There have been some complaints expressed by social service professionals about occupancy codes in townships and boroughs in Lancaster County that limit the number of unrelated persons making up a household. By limiting the number of unrelated people in a unit, households are prevented from sharing housing which is often the only way some households can afford housing given their low incomes. The extent to which these occupancy standards exist and are enforced and their potential impact on housing affordability should be reviewed.
- Private discrimination – While there are anecdotal stories of private discrimination, few individuals are willing to take the time and effort to file a complaint in Harrisburg. Even if the complaint were able to be filed in Lancaster, many individuals that feel they have been discriminated against want to focus on finding a place to live. For this reason, the public should not interpret the relatively low number of housing discrimination complaints as an indication of the lack of discrimination.

- Housing Conditions/ Lead Based Paint

It is likely that lead based paint hazards exist in much higher proportion in housing located in the City and the County's boroughs and rural areas, where housing is more likely to have been built before 1940 (see table X), renter-occupied and substandard. National data indicates that as many as 90% of all houses built before 1940 contain lead-based paint. According to HUD, most of the extremely low-income, low-income and moderate-income families reside in these older housing units. Lead-based paint has severe detrimental health

hazards for young children and pregnant women. In order to protect residents from lead-based paint hazards some communities like the City of Lancaster and Columbia Borough have instituted ordinances requiring the testing and remediation of lead-based paint hazards as a condition of obtaining a license for rental units. While a fair housing violation, this may have the unintended consequence of encouraging landlords to be less likely to rent to households with children. Local officials must be attuned to this possibility when enforcing the ordinances.

E. Assessment of Current Fair Housing Program and Activities

The previous Analysis of Impediments to Fair Housing Choice was completed in 2013. It quickly became apparent that the number of impediments were too high to fully address and that many of the impediments identified were for issues over which the City and County had no control or substantive ability to impact or change.

Table 32. 2013 Impediments and Progress to Date

Impediment	Action Items	Progress to Date
With an increasing number of people in the county, there is more demand for an ongoing educational program for fair housing requirements	Provide ongoing fair housing education in the form of one-to-one contacts, group meetings, training sessions, seminars, etc.	Staff of LHOP provided input on the target populations where outreach was needed and formulated a plan to address the needs cited. Since people with disabilities was the basis for most complaints, many efforts were undertaken to expand the understanding of fair housing requirements for people with disabilities, reasonable accommodation, service animals, etc.
An increased need exists for ongoing education of municipal officials of the benefits and requirements of fair housing.	<ol style="list-style-type: none"> 1. Provide ongoing fair housing education in the form of one-to-one contacts, group meetings, training sessions, seminars, etc. 2. When proposed regulations are found to be inconsistent with the Fair housing Act, the municipality should be advised to consult with municipal solicitors about ways to eliminate discriminatory effects. 	<p>Staff of LHOP provided input on the areas where outreach was needed and formulated a plan to address the areas cited. In 2018, LHOP began meeting with municipal officials to discuss fair housing issues.</p> <p>Review at least three regulations/ordinances annually for consistency with Fair Housing Act. This did not occur due to staff constraints.</p>

Impediment	Action Items	Progress to Date
	<p>3. Create an event that addresses potential fair housing concerns relating to regulations</p> <p>Provide sample ordinances that support fair housing requirements and access.</p>	<p>Hold an event to address potential fair housing concerns for municipalities. All municipal officials were invited to each of the Fair Housing Summits and several officials did attend.</p> <p>Create sample ordinances to provide to municipalities when requested. This did not occur due to staff constraints.</p>
<p>The limited transportation options make it difficult for persons without vehicles to get to where they want and need to be. This may limit fair housing choice.</p>	<p>Create a dialog between various transportation agencies surrounding current and future transportation needs and innovative ways to tackle needs.</p>	<p>The measurement was to coordinate a meeting of relevant parties to address transportation issues. This did not occur because the relevant parties agreed that transportation was not an area in which the City and County could have an impact given the funding structure for transportation issues.</p>
<p>Persons with disabilities are limited in where they go due to architectural barriers in the community and in private home construction like curbs, sidewalks, steps, narrow door openings, etc.</p>	<ol style="list-style-type: none"> 1. Continue to provide assistance to programs that assist households with persons with physical disabilities to complete accessibility modifications to their homes. 2. Provide assistance throughout the County and City. 3. Encourage affordable housing developers to increase the number of accessible units over 	<p>The measurements include: Maintain County funding for ADA Accessibility Programs</p> <p>Maintain funding for ADA improvements in public areas and continue to include necessary modifications in Homeowner Rehab and Critical Repair projects when appropriate.</p> <p>Evaluate effectiveness of current programs.</p>

Impediment	Action Items	Progress to Date
	<p>and above the mandated amount.</p> <p>4. Encourage private housing developers to make all construction visitable.</p> <p>5. Encourage municipalities to incentivize developers to create accessible housing.</p> <p>6. Work with employers to hire individuals with disabilities to create more buying power among individuals with disabilities. Increased buying power may provide increased housing choice.</p>	<p>Create a committee to discuss the most effective methods to encourage affordable, accessible housing.</p> <p>Hold a roundtable discussion with private housing developers to discuss the issue of increasing visitable features in housing development. This did not occur.</p> <p>Develop a draft model zoning ordinance to incentivize developers to create accessible housing. This did not occur due to staff constraints.</p> <p>Hold a roundtable discussion with relevant parties to discuss the issue of increasing employment opportunities for persons with disabilities. This did not occur.</p>
<p>Home financing data indicates a disparity between denial rates among racial and ethnic groups. However, because the sample size is statistically small, this indicates a need for further study.</p>	<p>Conduct a Home Mortgage Disclosure Act (HMDA) analysis periodically to gauge equity in housing finance. Meet with lenders to discuss concerns and partner to increase fair housing opportunities.</p>	<p>The measurement was to complete an annual analysis of the HMDA data. While the Redevelopment Authority staff has not analyzed data every year since 2013, several years have been reviewed and the data continues to show a higher denial rate for non-Whites than Whites, even when income is factored in. However, because the</p>

Impediment	Action Items	Progress to Date
		number of minorities is still significantly low, staff is cautious to definitively determine that discrimination is occurring
Lancaster County and City of Lancaster are racially and ethnically segregated.	<ol style="list-style-type: none"> 1. Provide education to housing professionals in terms of how to effectively reach and serve all persons including those with Limited English proficiency. 2. Consider conducting a survey of why people live where they live. 3. Provide comprehensive housing education and municipal services/programs and information in multiple languages to broaden awareness of choice. 	The measurement was to develop a task force or committee to determine the most effective methods to accomplish these tasks. This was not accomplished.
Homeownership rates for City residents lag behind other municipalities in Lancaster County. This may indicate a lack of homeownership education, financial education and services for City residents.	Ensure that homeownership education, financial education, services and funding are available/marketed to all citizens of Lancaster County, including City of Lancaster.	The measurement was to evaluate the effectiveness of marketing campaigns for homeownership programs.
Homeownership rates for people of color lag behind other races. This may indicate a lack of homeownership education and services for people of color.	Ensure that homeownership and financial education and services are available to everyone including people of color.	The measurement was to conduct a review of homeownership education and services to ensure that they are effectively and uniformly provided to all persons. The measure also called for the continuance of LHOP's Homeownership

Impediment	Action Items	Progress to Date
		<p>Fair and to ensure that it is effectively and uniformly marketed to all persons. LHOP administers an affordable homebuyer assistance program. It is marketed online, through printed materials, and through partner organizations, realtors, and lenders. Classes are available in both English and Spanish.</p>
<p>The lack of affordable housing in all areas of the county may limit fair housing choice.</p>	<ol style="list-style-type: none"> 1. Encourage the development of affordable housing in all regions of the county 2. Ease restrictions on multi-family housing where feasible to create more rental housing opportunities. 	<p>The measurement was to coordinate a meeting of all relevant parties to determine appropriate and effective methods to accomplish action. While no meeting was held on this topic, Lancaster County encourages affordable housing development in all areas of the county as a part of its Request for Proposals (RFP) process for HOME Investment Partnership funds for affordable housing preservation and construction.</p> <p>The measurement was to complete the Lancaster County Housing Study and ensure wide distribution. LHOP completed its Housing Study of Lancaster County as distributed it widely.</p> <p>The measurement was for the County and City to identify areas where</p>

Impediment	Action Items	Progress to Date
		restrictions exist. This did not occur due to staff constraints.
People with Limited English Proficiency may have barriers to fair housing.	<p>1.Ensure that all housing related documents are available in multiple languages and marketed to appropriate subpopulations</p> <p>2.Create a policy concerning individuals with Limited English Proficiency</p> <p>3.Provide training for nonprofits/municipalities on how to create equal access.</p>	<p>Lancaster County and the City of Lancaster adopted Limited English Proficiency Plans and encouraged all funded nonprofits to adopt similar plans.</p> <p>Part of the LEP plan was to translate housing related documents into Spanish. Marketing does not occur often for city and county as programs are already oversubscribed. To do so would be to generate demand for a service that would be unavailable.</p> <p>The measurement for this impediment was to publish a document on how nonprofit/municipalities can create equal access for those with Limited English Proficiency. This was not done.</p>
The Pennsylvania Housing Finance Agency (PHFA) siting policies for projects using Low Income Housing Tax Credit (LIHTC) could preclude the southern end of Lancaster County from developing new subsidized housing because it does not have access to public transportation or access to community serving agencies.	Invite leaders together to discuss concerns and create a plan to begin to address challenges.	The measurement was to hold at least one meeting to discuss the issue. This meeting did not happen. This impediment, while significant locally, was not perceived to be beneficial to the future residents of proposed housing developments in rural areas. This impediment was not pursued.

Impediment	Action Items	Progress to Date
<p>The distribution of Housing Choice Vouchers (section 8) in the City of Lancaster as well as the County of Lancaster is unevenly distributed. Landlords may be hesitant to participate in the Section 8 Program.</p>	<p>Educate landlords about the benefits of participating in the housing choice Voucher (Section 8) Program.</p>	<p>The measurement proposed was to publish articles on relevant websites providing education. Incorporate education in LHOP's Landlord Forums.</p> <p>Neither the City nor the County published articles in relevant websites to provide education. However, LHOP staff does talk to landlords in the course of their work and do promote the Section 8 Program to landlords.</p>

Table 33. 2021-2025 Impediments to Fair Housing

	Impediment	Action Items
1.	With an increasing number of people in the county, there is more demand for programming to educate partners on the requirements of fair housing.	Provide ongoing fair housing education in the form of one-to-one contacts, group meetings, training sessions, seminars, etc. Since people with disabilities was the basis for most complaints, many efforts will be taken to expand the understanding of fair housing requirements for people with disabilities, reasonable accommodation, service animals, etc.
2.	People with Limited English Proficiency may have barriers to fair housing	<p>Ensure that fair housing materials are available in a variety of languages and formats in accordance with Limited English Proficiency Plans</p> <p>Ensure that all nonprofits that provide housing related services make available documents in multiple languages and marketed to appropriate subpopulations or have a translator available for housing related information</p> <p>Provide education to housing professionals in terms of how to effectively reach and serve all persons including those with Limited English proficiency</p>
3.	An increased need exists for ongoing education of municipal officials of the benefits and requirements of fair housing.	<p>Provide ongoing fair housing education in the form of one-to-one contacts, group meetings, training sessions, seminars, etc.</p> <p>When proposed municipal regulations are found to be inconsistent with the Fair Housing Act, the municipality should be advised to consult with municipal solicitors about ways to eliminate discriminatory effects</p>

	Impediment	Action Items
4.	Persons with disabilities are limited in where they go due to architectural barriers in the community and in private home construction. Barriers include curbs, sidewalks, steps, narrow door openings, etc.	<p>Continue to help programs that assist households with persons with physical disabilities to complete accessibility modifications to their homes.</p> <p>Provide financial assistance for physical modification throughout the County and City.</p> <p>Encourage affordable housing developers to increase the number of accessible units over and above the mandated amount.</p>
5.	Home financing data indicates a disparity between denial rates among racial and ethnic groups. However, because the sample size is statistically small, this indicates a need for further study.	Conduct a Home Mortgage Disclosure Act (HMDA) analysis periodically to gauge equity in housing finance. Meet with lenders to discuss concerns and partner with lenders to increase fair housing opportunities
6.	Lancaster County and City of Lancaster are racially and ethnically segregated.	<p>Provide comprehensive housing education and municipal services/programs and information in multiple languages to broaden awareness of choice</p> <p>Promote and incentivize the development of affordable housing in both the rental and homeownership market close to employment, transportation, education and commercial resources</p>

	Impediment	Action Items
7.	Homeownership rates for City residents lag behind other municipalities in Lancaster County. This may indicate a lack of availability and or accessibility of homeownership education, financial education and services for City residents.	<p>Ensure that homeownership education, financial education, services and funding are available/marketed to all citizens of Lancaster County, including City of Lancaster</p> <p>Promote the development of affordable homes in the homeownership market through the purchase and rehabilitation of blighted and/or abandoned properties before they enter the home-flipping market.</p>
8.	Homeownership rates for people of color - are disproportionately low.	<p>Ensure homeownership and financial education services are available in communities of color</p> <p>Partner with housing development organizations to promote the development of affordable housing for purchase through targeted funding opportunities in communities of color</p> <p>Conduct county wide housing study to gain comprehensive information about available housing</p>
9.	The lack of affordable housing in all areas of the county may limit fair housing choice.	Encourage the development of affordable housing in all regions of the county
10.	The geographic distribution of Housing Choice Vouchers (section 8) in the City of Lancaster as well as the County of Lancaster is unevenly distributed.	<p>Educate landlords about the benefits of participating in the Housing Choice Voucher (Section 8) Program</p> <p>Educate the community by correcting myths and reversing the stigma about households with Housing Choice Voucher</p>

	Impediment	Action Items
11.	Housing Codes, including lead-based paint ordinances could inadvertently encourage discrimination against families.	Provide financial assistance to landlords to remediate lead-based paint hazards in rental units and address other housing code hazards