



Analysis of Impediments to Fair Housing Choice

Cumberland County § Carlisle Borough January 2014



TABLE OF CONTENTS

Introduction	1	Demographics	11	Housing	31
Fair Housing Choice	1	Locational Context.....	12	General Inventory Trends.....	32
Purpose of the Analysis of Impediments	2	Population.....	13	Ownership and Protected Class Status	39
The Relationship Between Fair Housing and Affordable Housing	3	Race and Ethnicity	15	Household Size and Protected Class Status	42
The Federal Fair Housing Act ...	4	Segregation.....	16	Housing Costs.....	43
The Pennsylvania Human Relations Act.....	6	RCAPs/ECAPs	17		
Comparison of Accessibility Standards	7	Race and Income	21		
Methodology.....	8	Poverty.....	23		
		Employment	25		
		Familial Status.....	27		
		Ancestry	28		
		Disability	29		

Mortgage Lending 47

Mortgage Loan Summary.....	48
Application Trends.....	50
Geographic Distribution of Approvals by Lender.....	51
Mortgage Application Denials	53
High-Cost Lending.....	56
Annual Trends in Mortgage Lending.....	59

Public Sector Policies 63

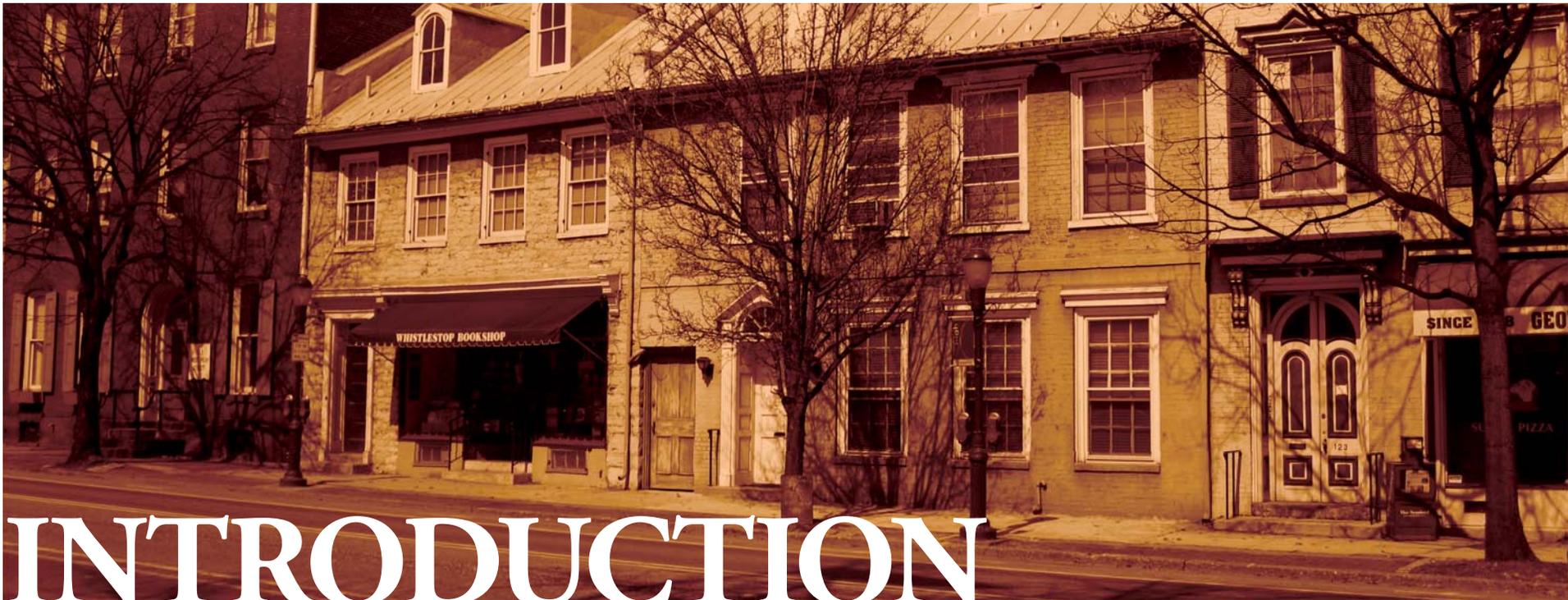
HUD CPD Programs.....	64
Affordable Housing Inventory	68
Distribution of Assisted Housing, 2014	73
Language Access.....	74
Land Use Comprehensive Planning.....	75
Municipal Zoning	78
Public Transit.....	84

Fair Housing Profile 85

Discrimination Complaints....	86
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Observations 89

Impediments to Fair Housing Choice 91



INTRODUCTION

Fair Housing Choice

Equal and unimpeded access to residential housing is a fundamental civil right that enables members of protected classes, as defined in the federal Fair Housing Act, to pursue personal, educational, employment, or other goals. Because housing choice is so critical to personal development, fair housing is a goal that government, public officials, and private citizens must embrace if social equity is to become a reality.

The federal Fair Housing Act prohibits discrimination in housing based on a person's race, color, religion, gender, disability, familial status, or national origin. In addition, the U.S. Department of Hous-

ing and Urban Development (HUD) issued a Final Rule on February 3, 2012 that prohibits entitlement communities, public housing authorities, and other recipients of federal housing resources from discriminating on the basis of actual or perceived sexual orientation, gender identity, or marital status. Persons who are protected from discrimination by fair housing laws are referred to as members of the protected classes.

HUD awards funds from the Community Development Block Grant (CDBG), HOME Investment Partnerships, Housing Opportunities for Persons with AIDS (HOPWA), and Emergency Solutions Grant (ESG) programs directly to eligible municipalities of a certain size. Cumber-

land County and the Borough of Carlisle are both federal entitlement grantees. As a condition of receiving HUD grants, the County and the Borough have specific fair housing planning responsibilities, including:

- Conducting an Analysis of Impediments to Fair Housing Choice
- Developing actions to overcome the effects of identified impediments to fair housing, and
- Maintaining records to support initiatives to affirmatively further fair housing.

HUD interprets these three certifying elements to include:

- Analyzing housing discrimination in a jurisdiction and working toward its elimination
- Promoting fair housing choice for all people
- Providing racially and ethnically inclusive patterns of housing occupancy
- Promoting housing that is physically accessible to and usable by all people, particularly individuals with disabilities, and
- Fostering compliance with the non-discrimination provisions of the Fair Housing Act.

The Borough of Carlisle and Cumberland County have chosen to collaborate on a regional Analysis of Impediments, which will allow both grantees to understand and jointly address housing problems that often transcend political boundaries.

Purpose of the Analysis of Impediments

The Housing and Community Development Act of 1974 requires that any community receiving HUD funds affirmatively further fair housing. Communities receiving HUD entitlement funds are required to:

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

These requirements can be achieved through the preparation of an Analysis of Impediments to Fair Housing Choice (AI).

An AI is a review of a jurisdiction's laws, regulations, and administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing.

It is also an assessment of conditions, both public and private, affecting fair housing choice.

This AI will:

- Evaluate population, household, income, and housing characteristics by protected classes
- Evaluate public and private sector policies that impact fair housing choice
- Identify blatant or de facto impediments to fair housing choice where any may exist, and
- Recommend specific strategies to overcome the effects of any identified impediments.

An impediment to fair housing choice is defined as any action, omission, or decision that restricts or has the effect of restricting the availability of housing choices of members of the protected classes.

This AI serves as the basis for fair housing planning; provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates; and assists in building public support for fair housing efforts. The County and Borough are expected to review and approve the AI and use it for direction, leadership, and resources for future fair housing planning. The AI will serve as a point-in-time baseline against which future progress in implementing fair housing initiatives will be evaluated and recorded.

The Relationship Between Fair Housing and Affordable Housing

To the extent that members of the protected classes tend to have lower incomes, then access to fair housing is related to affordable housing. In many areas across the U.S., a primary impediment to fair housing is a relative absence of affordable housing. Often, the public policies implemented in towns and cities can contribute to the lack of affordable housing in these communities, thereby disproportionately affecting housing choice for members of the protected classes.

This AI goes beyond an analysis of the adequacy of affordable housing in Cumberland County and Carlisle Borough. It defines the context of factors that influence the ability of protected classes to achieve equal access to housing and related services.

The Federal Fair Housing Act

What housing is covered?

The Federal Fair Housing Act covers most housing. In some circumstances, the Act exempts owner-occupied buildings with no more than four units, single-family housing sold or rented without the use of a broker, and housing operated by organizations and private clubs that limit occupancy to members.

What does the Fair Housing Act prohibit?

In the sale and rental of housing

No one may take any of the following actions based on race, color, religion, gender, disability, familial status, or national origin:

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different terms, conditions, or privileges for the sale or rental of a dwelling

- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale, or rental
- Persuade owners to sell or rent at a loss (“blockbusting”)
- Deny anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing

In mortgage lending

No one may take any of the following actions based on race, color, religion, gender, disability, familial status, or national origin:

- Refuse to make a mortgage loan
- Refuse to provide information regarding loans
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees
- Discriminate in appraising property
- Refuse to purchase a loan
- Set different terms or conditions for purchasing a loan

Other prohibitions

It is illegal for anyone to:

- Threaten, coerce, intimidate, or interfere with anyone exercising a fair housing right or assisting others who exercise that right.
- Advertise or make any statement that indicates a limitation or preference based on race, color, religion, gender, disability, familial status, or national origin. This prohibition against discriminatory advertising applies to single family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

Additional Protections for Persons with Disabilities

If someone has a disability (including but not limited to hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex, and intellectual disability) that substantially limits one or more major life activities, has a record of such a disability, or is regarded as having such a disability, a landlord may not:

- Refuse to let the person with a disability make reasonable modifications to a dwelling or common use areas at the person's expense, if necessary for the person to use the housing. Where reasonable, the landlord may permit changes only if the person agrees to restore the property to its original condition when he or she moves.
- Refuse to make reasonable accommodations in rules, policies, practices, or services if necessary for the person with a disability to use the housing.

Housing Opportunities for Families with Children

Unless a building or community qualifies as housing for older persons, it may not discriminate based on familial status. That is, it may not discriminate against families in which one or more children under the age 18 live with a parent, a legal custodian, or a designee of the parent or legal custodian with written permission.

Familial status protection also applies to pregnant women and anyone securing legal custody of a child under age 18.

Housing for older persons is exempt from the prohibition against familial status discrimination if:

- The HUD Secretary has determined that it is specifically designed for and occupied by elderly persons under a federal, state, or local government program
- It is occupied solely by persons who are 62 or older, or
- It houses at least one person who is 55 or older in at least 80% of the occupied units, and adheres to a policy that demonstrates the intent to house persons who are 55 or older, as previously described.

A transition period permits residents on or before September 13, 1988 to continue living in the housing, regardless of their age, without interfering with the exemption.

Recent Changes to HUD Program Regulations

On March 5, 2012, HUD implemented policies to ensure that its core programs are open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status. In response to evidence suggesting that lesbian, gay, bisexual, and transgender individuals and families were being arbitrarily excluded from housing opportunities in the private sector, HUD's aim was to ensure that its own programs do not allow for discrimination against any eligible person or household, and that HUD's own programs serve as models for equal housing opportunity.

This change to HUD program regulations does not amend the Fair Housing Act to prohibit all discrimination in the private market on the basis of sexual orientation, gender identity, or marital status. However, it prohibits discrimination of those types by any housing provider who receives HUD funding, including public housing agencies, those who are insured by the Federal Housing Administration (including lenders), and those who participate in federal entitlement grant programs through HUD.

The Pennsylvania Human Relations Act

In addition to the protected classes listed under the Federal Fair Housing Act, the Pennsylvania Human Relations Act (PHRA) prohibits housing discrimination based on ancestry, age (40 and above), pregnancy, support animals, or the disability of an individual with whom the person is known to have a relationship or association.

While the state law appears to protect additional classes of people, it primarily expands on the classes protected under federal law. For example, pregnant women are protected within the familial status class of the federal law. The primary difference in the protected classes between the federal law and the Pennsylvania law is the lowering of the age to 40 for the older persons class.

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

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

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

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

- Discriminatory real estate practices, including refusal to sell or lease housing accommodations to members of the protected classes
- Discrimination in the terms and conditions of real estate transactions
- Discrimination in the lending of money to acquire, construct, rehabilitate, repair, or maintain housing
- Discrimination in the refusal to make reasonable accommodation
- Advertising or marketing real estate in a way that makes members of the protected classes feel unwelcome or not solicited, and
- Making an inquiry concerning race, color, familial status, age, religion, ancestry, sex, national origin or disability.

Comparison of Accessibility Standards

There are several standards of accessibility that are referenced throughout the AI. These standards are listed below along with a summary of the features within each category or a direct link to the detailed standards.

Fair Housing Act

In buildings that are ready for first occupancy after March 13, 1991 and include four or more units:

- There must be an accessible entrance on an accessible route
- Public and common areas must be accessible to persons with disabilities
- Doors and hallways must be wide enough for wheelchairs, and
- All ground floor units and all units in elevator buildings must have:
 - An accessible route into and through the unit
 - Accessible light switches, electrical outlets, thermostats, and other environmental controls
 - Reinforced bathroom walls to allow later installation of grab bars
 - Kitchens and bathrooms that can be used by people in wheelchairs.

If a building with four or more units has no elevator and will be ready for first occupancy after March 13, 1991, these standards apply to ground floor units. These requirements for new buildings do not replace any more stringent standards in state or local law.

Americans with Disabilities Act (ADA)

Title II of the ADA applies to state and local services, including state and local housing programs. Government entities are obliged to assure that housing financed through state and local programs complies with ADA accessibility guidelines. A complete description of the guidelines can be found at www.ada.gov.

Uniform Federal Accessibility Standards (UFAS)

UFAS accessibility standards are required for facility accessibility by people with motor and sensory disabilities for federal and federally-funded facilities. These standards are to be applied during the design, construction, and alteration of and facilities to the extent required by the Architectural Barriers Act of 1968, as amended. A complete description of the guidelines can be found at www.access-board.gov.

Visitability Standards

The term “visitability” refers to housing designed so that it can be visited by people with disabilities. A house is visitable when it meets three basic requirements:

- At least one no-step entrance
- Doors and hallways wide enough to navigate a wheelchair through
- A bathroom on the first floor large enough to use while in a wheelchair

Universal Design

Universal design means products and environments are inherently accessible by all people, regardless of age or ability. Seven principles guide universal design:

- Equitable use (e.g., make the design appealing to all users)
- Flexibility in use (e.g., accommodate right- or left-handed use)
- Simple and intuitive use (e.g., eliminate unnecessary complexity)
- Perceptible information (e.g., provide compatibility with a variety of techniques or devices used by people with sensory limitations)
- Tolerance for error (e.g., provide fail-safe features)
- Low physical effort (e.g., minimize repetitive actions)
- Size and space for approach and use (e.g., accommodate variations in hand and grip size)

Methodology

A comprehensive approach was used to complete the Analysis of Impediments to Fair Housing Choice for Cumberland County and the Borough of Carlisle. The following sources were utilized:

- The most recently available demographic data regarding population, household, housing, income, and employment at the census tract and municipal level
- Public policies affecting the siting and development of housing
- Administrative policies concerning housing and community development
- Financial lending institution data from the Home Mortgage Disclosure Act (HMDA) database
- Agencies that provide housing and housing related services to members of the protected classes
- Fair housing complaints filed with HUD and the Pennsylvania Human Relations Commission
- The most recent AI
- Consolidated Plan, Annual Plans and CAPERs for the County and Borough
- Interviews and focus group sessions conducted with agencies and organizations that provide housing and housing related services to members of the protected classes

Use and Presentation of Data

The data used for the tables and maps in this AI cover the entire County and Borough of Carlisle, and are presented as collective countywide and boroughwide conditions. In addition, some data points are presented for other non-entitlements municipalities in the County when available and appropriate. These other municipalities are included in the AI because of their importance in driving regional trends.

To ensure that the AI is as up-to-date as possible, most of the census data used in this report is American Community Survey (ACS) sample data rather than 2010 Census data. To make the best of sample based ACS data and reduce sampling error, data compiled at five year increments between 2008 and 2012 were used. Census 2010 Summary File 1 data were used as the most recent data source when 2008-2012 ACS data were unavailable. Additionally, 2000 Census data and earlier were used when comparing current trends with past trends. Census tracts were used as the smallest unit of geographic analysis and form the basis of most maps, although other geographies (such as block groups) were also used when appropriate.

Each ACS dataset is subject to sampling error and non-sampling error, since statistics in census data products are based on the collection, tabulation, editing, and handling of questionnaires.

By the Census Bureau's definition, a margin of error (MOE) is the difference between an estimate and its upper or lower confidence bounds. Confidence bounds can be created by adding the MOE to the estimate (for the upper bound) and subtracting the MOE from the estimate (for the lower bound). All published ACS MOEs are based on a 90-percent confidence level. A 90-percent confidence interval can be interpreted roughly as providing 90 percent certainty that the interval defined by the upper and lower bounds contains the true value of the characteristic.

For the sake of clarity and simplicity, ACS MOEs are not reported in this AI. Variables with an especially high MOE are either specifically identified or not analyzed.

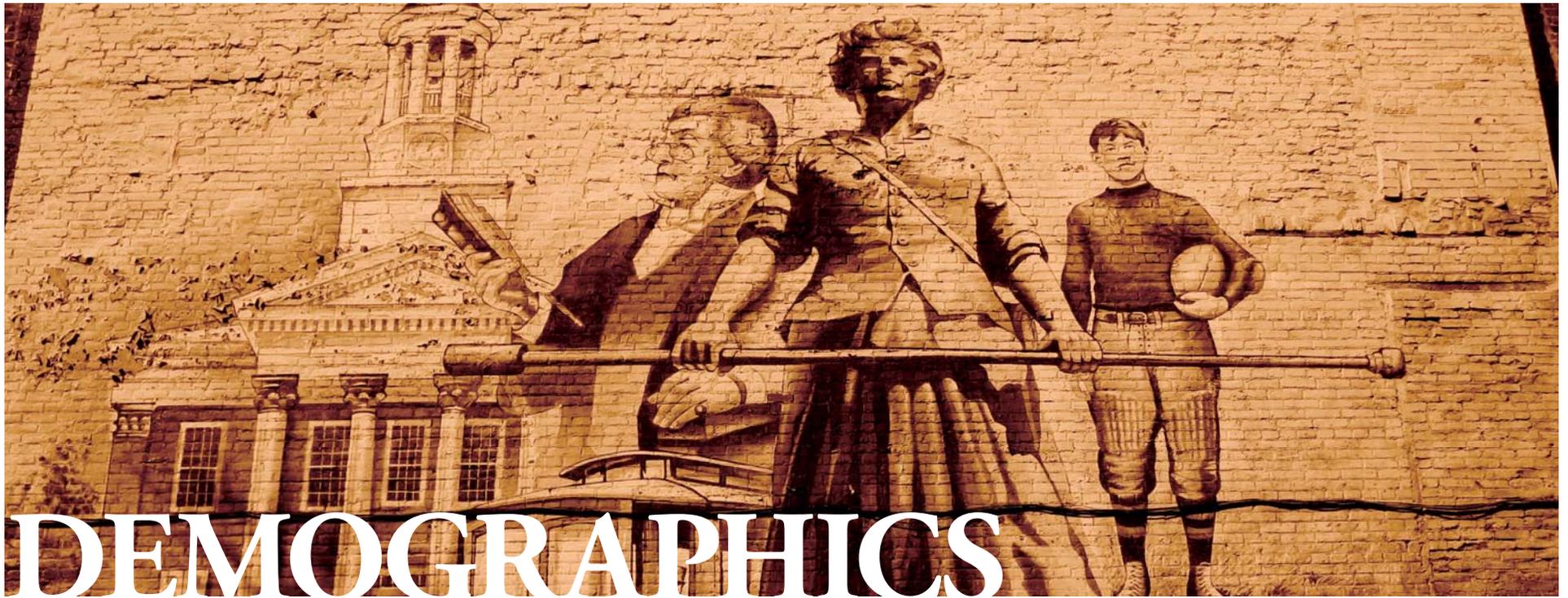
Non-sampling error includes confidentiality edits applied by the Census Bureau to assure that data do not disclose information about specific individuals, households, or housing units. Because of sampling and non-sampling errors there may be discrepancies in the reporting of similar type of data. These discrepancies do not negate the usefulness of the census data.

Development of the AI

The Cumberland County Housing and Redevelopment Authorities (CCHRA) was the lead agency for the preparation and implementation of the AI. Staff members identified and invited numerous stakeholders to participate in the process for the purpose of developing a thorough analysis with a practical set of recommendations to eliminate impediments to fair housing choice.

CCHRA employed an engagement process with public agencies, nonprofit organizations, and other interested entities in an effort to develop the AI. During March 2014, the consulting team conducted a series of group and individual interviews to identify current fair housing issues impacting the various agencies and organizations and their clients.

Comments received through these meetings and interviews are incorporated throughout the AI where appropriate.



DEMOGRAPHICS

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.

This chapter will explore demographic differences that affect housing choice among the population of Cumberland County and Carlisle Borough. It will provide context to existing conditions that reflect the effects of past policy decisions, and will pinpoint issues to inform strategies for broadening the availability of housing opportunities for all residents.

Data and analysis is presented for Cumberland County as a whole, as well as for Carlisle Borough and for the Urban County, which is the County's CDBG jurisdiction outside of Carlisle.

Locational Context

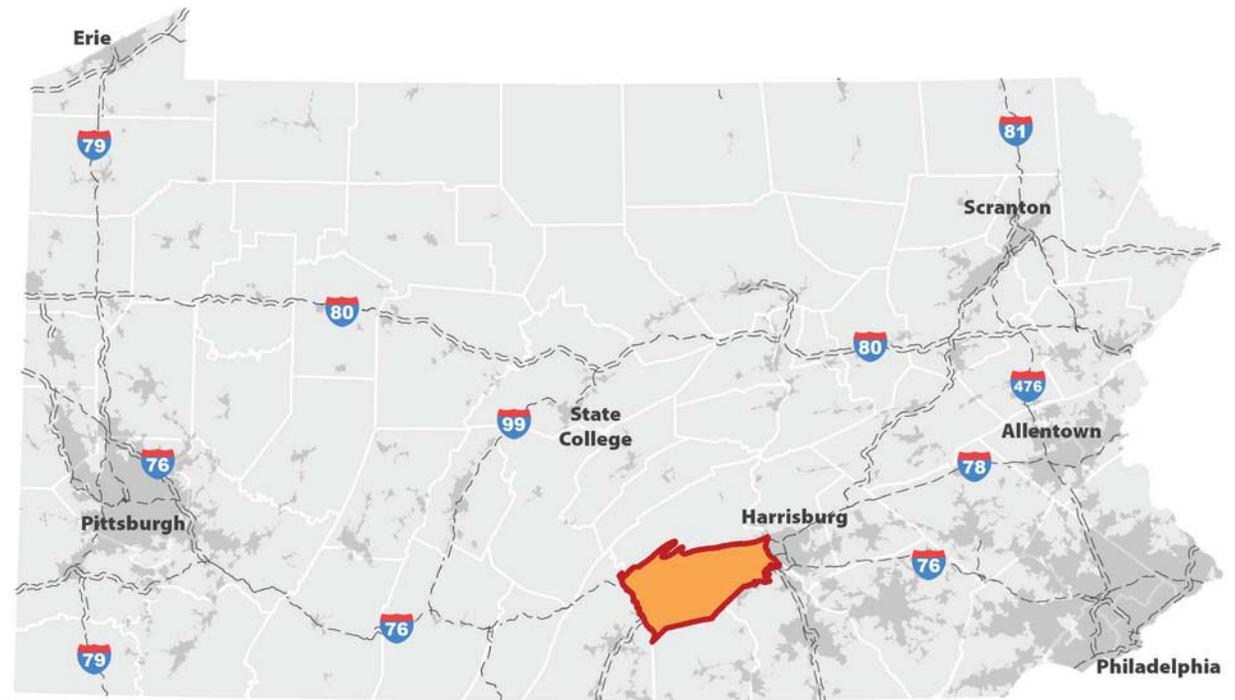
The County's transportation connections have greatly affected its land use characteristics and patterns. Easily accessible by I-81, I-83, and I-76, Cumberland County is within a three-hour drive of many major east coast cities, including Philadelphia, Pittsburgh, New York City, Washington D.C., and Baltimore. A close proximity to Harrisburg affords connections to the Harrisburg International Airport and Amtrak. After the completion of I-81, a large number of trucking companies and businesses located along U.S. Route 11 near the junction of I-81 and the Turnpike. The trucking industry currently moves more tons of goods through Cumberland County than any other county in South Central Pennsylvania, and the County has the second most warehousing and distribution space in the region.

Suburban development pressures generated in the greater Harrisburg area have caused higher densities in eastern townships, with townships becoming less densely populated moving westward. High population density patterns have also developed along the major transportation corridors connecting Carlisle with Harrisburg and in townships surrounding the Borough.

The presence of a state forest and steep slopes have limited development in the County's southwestern townships. Western and central townships are prime agricultural areas, which has played an important role in preserving their rural character. The northern fringes of the northern townships lie on the flanks of Blue Mountain. State forests, state game lands, and topography account for the low density in those municipalities.

Historically, the County has hosted a wide variety of industrial facilities, such as the manufacturing of carpets, tires, textiles, paper products, and printing services. A naval inland supply depot located in Hampden Township comprises 150 buildings, including housing.

Regional Context



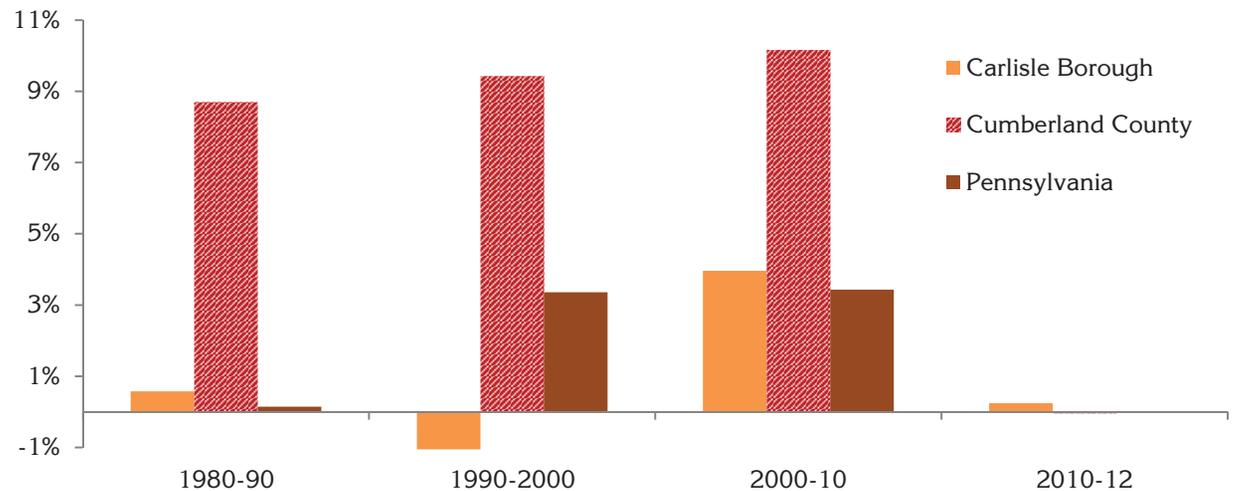
Population

For decades, the population of Cumberland County has been growing at rates much higher than the state overall. While Pennsylvania grew by 7% between 1980 and 2012, the County's population increased by 31% over the same time period. This is not to say that the County has changed uniformly during that time, however. Between 2000 and 2012, Cumberland County grew by 10%. Fourteen municipalities also grew at double-digit rates during these years, including three at 30% and higher, while six lost population.

The population of Carlisle Borough has been less stable over time than the County's. While the County has experienced consistent growth, Carlisle lost 2.4% of its population from 1990 to 2000, only to grow the following decade by almost 4%. To put this in perspective, however, 4% of Carlisle's 2000 population was only 712 people. In terms of total numbers, the population of Carlisle has remained relatively flat for decades.

If population trends in the County continue, the demand for housing will only increase. Among the Borough, the County, and the state, Carlisle is the only jurisdiction to have increased in population between 2010 and 2012, however. This of course represents a much shorter data period, but may indicate important implications for both the near- and long-term housing market.

Population Change by Decade, 1980-2012



Population Change, 2000-2012

	2000	2012	Change
Camp Hill borough	7,636	7,858	2.9%
Carlisle borough	17,970	18,727	4.2%
Cooke township	117	210	79.5%
Dickinson township	4,702	5,208	10.8%
East Pennsboro township	18,254	20,387	11.7%
Hampden township	24,135	27,803	15.2%
Hopewell township	2,096	2,387	13.9%
Lemoyne borough	3,995	4,543	13.7%
Lower Allen township	17,437	17,953	3.0%
Lower Frankford township	1,823	1,920	5.3%
Lower Mifflin township	1,620	1,731	6.9%
Mechanicsburg borough	9,042	8,966	-0.8%
Middlesex township	6,669	7,076	6.1%
Monroe township	5,530	5,831	5.4%
Mount Holly Springs borough	1,925	1,814	-5.8%
New Cumberland borough	7,349	7,272	-1.0%
Newburg borough	372	266	-28.5%
Newville borough	1,367	1,441	5.4%
North Middleton township	10,197	11,127	9.1%

	2000	2012	Change
North Newton township	2,169	2,384	9.9%
Penn township	2,807	2,897	3.2%
Shippensburg borough	4,467	4,420	-1.1%
Shippensburg township	4,504	5,401	19.9%
Shiremanstown borough	1,521	1,523	0.1%
Silver Spring township	10,592	13,763	29.9%
South Middleton township	12,939	14,644	13.2%
South Newton township	1,290	1,466	13.6%
Southampton township	4,787	6,396	33.6%
Upper Allen township	15,338	18,024	17.5%
Upper Frankford township	1,807	2,052	13.6%
Upper Mifflin township	1,347	1,211	-10.1%
West Pennsboro township	5,263	5,568	5.8%
Wormleysburg borough	2,607	3,045	16.8%
Cumberland County	213,674	235,314	10.1%
Urban County*	195,704	216,587	10.7%

* The County's CDBG jurisdiction excludes the Borough of Carlisle.

Source: 2000 Census (P001), 2012 Five-Year ACS (B01003)

Race and Ethnicity

According to the 2012 American Community Survey (ACS), 91% of all Cumberland County residents are White. Since 2000, however, the County has gradually become more diverse. Although Cumberland saw a net increase in White residents during the past decade, the growth amongst other racial and ethnic groups was much more pronounced.

For example, the countywide Hispanic¹ population increased 126% (3,624 people), and the Asian population increased 84% (2,993). People claiming two or more races increased 151% (3,121), the highest rate in the County. Of the non-White population groups, the Black population increased the least, but its rate of increase was still an order of magnitude higher than the White population's increase (46% compared to 6%).

This diversification is even more conspicuous in the Borough of Carlisle, where the White population has decreased in raw numbers. In Carlisle's case, the non-White Hispanic population increased by the highest rate.

Despite these changes, Cumberland County remains primarily White. The Black population is the largest racial or ethnic minority in the County, but only holds a 2.6% share of the population at the Urban County level and 8.8% at the Borough level.

1. Hispanic ethnicity is counted separately from race in U.S. Census Bureau data

Race and Ethnic Composition, 2000-2012

	2000		2012		Change
	#	%	#	%	
Cumberland County	213,674	100.0%	235,314	100.0%	10.1%
White	201,716	94.4%	214,006	90.9%	6.1%
Non-White	11,958	5.6%	21,308	9.1%	78.2%
Black	5,048	2.4%	7,324	3.1%	45.1%
Asian	3,578	1.7%	6,571	2.8%	83.7%
Some other race	915	0.4%	1,794	0.8%	96.1%
Two or more races	2,068	1.0%	5,189	2.2%	150.9%
Hispanic**	2,883	1.3%	6,507	2.8%	125.7%
Urban Cumberland County*	195,704	100.0%	216,587	100.0%	10.7%
White	185,736	94.9%	198,435	91.6%	6.8%
Non-White	9,968	5.1%	18,152	8.4%	82.1%
Black	3,805	1.9%	5,685	2.6%	49.4%
Asian	3,290	1.7%	5,940	2.7%	80.5%
Some other race	788	0.4%	1,631	0.8%	107.0%
Two or more races	1,765	0.9%	4,502	2.1%	155.1%
Hispanic**	2,531	1.3%	5,675	2.6%	124.2%
Borough of Carlisle	17,970	100.0%	18,727	100.0%	4.2%
White	15,980	88.9%	15,571	83.1%	-2.6%
Non-White	1,990	11.1%	3,156	16.9%	58.6%
Black	1,243	6.9%	1,639	8.8%	31.9%
Asian	288	1.6%	631	3.4%	119.1%
Some other race	127	0.7%	163	0.9%	28.3%
Two or more races	303	1.7%	687	3.7%	126.7%
Hispanic**	352	2.0%	832	4.4%	136.4%

* The County's CDBG jurisdiction excludes the Borough of Carlisle.

** Hispanic ethnicity is counted independently of race.

NOTE: The American Indian/Alaska Native and Native Hawaiian/Pacific Islander categories were omitted due to a lack of statistical significance

Source: 2000 Census (QT-P3), 2012 Five-Year ACS (B02001, B03003)

Segregation

Residential segregation is a measure of the degree of separation of racial or ethnic groups living in a community. An extreme example of segregation would be a perfect split between predominantly high-income, White, suburban communities and low-income, minority, inner-city neighborhoods. For this analysis, racial statistics for each census tract in the County were compared to countywide numbers.

The distribution of racial or ethnic groups across an area can be analyzed using an index of dissimilarity.¹ This method allows for comparisons between subpopulations, indicating how much one group is spatially separated from another within a community. The index of dissimilarity is rated on a scale from 0 to 100, in which a score of 0 corresponds to perfect integration and a score of 100 represents total segregation. Typically, an index under 30 is considered low, between 30 and 60 is moderate, and above 60 is high.

In 2000, the dissimilarity indices county-wide by census tract for all non-White groups were principally in the low range, with the exception of the index for Blacks. By 2012, most of the indices had increased, again with the exception of the one for Blacks.

Segregation can be reinforced both unintentionally and by deliberate actions. The highest concentrations of non-White residents in the County occur within Carlisle and the near-suburbs of Harrisburg. The increases in the dissimilarity indices are more likely the result of natural changes in settlement patterns due to urbanization than deliberate segregation.

Dissimilarity Indices, 2000-2012

	2000	2012
Black	55.83	47.85
Asian	29.89	38.95
Some other race	23.94	47.01
Two or more races	17.62	32.24
Hispanic*	26.39	34.06

* Hispanic ethnicity is counted independently of race.

Source: 2000 Census (QT-P3), 2012 Five-Year ACS (B02001, B03003)

1. For a given geographic area, the index is equal to $1/2 \sum \text{ABS} [(b/B)-(a/A)]$, where b is the minority population of a sub-region, B is the total minority population in the larger region, a is the majority population of a sub-region, and A is the total majority population in the larger region. ABS refers to the absolute value of the calculation that follows.

RCAPs/ECAPs

Federal regulations require grantees of HUD Community Planning and Development programs to identify and describe any areas within their jurisdictions that are concentrations of racial or ethnic minorities and low-income families. These areas are known as racially/ethnically concentrated areas of poverty (RCAPs and ECAPs).

In order to analyze the RCAPs/ECAPs in the Borough of Carlisle at a meaningful geographic scale, 2012 data was collected for Census block groups for all of Cumberland County.

Although ethnicity and race as described by the Census are not the same, this study uses rates of both non-White and Hispanic populations to map a single combined group of racial and ethnic concentrations, henceforth referred to collectively as RCAPs. Each block group was evaluated by the share of its non-White or Hispanic population, whichever was higher.

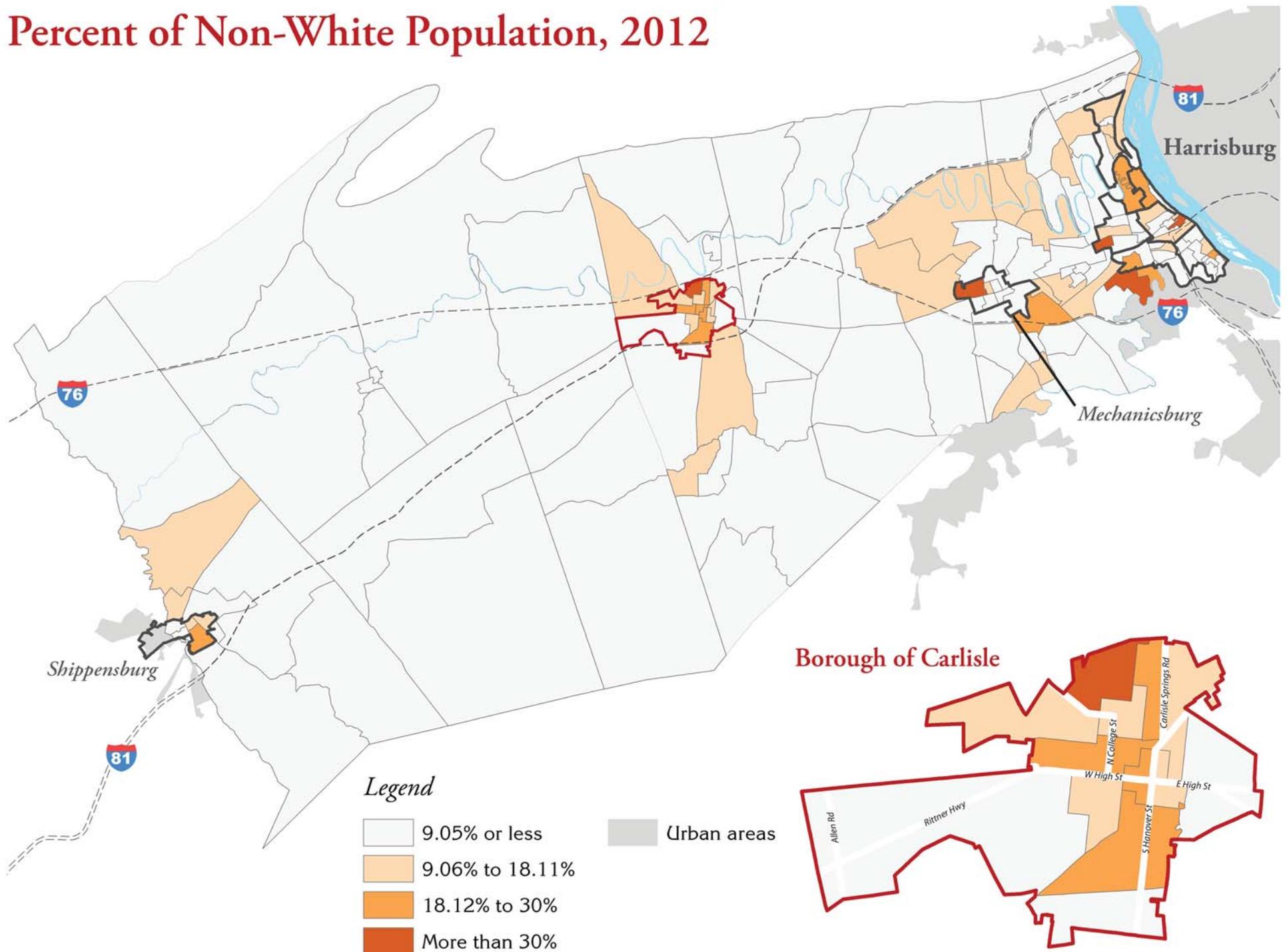
HUD provides baseline thresholds for defining RCAPs that are meant to serve as a starting point for communities across the nation. The standard HUD RCAPs are areas where the total non-White population is greater than 50% and the poverty rate is greater than 40%. HUD encourages communities to modify these thresholds if they do not make sense for local demographics.

This was the case for Cumberland County, as HUD's standard definitions do not appropriately describe the County's population. Areas of racial and ethnic concentration were determined to be where rates of non-Whites are more than twice the countywide rate (9.06%). As a proxy for poverty, any block groups that qualify as low/moderate-income (LMI) according to HUD were considered to be a low-income concentration.¹

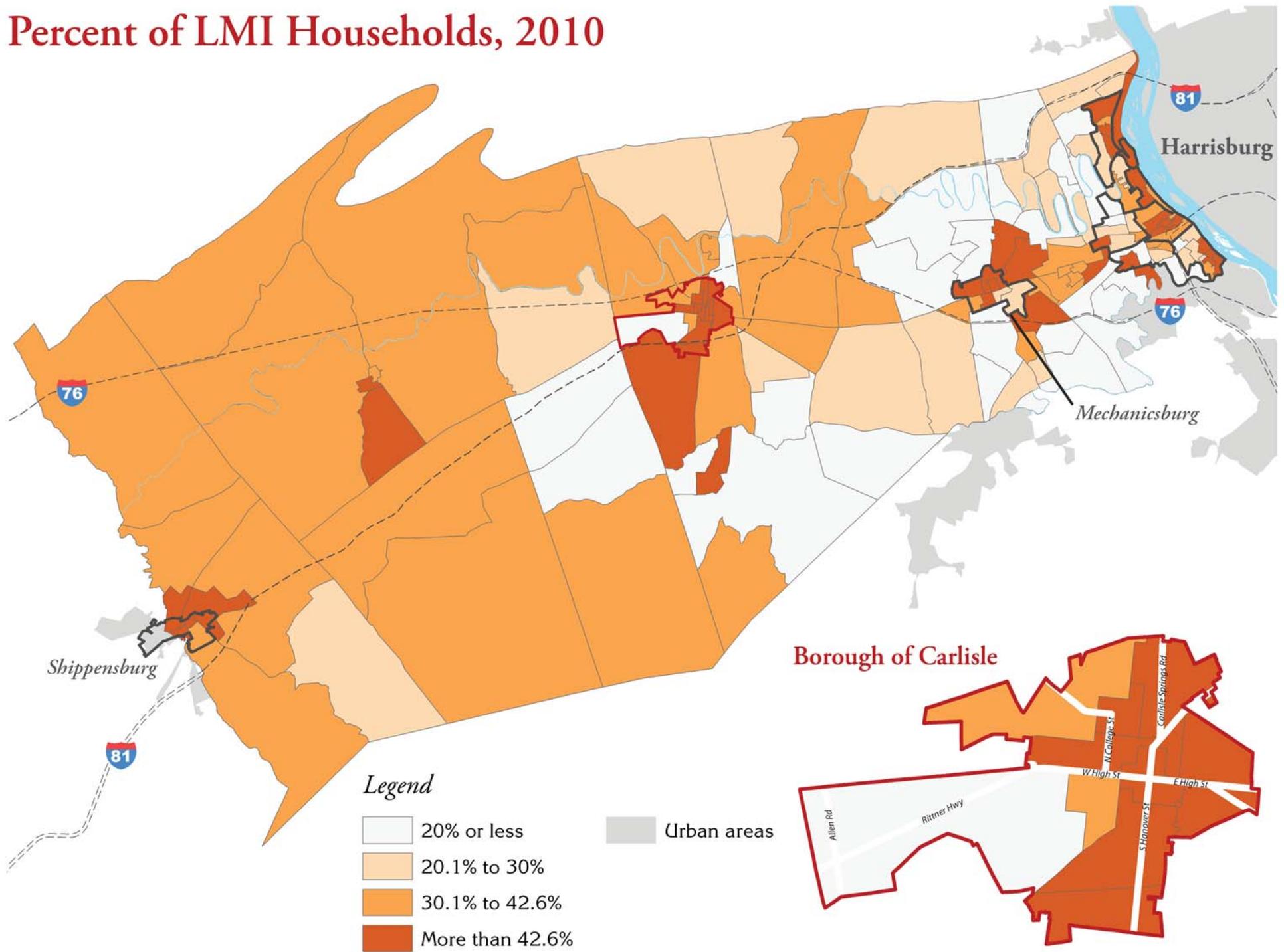
There are twice as many block groups in the County that meet the RCAP threshold for poverty concentration (30) than for racial/ethnic concentration (15). In total, there are seven block groups that qualify as a RCAPs, five of which are within the Borough of Carlisle. The remaining two are just outside of the Borough of Mechanicsburg.

1. In Carlisle Borough, HUD considers a block group to be LMI if at least 51% of the population it contains fall below HUD's income threshold. Across the balance of Cumberland County, an LMI block group is one in which at least 42.69% of the population falls below the threshold.

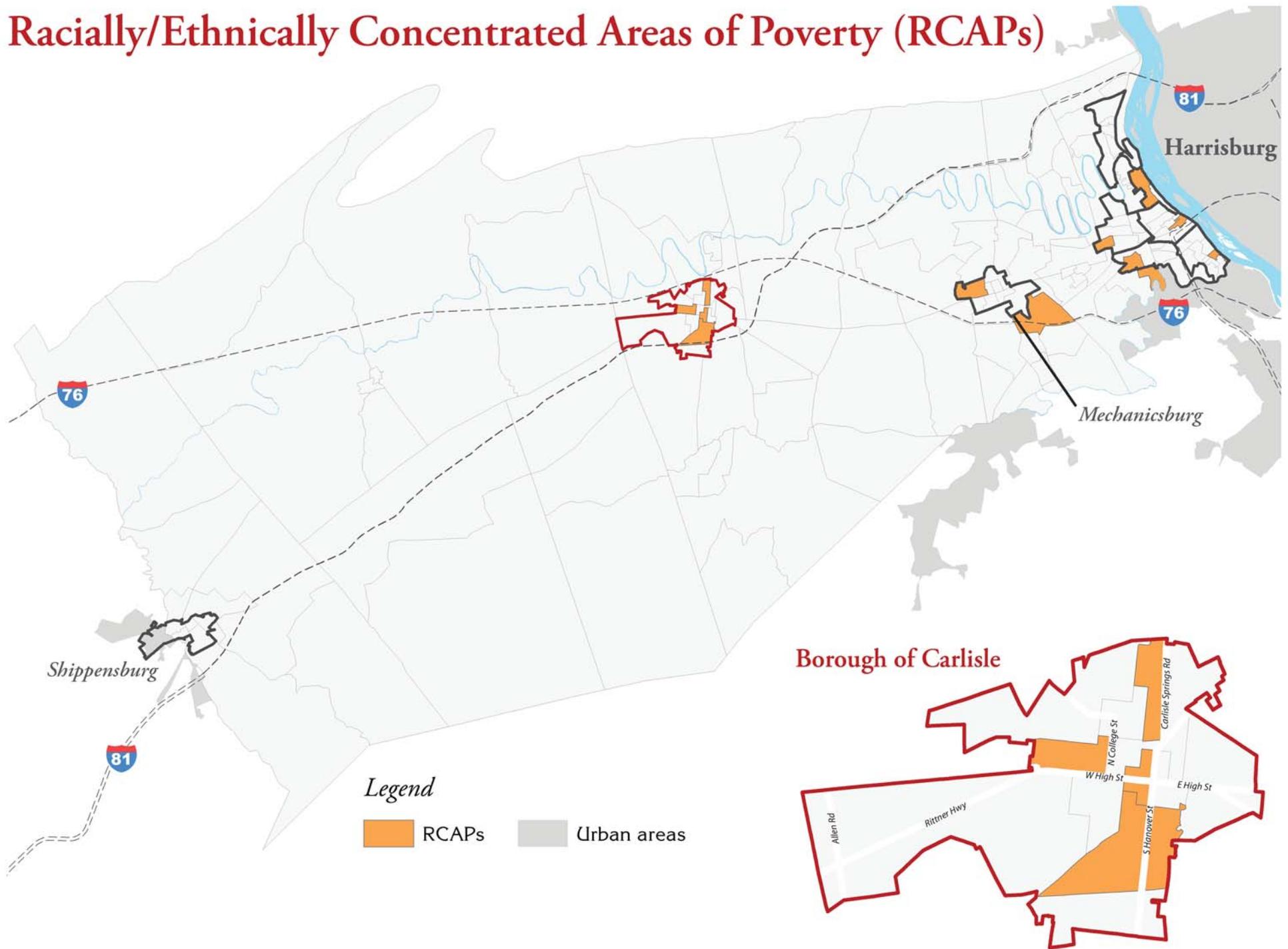
Percent of Non-White Population, 2012



Percent of LMI Households, 2010



Racially/Ethnically Concentrated Areas of Poverty (RCAPs)



Race and Income

Household income is one of several factors used to determine a household's eligibility for a home mortgage loan or a rental lease. Median household income (MHI) in Cumberland County was \$60,883 in 2012, higher than both the statewide median of \$52,267 and the national median of \$53,046. The median of \$44,215 in Carlisle Borough, on the other hand, was much lower.

Across racial and ethnic groups, Asians have the highest MHI in both Carlisle and Cumberland County, although Asians are less than 4% of the population in those jurisdictions. Black households have the lowest MHI of any racial or ethnic group in the County, and earn less than half of the MHI for White households in Carlisle. Hispanic households (one of the fastest growing groups) have an MHI toward the middle of the range in Cumberland County and the low end in Carlisle.

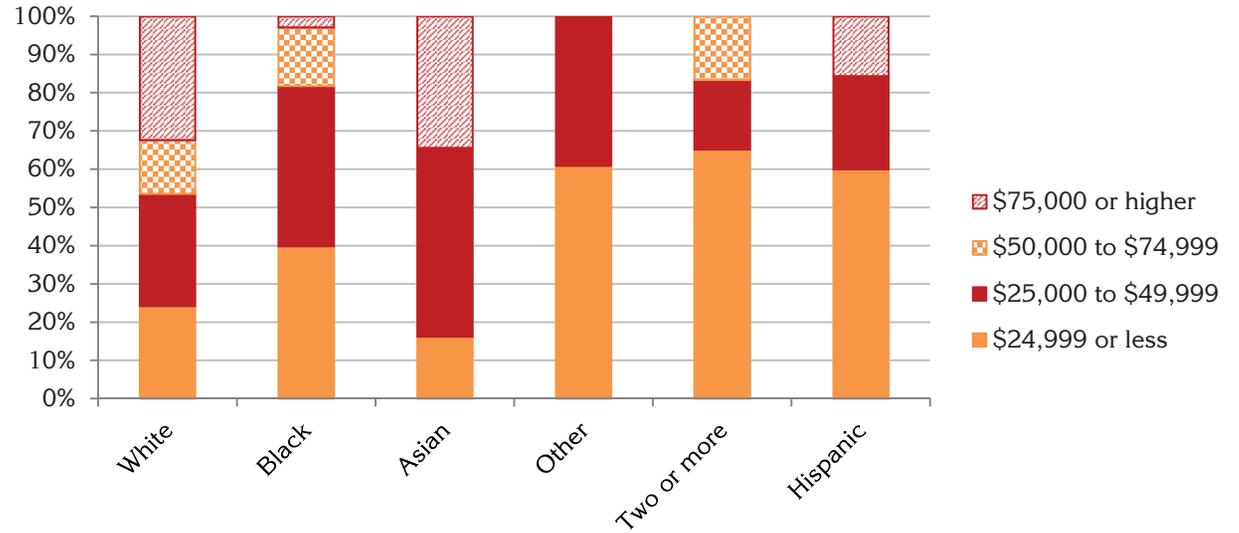
Median Household Income by Race, 2012

	Carlisle		Cumberland County		Pennsylvania	
	Median	% of Median	Median	% of Median	Median	% of Median
All Households	\$44,215	-	\$60,883	-	\$52,267	-
White	\$46,317	104.8%	\$61,331	100.7%	\$55,073	105.4%
Black	\$29,556	66.8%	\$38,702	63.6%	\$32,496	62.2%
Asian	\$48,909	110.6%	\$80,167	131.7%	\$63,627	121.7%
Some other race	\$23,750	53.7%	\$38,850	63.8%	\$29,782	57.0%
Two or more races	\$16,250	36.8%	\$57,317	94.1%	\$39,065	74.7%
Hispanic*	\$22,944	51.9%	\$40,047	65.8%	\$33,376	63.9%

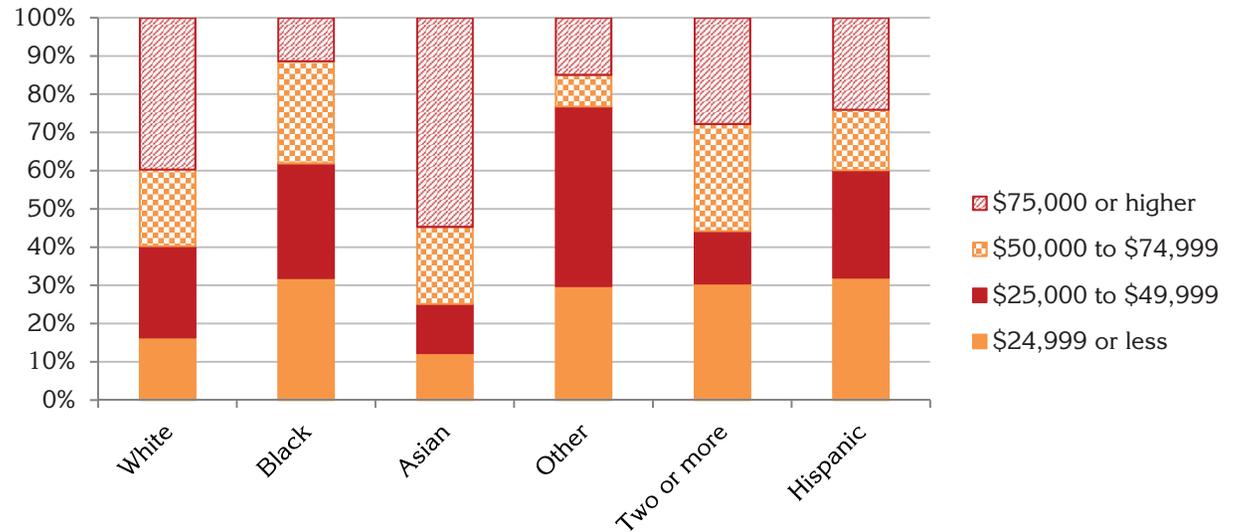
* Hispanic ethnicity is counted independently of race
Source: 2012 Five-Year ACS (S1903)

The distribution of household income across income tiers by race and ethnicity is comparable to the trends previously described, showing a disparity between White and non-White households. While White households are somewhat evenly distributed across income tiers, 62% of Black households and 60% of Hispanic households earn less than \$50,000 in Cumberland County. In Carlisle, those figures are 82% and 84%, respectively. In contrast, about one-third of White and Asian households in Carlisle have annual incomes exceeding \$75,000. In Cumberland County, those figures are 40% and 55%, respectively.

Household Income by Race in Carlisle, 2012



Household Income by Race in Cumberland County, 2012



Poverty

Household poverty is strongly related to limited housing choice. The federal poverty level in 2012 was defined as an annual income of \$23,050 for a family of four, or \$11,170 for an individual. The overall poverty rate in Cumberland County in 2012 was 8.2%.

Poverty rates in Cumberland County generally track with median household incomes. Black households, which have the second lowest MHI, also experience the highest poverty rate. Conversely, White households have a high MHI and the second lowest rate of poverty.

Both incomes and poverty rates for non-White households are lower in the Borough of Carlisle than in the County. According to the countywide numbers, the poverty rate for Black households is slightly higher than the rates for other groups with comparable incomes. In Carlisle, this effect is even more pronounced. Black households in the Borough have the fourth highest median income but the highest poverty rate. This indicates a larger than average income disparity within this racial group.

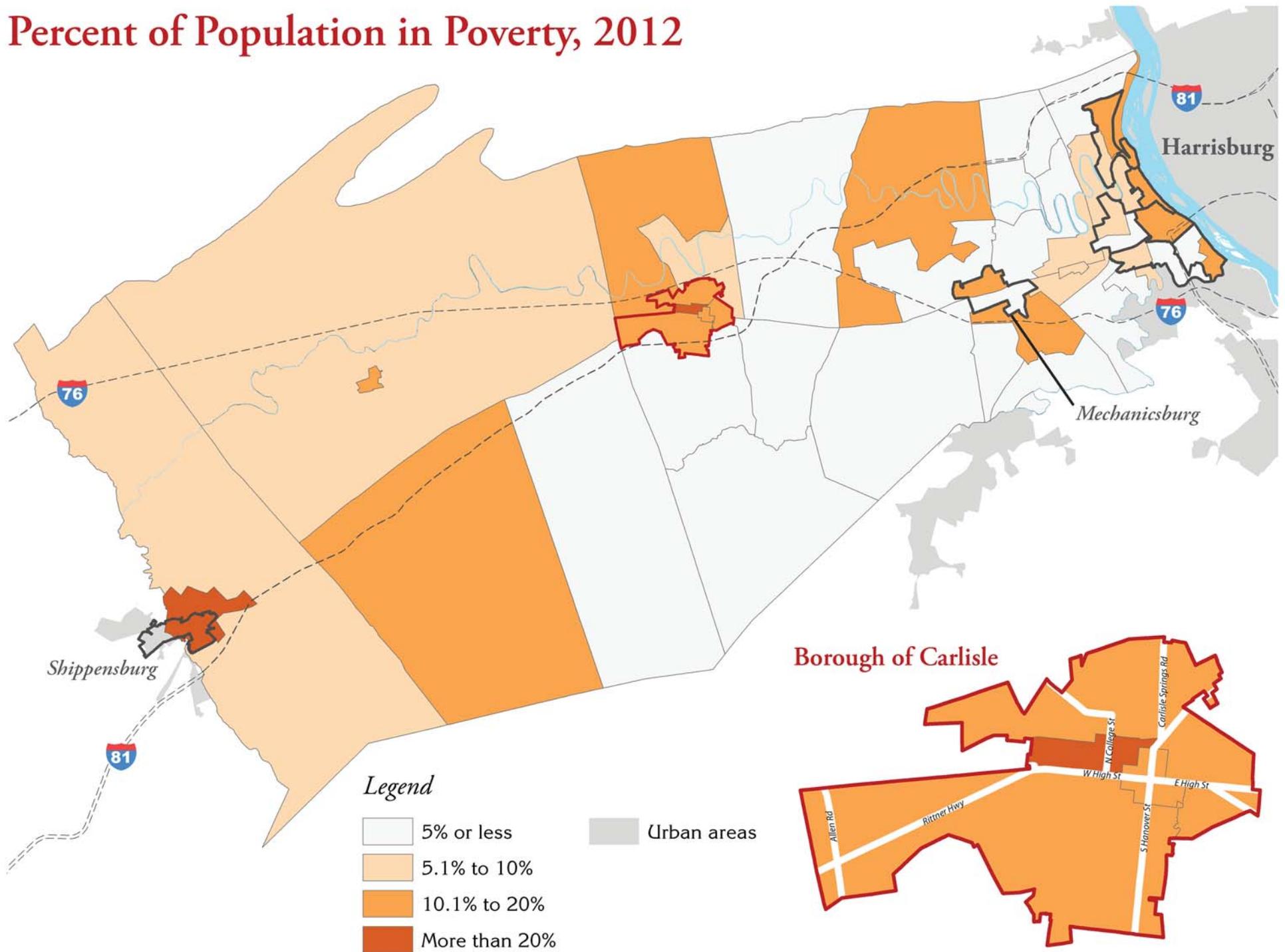
The highest poverty rates are mostly within Carlisle, Shippensburg Borough, and the inner-suburbs of Harrisburg. These areas correspond closely with lower income areas.

Income and Poverty by Race, 2012

	Carlisle		Cumberland County	
	Median Household Income	Poverty Rate	Median Household Income	Poverty Rate
All Households	\$44,215	10.0%	\$60,883	14.5%
White	\$46,317	7.2%	\$61,331	11.6%
Black	\$29,556	29.6%	\$38,702	42.4%
Asian	\$48,909	6.7%	\$80,167	4.5%
Some other race	\$23,750	17.5%	\$38,850	31.2%
Two or more races	\$16,250	27.9%	\$57,317	36.9%
Hispanic*	\$22,944	22.1%	\$40,047	39.8%

* Hispanic ethnicity is counted independently of race
 Source: 2012 Five-Year ACS (S1701)

Percent of Population in Poverty, 2012



Employment

The American Community Survey provides detailed employment data by gender and race, indicating differences in employment rates among groups. According to 2012 estimates for Cumberland County, women experience slightly lower unemployment rates than men. White and Asian residents are much less likely to experience unemployment than Blacks and Hispanics. These trends are generally the same in Carlisle Borough, though with higher percentages overall. One notable difference is the much higher unemployment rate for Asians.

The health care industry employs the largest share of County workers, followed by retail trade and educational services. Median earnings for these industries, however, are the 14th, 18th, and 11th, respectively, out of 20. The industries with the five highest median earnings (Utilities; Professional, scientific, and technical services; Public administration; Management; and Finance and insurance) employ less than 25% combined of the County's total workforce.

In the Borough of Carlisle, the largest field was educational services, in which 18% of workers were employed, followed by health care and retail. Less than 14% of Carlisle workers were in the industries with the five highest median earnings.

Unemployment, 2012

	Unemployment Rate	
	Cumberland County	Carlisle
Civilian labor force	4.0%	6.1%
White	5.7%	7.8%
Black	19.1%	17.3%
Asian	4.1%	16.7%
Some other race	19.2%	4.8%
Two or more races	8.5%	21.3%
Hispanic*	12.3%	15.2%
Male	5.9%	9.6%
Female	4.8%	7.7%
With a disability	7.9%	11.5%

* Hispanic ethnicity is counted independently of race
 Source: 2012 Five-Year ACS (S2301)

Employment by Industry, 2012

	Cumberland County			Carlisle		
	Total	Share	Median Earnings	Total	Share	Median Earnings
Civilian employed population 16 years and over	118,488	-	\$35,895	9,322	-	\$26,143
Utilities	391	0.33%	\$70,625	8	0.09%	-
Professional, scientific, and technical services	8,931	7.54%	\$58,304	465	4.99%	\$60,655
Public administration	10,333	8.72%	\$54,849	525	5.63%	\$52,153
Management of companies and enterprises	150	0.13%	\$48,750	0	0.00%	-
Finance and insurance	8,009	6.76%	\$47,634	298	3.20%	\$48,152
Mining, quarrying, and oil and gas extraction	219	0.18%	\$45,208	23	0.25%	-
Information	1,901	1.60%	\$43,313	165	1.77%	\$38,229
Manufacturing	9,637	8.13%	\$41,905	676	7.25%	\$31,165
Transportation and warehousing	6,069	5.12%	\$39,418	499	5.35%	\$32,271
Construction	5,663	4.78%	\$37,970	196	2.10%	\$41,094
Educational services	11,962	10.10%	\$37,453	1,642	17.61%	\$20,568
Wholesale trade	3,611	3.05%	\$36,513	335	3.59%	\$31,042
Real estate and rental and leasing	2,072	1.75%	\$36,155	196	2.10%	\$36,190
Health care and social assistance	15,527	13.10%	\$32,031	1,272	13.65%	\$24,434
Administrative and support and waste management services	3,342	2.82%	\$26,483	272	2.92%	\$16,875
Other services, except public administration	5,653	4.77%	\$26,360	379	4.07%	\$16,950
Agriculture, forestry, fishing and hunting	1,120	0.95%	\$23,143	31	0.33%	\$36,458
Retail trade	15,490	13.07%	\$20,701	1,164	12.49%	\$16,289
Arts, entertainment, and recreation	1,617	1.36%	\$15,981	236	2.53%	\$8,710
Accommodation and food services	6,791	5.73%	\$13,156	940	10.08%	\$11,406

Source: 2012 Five-Year ACS (S2403)

Familial Status

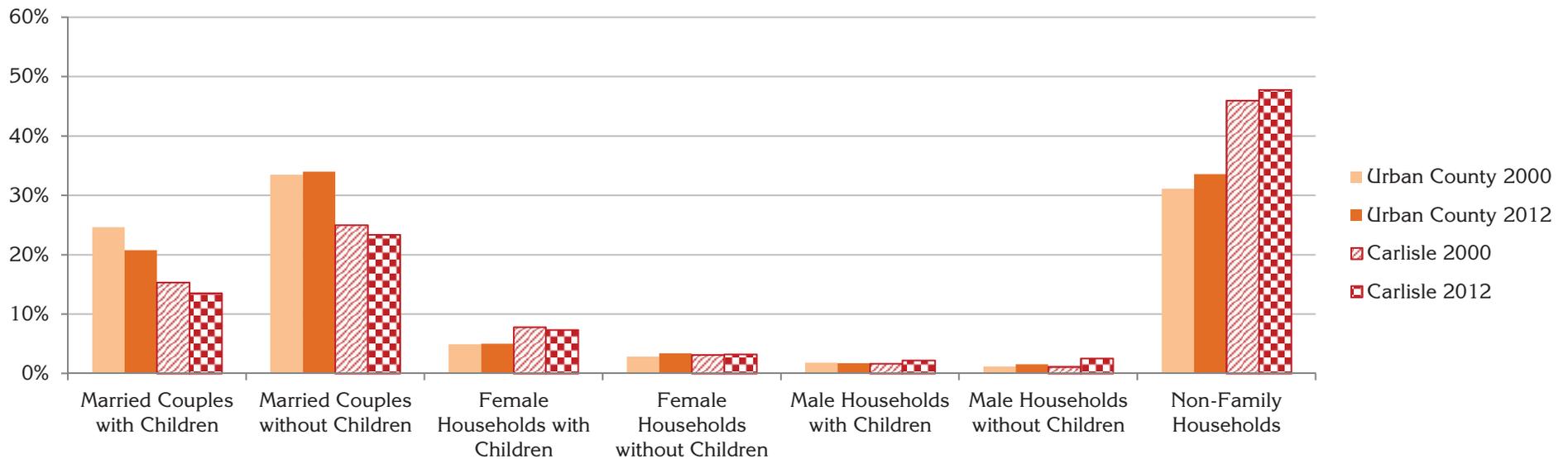
The Census Bureau divides households into family and non-family households. Family households are married couples with or without children, single-parent families, and other families comprised of related persons. Non-family households are either single persons living alone or two or more non-related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

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

Nearly half of all Carlisle households were non-family in 2012, compared to one-third of households in the remainder of the County. Carlisle also had a higher proportion of single female parents and a lower proportion of married couple households with or without children. Across the entire County, the share of married couples with children fell from 23.8% in 2000 to 20.2% in 2012, non-family households climbed from 32.5% to 34.7%, and single-parent households held steady. The total number of households with children remained substantially unchanged.

Female-headed households with children often experience difficulty in obtaining housing, primarily as a result of lower-incomes and the potential unwillingness of some landlords to rent their units to families with children. Although they comprised only 8% of family households in Cumberland County in 2012, female-headed households with children accounted for 44.1% of all families living in poverty.¹ Among female-headed households with children, 26.6% were living in poverty, compared to only 4.3% of married-couple families with children.

Trends in Household Type, 2000 and 2012



1. 2012 Five-Year ACS (B17012)

Ancestry

It is illegal to refuse housing based on place of birth or ancestry. Census data on native and foreign-born populations reported that in 2012, 11,591 (5.2%) Cumberland County residents were foreign-born. The 1,067 foreign-born residents in Carlisle comprise 6.8% of the Borough's total population. By way of origin, just under half of the County's foreign-born population (49.8%) came from Asian countries, while 23.3% were European, 12.1% were from Latin American nations, and 11.7% were from Africa. Origins of Carlisle's foreign-born population were similar, though with slightly more representation from Latin American nations and less from Asian countries.

The County's foreign-born population is more likely to experience poverty. According to 2012 American Community Survey estimates, 13.5% of the foreign-born population for which poverty status is determined fell below the poverty line, compared to 8.2% of all persons county-wide for whom this status is determined.¹

Persons with limited English proficiency (LEP) are defined by the federal government as persons who have a limited ability to read, write, speak, or understand English. In 2012, the Census Bureau reported that 560 (2.6%) people in Carlisle and 5,239 (3.2%) in the balance of Cumberland County spoke English less than "very well."

1. 2012 Five-Year ACS (B06012)

To determine whether translation of vital documents would be required, a HUD entitlement community must first identify the number of LEP persons in a single language group who are likely to qualify for and be served by the Urban County's programs. The only language group with more than 1,000 LEP speakers was Spanish.

Limited English Proficiency Language Groups, 2012

Language Group	Urban County		Carlisle	
	Number of LEP Speakers	% of Total Population	Number of LEP Speakers	% of Total Population
Spanish	1,395	0.6%	156	0.9%
Arabic	585	0.3%	0	0.0%
West Germanic Languages	531	0.2%	12	0.1%
Serbo-Croatian	377	0.2%	79	0.4%
Chinese	314	0.1%	75	0.4%

Source: American Community Survey 2008-12 Estimates (B16001)

Disability

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

The Fair Housing Act prohibits discrimination based on physical, mental, or emotional disability, provided “reasonable accommodation” can be made to address the needs of persons with disabilities. Reasonable accommodation may include adaptive structural changes (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting a service animal).

Across Cumberland County, 11.3% of the total civilian non-institutionalized population reported a disability in 2012. In Carlisle, the rate was 12.2%. The most common type of disability among persons ages 18 to 64 was ambulatory, referring to difficulty moving from place to place that makes it impossible or impractical to walk as a means of transportation. About 3% of County residents between ages 18 and 64 reported this type of difficulty, which often translates to a need for accessible housing. Of County residents ages 18 to 64, 3% reported a cognitive disability, which can refer to a variety of conditions that call for a wide range of special housing and/or supportive service needs.

Disability was more prevalent among seniors, affecting one-third of County residents age 65 and up. Ambulatory disability was the most common among this group, followed by difficulty living independently..

According to the National Organization on Disabilities, a significant income gap exists for persons with disabilities, given their lower rate of employment. In Cumberland County, 11.6% of residents with disabilities lived in poverty in 2012, compared to 6.9% of persons without disabilities. Median earnings for disabled persons age 16 and older were \$20,285, compared to \$32,785 for those without disabilities.



HOUSING

Demographic trends provide important context for identifying impediments to fair housing choice. Ultimately, though, that context must be applied to home ownership and rental patterns. Settlement patterns are closely related to housing market conditions, as the relationship between price and income can influence housing choice as well as the price and type of supply available in different neighborhoods.

By analyzing the costs, affordability, physical characteristics, location, and other factors of Cumberland County's housing stock, in combination with the conclusions already drawn from other sources of data, impediments to fair housing choice can be identified, scrutinized, and, eventually, mitigated.

This chapter will explore baseline housing market conditions through the lens of members of the protected classes, identifying and contextualizing barriers that may exist to a household's choice to live in a given area of Cumberland County.

General Inventory Trends

Cumberland County's total housing stock expanded by 14.8% between 2000 and 2012, slightly outpacing the County's 14.1% growth in total households. During the same years, total population expanded only 10.1%. The difference suggests that new households are not simply a result of births or in-migration, but also reflect changes in preferences and lifestyles.

Change varied across the County, ranging from loss or stagnation in six municipalities to growth exceeding 10% in 20 others. The largest gains by number occurred in Hampden, Silver Spring, Southampton, and Upper Allen townships, three of which are bedroom communities for Harrisburg commuters located in the County's eastern end.

In 2012, single-family units comprised 62.8% of housing in Carlisle and 76.3% in the balance of the County. Multi-family units were most commonly in the form of two- to four-unit dwellings, which comprised more than half of the multi-family structures in Carlisle and about one-third of multi-structures countywide. About 15% of multi-family structures in the County were located in Carlisle, compared to 7.8% of all households. Units in multi-family buildings accounted for 37% of all housing in Carlisle.

In 15 of 33 municipalities, multi-family housing comprised less than 10% of all units. There were zero multi-family units in Cooke, Lower Frankford, and Upper Mifflin townships and fewer than 50 in an additional seven townships. In a pattern typical of settlement patterns across the state, the County's multi-family units are concentrated in its older boroughs. Multi-family housing often represents an affordable housing option for households with lower incomes, which means that its concentration in limited geographic areas is potentially problematic from a housing choice perspective.

The County's occupied housing inventory was 71.8% owner-occupied in 2012, compared to 51.7% in Carlisle and 70.1% statewide. To isolate apartment units from condominium units that are owner-occupied and located within multi-family structures, the following table examines the tenure of units by structure type. Of 68,017 owner-occupied homes across the County, 1.6% were in multi-family structures. By comparison, 61% of the County's renter-occupied units were in multi-family structures. While 27.6% of all housing units were located in boroughs across the County, boroughs had roughly half of the County's renter-occupied multi-family housing.

Change in Total Units, 2000-2012

	2000	2012	Change
Camp Hill borough	3,529	3,537	0.2%
Carlisle borough	8,032	8,109	1.0%
Cooke township	67	196	192.5%
Dickinson township	1,834	2,125	15.9%
East Pennsboro township	7,804	8,594	10.1%
Hampden township	9,990	12,056	20.7%
Hopewell township	706	772	9.3%
Lemoyne borough	2,027	2,477	22.2%
Lower Allen township	6,520	7,240	11.0%
Lower Frankford township	707	796	12.6%
Lower Mifflin township	616	754	22.4%
Mechanicsburg borough	4,169	4,222	1.3%
Middlesex township	2,392	2,847	19.0%
Monroe township	2,165	2,378	9.8%
Mount Holly Springs borough	926	913	-1.4%
New Cumberland borough	3,417	3,375	-1.2%
Newburg borough	148	132	-10.8%
Newville borough	620	663	6.9%

	2000	2012	Change
North Middleton township	4,213	4,526	7.4%
North Newton township	784	913	16.5%
Penn township	996	1,202	20.7%
Shippensburg borough	2,093	2,194	4.8%
Shippensburg township	938	1,512	61.2%
Shiremanstown borough	742	763	2.8%
Silver Spring township	4,185	5,800	38.6%
South Middleton township	5,302	6,175	16.5%
South Newton township	480	542	12.9%
Southampton township	1,748	2,832	62.0%
Upper Allen township	5,198	6,934	33.4%
Upper Frankford township	719	839	16.7%
Upper Mifflin township	469	505	7.7%
West Pennsboro township	2,016	2,252	11.7%
Wormleysburg borough	1,399	1,673	19.6%
Cumberland County	86,951	99,848	14.8%
Urban County*	78,919	91,739	16.2%

* The County's CDBG jurisdiction excludes the Borough of Carlisle.
Source: 2000 Census (H001), 2012 Five-Year ACS (B25001)

Housing Units by Structure Type, 2012

	Total Units	Single-Family Units	Multi-Family Units				Total	Mobile Home/Other
			2 to 4	5 to 9	10 to 19	20 or more		
Camp Hill borough	3,537	2,759	285	396	42	42	765	13
<i>Carlisle borough</i>	<i>8,109</i>	<i>5,095</i>	<i>1,535</i>	<i>917</i>	<i>149</i>	<i>396</i>	<i>2,997</i>	<i>17</i>
Cooke township	196	189	0	0	0	0	0	7
Dickinson township	2,125	1,857	26	0	0	0	26	242
East Pennsboro township	8,594	6,535	630	605	506	295	2,036	23
Hampden township	12,056	9,898	447	270	578	450	1,745	413
Hopewell township	772	694	3	0	0	0	3	75
Lemoyne borough	2,477	1,289	653	187	169	179	1,188	0
Lower Allen township	7,240	5,138	282	358	544	818	2,002	100
Lower Frankford township	796	632	0	0	0	0	0	164
Lower Mifflin township	754	459	9	0	0	0	9	286
Mechanicsburg borough	4,222	3,027	628	274	156	137	1,195	0
Middlesex township	2,847	1,973	41	21	102	7	171	703
Monroe township	2,378	2,135	12	19	0	0	31	212
Mount Holly Springs borough	913	549	119	59	58	0	236	128
New Cumberland borough	3,375	2,624	604	126	0	21	751	0
Newburg borough	132	108	17	7	0	0	24	0
Newville borough	663	401	193	46	10	0	249	13
North Middleton township	4,526	3,440	216	147	153	27	543	543
North Newton township	913	793	39	0	6	34	79	41
Penn township	1,202	1,054	10	0	0	0	10	138

Housing Units by Structure Type, 2012 (continued)

	Total Units	Single-Family Units	Multi-Family Units					Mobile Home/Other
			2 to 4	5 to 9	10 to 19	20 or more	Total	
Shippensburg borough	2,194	1,160	376	260	102	252	990	44
Shippensburg township	1,512	478	60	185	401	88	734	300
Shiremanstown borough	763	536	189	38	0	0	227	0
Silver Spring township	5,800	5,053	167	107	101	114	489	258
South Middleton township	6,175	5,442	171	114	0	74	359	374
South Newton township	542	483	29	0	0	0	29	30
Southampton township	2,832	2,051	12	0	143	191	346	435
Upper Allen township	6,934	5,332	384	303	381	389	1,457	145
Upper Frankford township	839	575	5	25	0	0	30	234
Upper Mifflin township	505	404	0	0	0	0	0	101
West Pennsboro township	2,252	1,897	50	7	24	0	81	274
Wormleysburg borough	1,673	1,027	153	114	286	93	646	0
Cumberland County	99,848	75,087	7,345	4,585	3,911	3,607	19,448	5,313
Urban County*	91,739	69,992	5,810	3,668	3,762	3,211	16,451	5,296

* The County's CDBG jurisdiction excludes the Borough of Carlisle
 Source: 2012 Five-Year ACS (B25024)

Units by Tenure and Structure Type, 2012

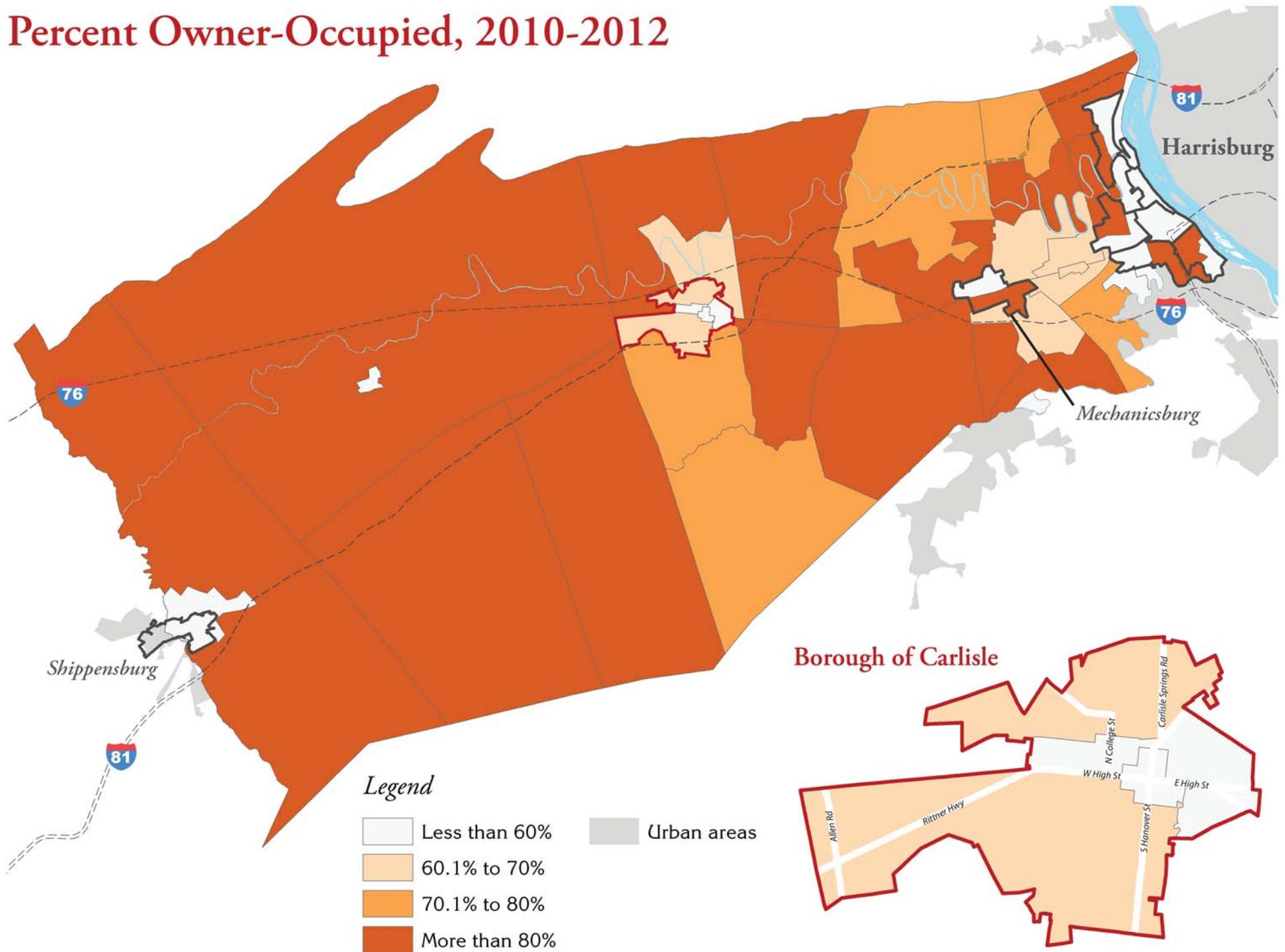
	Owner-Occupied				Renter-Occupied			
	Total	Single-Family	Multi-Family	% Multi-Family	Total	Single-Family	Multi-Family	% Multi-Family
Camp Hill borough	2,489	2,395	81	3.3%	913	253	660	72.3%
<i>Carlisle borough</i>	<i>3,814</i>	<i>3,745</i>	<i>52</i>	<i>1.4%</i>	<i>3,569</i>	<i>1,098</i>	<i>2,471</i>	<i>69.2%</i>
Cooke township	85	78	0	0.0%	0	0	0	-
Dickinson township	1,835	1,672	10	0.5%	124	76	16	12.9%
East Pennsboro township	5,663	5,517	123	2.2%	2,612	839	1,773	67.9%
Hampden township	9,387	8,959	15	0.2%	2,416	742	1,674	69.3%
Hopewell township	675	635	0	0.0%	84	46	3	3.6%
Lemoyne borough	977	931	46	4.7%	1,310	319	991	75.6%
Lower Allen township	4,710	4,439	171	3.6%	2,081	497	1,584	76.1%
Lower Frankford township	608	560	0	0.0%	147	49	0	0.0%
Lower Mifflin township	586	378	0	0.0%	104	49	9	8.7%
Mechanicsburg borough	2,409	2,337	72	3.0%	1,598	613	985	61.6%
Middlesex township	2,326	1,676	0	0.0%	468	297	171	36.5%
Monroe township	2,133	2,021	0	0.0%	157	94	12	7.6%
Mount Holly Springs borough	533	408	3	0.6%	319	124	189	59.2%
New Cumberland borough	2,342	2,257	85	3.6%	847	313	534	63.0%
Newburg borough	93	93	0	0.0%	39	15	24	61.5%
Newville borough	297	270	17	5.7%	334	121	210	62.9%
North Middleton township	3,247	2,687	61	1.9%	1,072	609	419	39.1%
North Newton township	736	689	6	0.8%	171	98	73	42.7%
Penn township	967	831	6	0.6%	169	157	4	2.4%

Units by Tenure and Structure Type, 2012 (continued)

	Owner-Occupied				Renter-Occupied			
	Total	Single-Family	Multi-Family	% Multi-Family	Total	Single-Family	Multi-Family	% Multi-Family
Shippensburg borough	626	600	26	4.2%	1,390	404	942	67.8%
Shippensburg township	541	262	0	0.0%	762	216	546	71.7%
Shiremanstown borough	435	432	3	0.7%	286	62	224	78.3%
Silver Spring township	4,537	4,292	46	1.0%	1,003	501	443	44.2%
South Middleton township	4,818	4,539	0	0.0%	1,114	667	352	31.6%
South Newton township	418	391	6	1.4%	113	81	23	20.4%
Southampton township	2,051	1,670	0	0.0%	484	229	201	41.5%
Upper Allen township	5,074	4,731	243	4.8%	1,677	530	1,147	68.4%
Upper Frankford township	729	534	5	0.7%	102	33	25	24.5%
Upper Mifflin township	432	350	0	0.0%	37	21	0	0.0%
West Pennsboro township	1,878	1,600	19	1.0%	298	221	62	20.8%
Wormleysburg borough	566	545	21	3.7%	959	392	567	59.1%
Cumberland County	68,017	62,524	1,117	1.6%	26,759	9,766	16,334	61.0%
Urban County*	64,203	58,779	1,065	1.7%	23,190	8,668	13,863	59.8%

* The County's CDBG jurisdiction excludes the Borough of Carlisle
 Source: 2012 Five-Year ACS (B25032)

Percent Owner-Occupied, 2010-2012



Ownership and Protected Class Status

It is typical across the country for non-Whites to have lower homeownership rates than Whites. In Cumberland County, White households are indeed more likely than non-Whites to own their homes. In 2012, 73.3% of White households county-wide and 56.3% in Carlisle owned their homes. By comparison, Asians had a home ownership rate of 65% (51.3% in Carlisle), Hispanics had a rate of 36.8% (17.1%), and the rate among Blacks was 26.5% (16.5%).

Among other municipalities in the County, minority home ownership varies widely. Many boroughs and townships with fewer than 50 minority households reported home ownership rates of 0% or 100%. For example, all 57 Asian households in North Middleton Township were reported as owners.

As previously noted, the median income for Black and Hispanic households in Cumberland County is drastically lower than the median for Whites. This is one among several factors that contribute to the generally lower rates of home ownership among these groups.

Tenure by Race and Ethnicity, 2012

	White		Black		Asian		Hispanic	
	HHs	% Owners	HHs	% Owners	HHs	% Owners	HHs	% Owners
Camp Hill borough	3,131	75.8%	86	12.8%	155	53.5%	45	75.6%
<i>Carlisle borough</i>	<i>6,372</i>	<i>56.3%</i>	<i>624</i>	<i>16.5%</i>	<i>154</i>	<i>51.3%</i>	<i>257</i>	<i>17.1%</i>
Cooke township	85	100.0%	0	-	0	-	0	-
Dickinson township	1,947	93.6%	0	-	7	100.0%	6	100.0%
East Pennsboro township	7,797	69.6%	69	42.0%	332	52.7%	162	29.6%
Hampden township	11,076	79.3%	117	70.9%	480	82.1%	129	81.4%
Hopewell township	756	88.9%	3	100.0%	0	-	0	-
Lemoyne borough	2,067	44.6%	46	19.6%	31	0.0%	93	0.0%
Lower Allen township	6,377	70.5%	167	21.0%	181	65.7%	173	64.7%
Lower Frankford township	739	81.5%	12	16.7%	4	100.0%	10	0.0%
Lower Mifflin township	681	85.6%	0	-	3	0.0%	4	100.0%
Mechanicsburg borough	3,739	62.7%	134	11.2%	85	41.2%	68	0.0%
Middlesex township	2,762	83.9%	0	-	0	-	25	32.0%
Monroe township	2,253	93.7%	0	-	9	100.0%	46	65.2%
Mount Holly Springs borough	832	63.7%	20	15.0%	0	-	7	42.9%
New Cumberland borough	3,053	75.7%	71	0.0%	15	100.0%	133	23.3%
Newburg borough	130	71.5%	0	-	0	-	10	0.0%
Newville borough	616	46.8%	12	50.0%	0	-	1	0.0%
North Middleton township	4,151	75.2%	45	100.0%	57	100.0%	69	42.0%
North Newton township	904	81.1%	0	-	0	-	0	-
Penn township	1,100	84.6%	6	100.0%	4	100.0%	5	100.0%

Tenure by Race and Ethnicity, 2012 (continued)

	White		Black		Asian		Hispanic	
	HHs	% Owners	HHs	% Owners	HHs	% Owners	HHs	% Owners
Shippensburg borough	1,962	31.9%	14	0.0%	0	-	107	0.0%
Shippensburg township	1,265	42.8%	33	0.0%	0	-	18	72.2%
Shiremanstown borough	710	60.6%	2	0.0%	9	55.6%	7	100.0%
Silver Spring township	5,200	81.9%	67	100.0%	170	84.1%	169	48.5%
South Middleton township	5,792	81.9%	74	59.5%	53	32.1%	52	0.0%
South Newton township	525	79.2%	0	-	2	100.0%	6	33.3%
Southampton township	2,412	83.0%	63	41.3%	39	46.2%	28	100.0%
Upper Allen township	6,210	78.1%	225	12.0%	156	91.0%	85	45.9%
Upper Frankford township	831	87.7%	0	-	0	-	0	-
Upper Mifflin township	469	92.1%	0	-	0	-	9	100.0%
West Pennsboro township	2,120	86.6%	0	-	16	100.0%	12	100.0%
Wormleysburg borough	1,351	40.8%	52	0.0%	76	0.0%	33	0.0%
Cumberland County	89,415	73.3%	1,942	26.5%	2,038	65.0%	1,769	36.8%
Urban County*	83,043	74.6%	1,318	31.2%	1,884	66.1%	1,512	40.1%

* The County's CDBG jurisdiction excludes the Borough of Carlisle
 Source: 2012 Five-Year ACS (B25032)

Household Size and Protected Class Status

A larger household, whether or not children are present, can raise fair housing concerns. If there are policies or programs that restrict the number of persons that can live together in a single housing unit, and members of the protected classes need more bedrooms to accommodate their larger household, the restriction on the size of the unit will have an unbalanced negative impact on members of the protected classes.

Across Cumberland County, racial minorities were more likely than Whites to live in households with more than three people. In 2010, 50.4% of White households had three or more people, compared to 69.9% of Blacks and 69.2% of Asians. The County's 1,769 Hispanic households were similar in size to White households.

To adequately house larger families, a sufficient supply of larger dwelling units consisting of three or more bedrooms is necessary. Across the County, there are fewer options to rent a unit to accommodate large families than to purchase one. Of 26,759 rental units in 2012, only 28.4% had three or more bedrooms, compared to 81.1% of the owner housing stock.

Housing Tenure by Race and Ethnicity, 2012

	Percent of Families with Three or More Persons		
	Cumberland County	Carlisle	Urban County*
White	50.4%	48.5%	50.5%
Black	69.9%	67.5%	70.8%
Asian	69.2%	63.5%	69.4%
Hispanic	50.2%	47.9%	50.3%
Total	51.7%	51.2%	51.7%

* The County's CDBG jurisdiction excludes the Borough of Carlisle

Source: U.S. Census Bureau, Census 2010 (SF1: P28, P28A, P28B, P28D, P28I)

Housing Tenure by Size, 2012

	Renter-Occupied		Owner-Occupied	
	# units	% of all units	# units	% of all units
Cumberland County				
0-1 bedroom	8,024	30.0%	1,088	1.6%
2 bedrooms	11,141	41.6%	11,743	17.3%
3 or more bedrooms	7,594	28.4%	55,186	81.1%
Total	26,759		68,017	
Carlisle				
0-1 bedroom	1,181	33.1%	101	2.6%
2 bedrooms	1,510	42.3%	606	15.9%
3 or more bedrooms	878	24.6%	3,107	81.5%
Total	3,569		3,814	
Urban County*				
0-1 bedroom	6,843	29.5%	987	1.5%
2 bedrooms	9,631	41.5%	11,137	17.3%
3 or more bedrooms	6,716	29.0%	52,079	81.1%
Total	23,190		64,203	

* The County's CDBG jurisdiction excludes the Borough of Carlisle

Source: 2012 Five-Year ACS (B25042)

Housing Costs

Increasing housing costs are not a direct form of discrimination. However, a lack of affordable housing does constrain housing choice. Residents may be limited to a smaller selection of neighborhoods because of a lack of affordable housing elsewhere.

Between 2000 and 2012, median housing value (adjusted to 2012 dollars using BLS indices) increased 14.7% across the County, while real median income declined 2.2% in real dollars. Median gross rent climbed 7% during the same years. The increase in costs paired with a fall in real income means that it has become comparatively more difficult to afford housing in Cumberland County.

Changes in Value, Rent and Income, 2000 to 2012

	Median Housing Value (in 2012 \$)	Median Gross Rent (in 2012 \$)	Median Household Income (in 2012 \$)
2000	\$160,662	\$769	\$62,274
2012	\$183,500	\$823	\$60,883
Change	14.2%	7.0%	-2.2%

Sources: Census 2000 (SF3: H076, H063, P053), 2012 Five-Year ACS (B25077, B25064, B19013)

The number of affordable rental units declined between 2000 and 2012. The number of units renting for less than \$500 per month countywide fell by about two-thirds. During the same time, the number of units renting for more than \$1,000 increased 533.4%. While the lowest-cost units formerly outnumbered the most expensive more than sixfold, as of 2012 the highest-cost units more than doubled the lowest-cost.

The data does not provide a distinction between units that were physically lost from the inventory (through demolition, deterioration or other reasons) and those for which rents were increased. This data should be analyzed with an understanding that \$500 was worth more in 2000 than in 2012, due to inflation. Due to the categorical nature of the variable, these figures cannot be adjusted for inflation.

Loss of Affordable Rental Housing Units, 2000 to 2012

Units Renting for:	2000	2012	Change	
			#	%
Cumberland County				
Less than \$500	7,197	2,594	-4,603	-64.0%
\$500 to \$699	8,134	6,042	-2,092	-25.7%
\$700 to \$999	4,557	9,956	5,399	118.5%
\$1,000 or more	1,047	6,946	5,899	563.4%
Carlisle				
Less than \$500	1,903	552	-1,351	-71.0%
\$500 to \$699	1,194	1,182	-12	-1.0%
\$700 to \$999	421	1,230	809	192.2%
\$1,000 or more	103	513	410	398.1%
Urban County*				
Less than \$500	5,294	2,042	-3,252	-61.4%
\$500 to \$699	6,940	4,860	-2,080	-30.0%
\$700 to \$999	4,136	8,726	4,590	111.0%
\$1,000 or more	944	6,433	5,489	581.5%

* The County's CDBG jurisdiction excludes the Borough of Carlisle

Sources: U.S. Census Bureau, Census 2000 (SF3, H062), Five-Year ACS (B25063)

The National Low Income Housing Coalition provides annual information on the Fair Market Rent (FMR) and affordability of rental housing in counties and cities in the U.S. for 2014. In Cumberland County, the FMR for a two-bedroom apartment is \$845. In order to afford this level of rent and utilities without paying more than 30% of income on housing, a household must earn \$2,817 monthly or \$33,800 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of \$16.25.

In Cumberland County, a minimum-wage worker earns \$7.25 per hour. In order to afford the FMR for a two-bedroom apartment, a minimum-wage earner must work 90 hours per week, 52 weeks per year. The NLIHC estimates that 46% of Cumberland County renters are currently unable to afford the two-bedroom FMR.

Monthly Supplemental Security Income (SSI) payments for an individual are \$721 in Cumberland County and across Pennsylvania. If SSI represents an individual's sole source of income, \$216 in monthly rent is affordable, while the FMR for a one-bedroom is \$662.

One method used to determine the inherent affordability of a housing market is to calculate the percentage of homes that could be purchased by households at the median income level. It is also possible to determine the affordability of the housing market for each racial or ethnic group in the County. To determine affordability (i.e. how much mortgage a household could afford), the following assumptions were made:

- The mortgage was a 30-year fixed rate loan at a rate of 4.125%,
- The buyer made a 10% down payment on the sales price,

- Principal, interest, taxes and insurance (PITI) combined with other consumer debt equaled no more than 35% of gross monthly income, a threshold of financial health commonly used by banks,
- Property taxes were levied at Cumberland County's average combined rate of 12.889 mills, and
- Additional monthly consumer debt service (credit cards, student loans, car payment, etc.) averaged \$500.

The figure below estimates the maximum affordable sales prices and monthly PITI payments by race/ethnicity. The 2012 median sales price was \$109,000, which is easily affordable to households making the County median. However, this price would have been out of reach for Black and Hispanic households, whose median incomes would afford only half of the inventory available to White households.

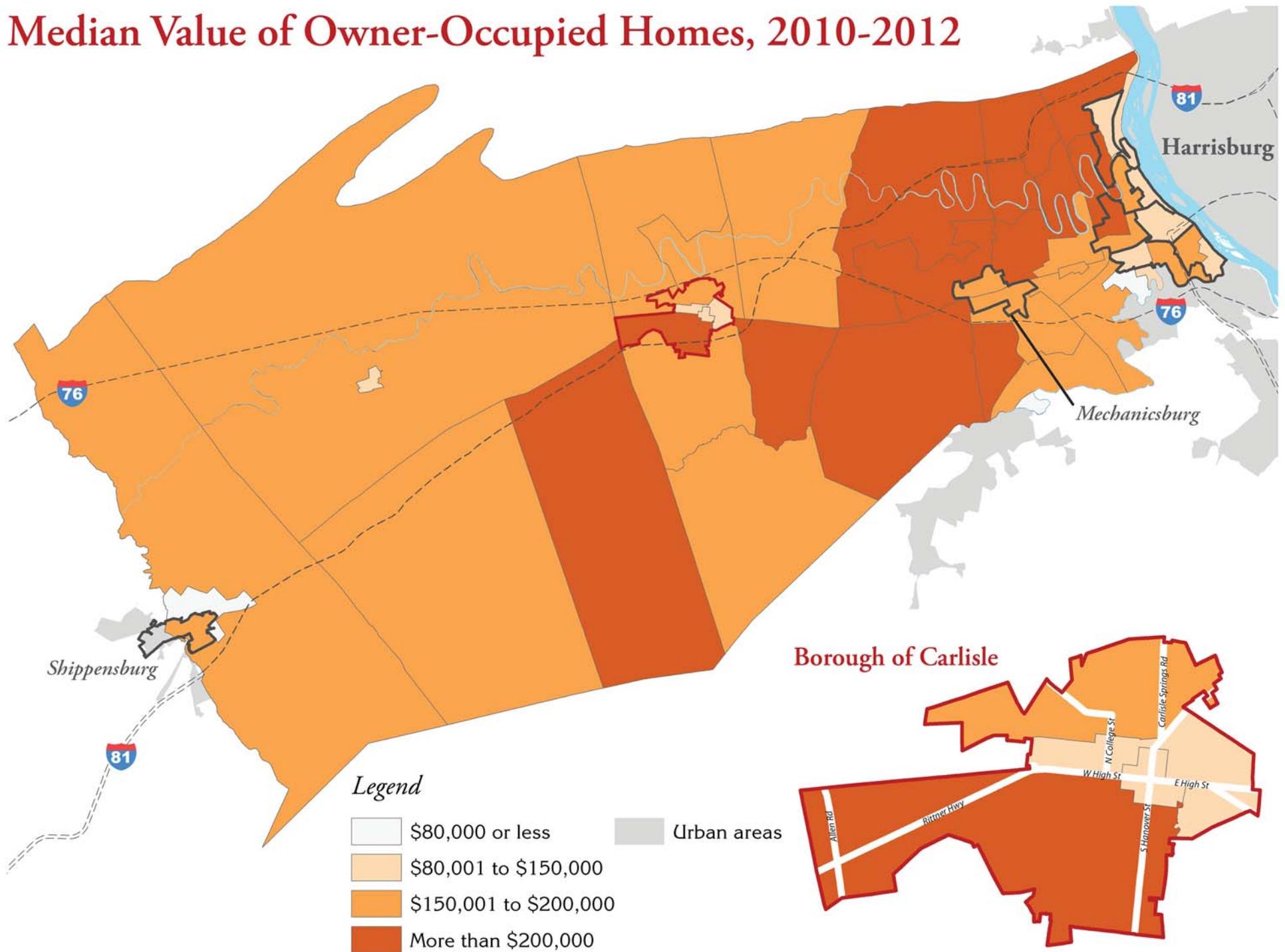
Maximum Affordable Purchase Price by Race/Ethnicity, 2012

	Median Household Income	Monthly Mortgage Payment				Maximum Affordable Purchase Price
		Principal & Interest	Real Estate Taxes	Homeowner's Insurance & PMI	Total Debt Service*	
Cumberland County	\$60,883	\$955	\$235	\$80	\$1,770	\$219,000
Whites	\$61,331	\$968	\$238	\$80	\$1,787	\$222,000
Blacks	\$38,702	\$436	\$107	\$80	\$1,124	\$100,000
Asians	\$80,167	\$1,409	\$347	\$80	\$2,336	\$323,000
Hispanics	\$40,047	\$471	\$116	\$80	\$1,167	\$108,000

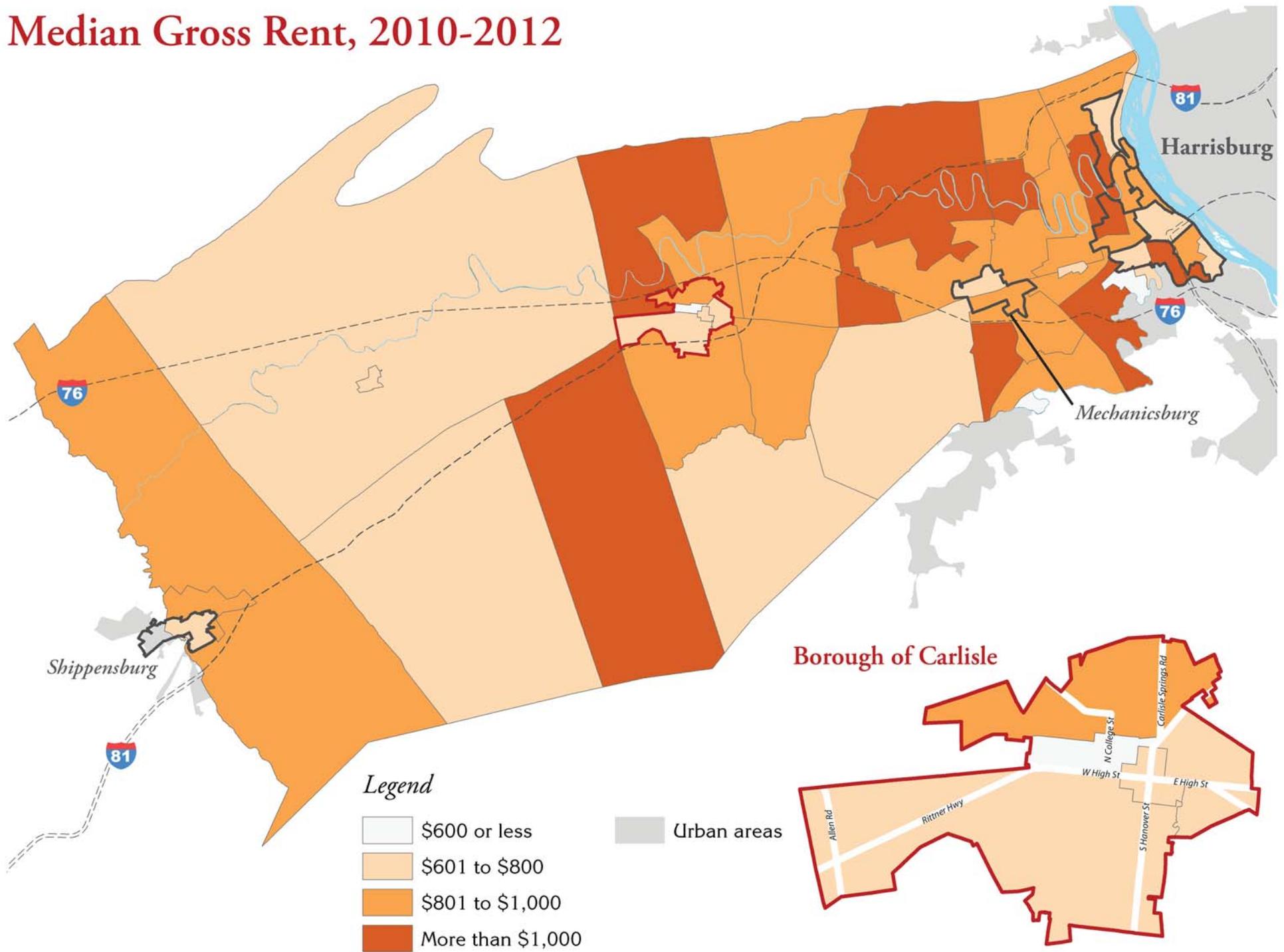
2013 Median Sales Price for Single-Family Home in Cumberland County MLS: \$109,000

* Includes PITI and \$500 in assumed average monthly consumer debt service
 Sources: 2012 Five-Year ACS (B19013, B19013A, B19013B); Calculations by Mullin & Lonergan Associates, Inc.

Median Value of Owner-Occupied Homes, 2010-2012



Median Gross Rent, 2010-2012





Unfettered access to fair housing choice requires impartial and equal access to the mortgage lending market. The Fair Housing Act prohibits lenders from discriminating against members of the protected classes in granting mortgage loans, providing information on loans, imposing the terms and conditions of loans (such as interest rates and fees), conducting appraisals, and considering whether to purchase loans. An analysis of mortgage applications and their outcomes can identify possible discriminatory lending practices and patterns in a community.

Under the terms of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, any commercial lending institution that makes five or more home mortgage loans annually must report all residential loan activity to the Federal Reserve Bank under the terms of the Home Mortgage Disclosure Act (HMDA). The HMDA regulations require most institutions involved in lending to comply and report information on loans denied, withdrawn, or incomplete by race, sex, and income of the applicant.

The information from the HMDA statements assists in determining whether financial institutions are serving the housing needs of their communities. The data also help to identify possible discriminatory lending practices and patterns. The data focus on the number of homeowner mortgage applications received by lenders for home purchases, refinancing, and improvements.

Mortgage Loan Summary

The data included for this analysis is for three years, 2010 through 2012, and constitutes all types of applications received by lenders by families: home purchase, refinancing, or home improvement mortgage applications for one-to four-family dwellings and manufactured housing units across the entire County, as well as a special tabulation for the Borough of Carlisle. The information provided is for the primary applicant only; co-applicants were not included in the analysis. In addition, where information was not provided or is categorized as not applicable, no analysis has been conducted due to the lack of information.

Cumulative Mortgage Data Summary Report, Cumberland County, 2010-2012

	Total Applications		Originated		Approved Not Accepted		Denied		Withdrawn/Incomplete	
	#	%	#	%	#	%	#	%	#	%
<i>Loan Purpose</i>										
Home purchase	12,454	26.3%	7,315	58.7%	466	3.7%	1,012	8.1%	746	6.0%
Home Improvement	3,451	7.3%	2,242	65.0%	149	4.3%	768	22.3%	221	6.4%
Refinancing	31,468	66.4%	17,094	54.3%	1,455	4.6%	4,056	12.9%	3,729	11.9%
<i>Loan Type</i>										
Conventional	36,306	76.6%	21,630	59.6%	1,647	4.5%	4,480	12.3%	3,268	9.0%
FHA	7,962	16.8%	3,421	43.0%	304	3.8%	1,017	12.8%	1,119	14.1%
VA	2,653	5.6%	1,378	51.9%	103	3.9%	287	10.8%	287	10.8%
FSA/RHS	452	1.0%	222	49.1%	16	3.5%	52	11.5%	22	4.9%
<i>Property Type</i>										
One to four-family unit	46,501	98.2%	26,342	56.6%	1,972	4.2%	5,501	11.8%	4,636	10.0%
Manufactured housing unit	763	1.6%	219	28.7%	95	12.5%	327	42.9%	53	6.9%
<i>Applicant Race</i>										
Native American	101	0.2%	45	44.6%	5	5.0%	26	25.7%	20	19.8%
Asian	1,121	2.4%	637	56.8%	63	5.6%	159	14.2%	135	12.0%
Black	422	0.9%	227	53.8%	16	3.8%	94	22.3%	44	10.4%
Hawaiian	57	0.1%	32	56.1%	1	1.8%	15	26.3%	7	12.3%
White	37,522	79.2%	23,549	62.8%	1,755	4.7%	4,740	12.6%	3,627	9.7%
No information	4,103	8.7%	1,970	48.0%	227	5.5%	793	19.3%	850	20.7%
Not applicable	4,047	8.5%	191	4.7%	3	0.1%	9	0.2%	13	0.3%
Hispanic*	457	1.0%	243	53.2%	16	3.5%	84	18.4%	60	13.1%
Total	47,373	100.0%	26,651	56.3%	2,070	4.4%	5,836	12.3%	4,696	9.9%

* Hispanic ethnicity is counted independently of race

NOTE: Percentages in the Originated, Approved Not Accepted, Denied, and Withdrawn/Incomplete categories are calculated for each line item with the corresponding Total Applications figures. Percentages in the Total Applications categories are calculated from their respective total figures.

Source: Federal Financial Institutions Examination Council, 2010 to 2012

Cumulative Mortgage Data Summary Report, Carlisle, 2010-2012

	Total Applications		Originated		Approved Not Accepted		Denied		Withdrawn/Incomplete	
	#	%	#	%	#	%	#	%	#	%
<i>Loan Purpose</i>										
Home purchase	1,376	26.1%	813	59.1%	52	3.8%	105	7.6%	75	5.5%
Home Improvement	362	6.9%	236	65.2%	18	5.0%	84	23.2%	21	5.8%
Refinancing	3,543	67.1%	1,909	53.9%	175	4.9%	483	13.6%	407	11.5%
<i>Loan Type</i>										
Conventional	4,011	76.0%	2,373	59.2%	200	5.0%	518	12.9%	348	8.7%
FHA	890	16.9%	369	41.5%	36	4.0%	129	14.5%	117	13.1%
VA	325	6.2%	188	57.8%	8	2.5%	19	5.8%	35	10.8%
FSA/RHS	55	1.0%	28	50.9%	1	1.8%	6	10.9%	3	5.5%
<i>Property Type</i>										
One to four-family unit	5,210	98.7%	2,925	56.1%	241	4.6%	645	12.4%	501	9.6%
Manufactured housing unit	45	0.9%	11	24.4%	3	6.7%	26	57.8%	1	2.2%
<i>Applicant Race</i>										
Native American	7	0.1%	1	14.3%	1	14.3%	2	28.6%	1	14.3%
Asian	44	0.8%	23	52.3%	6	13.6%	8	18.2%	5	11.4%
Black	104	2.0%	49	47.1%	6	5.8%	28	26.9%	7	6.7%
Hawaiian	8	0.2%	5	62.5%	0	0.0%	2	25.0%	0	0.0%
White	4,202	79.6%	2,638	62.8%	207	4.9%	542	12.9%	413	9.8%
No information	410	7.8%	197	48.0%	24	5.9%	89	21.7%	73	17.8%
Not applicable	506	9.6%	45	8.9%	1	0.2%	1	0.2%	4	0.8%
Hispanic*	45	0.9%	25	55.6%	0	0.0%	9	20.0%	8	17.8%
Total	5,281	100.0%	2,958	56.0%	245	4.6%	672	12.7%	503	9.5%

* Hispanic ethnicity is counted independently of race

NOTE: Percentages in the Originated, Approved Not Accepted, Denied, and Withdrawn/Incomplete categories are calculated for each line item with the corresponding Total Applications figures. Percentages in the Total Applications categories are calculated from their respective total figures.

Source: Federal Financial Institutions Examination Council, 2010 to 2012

Application Trends

Across Cumberland County during the last three years, home improvement loans were most likely to be successful, with an origination (i.e. being approved and executed) rate of 65%. However, a home improvement loan was also more likely to be denied than any other type of loan, with a denial rate of 22.3%. Home purchase loans were slightly more likely to be successful compared to refinancing loans, with 58.7% originating compared to 54.3%.

The most commonly sought type of financing in Cumberland County was a conventional loan, a category that represented 76.6% of all loan applications. An additional 16.8% of applications were for loans insured by the Federal Housing Administration (FHA), a type of federal assistance that has historically benefited lower-income residents. A smaller percentage of applications in Cumberland County, 5.6%, were for loans backed by the Department of Veteran Affairs (VA). VA loans

Loan Application Type by Race/Ethnicity, Cumberland County, 2010-2012

	Total	White	Black	Asian**	Other**	No data	Hispanic*
Home purchase	12,454 26.3%	10,093 26.9%	139 32.9%	327 29.2%	27 17.1%	1,868 22.9%	163 35.7%
Home improvement	3,451 7.3%	2,981 7.9%	41 9.7%	45 4.0%	25 15.8%	359 4.4%	34 7.4%
Refinance	31,468 66.4%	24,448 65.2%	242 57.3%	749 66.8%	106 67.1%	5,923 72.7%	260 56.9%
Total	47,373 100.0%	37,522 79.2%	422 0.9%	1,121 2.4%	158 0.3%	8,150 17.2%	457 1.0%

Loan Application Type by Race/Ethnicity, Carlisle, 2010-2012

	Total	White	Black	Asian**	Other**	No data	Hispanic*
Home purchase	1,376 26.1%	1,084 25.8%	28 26.9%	15 34.1%	7 46.7%	242 26.4%	14 31.1%
Home improvement	362 6.9%	317 7.5%	15 14.4%	3 6.8%	2 13.3%	25 2.7%	2 4.4%
Refinance	3,543 67.1%	2,801 66.7%	61 58.7%	26 59.1%	6 40.0%	649 70.9%	29 64.4%
Total	5,281 100.0%	4,202 79.6%	104 2.0%	44 0.8%	15 0.3%	916 17.3%	45 0.9%

* Hispanic ethnicity is counted independently of race

**Small sample size may make analysis unreliable

NOTE: Percentages within racial/ethnic groups are calculated within each group's total.

Source: Federal Financial Institutions Examination Council, 2010 to 2012

were slightly more sought after in the Borough of Carlisle than in greater Cumberland County, comprising 6.2% of all loan applications. A small number (1%) of loan applications were backed by the Farm Services Administration or Rural Housing Service (FSA/RHS).

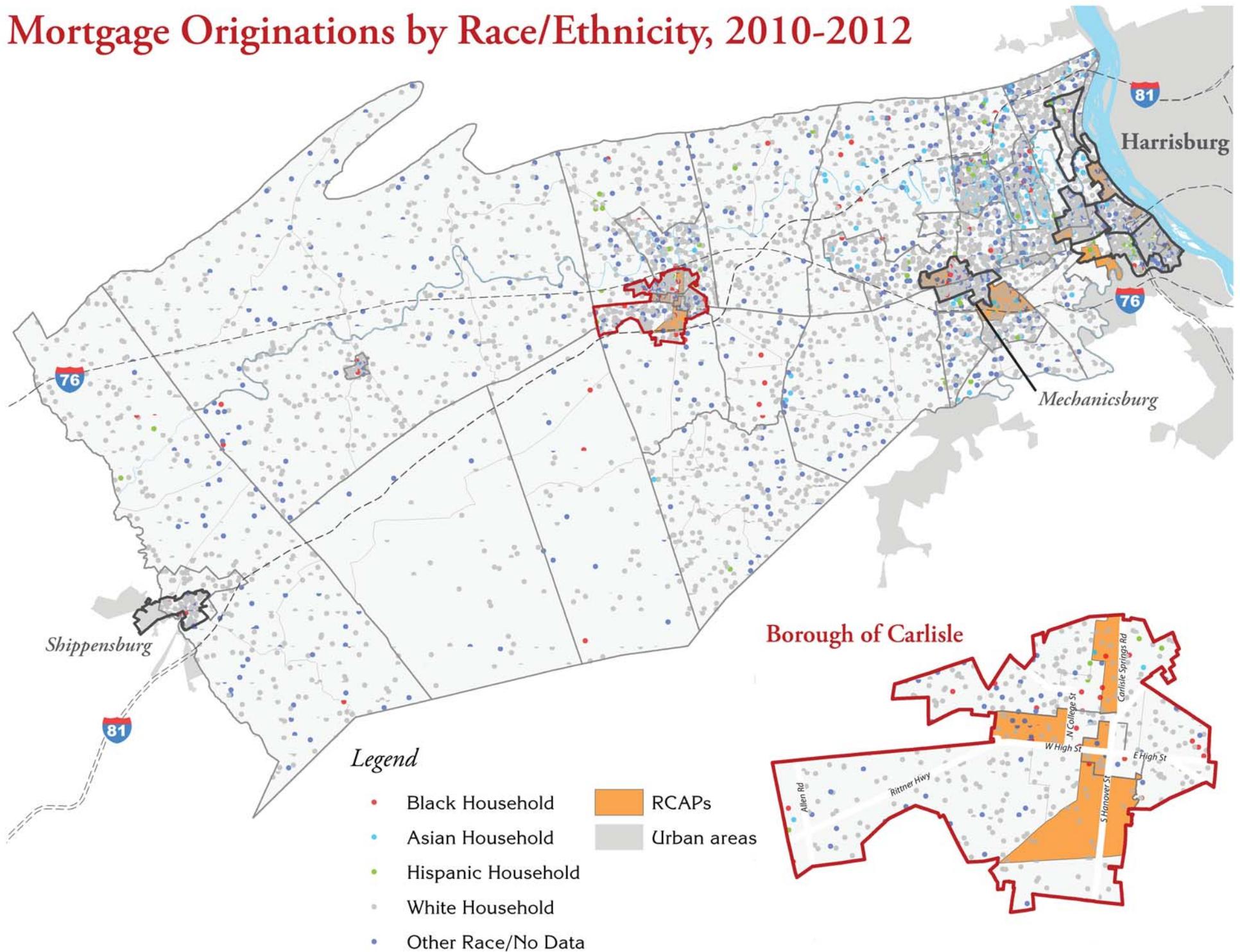
The racial and ethnic composition of loan applicants differs somewhat from the County's general demographic distribution. While 3.1% of all Cumberland County's households in 2012 were Black, only 0.9% of the loan applications for which racial/ethnic data was reported for 2012 were Black. Hispanic households were also underrepresented among mortgage applicants, with 1.1% of applications from Hispanic applicants compared to 2.8% of the County's population. Trends were similar within Carlisle, but with a higher proportion of Black applicants applying for mortgages at 2.8%.

Across racial and ethnic groups, loan application types differed. Refinancing was the predominant application purpose countywide and boroughwide; however, Whites were the most likely to refinance. Higher shares of Asian and Hispanic households applied for home purchase loans.

Geographic Distribution of Approvals by Lender

The following map illustrates the distribution of loan originations. Notably, far less lending activity occurs in Cumberland County's RCAP areas. The overall lack of loans in these areas is an indicator of low investment in their real estate during 2010 to 2012, whether due to disparate impact of the housing market crisis or difficulty of credit access for households who would purchase homes in these areas.

Mortgage Originations by Race/Ethnicity, 2010-2012



Mortgage Application Denials

Between 2010 and 2012, a total of 12.3% of mortgage loan applications were denied in Cumberland County, with 11.5% of these denials located within Carlisle. The denial rates by race and ethnicity ranged from 12.6% for Whites to 26.6% for Hawaiians (although this number constituted a very small sample size) and 22.3% for Blacks.

In reporting denials, lenders are required to list at least one primary reason for the denial and may list up to two secondary reasons. The most popular primary basis for rejection, besides “No Reason Given”, was credit history, followed by insufficient collateral and an unacceptable debt/income ratio. In 23.2% of denials, no reason was given.

Credit history was a more common reason for denial among Blacks than any other racial group besides Other. Hispanic applicants were also denied due to credit history at a rate higher than the average. “No Reason Given” was higher for Black and Hispanic applicants than for White applicants, particularly for applicants within Carlisle. In Carlisle, Whites had “No Reason Given” listed as their reason for denial on 17.5% of denials compared to 28.6% of Black applicants, 25% of Asian applicants, and 22.2% of Hispanic applicants.

Primary Reason for Application Denial by Race, Cumberland County, 2010-2012

	Total	White	Black	Asian	Other	No Info	Hispanic*
Collateral	18.4%	19.3%	11.7%	13.8%	9.8%	15.5%	15.5%
Incomplete Application	9.7%	9.3%	10.6%	13.2%	7.3%	11.3%	8.3%
Debt/Income Ratio	15.9%	15.9%	11.7%	27.0%	12.2%	14.6%	19.0%
Other	7.8%	7.8%	14.9%	11.9%	4.9%	6.4%	6.0%
No Reason Given	23.2%	22.9%	23.4%	13.8%	34.1%	26.4%	25.0%
Credit History	18.6%	18.7%	23.4%	10.1%	31.7%	18.6%	20.2%
Unverifiable Information	2.3%	2.1%	1.1%	6.3%	0.0%	2.9%	1.2%
Insufficient Cash	2.6%	2.7%	1.1%	1.9%	0.0%	2.2%	2.4%
Employment History	1.3%	1.1%	2.1%	1.9%	0.0%	1.9%	2.4%
Insurance Denied	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%

* Hispanic ethnicity is counted independently of race

Source: Federal Financial Institutions Examination Council, 2010 to 2012

Primary Reason for Application Denial by Race, Carlisle, 2010-2012

	Total	White	Black	Asian	Other	No Info	Hispanic*
Collateral	20.2%	22.0%	7.1%	0.0%	0.0%	16.7%	22.2%
Incomplete Application	9.8%	9.6%	14.3%	12.5%	25.0%	8.9%	11.1%
Debt/Income Ratio	16.5%	17.7%	10.7%	37.5%	0.0%	10.0%	11.1%
Other	10.0%	10.7%	7.1%	12.5%	0.0%	6.7%	11.1%
No Reason Given	20.1%	17.5%	28.6%	25.0%	25.0%	31.1%	22.2%
Credit History	18.3%	17.3%	28.6%	12.5%	50.0%	20.0%	11.1%
Unverifiable Information	1.3%	1.1%	3.6%	0.0%	0.0%	2.2%	0.0%
Insufficient Cash	1.3%	1.5%	0.0%	0.0%	0.0%	1.1%	11.1%
Employment History	2.4%	2.6%	0.0%	0.0%	0.0%	2.2%	0.0%
Insurance Denied	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

* Hispanic ethnicity is counted independently of race

Source: Federal Financial Institutions Examination Council, 2010 to 2012

For this analysis, lower-income households earn incomes between 0% and 80% of the median family income (MFI), while upper-income households have incomes above 80% MFI. Applications made by lower-income households in Cumberland County accounted for 43.1% of all denials between 2010 and 2012, although they accounted for only 23.8% of total applications for those three years.

Among lower-income households, denial rates were higher for non-Whites. While the overall lower-income denial rate was 18.7%, the denial rates for lower-income Black, Hispanic, and Asian households were 30.8%, 23.2%, and 23.4% respectively.

While denial rates were generally lower for upper-income households, differences persisted across racial and ethnic groups. The overall upper-income denial rate was 10.9%, compared to 10.5% for Whites. In comparison, upper-income Blacks had a denial rate of 19% and upper-income Hispanics had a denial rate of 16.3%. Lower-income White households were less likely to experience denial than upper-income Black households. While lower-income denial rates are lower for White and Hispanic applicants in Carlisle, they are significantly higher for Black and Asian applicants.

The following map illustrates census tracts in Cumberland County that experienced mortgage denial rates exceeding the countywide denial rate.

Application Denials by Household Race/Ethnicity, Cumberland County, 2010-2012

		Total	White	Black	Asian**	Other**	No data	Hispanic*
Lower-Income	Total Applications	13,447	11,631	143	269	42	1,113	151
	Denials	2,518	2,094	44	63	16	301	35
	% Denied	18.7%	18.0%	30.8%	23.4%	38.1%	27.0%	23.2%
Upper-Income	Total Applications	28,071	23,610	231	810	102	2,600	270
	Denials	3,051	2,473	44	91	23	420	44
	% Denied	10.9%	10.5%	19.0%	11.2%	22.5%	16.2%	16.3%
Total	Total Applications	47,373	37,522	422	1,121	158	8,150	457
	Denials	5,836	4,740	94	159	41	802	84
	% Denied	12.3%	12.6%	22.3%	14.2%	25.9%	9.8%	18.4%

Application Denials by Household Race/Ethnicity, Carlisle, 2010-2012

		Total	White	Black	Asian**	Other**	No data	Hispanic*
Lower-Income	Total Applications	1,689	1,450	42	23	6	134	17
	Denials	318	247	15	7	2	47	3
	% Denied	18.8%	17.0%	35.7%	30.4%	33.3%	35.1%	17.6%
Upper-Income	Total Applications	2,904	2,511	49	21	9	236	26
	Denials	324	274	12	1	2	35	5
	% Denied	11.2%	10.9%	24.5%	4.8%	22.2%	14.8%	19.2%
Total	Total Applications	5,281	4,202	104	44	15	916	45
	Denials	672	542	28	8	4	90	9
	% Denied	12.7%	12.9%	26.9%	18.2%	26.7%	9.8%	20.0%

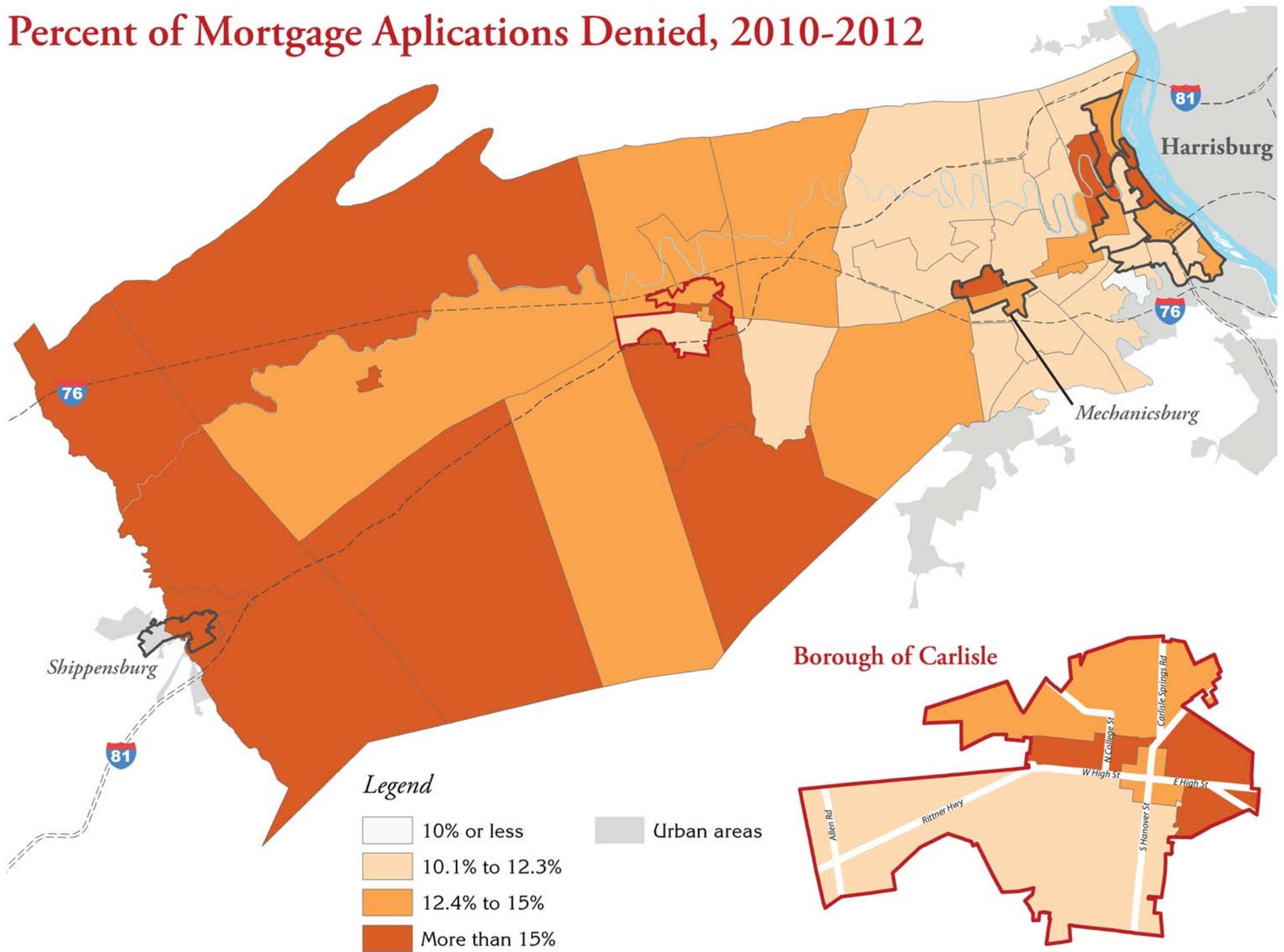
* Hispanic ethnicity is counted independently of race

**Small sample size may make analysis unreliable

Note: Total also includes 7,345 applications for which no income data was reported

Source: Federal Financial Institutions Examination Council, 2010 to 2012

Percent of Mortgage Applications Denied, 2010-2012



High-Cost Lending

The widespread housing finance market crisis of recent years has brought a new level of public attention to lending practices that victimize vulnerable populations. Subprime lending, designed for borrowers who are considered a credit risk, has increased the availability of credit to low-income persons.

At the same time, subprime lending has often exploited borrowers by piling on excessive fees, penalties, and interest rates that make financial stability difficult to achieve. Higher monthly mortgage payments make housing less affordable, increasing the risk of mortgage delinquency and foreclosure and the likelihood that properties will fall into disrepair.

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

Since 2005, HMDA data has included price information for loans priced above reporting thresholds set by the Federal Reserve Board. HMDA does not require lenders to report credit scores for applicants, so the data does not indicate which loans are subprime. It does, however, provide price information for loans considered “high-cost.”

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

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

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

Between 2010 and 2012, there were 26,651 home purchase, refinance, or home improvement loans granted in Cumberland County. Out of this number, 2,958 were in Carlisle. Of the countywide figures, 2.6% were high-cost mortgages. Overall, upper-income households were less likely to have high-cost mortgages than lower-income households.

An analysis of loans in Cumberland County by race and ethnicity is difficult due to the sample size among these groups being notably small. Among lower-income non-White households, 7.5% of loans to Hispanics and 8.8% of loans for Black households were high-cost. In comparison, 4.6% of the mortgages obtained by lower-income White households were high-cost. Lower-income Asian households had rates of high-cost loans lower than the countywide average.

Higher rates of high-cost lending among non-White households were more apparent among upper-income households. Upper-income White households experienced a high-cost loan rate of 2%, while upper-income Black households experienced a high-cost loan rate over twice as high (4.4%).

The following map depicts the distribution of high-cost loans by census tract across Cumberland County and highlights census tracts with high-cost rates of 1% or higher. Tracts meeting this criteria included, but were not exclusive to, RCAPs/ECAPs.

Loan Originations by Household Race/Ethnicity, Cumberland County, 2010-2012

		Total	White	Black	Asian**	Other**	No data	Hispanic*
Lower-Income	Total Originations	7,325	6,654	68	138	16	447	80
	High-Cost	331	304	6	3	1	17	6
	% High-Cost	4.5%	4.6%	8.8%	2.2%	6.3%	3.8%	7.5%
Upper-Income	Total Originations	17,572	15,524	135	479	52	15,524	15,524
	High-Cost	339	308	6	9	0	15	4
	% High-Cost	1.9%	2.0%	4.4%	1.9%	0.0%	0.1%	0.0%
Total	Total Originations	26,651	23,549	227	637	77	2,161	243
	High-Cost	703	644	12	12	1	32	11
	% High-Cost	2.6%	2.7%	5.3%	1.9%	1.3%	1.5%	4.5%

* Hispanic ethnicity is counted independently of race

**Small sample size may make analysis unreliable

Note: Total also includes 7,345 applications for which no income data was reported

Source: Federal Financial Institutions Examination Council, 2010 to 2012

Loan Originations by Household Race/Ethnicity, Carlisle, 2010-2012

		Total	White	Black	Asian**	Other**	No data	Hispanic*
Lower-Income	Total Originations	920	840	18	10	3	48	9
	High-Cost	42	36	5	0	0	1	0
	% High-Cost	4.6%	4.3%	27.8%	0.0%	0.0%	2.1%	0.0%
Upper-Income	Total Originations	1,821	1,644	27	13	3	1,644	1,644
	High-Cost	38	32	2	2	0	2	0
	% High-Cost	2.1%	1.9%	7.4%	15.4%	0.0%	0.1%	0.0%
Total	Total Originations	2,958	2,638	49	23	6	242	25
	High-Cost	85	74	6	2	0	3	0
	% High-Cost	2.9%	2.8%	12.2%	8.7%	0.0%	1.2%	0.0%

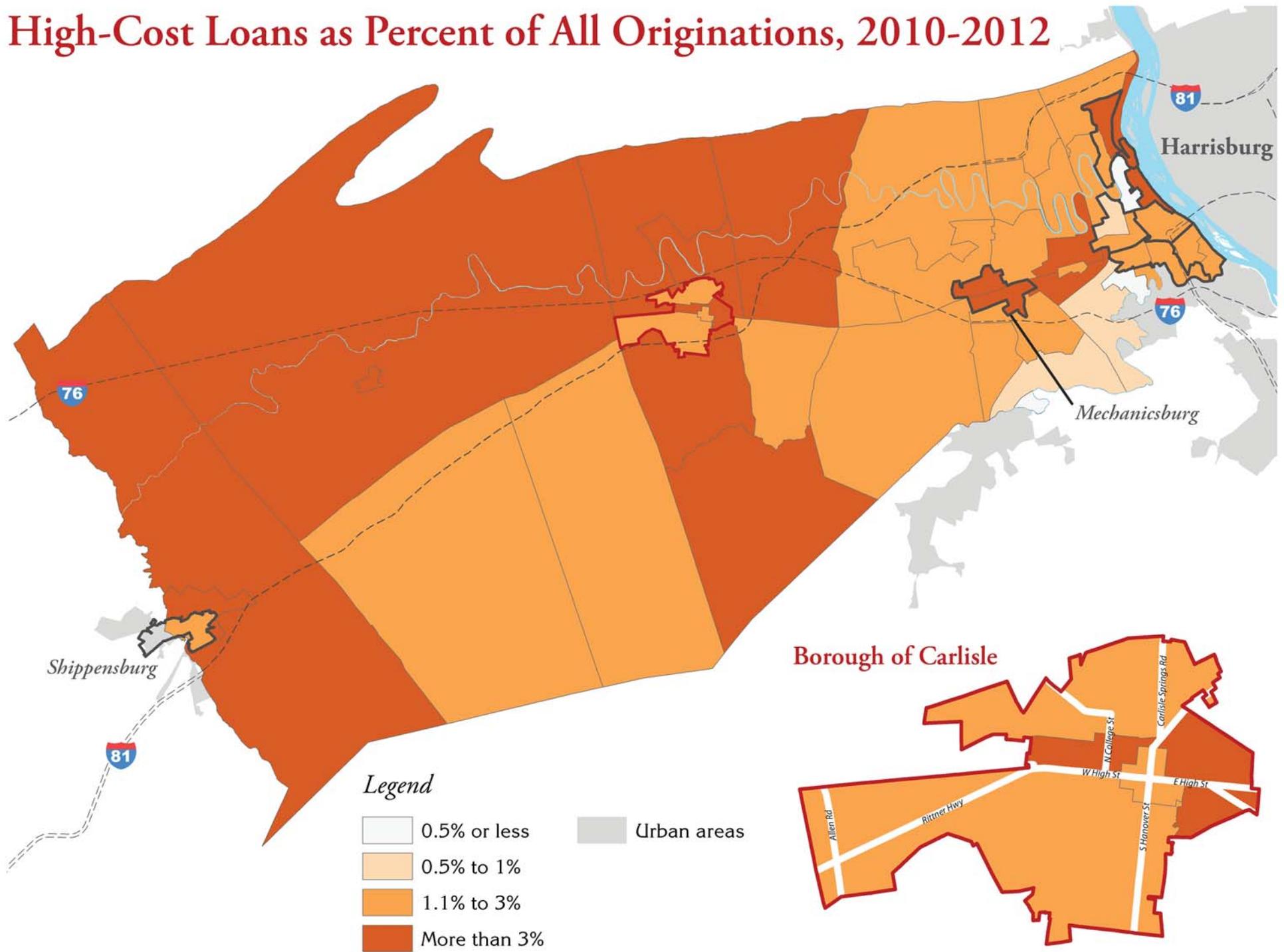
* Hispanic ethnicity is counted independently of race

**Small sample size may make analysis unreliable

Note: Total also includes 7,345 applications for which no income data was reported

Source: Federal Financial Institutions Examination Council, 2010 to 2012

High-Cost Loans as Percent of All Originations, 2010-2012



Annual Trends in Mortgage Lending

Studying mortgage application data on an annual basis allows insight into the influence of housing market trends on the behavior of applicants and banks. The following figures illustrate annual change.

Housing markets across the country are beginning to show recovery following the steep declines in sales volume and mortgage applications caused by the housing crisis. Data from both Cumberland County and Carlisle on mortgage applications follows local sales data trends, indicating a substantial spike in 2012. The number of applications in Cumberland County declined 12.1% between 2010 and 2011 and rebounded 18.9% from 2011 to 2012. This is not true within Carlisle, which has had steadily falling application numbers for all three years. Total applications in Carlisle fell 41.8% from 2010 to 2012.

The number of applications resulting in loan originations in Cumberland County similarly fell in 2011 before rising in 2012. For most individual racial and ethnic groups, this trend varied. Originations among Blacks and Whites rose slightly, and originations among Hispanics showed a net gain after dipping in 2011.

High-cost originations represent a very small portion of all loans made between 2010 and 2012, but have risen from 216 in 2010 to 244 in 2012. The overall low prevalence can likely be attributed to increasing statutory control over predatory lending practices. The slight rise, however, is inconsistent with national trends and should be monitored in the coming years.

Annual Trends in Mortgage Lending, Cumberland County, 2010-2012

	2010		2011		2012	
	#	%	#	%	#	%
Applications	16,202	100.0%	14,236	100.0%	16,935	100.0%
White	12,876	79.5%	11,217	78.8%	13,429	79.3%
Black	127	0.8%	148	1.0%	147	0.9%
Asian	330	2.0%	343	2.4%	448	2.6%
Other race	57	0.4%	42	0.3%	59	0.3%
No information/NA	2,812	17.4%	2,486	17.5%	2,852	16.8%
Hispanic*	142	0.9%	137	1.0%	178	1.1%
Originated	9,164	56.6%	7,833	55.0%	9,654	57.0%
White	8,075	62.7%	6,890	61.4%	8,584	63.9%
Black	70	55.1%	73	49.3%	84	57.1%
Asian	196	59.4%	185	53.9%	256	57.1%
Other race	27	47.4%	21	50.0%	29	49.2%
No information/NA	796	28.3%	664	26.7%	701	24.6%
Hispanic*	78	54.9%	73	53.3%	92	51.7%
Originated - High Cost	216	2.4%	243	3.1%	244	2.5%
White	197	2.4%	223	3.2%	224	2.6%
Black	6	8.6%	3	4.1%	3	3.6%
Asian	5	2.6%	1	0.5%	6	2.3%
Other race	-	0.0%	1	4.8%	-	0.0%
No information/NA	8	1.0%	15	2.3%	11	1.6%
Hispanic*	2	2.6%	6	8.2%	3	3.3%
Denied	2,036	12.6%	1,770	12.4%	2,030	12.0%
White	1,674	13.0%	1,437	12.8%	1,629	12.1%
Black	28	22.0%	34	23.0%	32	21.8%
Asian	41	12.4%	54	15.7%	64	14.3%
Other race	7	12.3%	9	21.4%	10	16.9%
No information/NA	283	10.1%	230	9.3%	280	9.8%
Hispanic*	27	19.0%	22	16.1%	35	19.7%

* Hispanic ethnicity is counted independently of race

NOTE: Percentages in the Originated - High Cost category are calculated based on the number of Originated loans only. Percentages in the Originated and Denied categories are calculated from the Total Application figures.

Source: Federal Financial Institutions Examination Council, 2010-12

Annual Trends in Mortgage Lending, Carlisle, 2010-2012

	2010		2011		2012	
	#	%	#	%	#	%
Applications	2,168	100.0%	1,853	100.0%	1,260	100.0%
White	1,739	80.2%	1,474	79.5%	989	78.5%
Black	29	1.3%	40	2.2%	35	2.8%
Asian	13	0.6%	15	0.8%	16	1.3%
Other race	8	0.4%	1	0.1%	6	0.5%
No information/NA	379	17.5%	323	17.4%	214	17.0%
Hispanic*	16	0.7%	16	0.9%	13	1.0%
Originated	1,184	54.6%	1,047	56.5%	727	57.7%
White	1,063	89.8%	925	88.3%	650	89.4%
Black	16	1.4%	19	1.8%	14	1.9%
Asian	8	0.7%	6	0.6%	9	1.2%
Other race	3	0.3%	-	0.0%	3	0.4%
No information/NA	94	7.9%	97	9.3%	51	7.0%
Hispanic*	7	0.6%	11	1.1%	7	1.0%
Originated - High Cost	33	2.8%	32	3.1%	20	2.8%
White	30	2.8%	28	3.0%	16	2.5%
Black	2	12.5%	2	10.5%	2	14.3%
Asian	-	0.0%	1	16.7%	1	11.1%
Other race	-	0.0%	-	#DIV/0!	-	0.0%
No information/NA	1	1.1%	1	1.0%	1	2.0%
Hispanic*	-	0.0%	-	0.0%	-	0.0%
Denied	289	13.3%	218	11.8%	165	13.1%
White	245	14.1%	174	11.8%	123	12.4%
Black	9	31.0%	10	25.0%	9	25.7%
Asian	2	15.4%	3	20.0%	3	18.8%
Other race	1	12.5%	-	0.0%	1	16.7%
No information/NA	32	8.4%	30	9.3%	27	12.6%
Hispanic*	5	31.3%	2	12.5%	2	15.4%

* Hispanic ethnicity is counted independently of race

NOTE: Percentages in the Originated - High Cost category are calculated based on the number of Originated loans only. Percentages in the Originated and Denied categories are calculated from the Total Application figures.

Source: Federal Financial Institutions Examination Council, 2010-12



Impediments to fair housing choice can take many forms. Some policies, practices, and procedures may appear neutral on their face but adversely affect the provision of fair housing in reality.

An important element of this AI is an examination of public policies in Cumberland County and Carlisle Borough to determine opportunities for reducing obstacles to fair housing and furthering the expansion of fair housing choice.

HUD CPD Programs

Collectively, the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG) and Housing Opportunities for Persons with AIDS (HOPWA) programs are under the authority of the Community Planning and Development (CPD) division of the U.S. Department of Housing & Urban Development (HUD).

As a condition of receiving federal funds for housing and community development, the County and Borough must each engage in the development of an Annual Action Plan to identify the eligible activities they will fund and implement with CDBG and HOME funds on the part of the County, and CDBG funds on the part of the Borough. Both Cumberland County and Carlisle are eligible for ESG funds through the State of Pennsylvania and HOPWA funds through Harrisburg, but are not responsible for regulating these programs. Carlisle is also eligible to compete for HOME funds available through the State.

In addition, the County and Borough undertake a Consolidated Plan every five years to set priorities and goals for upcoming Annual Action Plans. This section analyzes the local policies in place that guide how Cumberland County and Carlisle affirmatively further fair housing as part of their planning process.

In FY 2014, the County received \$1,086,122 in CDBG funds and \$392,313 in HOME. The County typically divides its CDBG allocation among economic development, the rehabilitation of owner-occupied housing, public services, physical infrastructure, public facilities, code enforcement, historic preservation and blight removal. The funds support activities located throughout the County, benefiting both site-specific public facilities and infrastructure activities as well as public services and economic development activities assist persons countywide. The County applies its HOME funds to a combination of activities that have included home ownership assistance, operational support for community housing developers and rental construction. In recent years, the County has not included pure fair housing activities, such as paired testing, education or outreach, in its CDBG budget.

The Borough received a FY 2014 CDBG allocation of \$336,870, which it divided among activities similar to those carried out by the County, including public facility improvements, public services, owner-occupied housing rehabilitation, economic development and code enforcement. The Borough also does not typically fund pure fair housing activities such as testing, education or outreach, though in FY 2014, it allocated \$4,000 in CDBG toward the completion of this Analysis of Impediments.

Project Proposal and Selection

The Cumberland County Redevelopment Authority's Community Development Division (CCHRA CDD) administers the County's CDBG and HOME programs and also administers Carlisle's CDBG program on behalf of the Borough.

Both Cumberland County and Carlisle allocate formula grant funds on a competitive basis. In Carlisle, the window for funding applications typically opens in January, with applications due at the end of February. CCHRA staff evaluates the eligibility of projects and their ability to address priorities identified in the Consolidated Plan and makes recommendations to Borough Council in March so that a final program budget can be submitted to HUD in May.

The County's CDBG funds may be used in any municipality within Cumberland County with the exception of Carlisle. Its HOME funds may be used anywhere within the County. The annual funding request round typically opens in July, with CDBG and HOME applications due at the end of August. CCHRA staff makes recommendations to the Board of Commissioners in September to facilitate submission of a final program budget to HUD by mid-November. The County typically receives its annual program allocation within three months of passage of the federal budget.

The County uses a single application for

both CDBG and HOME projects. It requires applicants to identify a national objective that the proposed project will address, and, for projects benefiting low- and moderate-income residents, the application must specify how the project will meet income qualification requirements. Applicants must describe how the project will have an identifiable and measurable impact on an unmet critical need and what outcomes will ensue. Finally, the applicant must describe and demonstrate capacity in explaining how the project will be carried out.

Applications for property acquisition and new construction projects additionally require due diligence and site control (or plans for the same), but do not impose any specific priorities or scoring criteria for any particular geography or type of development. To affirmatively further fair housing, the County could more proactively direct the use of HOME funds by adopting criteria that would prioritize the expansion of affordable housing in areas of the County where it is less traditionally located. Particularly, the County could incentivize the construction or rehabilitation of rental housing for families in lower-poverty areas with access to employment and higher-performing school districts.

Additionally, in order to protect its own certification to affirmatively further fair housing, the County should adopt language to clarify that municipalities participating in its CDBG program must have non-discriminatory zoning and land use

practices and policies. The County cannot provide CDBG or HOME funds to units of government that it knows to be perpetuating segregated settlement patterns.

Affirmative Marketing

The County is federally required to adopt affirmative procedures and requirements for all HOME-assisted housing with five or more units. Such a plan should include:

- Methods of informing the public, owners and potential tenants about fair housing laws and the Urban County's policies
- A description of what the owners and/or the Urban County will do to affirmatively market housing assisted with HOME funds
- A description of what the owners and/or the Urban County will do to inform persons not likely to apply for housing without special outreach
- Maintenance of records to document actions taken to affirmatively market HOME-assisted units and to assess marketing effectiveness, and
- A description of how efforts will be assessed and what corrective actions will be taken where requirements are not met.

Cumberland County requires recipients of grant funds supporting more than five units to complete an Affirmative Fair Housing Marketing Plan (AFHMP) in the form of a HUD-developed template. The

document requires grantees to advertise the availability of housing opportunities at least 90 days prior to initial or renewed occupancy for new construction and substantial rehabilitation projects. Grantees must identify the demographic groups least likely to apply for the housing without special outreach efforts (by race/ethnicity as well as persons with disabilities, families with children or "other") and submit proposed marketing activities and community contacts for County review. The form requires grantees to identify and explain any residency preferences.

The form requires grantees to identify staff members who will be responsible for affirmative marketing and indicate how they will be trained. Finally, the form requires grantees to explain the process they will use to determine whether affirmative marketing efforts have been successful.

The County's adoption of this particular form has the effect of requiring a serious diligence effort among its grantees, as the form is thorough with regard to fair housing expectations for marketing HOME-subsidized units. The County could fortify its intention to affirmatively further fair housing by also adopting an official affirmative marketing policy that states how it will monitor grantee compliance over time and what consequences would exist for non-compliance. This could take the form of an annual site visit to review records for funded projects. If a project is determined to be out of compliance, the

County has the authority to require the recapture of all HOME funds and disallow future participation in the County's HOME program. Additionally, the County may refer the matter to HUD and/or a fair housing rights organization.

Spending Patterns

Entitlement jurisdictions are required to prepare Annual Plans describing activities that will be supported by federal entitlement grant funds. At the end of each fiscal year, jurisdictions prepare Consolidated Annual Performance and Evaluation Reports (CAPERs) to report on progress achieved. The following narrative includes an analysis of the investment of entitlement funds in Cumberland County and in Carlisle, as reported in these documents.

In FY2013, the latest for which data was available, the County assisted 16 existing owner and 31 first-time home buyer households despite reduced federal allocations and a considerable delay in passage of the federal budget, which delayed the County's access to funds. The County assisted 577 renter households across the CDBG and HOME programs as well as with additional funds available through the Cumberland County Housing and Redevelopment Authority, which continued to upgrade its 149 family units and 309 senior units. The County provided assistance to 579 homeless persons, precisely meeting its goal.

The County's CDBG program supported

enhanced police patrols, park improvements and accessibility improvements as a part of streetscape projects, in addition to site-specific undertakings in Shippensburg Township, Shippensburg Borough and Newville Borough. More than 27% of CDBG expenditures in FY2013 were related to housing, including rehabilitation, purchase assistance and special needs housing. The County invested in economic development by making a loan that supported job creation and capitalizing a revolving loan fund.

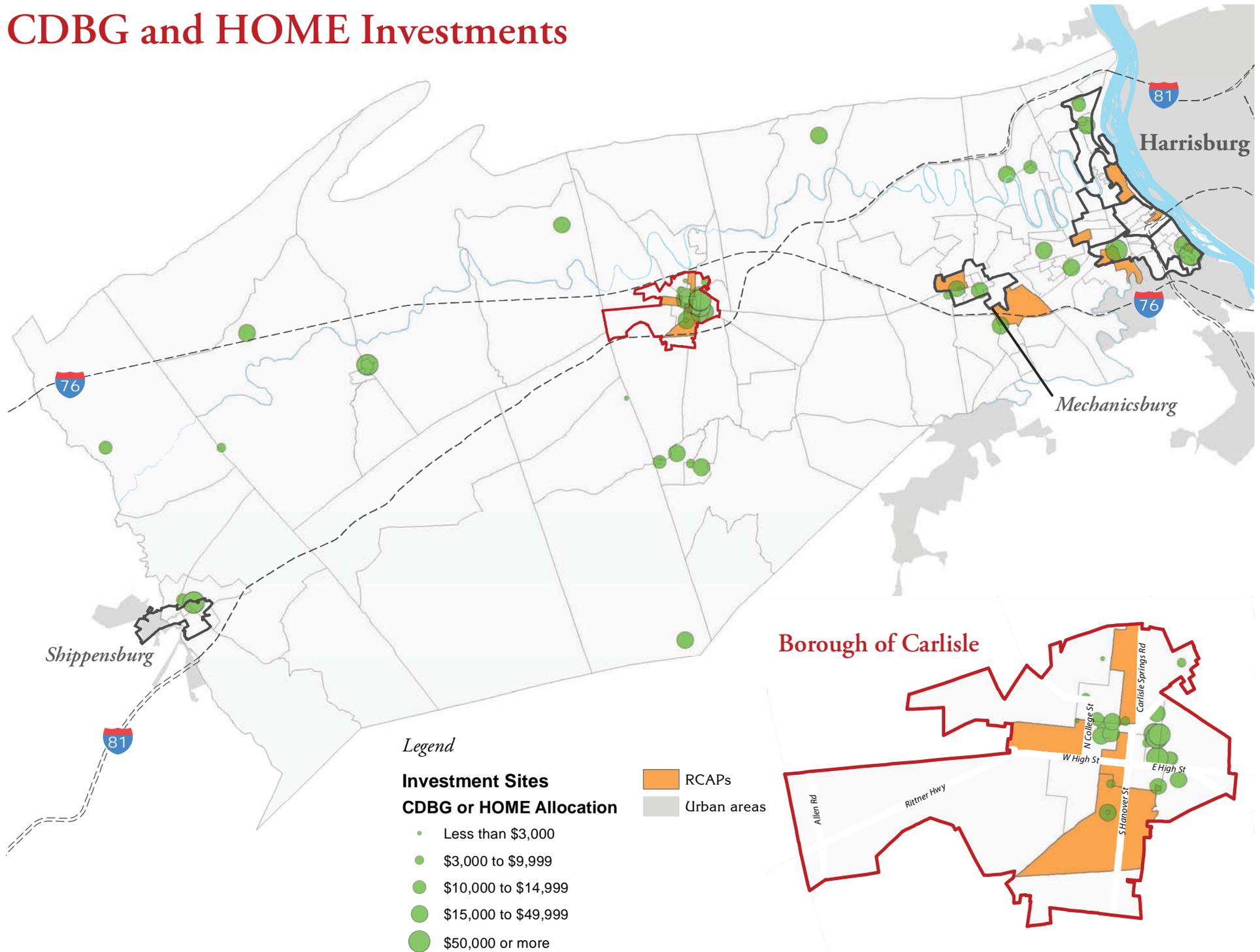
Carlisle Borough expended \$519,938 of CDBG in 2012, the latest year for which a CAPER was available for review, and collected \$44,845 in program income. The Borough divided its spending among housing programs – owner rehabilitation, closing-cost assistance and public housing rehabilitation – social services, economic development, job training and facilities improvements. The Borough typically focuses its CDBG activities in block groups with the highest concentrations of poverty and with the greatest deterioration of facilities and housing stock. Inasmuch as the Borough's access to the types and volumes of funding that would create new housing opportunities in diverse areas are limited, and because residential segregation is a problem that is regional in nature, revitalization of the Borough's areas of greatest need is a sensible policy from a fair housing perspective. The Borough should, however, proactively evaluate how it could apply its

CDBG funds to the aim of broadening the array of housing options available to its lowest-income citizens, particularly low-income members of the protected classes.

CCHRA provided address data for 45 recent CDBG and HOME projects in the Urban County and 26 such projects in Carlisle. About three-quarters of the County investment sites and two-thirds of Carlisle's sites were owner-occupied housing rehabilitations, in addition to a handful of sidewalk improvement undertakings. Additionally, there were five acquisitions/rehabilitations for resale in the borough, located on East Penn, Lincoln and North East streets and seven in the Urban County, four of which occurred in New Cumberland, two in Newville and one in Shippensburg. Finally, the County invested in one new housing construction project in Lower Allen Township.

None of the acquisition/rehabilitation or new construction projects took place in RCAPs/ECAPs, which is a considerable accomplishment from the viewpoint of affirmatively furthering fair housing. While development is often most financially feasible in a community's lowest-cost neighborhoods, HUD grantees must achieve a balance between revitalizing those areas (such as with owner-occupied rehabilitation and infrastructure improvements) and creating new housing opportunities in other areas (such as with acquisition/rehab and new construction).

CDBG and HOME Investments



Other Sources

Cumberland County also broadens housing opportunities through its Affordable Housing Trust Fund, which the Board of Commissioners established in 1996. The fund provides local matches for federal HOME funds and supports the down payment and closing cost assistance program for first-time home buyers, the emergency repair loan program and the accessibility improvements grant program for home owners. The fund also supports other projects via the request for proposals process. The fund is overseen by an advisory board, with Commissioners ultimately responsible for the distribution of resources. Between the fund's establishment in 1996 and 2005, when the Pennsylvania Housing Finance Agency conducted a statewide review, the County's trust fund collected \$2,712,932 through an increased fee for the recording of deeds and mortgages as empowered by Pennsylvania's Act 137. The trust fund created 275 affordable units during those years.

Affordable Housing Inventory

The Cumberland County Housing and Redevelopment Authority (CCHRA) owns and manages 208 apartments and townhouses, 199 (97.5%) of which are in Carlisle. The units in Carlisle include 12 efficiencies, 57 one-bedroom apartments, 66 two-bedroom apartments, 62 three-bedroom apartments, and eight four-bedroom apartments. Fifty of the units are designated for elderly households, and the remainder are for families. In addition, CCHRA owns and manages 10 buildings that provide an additional 320 units for elderly households. These units are scattered throughout the County in Carlisle, East Pennsboro Township, Middlesex Township, Mechanicsburg, Newville, South Middleton and Mt. Holly Springs Borough.

CCHRA Public Housing Inventory, 2014

Development	Address	Elderly Units	Family Units	Number of Bedrooms					Occupancy Rate	Annual Turnover
				0	1	2	3	4+		
Two West Penn	2 W. Penn St., Carlisle	50	0	12	38	0	0	0	100%	12
Chestnut Commons	324 Chestnut St., Mt. Holly	9	0	0	9	0	0	0	100%	1
Family Public Housing	152-156 W. Penn St., Carlisle	0	6	0	0	6	0	0	83%	3
Family Public Housing	100-212 Lincoln St., Carlisle	0	22	0	2	20	0	0	95%	3
Family Public Housing	300-318 N. West St., Carlisle	0	10	0	0	0	8	2	100%	2
Family Public Housing	301-313 N. Bedford St., Carlisle	0	11	0	2	6	3	0	100%	2
Family Public Housing	101-105 W. North St., Carlisle	0	6	0	1	5	0	0	100%	1
Family Public Housing	200-321 N. Pitt St., Carlisle	0	20	0	4	8	7	1	95%	2
Family Public Housing	273-287 E. Pomfret St., Carlisle	0	12	0	8	3	1	0	92%	1
Family Public Housing	22-38 S. Spring Garden St., Carlisle	0	13	0	2	6	4	1	100%	5
Family Public Housing	1330-1397 Grandview Ct., Carlisle	0	36	0	0	0	32	4	92%	9
Family Public Housing	500-527 Cherry Ct., Carlisle	0	13	0	0	6	7	0	100%	3
<i>Total/Average</i>		<i>59</i>	<i>149</i>	<i>12</i>	<i>66</i>	<i>60</i>	<i>62</i>	<i>8</i>	<i>96%</i>	<i>44</i>

Source: CCHRA

Characteristics of Households Served by CCHRA, 2014

	Public Housing	
	#	%
Total	208	100%
Extremely Low Income (<30% MFI)	150	75%
Very Low Income (>30% but <50% MFI)	46	23%
Low Income (>50% but <80%)	5	2%
Families with Children	131	65%
Elderly Households (1 or 2 persons)	70	35%
Families with Disabilities	30	15%
White Households	131	65%
Black Households	62	31%
Hispanic Households	16	8%
Other Race Households	8	4%
<i>Characteristics by Bedroom Size</i>		
0 Bedrooms	12	6%
1 Bedroom	58	28%
2 Bedrooms	65	31%
3 Bedrooms	64	31%
4 Bedrooms	9	4%
5+ Bedrooms	0	0%

Source: CCHRA

Racial and ethnic minorities are overrepresented among the households served by CCHRA's housing units. Whereas Black households comprise only 2.1% of the total in Cumberland County, they accounted for 31% of public housing households. Hispanic households represent 1.9% of the County total and 8% of CCHRA households. The pattern is related to the prevalence of Black and Hispanic households among those in the County making 30% or less of the median income.

The waiting lists for both public housing units and housing choice vouchers are currently open. There are 376 households waiting for public housing and 1,501 waiting for vouchers, which would allow the recipient to select any qualifying unit on the market. On average, the Authority receives 40 new applications each week for vouchers, and the waiting list averages one and a half years.

Characteristics of Households Waiting for Assistance, 2014

	Public Housing		Section 8	
	#	%	#	%
Total	376	100%	1,501	100%
Extremely Low Income (<30% MFI)	358	95%	1,411	94%
Very Low Income (>30% but <50% MFI)	18	5%	81	5%
Low Income (>50% but <80%)	0	0%	3	0%
Families with Children	199	53%	1,016	68%
Elderly Households (1 or 2 persons)	107	28%	158	11%
Families with Disabilities	100	27%	456	30%
White Households	232	62%	904	60%
Black Households	128	34%	501	33%
Hispanic Households	36	10%	177	12%
Other Race Households	16	4.3%	96	6.4%
Housing Needs by Bedroom Size				
0 Bedrooms	0			
1 Bedroom	140		485	
2 Bedrooms	147		1,016	
3 Bedrooms	68			
4 Bedrooms	21			
5+ Bedrooms				

Source: CCHRA

Privately Assisted Housing Sites, 2014

Municipality	Development	Unit Type			Total
		Family	Elderly	Accessible	
Camp Hill Borough	Susquehanna View	0	200	10	200
Carlisle Borough	Stevens Affordable Housing	17	0	1	17
Lower Allen Township	Mallard Run Apartments	0	101	14	101
	Orchard Apartments	80	0	4	80
Mechanicsburg Borough	Cumberland Pointe	113	0	0	113
	Geneva Greens	64	0	0	64
	Roth Village	60	0	4	60
	Silver Spring Courtyards	0	55	6	55
Shippensburg Borough	Episcopal Square	0	95	5	95
	Farmington Manor	70	0	0	70
	Shippen House	0	24	0	24
	Cottages of Shippensburg	0	120	8	120
	New Visions	10	0	0	10
South Middleton Township	Boiling Springs Apartments	48	0	3	48
Total		462	595	55	1,057

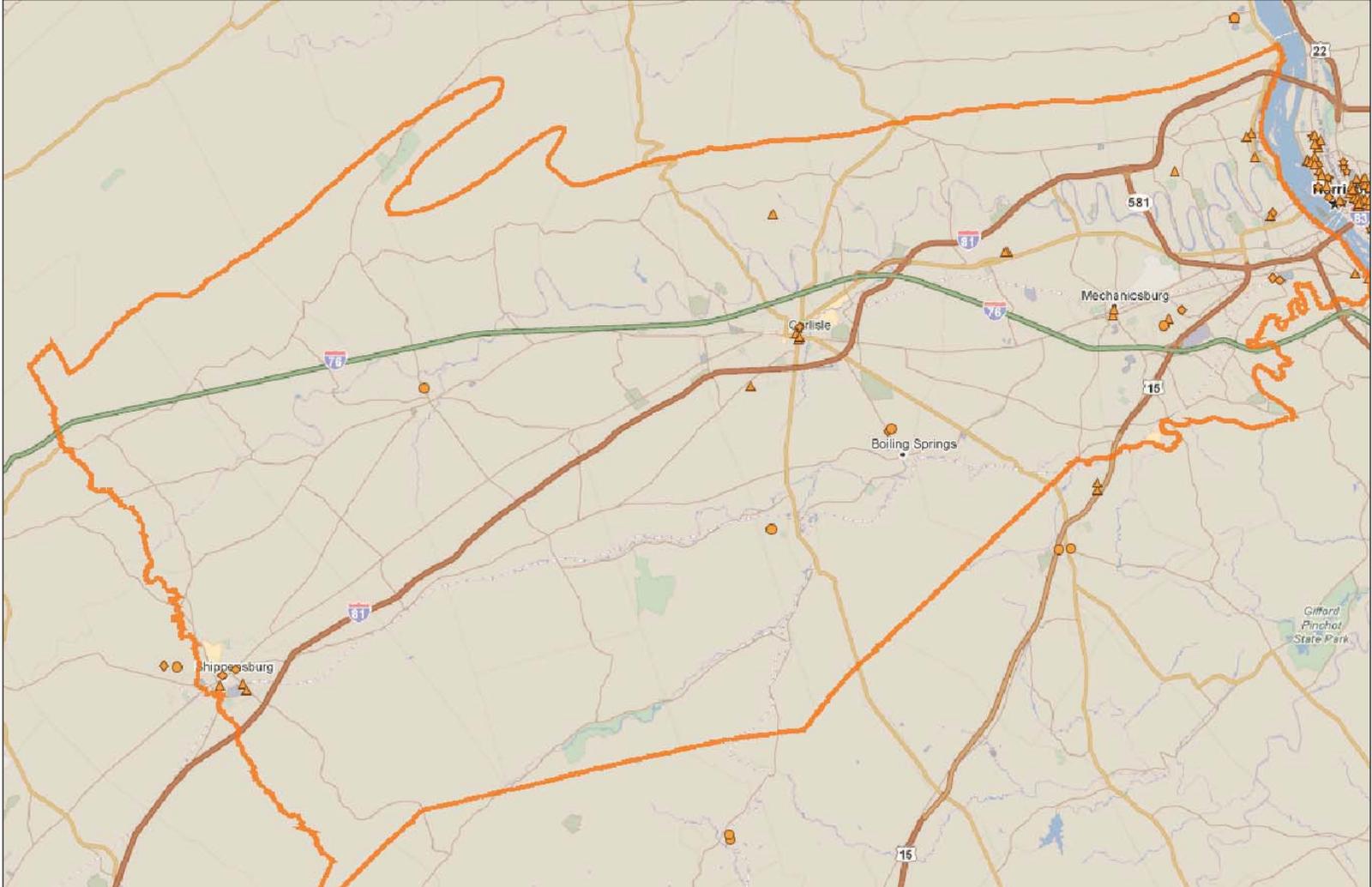
Source: Pennsylvania Housing Finance Agency, 2014 Affordable Apartment Locator

CCHRA has identified a priority housing need among people with disabilities. Such households represent 30% of those waiting for a voucher and 27% of those waiting for a public housing unit. The Authority addresses this need in part by implementing a waiting list selection preference for people with disabilities, who often experience difficulty finding affordable rental housing on the private market that is accessible.

Section 504 of the Rehabilitation Act of 1973 and 24 CFR Part 8 requires that 5% of all public housing units be accessible to persons with mobility impairments. Another 2% of public housing units must be accessible to persons with sensory impairments. In addition, an authority's administrative offices, application offices and other non-residential facilities must be accessible to persons with disabilities. The Uniform Federal Accessibility Standards (UFAS) is the standard against which residential and non-residential spaces are judged to be accessible. CCHRA reported that it has complied with Section 504 requirements and has modified 10 apartments to meet applicable standards.

In addition to units owned and operated by CCHRA, at least 1,057 additional units of subsidized housing are known to be available across the County, 55 of which are accessible to persons with disabilities. These units were created through use of tax credits or other federal programs such as Section 202 or Section 811.

Distribution of Assisted Housing, 2014



- ★ HUD Public Housing
Source: HUD REAC, HUDs Picture of Subsidized Households
- ◆ HUD Multifamily
Source: HUD MF Contracts, HUD REAC, HUDs Picture of Subsidized Households
- ▲ LIHTC
Source: LIHTC
- USDA Rural Development - Multi-Family
Source: USDA Rural Development Multifamily



Source: TRF

Language Access

Persons with limited English proficiency (LEP) are defined by the federal government as persons who have a limited ability to read, write, speak, or understand English. As noted in an earlier section of this report, 560 (2.6%) people in Carlisle and 5,239 (3.2%) in the balance of Cumberland County spoke English less than “very well” in 2012.

HUD issued its guidelines on how to address the needs of persons with LEP in January 2007. HUD uses the prevalence of persons with LEP to identify the potential for impediments to fair housing choice due to their inability to comprehend English. Persons with LEP may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. To assist these individuals, it is important that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent, and establishes policies to eliminate barriers. It is also incumbent upon HUD entitlement communities to determine the need for language assistance and comply with Title VI of the Civil Rights Act of 1964.

In Cumberland County, 1,385 Spanish speakers qualified as LEP in 2012. This group exceeds the HUD “safe harbor” minimum of 1,000 LEP persons or 5%. In order to determine whether the translation of vital documents is required, the County must conduct the four-factor analysis.

The term “vital document” refers generally to any publication that is needed to gain access to the benefits of a program or service. The four-factor analysis requires entitlements such as the Urban County to evaluate the need for translation and/or other accommodations based on four factors:

- The number or proportion of persons with LEP to be served or likely to be encountered by the program
- The frequency with which persons with LEP come into contact with the program
- The nature and importance of the program, activity or services provided by the program, and
- Resources available to the grantee vs. costs

Although there is no requirement to develop a Language Access Plan (LAP), HUD entitlement communities are responsible for serving LEP persons in accordance with Title VI of the Civil Rights Act of 1964. Conducting the four-factor analysis is the best way to comply with this requirement. The obligation to translate vital documents would also extend to the Cumberland County Housing and Redevelopment Authority.

CCHRA has an LAP on file to ensure that the Authority will “take reasonable steps” to provide meaningful access to LEP individuals who are:

- Seeking housing assistance from a public housing agency or assisted housing provider or are current tenants in such housing
- Seeking assistance from a state or local government for home rehabilitation
- Attempting to file housing discrimination complaints with a local Fair Housing Assistance Program grantee
- Seeking supportive services to become first-time homebuyers
- Seeking housing-related social services, training, or any other assistance from HUD recipients
- Parents and family members of the above.

Language assistance that CCHRA might provide to persons with LEP includes, but is not limited to:

- Oral interpretation services
- Bilingual staff
- Telephone service lines interpreter
- Written translation services
- Notices to staff and recipients of the availability of LEP services or persons.

The Authority considers translation on a case-by-case basis, evaluating the frequency of languages encountered and the context of circumstances surrounding the request.

Land Use Comprehensive Planning

A community's comprehensive plan is its vision for the future, describing land use, housing, commercial areas, transportation, natural resources, community facilities, and other conditions 10 or more years into the future. Particularly relevant to the AI, the land use element of the comprehensive plan defines the location, type, and character of future development; the housing element expresses the preferred density and intensity of residential neighborhoods. The land use and housing elements of the comprehensive plan, taken together with the remaining components, define the type of place that a community wishes to become.

Cumberland County

Cumberland County's Comprehensive Plan serves to inform County decision-making and assist local governments in preparing their own, more detailed local plans in accordance with their own goals and land use policies. It does not preempt the authorities of municipalities, but exists to establish a vision and expand and strengthen the capacities of local governments to make informed decisions that advance the prosperity and livability of the region. The Pennsylvania Municipalities Planning code leaves ultimate authority for local land-use decisions with

municipalities, which limits the County's ability to impact settlement patterns.

In 2001, the Cumberland County Planning Commission developed a mission statement and set of goals to guide its activities. The goals of the Commission are:

- The protection and preservation of our natural and cultural heritage to include open space, greenways and farmland preservation;
- The revitalization of our urban communities;
- The development of our communities so as to afford a high quality of living standard;
- The maintenance of a sustainable economy;
- The mobilization and investment in the talents of our human resources;
- The promotion of strong planning leadership, awareness, responsibility, and involvement in county and community planning issues;
- The coordination of planning priorities for transportation, economic development, tourism, and other planning organizations within the County.

The current comprehensive plan for Cumberland County was adopted by the Commission in 2003 as an update from the 1990 plan. In 2011, the Commission revised the future land use plan, transportation plan, and historic preservation plan. The housing plan will be updated in

2015.

The comprehensive plan was developed through an extensive public engagement process that involved multiple public forums, meetings, and surveys targeting elected officials, municipal staff, local and county planning commissions, school districts, chambers of commerce, non-profit organizations, and the public at-large. The results of this outreach process heavily drove the formation and prioritization of the comprehensive plan's goals and priorities. The primary goals of the plan, in order of priority, are:

- Farmland preservation
- Land use compatibility and zoning enforcement
- Conservation of natural features and open space
- Mass transportation
- Planned growth areas
- Educational outreach

As noted in the housing plan, "housing availability and affordability were not identified as a priority issue compared to farmland preservation, land use compatibility, and transportation issues." While housing availability and affordability being absent from the plan's list of priority goals is not in and of itself an impediment to fair housing choice, reducing or sacrificing these characteristics in the name of achieving priorities could be.

The housing plan also notes that “the survey reflected that an adequate number of dwelling units are available to house the current population.” While technically correct, a simple comparison of the housing inventory to a population count does not necessarily imply that fair housing choice is present for all households in the County.

The future land use plan and housing plan recommend that future development be restricted to Planned Growth Areas serviceable by existing or reasonable extensions of infrastructure. This type of recommendation, while a common and prudent land use and growth strategy, can have the risk of impeding fair housing choice by effectively eliminating the amount and location of available land where certain housing types can be developed. In Cumberland County, however, the future land use map suggests that there is sufficient developable land designated for higher density residential character areas for this to not be the case.

Notably, the forecasts used in the housing plan to determine future residential demand include numbers for low-income households and housing units. This is a good indication that the Commission’s planning efforts are sensitive to the needs of members of the protected classes, who are more likely to be low-income. The plan also encourages the investigation of potential new funding sources for low-income housing.

There are a number of other recommendations presented in the housing plan and throughout the comprehensive plan that are compatible with the goals of furthering fair housing choice. These include:

- Local ordinances should provide for a variety of housing types (including mobile/manufactured homes) at varying price ranges in locations that can support residential development.
- Development regulations, which allow for more flexible application of ordinance standards concerning architecture and design, should be encouraged.
- Within Planned Growth Areas, density bonuses should be encouraged as an incentive to preserve open space/recreational and environmentally sensitive areas within the development. Opportunities for construction of townhouses and apartments, which allow different architecture designs, should be encouraged in areas appropriate for higher density development.
- Residential cluster development regulations should be considered for residential areas as an alternative to conventional subdivisions.
- An emphasis should be placed on the preservation and rehabilitation of existing housing through municipal ordinances.
- Consider housing needs of older suburban areas, particularly those within

the 581 Beltway, in the next 10 years. The housing stock in this area is aging beyond a critical point and funding should be allocated for maintenance.

- The County should encourage the development of housing designed to meet the special needs of the elderly and handicapped, and promote the availability of group homes for the mentally, physically and developmentally disabled within residential districts.
- Encourage mixed use development
- Make appropriate recommendations for transit supportive land use (i.e. park and rides, bus shelters, density/density bonuses, building location/setback, roadway right-of-ways, etc.) as part of county subdivision and land development plan reviews.
- Partner with CAT to improve public transit in Cumberland County.
- Promote transit education and outreach to public/private sector employees and county residents.
- Incorporate bicycle, pedestrian, horse and buggy and ADA improvements into county and municipal transportation projects.
- Promote land use planning practices that support cycling and walking.

Borough of Carlisle

The Borough of Carlisle's Comprehensive Plan was adopted in 2002. Like the County's plan, it is not itself regulatory, but instead provides direction to establish overall policies for the development and preservation of Carlisle over the next fifteen years.

Some of the goals and recommendations of the plan are positive activities that typically further fair housing choice. For example, one is to "further enhance the diversity of Carlisle's population, uniting persons of varying ages, incomes, and racial and ethnic backgrounds." Another, to "promote increased use of public transit, bicycling, walking and carpooling," would benefit members of the protected classes who are less likely to be able to afford private vehicles.

However, there are many instances of recommendations in the plan that are problematic and that could be associated with impeding fair housing choice.

One theme of the plan that influences many of the goals and action steps is the preservation of Carlisle's "small-town" atmosphere. This theme frequently takes the form of advocating for low density neighborhoods and home-ownership opportunities. This theme is even taken so far as to recommend the de-conversion of existing single-family structures that have been adapted into multi-family residences. The stated reasoning behind this

is that "de-conversions can help increase the stability of a neighborhood and reduce parking shortages," although the end result would be the reduction of housing choice for renter households.

While not exactly equivalent to impeding fair housing choice, the discouragement of more dense, renter-occupied housing options disproportionately impacts members of the protected classes.

The plan's goal to "assist in providing housing for persons with special needs throughout the county," although supportive on its face, was followed by the language "care is needed to make sure that Carlisle is not overburdened by more than its fair share of the region's needs for subsidized housing and human services. While these services are important, some types of specialized housing can create difficulties and unusually large expenses for the police department and the school system, and nuisances for the surrounding neighborhood." This language, especially the use of the legal term "nuisance," could be viewed as derogatory toward members of the protected classes, who often require the benefit of subsidized housing.

There are also a number of places where language in the plan specifically targets middle- or upper-income households to the obvious exclusion of low-income households, or is prejudiced against low-income households outright. For instance:

- "To maintain its economic health, the Borough needs to continually work to attract and retain middle-income households in new construction and existing homes. A single blighted property can severely discourage new investment on an entire block and can cause responsible residents to move out."
- "Care is needed to avoid placing very low-income households in subsidized home-ownership. In too many cases, these households do not have the funds to pay for repairs that are periodically needed in an older home. If they have no equity in the home, they may be tempted to walk away from the mortgage. As a result, a property can stand vacant for months until foreclosure occurs and the property is resold. During this time, the property can deteriorate and/or be vandalized."

Municipal Zoning

The power behind land development decisions in Pennsylvania resides with municipal governments through the formulation and administration of local controls. These include comprehensive plans, zoning ordinances and subdivision ordinances, as well as building and development permits. All but four of Cumberland County's 33 municipalities enforce local zoning ordinances. The County manages local land use mapping and provides review and comment on zoning changes as well as subdivision and land development activity.

This section includes analysis of a sample of 14 zoning ordinances that represent the variety of communities across the County, in terms of settlement patterns and character. All of the included municipalities, with the exception of Lower Mifflin Township and Carlisle Borough, have received Urban County CDBG funds. The Borough is a federal CDBG grantee.

In providing CDBG funds to municipal subrecipients, the County is responsible to HUD to ensure that it is not investing in systems that perpetuate segregated housing patterns. In cases where this analysis determines that local rules are inconsistent with fair housing laws, the County will inform community leaders and suspend the award of County-administered competitive federal funds until problem issues are adequately addressed. In cases where local rules are legal but inconsistent with

fair housing best practices, the County will inform community leaders and advise changes that would make ordinances more open and inclusive.

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

- The opportunity to develop various housing types (including apartments and housing at various densities)
- The treatment of mobile or manufactured homes¹
- Minimum lot size requirements
- Dispersal requirements for housing facilities for persons with disabilities in single family zoning districts
- Restrictions of the number of unrelated persons in dwelling units based on the size of the unit or the number of bedrooms

It is important to consider that the presence of inclusive zoning does not necessarily guarantee a zoning ordinance's fairness. This analysis does not address the issue of availability, suitability or development potential of sites.

1. In its decision in *Geiger v. Zoning Hearing Board of North Whitehall*, the Pennsylvania Supreme Court established that zoning ordinances must treat manufactured housing units in the same manner as all other single family detached dwelling units. In addition, Section 604(4) of the Pennsylvania Municipalities Planning Code states that "... zoning ordinances shall be designed ... to provide for the use of land for ... mobile homes and mobile home parks." Several additional court decisions have reaffirmed this law.

Sample of Ordinances Reviewed

Carlisle Borough

East Pennsboro Township

Hampden Township

Lemoyne Borough

Lower Mifflin Township

Mechanicsburg Borough

Monroe Township

New Cumberland Borough

Newville Borough

Shippensburg Borough

Shippensburg Township

Shiremanstown Borough

Silver Spring Township

Wormleysburg Borough

Benchmarking

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

The full set of criteria is:

1. Ordinance defines “family” inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit
2. Ordinance defines “group home” or similarly named land use comparatively to single family dwelling units
3. Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use/conditional use permit or public hearing

4. Ordinance regulates the siting of group homes as single family dwelling units without any additional regulatory provisions

5. Ordinance has a “Reasonable Accommodation” provision or allows for persons with disabilities to request reasonable accommodation/modification to regulatory provisions

6. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right

7. Ordinance does not distinguish between “affordable housing/multi-family housing” (i.e., financed with public funds) and “multi-family housing” (i.e., financed without any public funds)

8. Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing, or permanent supportive housing facili-

ties exclusively to non-residential zoning districts

9. Ordinance permits manufactured and modular housing on single lots like single family dwelling units

10. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less

11. Ordinance does not include exterior standards for all single family dwelling units regardless of size, location, or zoning district

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

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

Zoning Review Benchmark Criteria

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

Results

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

A high benchmark score, which indicates a relatively high risk relative to fair housing issues, does not necessarily reflect a high probability of the real-world implementation of an ordinance causing impediments to fair housing choice. Nor does a low score mean that impediments are unlikely to happen. The scores are merely guidelines to judge a particular code against known fair housing zoning issues.

Most ordinances ranked as posing a moderate to high risk for discriminatory provisions. The most common affirmative language consisted of reasonable allowances for multi-family densities and low minimum lot sizes that would provide an array of affordable housing development or infill options. No ordinances had

design guidelines for dwelling units that would have the effect of making development less feasible for assisted units. The most common problems were restricting the siting of group homes, in some cases literally with buffer requirements, and limiting the number of unrelated people who may live together. Few ordinances included a “reasonable accommodation” provision for variances for persons with disabilities.

The highest score of the group (i.e. the most problematic ordinance) was Newville Borough’s, at 1.64. Although this ordinance has aspects that are known to promote fair housing, such as a permissive minimum lot size in R1, it is lacking other constructive measures, such as unrestricted siting of group home and manufactured homes. It also has one of the most narrow definitions of “family” of all the ordinances reviewed, allowing only “a father, mother, grandfather, grandmother or single parent and their children” to live together.

The lowest score (i.e. the ordinance that most promotes fair housing choice) was in Hampden Township, at 1.09. The only missing element of this ordinance from a fair housing perspective was a reasonable accommodation provision for persons with disabilities.

Zoning Review Scoring Results

Community	Score
Newville Borough	1.64
Shippensburg Township	1.55
Shiremanstown Borough	1.55
Lower Mifflin Township	1.50
New Cumberland Borough	1.45
Shippensburg Borough	1.36
Mechanicsburg Borough	1.35
Carlisle Borough	1.35
Lemoyne Borough	1.27
Silver Spring Township	1.23
Monroe Township	1.23
East Pennsboro Township	1.18
Wormleysburg Borough	1.09
Hampden Township	1.09

Carlisle Borough

With a score of 1.35, Carlisle’s ordinance falls into the “moderate risk” range for discriminatory provisions. The ordinance requires that group homes for up to six people with disabilities locate according to a 900-foot buffer of other such facilities, which given the Borough’s built-out status, could effectively zone this use out of areas where it is affordable to develop. Additionally, the ordinance specifies that group home activity “shall not be oriented to ... treatment for current alcohol or drug addiction,” which amounts to discrimination according to the Americans with Disabilities Act, which covers persons recovering from substance abuse. In an inconsistency with the PA Municipalities Planning Code, the Borough allows mobile and manufactured homes only as a special exception in R3, not as a use permitted by right in any residential area. On the other hand, the ordinance includes provisions that would advance housing choice, such as a reasonable accommodation policy.

East Pennsboro Township

East Pennsboro’s zoning ordinance scored relatively low on the benchmarking tool at 1.18, meaning that it does not contain many elements that pose high risks of causing impediments to fair housing choice. Its definition of family is broad and inclusive, it allows reasonably small lot sizes in residential districts and it expressly allows manufactured homes to

exist as single-family dwelling units. However, it requires that group homes obtain approval from the Board of Commissioners and provide evidence that the home “will be conducted in a manner that will not be detrimental to neighboring property owners.”

Hampden Township

Among the sample of ordinances reviewed, Hampden Township’s was the most consistent with fair housing standards, offering a liberal definition of a “family” that would include group homes and other non-traditional households to settle throughout the community, the encouragement of residential density in planned residential developments, the absence of design standards that would drive up development costs and explicit allowance for mobile homes in single-family residential districts. The ordinance could be improved by adding a provision for reasonable accommodation for persons with disabilities.

Lemoyne Borough

Lemoyne’s zoning ordinance qualified as a moderate risk on the benchmarking tool with a score of 1.27. Its “family” definition is open and inclusive and would include group homes for people with disabilities, though the ordinance does not specifically call out this use. The Urban Residential district is relatively large and allows multi-family structures up to six units by right. Permanent mobile homes may lo-

cate as single-family dwelling units upon issuance of a permit.

Lower Mifflin Township

Lower Mifflin Township’s score of 1.5 on the benchmarking tool places it near the upper limit of the “moderate risk for discriminatory provisions” range, owing largely to its treatment of group homes for people with disabilities. The ordinance does not allow more than three unrelated people to live together, and exception is made only for people with developmental disabilities (by the definition of “family group home,”) not disabilities of other types, such as sensory or mobility limitations. Family group homes are not permitted by right in any district. The Township’s minimum lot sizes in residential districts are also relatively large, which may raise cost issues that would impede the development of affordable housing types.

Mechanicsburg Borough

Mechanicsburg’s zoning ordinance scored 1.35 on the benchmarking tool, squarely in the “moderate risk” range. The risks are related primarily to restrictions on group homes. Those with up to five residents may exist as single-family dwelling units, but group homes for six to eight residents are considered to be a conditional use requiring a 1,000-foot buffer and a “detailed statement of intent” that describes the “nature of the anticipated occupants.” Group home operators face

a burden of proof in convincing officials that the home satisfies “a demonstrative need and shall be conducted in a responsible manner without detriment to the surrounding properties and the neighborhood.” This provision is antithetical to the notion of mainstreaming people with disabilities into community life.

Monroe Township

Monroe Township’s zoning ordinance scored 1.23 on the benchmarking tool, also in the “moderate risk” range. Its definition of “family” allows up to six unrelated, and its definition of “group care facility” includes no cap on the number of residents, stating specifically that such use “shall be subject to the same limitations and regulations ... as single-family dwellings.” There is some limitation on the development of multi-family structures of four or more units, though the Village Overlay exists in part to encourage scattered-site affordable housing opportunities. Lot sizes in the Township are generally large except in the Village of Churchtown and in the mixed-use Village Overlay.

New Cumberland Borough

With a score of 1.45, New Cumberland Borough’s ordinance borders high risk for discriminatory provisions. The ordinance does not allow more than three unrelated people to live together. While there is an exception for group homes of up to six unrelated persons, this use is defined

separately in the ordinance and not permitted by right in any residential district – only by exception in a commercial district conditioned on a 500-foot buffer. However, other provisions would promote housing choice, such as the permitting of apartment buildings by right in R2, which comprises a relatively large portion of the land use map, very permissive minimum lot sizes of 5,000 square feet in R1 and R2 and treatment of modular homes a single-family detached dwellings throughout the Borough.

Newville Borough

Newville’s ordinance was the highest scoring among those reviewed, meaning that it presents the greatest potential risk for discriminatory provisions. Its definition of family is extremely restrictive, laying out the relationships that must exist between members (“father, mother,” etc.). By strict interpretation, this would not allow unmarried couples to cohabit. The definition does not except group homes, which are not described as a use allowed by right or condition in any district. Multi-family dwellings are listed in the district use schedule as permitted by right only in the Village District, but the Village District regulations specify that this use is conditional, not permitted. Mobile homes are not permitted by right in any district and are conditional only in R2, which represents inconsistency with the PA Municipalities Planning Code.

Shippensburg Borough

Shippensburg Borough’s zoning ordinance scored 1.36 on the benchmarking tool, squarely within the “moderate risk” category. The Borough limits a “family” to three unrelated people and does not include an exception for group homes, which are not expressly a permitted or conditional use in any district. Thus group homes would be a conditional use, with burden on the applicant to demonstrate that they “would not be detrimental to the public health, safety and welfare of the neighborhood.” Requiring group homes for up to six people with disabilities to comply with regulations that do not apply to single-family homes is considered discriminatory by fair housing standards. However, the ordinance seems to treat mobile homes as single-family homes, and it provides a variety of districts for the development of multi-unit structures.

Shippensburg Township

The score of 1.55 places Shippensburg Township’s ordinance within the range of “high risk” for discriminatory provisions. The ordinance allows only three unrelated people to live together without exception for group homes. There is no definition approximating the group home use; thus it might qualify as a boarding house, which may serve only four persons in R1 and six in R2. The Township permits multi-family structures of up to 12 units by right in R2. While larger apartment buildings are permitted by right in R3, no

land on the Township map is zoned R3. Mobile homes are not permitted by right in R1, a limitation that is inconsistent with the PA Municipalities Planning Code.

Shiremanstown Borough

The ordinance for Shiremanstown received an identical score of 1.55, landing it also in the “high risk” category. This is in large part due to the Borough’s treatment of group homes, as the ordinance allows no more than three unrelated people to live together without exception. There is no use defined for group home, which would not qualify as a single-family dwelling unit and would not fall under permitted and conditional uses listed for any district. The Borough allows mobile homes by right only in the multi-family residential and apartment-office districts, not single-family residential. On the other hand, the ordinance lays out a variety of areas where multi-family structures can be developed.

Silver Spring Township

Silver Spring’s zoning ordinance fell into the “moderate risk” range with a score of 1.23. While its limitation of family to three unrelated members would discourage non-traditional household formation, such as people living together for economic reasons, it specifically excepts “any number of unrelated persons who reside within a licensed group home.” The ordinance states that group homes will be treated as single-family dwellings. The risk in Silver

Spring is related more to limitations on land available and zoned for affordable housing types. For instance, multi-family housing is permitted by right in the high-density residential district (which comprises a small expanse of land), but only up to five dwelling units per acre.

Wormleysburg Borough

Wormleysburg’s ordinance also ranks as the lowest risk among those reviewed according to the benchmarking tool with a score of 1.09. It promotes housing choice with a broad and inclusive definition of family that would encompass the group home use. The multi-family residential and two village mixed use districts allow multi-family structures by right and impose reasonable lot size minimums. Manufactured homes appear to be treated as single-family dwelling units. The only noted area for improvement in the ordinance is provision of a reasonable accommodation policy that would expressly allow exceptions as needed to serve persons with disabilities.

Public Transit

Households without a vehicle, which in most cases are primarily low- and moderate-income households, are at a disadvantage in accessing jobs and services, particularly if public transit is unavailable. Access to public transit is critical to these households. Without convenient access, employment is potentially at risk and the ability to remain housed is threatened. The linkages between residential areas (with minority concentrations and LMI persons) and employment opportunities are key to expanding fair housing choice.

The Cumberland-Dauphin-Harrisburg Transit Authority, more commonly known as Capital Area Transit (CAT), was formed in 1973 to provide local bus service to the residents of the Harrisburg area. The majority of the fixed routes in Cumberland County service the inner-suburbs of Harrisburg. Two commuter lines service park-and-ride locations in Carlisle, one also continuing to Shippensburg. Shippensburg has two additional fixed bus routes, Carlisle has one.

The Cumberland County Transportation Department (CCTD) offers a shared ride service throughout Cumberland County and limited service to surrounding counties with available resources. CCTD provides service Monday-Friday 8am-4pm, provided that notification is given for a ride prior to 12 PM the previous day. Residents of Cumberland County must register prior to transportation. Fares are mileage-based, with seniors eligible for a significant discount.

In general, the transit within Cumberland County caters to metro-Harrisburg and the next two largest population centers, Carlisle and Shippensburg. Traveling to or from anywhere else in the County on public transit is difficult, expensive, or both. This has the potential to limit fair housing choice to those wishing to live outside of these areas but who do not have access to a private vehicle.



Discrimination Complaints

This section analyzes the existence of fair housing complaints or compliance reviews where a charge of a finding of discrimination has been made. Additionally, this section will review the existence of any fair housing discrimination suits filed by the United States Department of Justice or private plaintiffs in addition to the identification of other fair housing concerns or problems.

The number of complaints reported may under-represent the actual occurrence of housing discrimination in any given community, as persons may not file complaints because they are not aware of how or where to file a complaint. Discriminatory practices can be subtle and may not be detected by someone who does not have the benefit of comparing his treatment with that of another home seeker. Other times, persons may be aware that they are being discriminated against, but they may not be aware that the discrimination is against the law and that there are legal remedies to address the discrimination. Also, households may be more interested in achieving their first priority of finding decent housing and may prefer to avoid going through the process of filing a complaint and following through with it. According to the Urban Institute, 83% of those who experience housing discrimination do not report it because they feel nothing will be done. Therefore,

education, information, and referral regarding fair housing issues remain critical to equip persons with the ability to reduce impediments.

U.S. Department of Housing and Urban Development

The Office of Fair Housing and Equal Opportunity (FHEO) at HUD receives complaints from persons regarding alleged violations of the federal Fair Housing Act. Fair housing complaints originating in Cumberland County were obtained and analyzed for the period of January 2004 through October 2014. In total, 42 complaints originating in the County were filed with HUD during this period. There was no linear pattern of increase or decrease in annual volume, with a minimum of zero filed in 2006 and 2012 and a maximum of seven filed in 2010. As of October 2014, there were five unresolved cases.

HUD provided information on the geographic distribution of cases. Fair housing complaints originated in localities across the County, with the greatest occurrence in Carlisle, where 13 complaints were based. Within the Urban County, the communities with the highest number of complaints were Mechanicsburg, with nine, and Camp Hill, with six. No other jurisdiction had more than four fair housing complaints during the nearly 10 years studied.

Disability was easily the most common basis for complaint, cited in 27 cases (64.3%). Retaliation was an issue in 12 cases, while race and familial status were each cited in eight cases. Many complaints involve alleged discrimination on multiple grounds.

Across all 42 complaints filed with HUD, discriminatory terms, conditions and privileges in leasing property was the most commonly cited issue, factoring into 16 cases. Eviction was an issue in 14 cases, while discrimination in the furnishing of facilities, services or privileges in general was an issue in nine. Eight cases involved refusal to lease, and six involved refusal to make reasonable accommodations or modifications for people with disabilities.

In terms of result, of the 37 complaints that were resolved as of October 2014, six (16.2%) were conciliated with a successful settlement prior to a cause finding, and one additional complaint resulted in a conciliation agreement/consent order following a finding of probable cause. A complaint is considered conciliated when all of the parties to the complaint enter into a conciliation agreement with HUD. Such agreements include benefits for the complainant, and affirmative action on the part of the respondent, such as civil rights training. HUD has the authority to monitor and enforce these agreements. These cases involved familial status, reasonable accommodation and retaliation.

Twenty-two complaints (59.5%) were

found to be without probable cause. This occurs when the preponderance of evidence obtained during the course of the investigation is insufficient to substantiate the charge of discrimination. Another eight cases (21.6%) were administratively closed, due to complaint withdrawal before or after resolution, judicial dismissal or the complainant's refusal to cooperate. Caution should be used when interpreting complaints that are administratively closed. This resolution does not always mean that housing discrimination has not occurred. In the case of a complainant withdrawing a complaint, an uncooperative complainant, or a complainant who cannot be located, it is possible that the complainant changed her mind, decided against the trouble of following through with the complainant, chose to seek other housing without delay, or some other reasons.

Pennsylvania Human Relations Commission

The County submitted a formal request for complaints data from the Pennsylvania Human Rights Commission on October 15, 2014. As of January 2015, the HRC had not responded.

Fair Housing Policies and Actions

The last Analysis of Impediments to Fair Housing Choice for Cumberland County and the Borough of Carlisle was conducted in 2004. Both jurisdictions report progress in fair housing initiatives annu-

ally in the CAPER.

Summarized below are the major impediments identified in 2004:

- Low-income areas tend to be disproportionately populated by members of the protected classes, particularly minorities and female-headed households.
- While the County has actively addressed the housing needs for the disabled, there continues to be the need to effectively address their housing needs reducing the potential for impediments.
- There is no focus on fair housing by County officials and among housing services.
- Local zoning in some communities restricts unrelated persons from living together and/or establishes dispersal requirements for group homes. Also, zoning lacks streamlined development processes for design alternatives that support affordable housing and adaptive use and in-fill development in older boroughs in addition to regulations that support reuse.
- Members of the protected classes experience higher mortgage loan denial rates, often due to a poor credit history or a lack of credit history.

The County's efforts to affirmatively further fair housing, as reported in its CAPER documents, center on addressing

these five issues. CCRHA staff participate in the local Fair Housing Council, direct first-time homebuyer classes and distribute fair housing information where possible. The Authority annually identifies potential development projects that will deconcentrate housing for members of the protected classes, which in recent years have included multi-unit facilities for seniors, people with cognitive disabilities and the chronically homeless in locations outside of low- and moderate-income census tracts. In 2013, CCRA published fair housing information on its website, produced and distributed a new fair housing pamphlet and reminded the County Planning Commission about the need to review municipal codes for impediments to fair housing.

Additionally, the Authority publishes a notice in the newspaper to inform residents of their fair housing rights and the recourse available in case they have been unfairly denied housing. County CDBG funds continue to fund the Local Housing Options Team coordinator, who assists residents to locate rental housing. In concert with local banks, CCHRA runs a housing counseling workshop to assist members of the protected classes in securing loans.

In addition to these efforts, the Borough of Carlisle ensures that the Equal Opportunity poster is prominently displayed in all publicly supported rental facilities as well as the courthouse and other County and Borough facilities. CCHRA trains all

rental housing staff on fair housing, and staff members must sign a code of conduct following the training as a condition of employment. Authority staff administering the voucher program review locations of high poverty concentration with potential recipients and encourage them to seek housing outside of such neighborhoods.

CCHRA hired a Compliance Specialist who will focus on fair housing activities and implementing the results of this report. In 2012, the Authority reviewed its undertakings from a fair housing perspective and concluded that homebuyer activities were providing safe housing to underserved populations, and that counseling sessions provided clients with information about landlord/tenant rights that allowed them to more proficiently navigate fair housing issues with their current landlords.

With regard to zoning, CCHRA worked with Carlisle Borough in 2011 and 2012 to revise residential districts to include a new Village district that incorporates more diverse housing types, with the effect of broadening uses in some areas of the Borough that had been traditionally dominated by large-lot single-family housing.

Finally, the County and the Borough coordinated the production of this document with the undertaking of their Five-Year Consolidated Plans to ensure that recommendations are grounded firmly in fair housing principles.

Local Fair Housing Infrastructure

Cumberland County and Carlisle Borough have not adopted local human rights/relations ordinances; therefore, prohibitions against discrimination at the federal and state levels apply. In many jurisdictions across Pennsylvania, locally adopted provisions expand the number and type of protected classes, extending protection on the basis of sexual orientation, gender identity, marital status or other characteristics. Such ordinances usually also establish a local system for enforcement by creating a commission that receives, reviews, investigates and resolves discrimination complaints. Human rights/relations commissions commonly undertake proactive outreach activities such as commissioning paired discrimination testing – which can help determine which problems might exist in a given community and how to address them – or education and outreach that broaden awareness of housing rights and responsibilities.

In the absence of such infrastructure, much of the fair housing work in Cumberland County is carried out by agencies such as the Fair Housing Council of the Capital Region, which has existed for more than two decades to eliminate housing discrimination by providing housing counseling, an information help line, homeownership workshops, publications, seminars and training. The Council, a HUD-certified counseling agency, has

graduated more than 10,000 people from its homebuyers workshops offered across its service area.



GENERAL OBSERVATIONS

This section of the AI is a summary of general observations included in earlier sections of the report. General observations include the results of primary and secondary research that define the underlying conditions, trends, and context for fair housing planning in the Urban County and in Carlisle. These observations in and of themselves do not necessarily constitute impediments to fair housing choice. Rather, they establish a contextual framework for the impediments to fair housing choice that are presented in the following section of the AI.

1. Population growth in the Urban County continues to experience constant growth that outpaces statewide averages and bolsters housing demand. By contrast, Carlisle's population has remained generally stable for decades. Higher densities exist as a result of suburban development pressures in the County's eastern municipalities and along the major corridors connecting Carlisle with Harrisburg and in townships surrounding the Borough.

2. The County has become more racially and ethnically diverse since 2000, though it was still 91% White as of 2012. The diversification is especially conspicuous in Carlisle, where the White population has decreased in raw number while minority populations increase. Black residents are the largest minority group, representing 2.6% of the Urban County and 8.8% of the Borough.

3. The residential integration of Black households has increased across the County since 2000, but the County is still moderately segregated, as 100% spatial integration would require about 48 in every 100 Black persons to relocate to a different census tract.

4. Thirty census block groups across the County qualify as low- and moderate-income, and 15 qualify as areas of racial or ethnic concentration. Of these, seven block groups meet both criteria and are therefore racially/ethnically concentrated areas of poverty. Five of these areas are located within Carlisle, and the remaining two are just outside of the Borough of Mechanicsburg.

5. There is a sufficiently large number (1,395) of limited-English Spanish speakers across the County to warrant further analysis of their access to public programs and services.

6. The greatest gain in housing units since 2000 has occurred in the County's eastern half, particularly Hampden, Silver Spring, Southampton and Upper Allen townships. Overall, the stock expanded 14.8%.



IMPEDIMENTS TO FAIR HOUSING CHOICE

1. Housing affordability continues to be a problem, and members of the protected classes are disproportionately affected.

Between 2000 and 2012, real median housing value increased 14.2% and rent climbed 7% across the County, while real household income fell by 2.2%. The Urban County lost 61.4% of its units renting for less than \$500 between 2000 and 2012. By comparison, the number of units renting for more than \$1,000 expanded from 944 to 5,489 (582%). In Carlisle, the number of units priced below \$500 fell from 1,903 to 552 (-71%), while units priced at or above \$1,000 increased 400% to 513. Minimum-wage and single-income households cannot afford a two-bedroom housing unit renting for the HUD fair market rent in Cumberland County. Persons with disabilities receiving a monthly SSI check for \$721 as their sole source of income cannot afford a one-bedroom unit renting at the fair market rate of \$662. The affordability of sales housing fluctuates greatly among municipalities in the Urban County, with median prices ranging between \$72,100 (Shippensburg Township) and \$242,600 (Hampden Township) in 2012.

Black households and Hispanic households were more likely to have lower

incomes than Whites across the Urban County and were disproportionately represented among lower-income households. Lower household incomes among Blacks and Hispanics are reflected in lower home ownership rates when compared to Whites and Asians. Among minorities in the County, 26.5% of Blacks and 36.8% of Hispanics were home owners, compared to 73.3% of Whites and 65% of Asians. The maximum affordable purchase price for Blacks and Hispanics fell below the median sales price and was only 45.7% and 49.3%, respectively, of the maximum affordable purchase price for the County overall.

Although female-headed households with children comprised only 8% of family households in Cumberland County in 2012, they accounted for 44.1% of all families living in poverty. More than one in every four female-headed households with children were living in poverty, compared to only 4.3% of married-couple families with children.

Persons with disabilities were more than twice as likely to live in poverty as persons without disabilities. In 2012, 11.6% of people with disabilities had incomes below the poverty line. More than one-third of County seniors reported at least one disability.

Proposed Action Step: CCHRA will continue to strategically allocate its limited resources to broaden the availability of housing options. In addition to the effective operation of existing programs, the Authority should consider creative options such as incentives for an affordable housing setaside in any County-assisted development with a residential component. Because the inability to afford housing costs is an income problem as well as a price problem, CCHRA will continue to fortify the partnerships through which it creates local economic development opportunities, particularly those which create jobs.

2. Subsidized housing and affordable market rentals are geographically concentrated in particular areas of the County.

Renter-occupied multi-family units represented less than 10% of the occupied housing stock in 17 townships, or half of all municipalities in the County. Housing choice for lower-income households is restricted by an inadequate supply of affordable multi-family rental housing units in non-impacted areas. A lack of larger rental units consisting of three or more bedrooms has a disproportionately greater impact on minority families, who tend to live in larger families. Of 26,759 rental units across the County, only 28.4% had three or more bedrooms, compared to 81.1% of the owner housing stock.

CCHRA encourages voucher holders to settle in lower-poverty neighborhoods and evaluates applications for CDBG and HOME funds with the intention of creating affordable opportunities in less traditional areas. However, previous federal directives to build subsidized housing where need is concentrated, vestiges of segregation and local economic patterns have limited the array of affordable housing options outside of the County's higher-poverty neighborhoods. In order to demonstrate meaningful compliance with the certification to affirmatively further fair housing choice, both the Urban County and Carlisle must work collaboratively to identify and pursue means of connect-

ing members of the protected classes with housing options wherever they might choose to live.

Proposed Action Step: CCHRA will continue to administer programs that advance the availability of decent, affordable housing opportunities outside of racially or ethnically concentrated low-income neighborhoods, including:

- Seek opportunities to leverage project-based vouchers to create low-income housing in non-impacted areas.
- Formally adopt and incorporate into the HOME application packet a scoring system that would prioritize housing project sites across the Urban County with a focus in low-poverty areas.
- Actively monitor municipal zoning ordinances, making recommendations as needed to eliminate the potential for discrimination. Ensure that municipalities that do not address identified discriminatory practices will be ineligible for CDBG or HOME funding.
- Mandate fair housing training for municipal officials, developers/management companies and nonprofit agencies and staff from municipalities receiving federal entitlement allocations.
- Continue to support education and outreach initiatives that reach all areas of the County.

3. Local units of government that participate in the Urban County's entitlement grant programs may not unequivocally understand their responsibility to affirmatively further fair housing choice.

Some individual local government zoning ordinances reviewed during the AI were found to impose unreasonable requirements or limitations on group homes. Other communities discourage compact, more affordable residential development by devoting the vast majority of land area to very large minimum lots for the development of single-family homes. In several communities, the zoning ordinance places undue restriction on the relationship between people allowed to live together as a family. All of these measures have the potential to limit fair housing choice.

Proposed Action Step: CCHRA should provide one-on-one technical land use planning assistance to local units of government aimed at identifying and overcoming procedural and regulatory barriers to fair housing and affordable housing. Local elected officials, planning commission members and zoning hearing board members should receive training as resources allow.

Proposed Action Step: CCHRA should formally adopt a policy of refusing to grant CDBG and HOME funds to municipalities that it determines are engaging in

unlawful discrimination.

Proposed Action Step: The County should develop and promote the use and adoption of model ordinances, especially as they relate to the removal of barriers to affordable housing and accommodating group homes for persons with disabilities.

Proposed Action Step: In order to protect its own certification, the County should formally require that all CDBG and HOME recipients certify that they will affirmatively further fair housing as a part of all subrecipient agreements.

4. Some of the policy documents used by CCHRA in the administration of housing programs could be improved from a fair housing perspective.

In addition to requiring developers and managers of HOME-assisted housing developments to complete a HUD form detailing affirmative marketing efforts, CCHRA could fortify its intention to affirmatively further fair housing by also adopting an official policy that states how it will monitor grantee compliance over time and what consequences would exist for non-compliance. This could take the form of an annual site visit to review records for funded projects. If a project is determined to be out of compliance, CCHRA has the authority to require the recapture of all HOME funds and disallow future participation in the County's HOME program. Additionally, CCHRA may refer the matter to HUD and/or a fair housing rights organization.

CCHRA's Language Access Plan consists of general policy guidance in considering accommodations on a case-by-case basis, not an analysis of the needs of local households who would be eligible for programs. CCHRA should continue to monitor American Community Survey data to determine the prevalence of persons with limited English proficiency being served by its programs in order to ensure that its LAP adequately accommodates demographic changes.

Proposed Action Step: CCHRA should develop and adopt a formal Affirmative Marketing Policy that states how it will monitor grantee compliance and what consequences would exist for non-compliance.

Proposed Action Step: CCHRA should evaluate the extent to which its programs and services meet the needs of populations with limited English proficiency by conducting the four-factor analysis.

5. The relatively sparsely developed townships in the eastern portion of the County are isolated from transit service, due to the financial infeasibility of extending routes to such areas.

In general, the transit within Cumberland County caters to metro-Harrisburg and the next two largest population centers, Carlisle and Shippensburg. Traveling to or from anywhere else in the County on public transit is difficult, expensive, or both. While this arrangement is certainly understandable from a transportation management perspective, it has the effect of limiting fair housing choice. The lack of transit service in these communities presents a barrier to the development of affordable housing.

Proposed Action Step: CCHRA should continue to collaborate with Capital Area Transit to promote the strategic expansion of public transit service in non-impacted, high growth areas of the County. This could include the creation of ride-to-work public transit routes that consider the needs of second-shift workers.

Proposed Action Step: The County should additionally identify opportunities around existing areas of public transit for the development of medium-density and high-density affordable multi-family housing for families.

Proposed Action Step: The County should consider the creation, promotion and adoption of an inclusionary housing ordinance that would require the set-aside of a specific percentage of housing units affordable to LMI households. Transit-oriented developments along public transit routes would provide the ideal opportunity to incentivize the provision of affordable housing for members of the protected classes.

6. Carlisle's Comprehensive Plan requires an update to achieve consistency with fair housing standards.

The Plan includes an intention to “make sure that Carlisle is not overburdened by more than its fair share of the region’s needs for subsidized housing and human services” and further suggests that such uses generate “nuisances for the surrounding neighborhood.” The latter comment is discriminatory, and the intention is problematic inasmuch as subsidized housing and human services are designed to serve the lower-income and special-needs populations among which members of the protected classes are heavily over-represented – therefore, an intention to exclude such uses is effectively an intention to exclude members of the protected classes from the community. Finally, the Plan includes a number of passages that specifically promote the attraction of middle- or upper-income households to the obvious exclusion of low-income households or are prejudiced against low-income households outright.

Proposed Action Step: The Borough should prioritize an update to the relevant sections of its Comprehensive Plan and amend the document to ensure that it does not include language that is expressly or effectively discriminatory.

7. Evidence demonstrates that some discrimination is present in the sale and rental of housing across Cumberland County, especially on the basis of disability.

Across the County, disability was an issue in two-thirds of the housing discrimination complaints made to HUD during the last 10 years.

Proposed Action Step: CCHRA should consider hiring a fair housing advocacy organization to undertake paired real estate testing, both for rental and sales housing. The results of such testing should be well-publicized to serve as a public education tool and as a deterrent for future discriminatory actions. Where appropriate, complaints should be filed with HUD or the PHRC.

Proposed Action Step: CCHRA should continue its current efforts to promote education and outreach with regard to landlord, tenant and homebuyer rights and responsibilities.

8. Mortgage lending data suggests that racial minorities are more likely to experience mortgage application denial or high-cost lending than White applicants.

Across the three years studied, the loan denial rates among racial and ethnic minority applicants were higher than the denial rate for White applicants. Black households were denied at a rate of 22.3%, compared to 12.6% of White households.

Upper-income minority households consistently experienced denial rates that were significantly higher than those of lower-income White households. While this fact alone does not imply an impediment to fair housing choice, the pattern is consistent with discrimination.

Proposed Action Step: CCHRA should continue to support HUD-certified housing counselors to provide credit repair advice on a public, countywide basis. This service must ensure to the extent possible that members of the protected classes have access to means of improving their ability to obtain and maintain decent, affordable housing.