

2018 STATE OF IOWA ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



**FINAL REPORT
JANUARY 25, 2019**

2018 STATE OF IOWA

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE:



Prepared for:
Iowa Economic Development Authority
and the
Iowa Finance Authority

Prepared by:
Western Economic Services, LLC
212 SE 18th Avenue
Portland, OR 97214
Phone: (503) 239-9091
Toll Free: (866) 937-9437
Fax: (503) 239-0236

Website: <http://www.westernes.com>

Final Report
January 25, 2019

HAS YOUR RIGHT TO FAIR HOUSING BEEN VIOLATED?

If you feel you have experienced discrimination in the housing industry, please contact:

Iowa Civil Rights Commission
Grimes State Office Building
400 E. 14th Street
Des Moines, IA 50319-0201
Phone: 515-281-4121, 1-800-457-4416
Fax 515-242-5840

U.S. Department of Housing and Urban Development
Kansas City Regional Office of FHEO
U.S. Department of Housing and Urban Development
Gateway Tower II
400 State Avenue, Room 200
Kansas City, Kansas 66101-2406
(913) 551-6958
(800) 743-5323
TTY (913) 551-6972

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SECTION I. EXECUTIVE SUMMARY

OVERVIEW

Title VIII of the 1968 Civil Rights Act, also known as the Federal Fair Housing Act, made it illegal to discriminate in the buying, selling, or renting of housing based on a person's race, color, religion, or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected characteristics. Federal fair housing statutes are largely covered by the following three pieces of U.S. legislation:

1. The Fair Housing Act,
2. The Housing Amendments Act, and
3. The Americans with Disabilities Act.

The purpose of fair housing law is to protect a person's right to own, sell, purchase, or rent housing of his or her choice without fear of unlawful discrimination. The goal of fair housing law is to allow everyone equal opportunity to access housing.

ASSESSING FAIR HOUSING

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. These provisions come from Section 808(e) (5) of the federal Fair Housing Act, which requires that the Secretary of HUD administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG)¹, and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As a part of the consolidated planning process, and entitlement communities that receive such funds as a formula allocation directly from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH). This was the Analysis of Impediments to Fair Housing Choice and a Fair Housing Planning Guide offering methods to conduct such as study was released in March of 1993.

In 2015, HUD released a new AFFH rule, which gave a format, a review process, and content requirements for the newly named "Assessment of Fair Housing" or AFH. The assessment would now include an evaluation of equity, the distribution of community assets, and access to opportunity within the community, particularly as it relates to concentrations of poverty among minority racial and ethnic populations. Areas of opportunity are physical places, areas within communities that provide things one needs to thrive, including quality employment, good schools, affordable housing, efficient public transportation, safe streets, good services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes.

¹ The Emergency Shelter Grants program was renamed the Emergency Solutions Grants program in 2011.

The AFH would also include measures of segregation and integration and provide some historical context about how such concentrations became part of the community's legacy. Together, these considerations were intended to better inform public investment decisions that would lead to amelioration or elimination of such segregation, enhancing access to opportunity, promoting equity, and hence housing choice. Equitable development requires thinking about equity impacts at the front end, prior to the investment occurring. That thinking involves analysis of economic, demographic, and market data to evaluate current issues for citizens who may have previously been marginalized from the community planning process. All this would be completed by using an on-line Assessment Tool.

However, on January 5, 2018, HUD issued a notice that extended the deadline for submission of an AFH by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020. Then, on May 18, 2018, HUD released three notices regarding the AFFH; one eliminated the January 5, 2018, guidance; a second withdrew the on-line Assessment Tool for local government program participants; and, the third noted that the AFFH certification remains in place. HUD went on to say that the AFFH databases and the AFFH Assessment Tool guide would remain available for the AI and encouraged jurisdictions to use them, if so desired.

Hence, the AI process involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, housing transactions, locations of public housing authorities, areas having racial and ethnic concentrations of poverty and access to opportunity. The development of an AI also includes public input, focus groups, and interviews with stakeholders, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified fair housing issues/impediments.

In accordance with the applicable statutes and regulations governing the Consolidated Plan, the Iowa Economic Development Authority (IEDA) and Iowa Finance Authority (IFA) certify that they will affirmatively further fair housing, by taking appropriate actions to overcome the effects of any impediments identified in the Analysis of Impediments to Fair Housing Choice, and maintaining records that reflect the analysis and actions taken in this regard.

OVERVIEW OF FINDINGS

As a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback, IEDA and IFA have identified a series of fair housing issues/impediments and other contributing factors that contribute to the creation or persistence of those issues.

Table I.1, on the following page, provides a list of the contributing factors that have been identified as causing these fair housing issues/impediments and prioritizes them according to the following criteria:

1. High: Factors that have a direct and substantial impact on fair housing choice
2. Medium: Factors that have a less direct impact on fair housing choice or that IEDA or IFA has a comparatively limited capacity to address
3. Low: Factors that have a slight or largely indirect impact on fair housing choice or that IEDA or IFA has little capacity to address.

Table I.1
Contributing Factors
 State of Iowa

Contributing Factors	Priority	Justification
Discriminatory terms/conditions	High	The fair housing survey and public input. HUD complaint data indicated that discriminatory terms and condition were the most frequently cited fair housing complaint issue between 2008 and 2016 in non-entitlement areas of the state.
Discriminatory patterns in lending	High	As demonstrated by 2008-2016 HMDA data, black and Hispanic loan denial rates exceeded 15.9 percent and 17.3 percent respectively, compared with 10.2 percent for white households
Access to proficient schools	Low	School proficiency index are almost markedly lower for black and Hispanic populations than white school proficiency, indicating inequitable access for black and Hispanic households to proficient schools. There are various areas in the State, particularly in rural areas, with low school proficiency. However, IEDA and IFA have little control over increasing access on a large scale.
Lack of access to services for persons with disabilities	High	Public input during the access to opportunity workgroups indicated that persons with disabilities have barriers in access to services vary across the state, and are lacking in rural areas
Access to low poverty areas	High	Black and Hispanic households have a lower low poverty index than white households for non-entitlement areas, as demonstrated by low poverty indices.
Moderate levels of segregation for black and Hispanic households	High	Black and Hispanic households have moderate levels of segregation in the State, which has increased since 2000. Other racial minorities also have moderate to high levels of segregation in the non-entitlement areas of the State, but represent a small proportion of the overall population.
Black and Hispanic households tend to have higher rates of housing problems	High	Some 44.7 percent of black households and 36.5 percent of Hispanic households experienced cost burden or severe cost burdens in 2014, according to CHAS data, compared to the jurisdiction average of 21.6 percent
Insufficient accessible affordable housing	High	Public input and the Disability and Access Workgroup indicated that persons with disabilities have a lower level of access to financial services to access accessible affordable housing. In addition, the availability of accessible housing is limited, particularly in the more rural areas of the State.
Failure to make reasonable accommodation	High	The second most frequent HUD fair housing complaint issue with cause between 2008 and 2016 was failure to make reasonable accommodation, accounting for 244 complaints. The basis of 312 complaints during this time period was based on disability.
Lack of fair housing infrastructure	High	The fair housing survey and public input indicated a lack of collaboration among agencies to support fair housing
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education
Insufficient understanding of credit	High	The fair housing survey and public input indicated an insufficient understanding of credit

ADDITIONAL FINDINGS

In addition to the table above, there are several significant findings or conclusions summarized here. Overall, non-entitlement areas of the State have a moderate level of segregation by race and ethnicity, particularly for black and Hispanic households. The non-entitlement areas of the State do not have any Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) at the time of this report.

Black and Hispanic households have lower access to areas of opportunity, including access to proficient school and low poverty areas. Rural areas tended to have lower access to transportation, jobs, and proficient schools than more urban areas.

Black and Hispanic households have a higher incidence of housing problems, as well as a higher incidence of mortgage denials in the non-entitlement areas of the State.

Persons with disabilities may have difficulty locating accessible and affordable housing, particularly in the more rural areas of the State. Households with disabilities may face discriminatory terms and conditions or lack of reasonable accommodations in housing choices.

The survey and public input revealed there is a continued need for fair housing outreach and education in the non-entitlement areas of the State.

FAIR HOUSING ISSUES, CONTRIBUTING FACTORS, AND PROPOSED ACHIEVEMENTS

The Table I.2, on the following page, summarizes the fair housing issues/impediments and contributing factors. It includes metrics and milestones and a timeframe for achievements as well as designating a responsible agency.

Table I.2
Fair Housing Issues, Contributing Factors, and Recommended Actions
 State of Iowa

Fair Housing Issues/ Impediments	Contributing Factors	Recommended Action to be Taken	Responsible Agency
Segregation	Moderate levels of segregation for black and Hispanic households	Promote the development of affordable housing units in high opportunity areas	IFA & IEDA
Disparities in Access to Opportunity	Access to proficient schools	Promote the development of affordable housing units in low poverty areas and areas with proficient schools	IFA & IEDA
	Access to low poverty areas		
	Lack of access to services for persons with disabilities	Continue to work with the Olmstead Task Force to reduce barrier to affordable housing for persons with disabilities	
Disproportionate Housing Needs	Black and Hispanic households tends to have higher rates of cost burdens	Continue to preserve affordable housing options through owner-occupied and rental rehabilitation and expand affordable housing options throughout the State. Review programs on an annual basis.	IEDA & IFA
Publically supported housing	Insufficient accessible affordable housing	Continue to require projects under LIHTC, HOME, and NHTF to establish Affirmative Fair Marketing Plans (AFHMP) that reduce barriers to housing	IFA
Disability and Access	Insufficient accessible affordable housing	Continue to work with the Olmstead Task Force to reduce barrier to affordable housing for persons with disabilities Explore the option of creating a program to provide home loan opportunities targeted to people with disabilities. Encourage a percentage of new LIHTC and HOME units are accessible in areas with higher access to needed services. Continue use of LIHTC's Qualified Action Plan (QAP) Olmstead Goals.	IFA
	Failure to make reasonable accommodation		
Fair Housing Enforcement and Outreach	Failure to make reasonable accommodation	Continue to work with Iowa Civil Rights Commission (ICRC) to provide trainings, CDBG grantee requirements on an annual basis. Promote outreach and education related to credit for prospective homebuyers. Include enhanced financial literacy for senior high school students	IEDA
	Insufficient fair housing education		
	Insufficient understanding of credit		
	Discriminatory patterns in lending		
	Discriminatory terms and conditions		

SECTION II. COMMUNITY PARTICIPATION PROCESS

The following section describes the community participation process undertaken for the 2018 State of Iowa Analysis of Impediments to Fair Housing Choice.

A. OVERVIEW

The outreach process included the 2018 Fair Housing Survey, a series of Disability and Access Work Group meetings, a public input meeting, and a public review meeting.

The Fair Housing Survey was distributed as an internet outreach survey. Some 443 responses were received.

The three Disability and Access Work Group meetings were held via webinar monthly throughout the development of the AI. The purpose of these meetings was to provide the public and stakeholder an opportunity to comment on the needs and challenges for households with disabilities and access to housing and opportunities.

A public input meeting was held on September 27, 2018 in order to gather feedback and input from members of the public.

The Final Report AI was made available on December 10 and a 30-day public input period was initiated.

A public hearing was held on December 18, 2018 in order to gather feedback and input on the draft Analysis of Impediment. After the close of the public review period and inspection of comments received, the final report was made available to the public at the end of January, 2019.

B. DISABILITY AND ACCESS WORK GROUPS

Three Disability and Access Work Groups were held throughout the Analysis of Impediments development process. These meetings presented information and data collected about Access to opportunity assets in the State for persons with disabilities, including low poverty areas, transportation, proficient schools, healthy neighborhoods, and employment opportunities, in an effort to gather additional commentary and feedback on opportunities in the State. A summary of comments from these meetings are included below. A complete set of meeting transcripts are included in the Appendix.

- Transportation is a major barrier to access services throughout the State
- Persons with disabilities have less access to housing opportunities because of lower incomes
- Persons with disabilities would benefit from a targeted program to increase access to homeownership opportunities

C. THE 2018 FAIR HOUSING SURVEY

The purpose of the survey, a relatively qualitative component of the AI, was to gather insight into knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Many individuals and organizations throughout the State were invited to participate. Some 443 responses were received. A complete set of survey responses can be found in **Section IV.I Fair Housing Survey Results**.

D. PUBLIC INPUT MEETING

The public input meeting was held via Webinar on September 27, 2018. Comments from this meeting are summarized below.

- Addiction and mental health are major barriers to accessing housing
- Language barriers and legal status are a barrier to accessing housing, particularly for black households
- Fully accessible units are prohibitively expensive. Conducting a study of where they are actually needed would be useful to make it more efficient
- Landlords still need to be able to make enough money to maintain their buildings and pay staff

E. THE FINAL PUBLIC REVIEW PROCESS

A 30-day public review process began on December 10, 2018.

It included a public review meeting on December 18, 2018. Comments from this meeting are included in the Appendix.

SECTION III. ASSESSMENT OF PAST GOALS AND ACTIONS

The 2014 Analysis of Impediments to Fair Housing Choice for the State of Iowa was finalized in October 2014. This analysis highlighted six (6) impediments to fair housing choice in the State. These are outlined in the following section.

A. PAST IMPEDIMENTS AND ACTIONS

IMPEDIMENT: RECENT PATTERNS OF GROWTH COULD EXACERBATE SEGREGATION

Iowa has been slowly becoming a more urbanized State. With that transformation comes a magnification of the characteristics that are a natural part of urban Iowa. For example, most of the State's non-white households live in cities. As these places grow and diversity increases overall, it also means that segregation is increasing along with it. All of the State's defined racially concentrated areas of poverty (RCAPs) and Near-RCAPs are within municipalities. There is a risk, therefore, that RCAP areas will expand as cities expand. Striking a balance between investment in RCAP and Near-RCAP areas while fostering affordable housing development in higher opportunity areas can lessen the degree to which poverty could become further concentrated and fair housing choice more restricted.

Fair Housing Action Strategies:

- To the greatest extent possible, IFA should refrain from approving LIHTC financing for projects located in RCAP areas where a concentration of subsidized housing already exists. Furthermore, projects proposed for locations within higher opportunity areas should be awarded bonus points.
- IFA should continue requiring annual reporting of the demographic characteristics of LIHTC tenants and monitor the extent to which the program has advanced integration or perpetuated segregation over time.

IMPEDIMENT: HOUSING CHOICE IS LIMITED FOR MEMBERS OF THE PROTECTED CLASSES BECAUSE OF THEIR LOWER INCOMES

Housing choice is limited in meaningful ways for members of the protected classes. In Iowa, many protected classes – racial and ethnical minorities, families with children, persons with disabilities, foreign-born residents, and others – earn less and are more likely to live in poverty. For example, as calculated in this AI, there is a huge gap between homes that are affordable for white households and those that are affordable to non-white households. Continuing to invest the State's resources in affordable housing is a useful and productive way for the State to affirmatively further fair housing.

Fair Housing Action Strategies:

- IFA should continue providing specific training on affirmative marketing initiatives during its mandatory developer training

- IFA should continue to expand the inventory of affordable housing through the HOME Program and other State-financed initiatives
- IFA should continue to preserve the existing affordable housing inventory through rental rehabilitation programs
- IEDA should continue to preserve the existing affordable housing inventory through owner-occupied rehabilitation programs
- IFA should continue the preservation set-aside in the QAP for assisted housing developments with expiring subsidies
- IFA should continue to incentivize affordable housing development on major corridors in urban areas with transit service
- IEDA should continue to provide financing for and promote economic development initiatives that create employment opportunities for lower income individuals

IMPEDIMENT: HOMEOWNERSHIP IS MORE DIFFICULT FOR MINORITIES TO ACHIEVE

For the vast majority of Americans, household wealth is tied to homeownership. In addition, among minority applicants, the ability to achieve homeownership is impeded by higher rates of mortgage application denials. Black and Hispanic households in Iowa were denied mortgages at higher rates than white households even when controlling for income. And, higher cost loans were more prevalent among lower income households than upper income households.

Fair Housing Action Strategies:

- ICRC should evaluate the feasibility of conducting mortgage testing
- IFA should continue to support Iowa Mortgage Help, which provides a statewide referral hotline, foreclosure intervention, negotiation and mediation services with loan servicers and lenders, and free legal services

IMPEDIMENT: MEMBERS OF THE PROTECTED CLASSES MAY EXPERIENCE DIFFICULTY FINDING HOUSING DUE TO SPECIFIC HOUSING NEEDS

Differences among protected classes extend beyond categorical definitions. Different types of households have different housing needs. Non-white households, for example, are more likely to rent, live in multi-family structures, and require larger units consisting of three bedrooms or more. In municipalities with limited rental housing inventory, housing choice for non-white households can be restricted. And, renters paying more of their income than owners toward housing costs is indicative of a lack of affordable rental housing, particularly in the higher-cost urban areas. Persons with disabilities lack an adequate inventory of decent and affordable housing that is also accessible, especially to persons with mobility impairments. The supply of independent living arrangements integrated into appropriate residential community settings is inadequate to meet current demand.

Fair Housing Action Strategies

- IFA should continue to provide incentives to encourage the construction of more visitable units in multi-family housing

- IFA should continue to require that 10% of all new multi-family construction financed with LIHTC is to be accessible to persons with mobility impairments
- IFA should continue to provide incentives in the QAP to expand the supply of units affordable and suitable for large families (four bedrooms or larger)
- IFA should facilitate training opportunities for design professionals on FHA, UFAS, and other design and construction accessibility standards
- Ensure all LIHTC-financed multi-family developments are built to the required accessibility design standard as certified to by the licensed architect

IMPEDIMENT: SOME POLICIES ARE NOT FULLY CONSISTENT WITH FAIR HOUSING STANDARDS

Overall, the State is fulfilling the fair housing obligations placed on the federal programs it manages. IFA and IEDA staff provide appropriate requirements on and education to their sub-recipients, and federal and State funded programs are not concentrated in RCAP areas. At the local level, a sampling of zoning ordinances did not reveal many high risks of impediments. There are a number of occasions, however, where impediments are more likely or where opportunities to affirmatively further fair housing could be enhanced:

- Goals for affirmatively furthering fair housing are not always explicit in the State's programmatic requirements provided to eligible applicants
- IFA does not include the Site and Neighborhood Standards of the HOME Program in its program application review

Fair Housing Action Strategies:

- IFA should incorporate fair housing criteria into the competitive application process for new affordable housing developments. Establish a preference or higher scoring for projects proposed in RCAP areas in municipalities without concentrations of assisted housing
- Incorporate the Site and Neighborhood Standards of the HOME Program (found at 24 CFR 983.6) as an integral part of the project evaluation process to ensure proposed project locations will not contribute to undue concentration of affordable housing in RCAP areas
- Require IEDA and IFA program staff to undergo mandatory fair housing training on a regular basis

IMPEDIMENT: THE CONTINUING NEED FOR EXPANDED FAIR HOUSING EDUCATION, OUTREACH, AND ENFORCEMENT IS GREAT, AS DEMONSTRATED BY THE WORK CONDUCTED BY THE IOWA CIVIL RIGHTS COMMISSION

ICRC serves a critical role in the elimination of housing discrimination throughout the State with a multi-faceted approach of education, outreach, and enforcement. The Commission's level of complaint investigation, including mediation and conciliation, coupled with its extensive training program, are necessary to expand fair housing choice for all Iowans. As the State's population continues to diversify, the need for fair housing services will also increase. An increase in housing discrimination complaints often means that individuals are becoming more aware of identifying behavior that is illegal and knowing what recourse they have at their

disposal. In municipalities with civil rights commissions that lack adequate resources to provide enforcement of fair housing laws, ICRC fills the gaps with seasoned professionals and a successful track record. It is, therefore, even more important that the Commission's resources be sustained as it is the only fair housing agency for most areas in Iowa. And, results from the survey of municipal officials indicate that fair housing education and outreach are needed throughout the State.

Fair Housing Action Strategies:

- IEDA should collaborate with ICRC to devise a practical fair housing program for CDBG sub-recipients with limited resources for implementation
- IEDA should implement a menu of mandatory and elective fair housing activities as part of its CDBG program
- ICRC should monitor the implementation of Nuisance Premises Ordinances adopted in municipalities throughout the State for any fair housing impact, and take appropriate action, if necessary
- ICRC should continue its programming of providing fair housing education and outreach to municipalities across the State

FAIR HOUSING ACTIVITIES

Although referenced above in the State's 2014 Analysis of Impediment, IFA does utilize Site and Neighborhood Standards in its HOME program, which states that proposed sites for new construction rental projects with HOME funds cannot be located in areas of minority concentration. Areas of minority concentration are areas where the percentage of minorities is greater than 50 percent.

The following actions have been described in the State's 2015, 2016, and 2017 CAPERS regarding actions taken to address fair housing issues in the State:

The State is committed to fair housing. IEDA and IFA demonstrate the State's commitment to fair housing through its policies, procedures and practices. These are conveyed through workshops, contractual language, management guide instructions and technical assistance. IEDA's CDBG Management Guide, which is distributed to program recipients, contains sections on fair housing and affirmative marketing. The sections provide guidance for achieving goals.

IFA provides a HOME Program Guide to Rental, Homebuyer, and TBRA recipients which provides guidance on civil rights and fair housing. HOME recipients and developers must submit an Affirmative Fair Housing Marketing Plan, so IFA developed an Outreach Guide to assist them in completing their AFHM Plans. This guide provides links to HUD regulations, publishing standards and forms. The guide also describes the difference between general and special outreach marketing efforts. In addition, it provides ideas for community contacts in Iowa that may be available to reach targeted populations more effectively.

IFA's monitoring of HOME recipients in 2017 found several examples of outreach in Affirmative Fair Marketing efforts. Special correspondence by the recipient was prepared to

market homes and apartments by sending notices and documenting efforts made to market offerings provided. The recipient was responsible for clearly identifying targeted group(s). Advertising included typical advertising methods as well as non-traditional outreach methods which the recipient was required to document. A recent addition to marketing efforts is advertising on foreign language radio and newspapers in areas of significant ethnic concentration.

IEDA project managers provide technical assistance to recipients in the area of fair housing. Additionally, through project monitoring, IEDA reviews each recipient's fair housing performance. If noncompliance with fair housing policies and procedures is indicated, further action is taken. IEDA did not identify any cases of noncompliance in 2017. One IEDA project manager is assigned fair housing as a specialty area. That individual is listed with the HUD Fair Housing Information Clearinghouse and serves as a resource person on fair housing issues. In November 2017, IEDA and Iowa Civil Rights Commission hosted a fair housing training for CDBG grant administrators.

IEDA CDBG Fair Housing Recipient Efforts

IEDA CDBG Management Guide, which is distributed to program recipients, contains sections on fair housing and affirmative marketing. The sections provide guidance for achieving goals. Recipients pattern their fair housing efforts from the guide, which includes these recommendations: Publicize that the local government will assist persons experiencing discrimination in housing. Such assistance can be in the form of facilitating the filing of a complaint with HUD or the Iowa Civil Rights Commission. Develop and adopt a fair housing ordinance and identify the methods of enforcement. Provide housing counseling services which assist minorities and women seeking housing outside areas of concentration. Work with local real estate brokers to form a Voluntary Area-wide Marketing Agreement. Work with local banks to end redlining practices and to post equal lending opportunity advertisements. Use equal housing opportunity slogan and logo on city/county letterhead and brochures. Sponsor fair housing seminars and campaigns. Work with minority and women leaders in the area to promote housing development and increase minority and female participation. Help local housing developers develop outreach programs to attract minorities and females. Review zoning ordinance and comprehensive plans to insure they promote spatial deconcentration of assisted housing units. Make city-owned property located outside areas of concentration available to developers at no or nominal costs for construction of assisted units particularly for large family units. Develop an Area-wide Housing Opportunity Plan. Support fair share housing allocation plans. Create a local housing authority. Conduct studies to ensure that minority and female housing needs are adequately defined. Adopt a code enforcement ordinance that will compel landlords to keep their units in safe and sanitary condition. Publicly advertise that the city is a fair housing city (See the sample Public Notice). Work with local real estate brokers and mortgage lenders in reviewing mortgage credit analysis and underwriting criteria. Provide fair housing counseling programs that include information on fair housing rights and the availability of housing in a variety of locations, emphasizing housing choice. Modify local ordinances and land use measures in pursuit of housing opportunity. Support training and education programs for real estate agents, housing managers, city officials and others to increase knowledge of techniques for promoting economically and racially integrated housing. They may also carry out promotional activities to initiate housing proposals in areas outside those with a high proportion of lower-income persons.

IFA HOME Fair Housing Recipient Efforts

IFA provides a HOME Program Guide to Rental, Homebuyer, and TBRA recipients which provides guidance on civil rights and fair housing. HOME recipients and developers must submit an Affirmative Fair Housing Marketing Plan, so IFA developed an Outreach Guide to assist them in completing their AFHM Plans. This guide provides links to HUD regulations, publishing standards and forms. The guide also describes the difference between general and special outreach marketing efforts. In addition, it provides ideas for community contacts in Iowa that may be available to reach targeted populations more effectively. Each Affirmative Fair Housing Marketing Plan must address the following: Methods to inform the public, owners and potential tenants about their fair housing rights. Description of how the recipient/owner will affirmatively market HOME-assisted housing. Description of how the recipient/owner will provide special outreach to persons not likely to apply for assistance. Maintenance of records documenting actions to affirmatively market housing. Description of how affirmative marketing efforts will be assessed and corrective actions taken when needed. Updated guidance on how to write an Affirmative Marketing Plan has been distributed to HOME funded projects and placed on the IFA website. IFA staff provides recommendations and technical assistance to projects so that the Affirmative Marketing Plans submitted are meaningful and provide the apartment manager with a better understanding of his/her responsibility under the law. Several educational opportunities have been provided including applicant training sessions, post-award orientation to the HOME program, and break-out sessions at the Housing Iowa conference on finding sources for affirmative marketing outreach, and fair housing. Affirmative marketing activities must be part of the ongoing administration of rental projects throughout the term of affordability, and the monitoring compliance team confirms that affirmative marketing activities are ongoing.

AI Part 1

In 2014 IEDA and IFA completed an Analysis of Impediments to Fair Housing Choice (the AI). The analysis identified the following impediments: the potential for increased urbanization to exacerbate segregation; limited housing choice for members of the protected classes because of their lower incomes; increased difficulty for minorities to achieve homeownership; the potential for members of the protected classes to experience difficulty finding housing due to specific housing needs; local jurisdictional policies inconsistent with fair housing standards and best practices; and, the need for expanded fair housing education, outreach and enforcement. The State's Fair Housing Action Plan provides a series of recommended actions. These range from increasing education and testing, to incorporating the Site and Neighborhood Standards of the HOME Program, to requiring and incentivizing the location of housing developments. Clearly the greatest barrier to affordable housing is the lack of resources available. The State will work closely with communities, councils of governments, agencies and others to educate Iowans about affordable housing programs and attempt to change negative perceptions of affordable housing. The following are some examples of strategies and actions the State is taking to address the identified impediments to fair housing choice in Iowa.¹) Impediment: Recent patterns of growth could exacerbate segregation. Strategy: IFA incorporated fair housing criteria into the Qualified Application Plan (QAP) for new Low Income Housing Tax Credit (LIHTC) housing developments. The QAP provided scoring points for projects proposed in a

census tract that was identified as very high or high opportunity area. The high and very high opportunity areas were calculated as part of the State of Iowa's Analysis of Impediments to Fair Housing Choice. Projects that were proposed in one of these census tracts were awarded three (3) additional points. The objective of pinpointing Opportunity Areas is to identify places that are good locations for investment that may not have been selected based on other criteria. This identification allows for balanced investment across neighborhoods that offer opportunities and advantages for families. These additional points also try to counteract the incentive established in Section 42 of the Internal Revenue Code (LIHTC) that provides a boost of 30% for projects that are within a Qualified Census Tract (QCT). A QCT has generally the opposite characteristics of opportunity areas; high poverty rate and low wages. IFA also incorporated fair housing criteria into its HOME allocation round. If a project was located entirely in a high or very high opportunity area, they were awarded additional points. Projects within a census tract designated as a high opportunity area were awarded three (3) points. Projects within a census tract designated as a very high opportunity area were awarded five (5) points.2.) Impediment: Housing choice is limited for members of the protected classes because of their lower incomes. Strategy: IFA will continue to provide specific training on affirmative marketing initiatives during its mandatory developer training. IFA and IEDA will continue to preserve the existing affordable housing inventory through rental and owner-occupied rehabilitation programs for low-income Iowans. IEDA continues to provide financing for and promote economic development initiatives that create employment opportunities for lower income Iowans.

AI Part 2

3.) Impediment: members of the protected classes may experience difficulty finding housing due to specific housing needs. Strategy: An IFA staff person works with the Olmstead Task Force as a housing consultant, and assists the Task Force in identifying ways that the state can reduce barriers to accessible and affordable housing for people with disabilities. IEDA has presented to the Olmstead Task Force. Through standard policies and procedures, IFA also ensures that all LIHTC financed multi-family developments are built to the required accessibility design standard as certified to by the licensed architect. 4.) Impediment: Some policies are not fully consistent with fair housing standards. Strategy: In the HOME allocation round for rental projects, IFA also incorporated the Site and Neighborhood Standards of the HOME Program (found at 24 CFR 92.202) as an integral part of the project evaluation process to ensure proposed project locations will not contribute to undue concentration of affordable housing in RCAP areas. Projects that were proposed in a census tract with greater than 50 percent of the population of minorities were required to document and certify that the area has sufficient/comparable opportunities or an overriding housing need exists, through photos, market studies, redevelopment plans, etc. IFA staff reviewed the documentation and locations of the proposed projects to verify the information. 5.) Impediment: The continuing need for fair housing education, outreach, and enforcement is great. Strategy: Starting with the 2015 awards, IEDA now requires each recipient to undertake at least 2 mandatory actions and at least 1 elective activity to fulfil their requirement to affirmatively further fair housing. All recipients receiving CDBG funds through the State must complete the mandatory strategies and elective strategy regardless of whether they are using CDBG funds for housing activities. The implementation of the mandatory strategies must be carried out State of Iowa 2017 CAPER 32 OMB Control No: 2506-0117 (exp. 06/30/2018) each year for which the jurisdiction has received CDBG funds through IEDA. Additionally, in 2015, IEDA issued an RFP for services to

bring in a consultant to: 1. Conduct fair housing training to IEDA staff and grant administrators and 2. Develop a fair housing toolkit/ manual that we can provide to our CDBG recipients. The training took place in June 2016 and was a success.

IEDA and IFA Coordination with Iowa Civil Rights Commission

IEDA and IFA coordinated efforts this year with the Iowa Civil Rights Commission staff members in fair housing and affirmative marketing initiatives throughout the year. This included fair housing presentations and education, and outreach through events and distributed fair housing materials. Totals for the Entire Year of 2017: Education and Outreach - Total Number of Fair Housing Presentations/Outreach Events: 36 Total Number of Publications Distributed: 37,000 Total Number of People met directly with: 915. Fair Housing Testing - Total Tests by the Iowa Civil Rights Commission: 512 with 201 passed and 26 failed. New complaints: 128 with documented probable cause in 1 case. Investigations - 563. 1 went to litigation review and none resulted in a district court action filed. Each year the Iowa Civil Rights commission also hosts the 'Be the Change' ICRC Symposium. All CDBG IEDA project managers attend this training about Civil Rights and Fair Housing. IEDA also encourages all its recipients to attend. Another aspect was the testing component where testing on discrimination in Iowa was conducted. This involved testing by reviewing hundreds of rental ads in various print and online publications, looking for possible discriminatory advertising.

In 2016, ICRC included fair housing presentations for in 26 events across the State, including the Iowa State Fair, reaching 1,031,728 people. During the course of the year, ICRC received over 854 housing calls and intakes, received 126 new housing complaint to investigate, and documented probable cause in 2 cases. During this time period 2 cases underwent Litigation Review and 2 cases were filed with the District Court for further action.

B. PAST AND CURRENT GOALS

In several cases, goals that were set in previous fair housing planning documents continue to be barriers to fair housing in the State of Iowa. For example, there is a continued need for fair housing outreach and education throughout the State. Denial rates for black and Hispanic households remains an issue in the State as well. The State has set new goals in this Analysis of Impediments to address these issues in the next five (5) years.

SECTION IV. FAIR HOUSING ANALYSIS

This section presents demographic, economic, and housing information. Data were used to analyze a broad range of socio-economic characteristics, including population growth, race, ethnicity, disability, employment, poverty, and housing trends; these data are also available by Census tract, and are shown in geographic maps. Ultimately, the information presented in this section illustrates the underlying conditions that shape housing market behavior and housing choice in the State of Iowa.

LEAD AGENCIES

The Iowa Economic Development Authority (IEDA) is partnering with the Iowa Finance Authority (IFA) to undertake this Analysis of Impediments to Fair Housing Choice. This study does not include the entitlement cities of Ames, Cedar Falls, Cedar Rapids, Council Bluffs, Davenport, Des Moines, Dubuque, Iowa City, Sioux City, Waterloo, and West Des Moines. The area of study is presented in Map IV.1, on the following page.

A. SOCIO-ECONOMIC OVERVIEW

Table IV.1 shows population by age for the 2000 and 2010 census. The population changed by 3.9 percent overall between 2000 and 2010. Various age cohorts grew at different rates. The elderly population, or persons aged 65 or older, grew by 4.5 percent to a total of 342,526 persons in 2010. Those aged 25 to 34 grew by 5.1 percent, and those aged under 5 grew by 8.2 percent.

Table IV.1
Population by Age

Non-Entitlement Area
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	128,071	6.3%	138,548	6.5%	8.2%
5 to 19	454,387	22.2%	434,801	20.5%	-4.3%
20 to 24	110,021	5.4%	111,114	5.2%	1.0%
25 to 34	231,059	11.3%	242,728	11.4%	5.1%
35 to 54	601,235	29.4%	579,542	27.3%	-3.6%
55 to 64	190,832	9.3%	273,999	12.9%	43.6%
65 or Older	327,707	16.0%	342,526	16.1%	4.5%
Total	2,043,312	100.0%	2,123,258	100.0%	3.9%

The elder population is further explored in Table IV.2. Those aged 65 to 66 grew by 21.7 percent between 2000 and 2010, resulting in a population of 39,294 persons. Those aged 85 or older grew by 13.6 percent during the same time period, and resulted in 56,412 persons over age 85 in 2010.

Map IV.1
Area of Study
Non-Entitlement Areas of Iowa

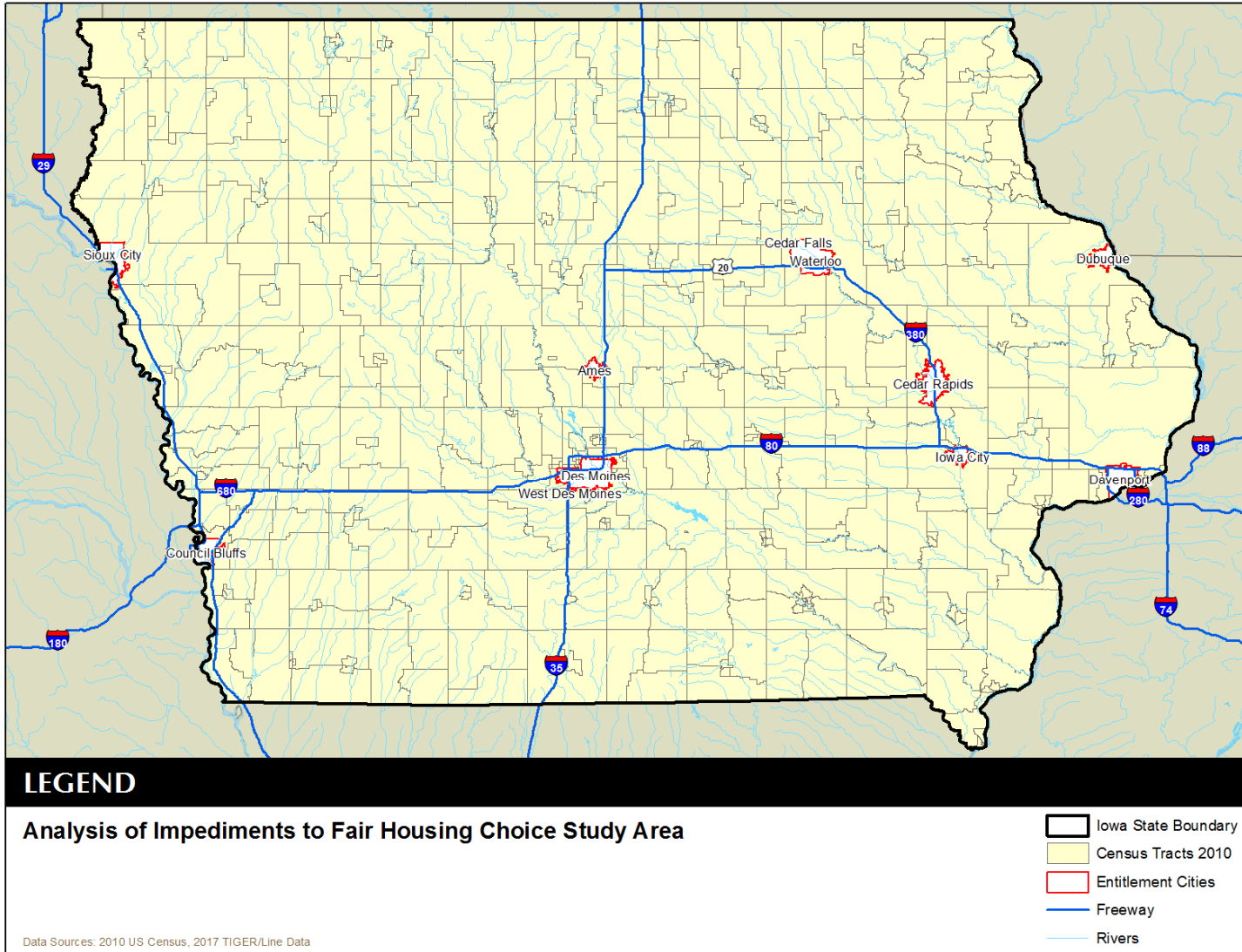


Table IV.2
Elderly Population by Age

Non-Entitlement Area
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	32,283	9.9%	39,294	11.5%	21.7%
67 to 69	48,216	14.7%	54,493	15.9%	13.0%
70 to 74	78,164	23.9%	76,285	22.3%	-2.4%
75 to 79	68,320	20.8%	63,252	18.5%	-7.4%
80 to 84	51,077	15.6%	52,790	15.4%	3.4%
85 or Older	49,647	15.1%	56,412	16.5%	13.6%
Total	327,707	100.0%	342,526	100.0%	4.5%

Population by race and ethnicity is shown in Table IV.3. The white population grew by 1.8 percent between 2000 and 2010, and resulted in representing 94.8 percent of the population in 2010. The black population grew by 78.7 percent, represented 1.2 percent of the population in 2010. The American Indian and Asian populations represented 0.3 and 1 percent, respectively, in 2010. As for ethnicity, the Hispanic population grew by 2 percent between 2000 and 2010, compared to the 92.4 percent growth rate for non-Hispanics.

Table IV.3
Population by Race and Ethnicity

Non-Entitlement Area
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	1,976,636	96.7%	2,013,121	94.8%	1.8%
Black	14,252	0.7%	25,472	1.2%	78.7%
American Indian	5,042	0.2%	6,063	0.3%	20.2%
Asian	12,592	0.6%	21,585	1.0%	71.4%
Native Hawaiian/ Pacific Islander	592	0.0%	1,002	0.0%	69.3%
Other	18,663	0.9%	29,186	1.4%	56.4%
Two or More Races	15,535	0.8%	26,829	1.3%	72.7%
Total	2,043,312	100.0%	2,123,258	100.0%	3.9%
Hispanic	42,806	2.1%	82,339	3.9%	2.0%
Non-Hispanic	2,000,506	97.9%	2,040,919	96.1%	92.4%

Population by race and ethnicity through 2016 is shown in Table IV.4. The white population represented 94.4 percent of the population in 2016, compared with black households accounting for 1.5 percent of the population. Hispanic households represented 4.4 percent of the population in 2016.

Table IV.4
Population by Race and Ethnicity

Non-Entitlement Area
2010 Census & 2016 Five-Year ACS

Race	2010 Census		2016 Five-Year ACS	
	Population	% of Total	Population	% of Total
White	2,013,121	94.8%	2,030,077	94.4%
Black	25,472	1.2%	32,010	1.5%
American Indian	6,063	0.3%	5,887	0.3%
Asian	21,585	1.0%	26,456	1.2%
Native Hawaiian/ Pacific Islander	1,002	0.0%	1,175	0.1%
Other	29,186	1.4%	21,917	1.0%
Two or More Races	26,829	1.3%	33,572	1.6%
Total	2,123,258	100.0%	2,151,094	100.0%
Non-Hispanic	2,040,919	96.1%	2,056,321	95.6%
Hispanic	82,339	3.9%	94,773	4.4%

The population by race is broken down further by ethnicity in the table below. While the white non-Hispanic population changed by 0.6 percent between 2000 and 2010, the white Hispanic population changed by 120.9 percent. The black non-Hispanic population changed by 77.4 percent, while the black Hispanic population changed by 128.1 percent.

Table IV.5
Population by Race and Ethnicity

Non-Entitlement Area
2000 & 2010 Census Data

Race	2000		2010 Census		% Change 00 - 10
	Population	% of Total	Population	% of Total	
Non-Hispanic					
White	1,955,983	97.8%	1,967,503	96.4%	0.6%
Black	13,868	0.7%	24,596	1.2%	77.4%
American Indian	4,510	0.2%	4,874	0.2%	8.1%
Asian	12,449	0.6%	21,330	1.0%	71.3%
Native Hawaiian/ Pacific Islander	513	0.0%	882	0.0%	71.9%
Other	848	0.0%	941	0.0%	11.0%
Two or More Races	12,335	0.6%	20,793	1.0%	68.6%
Total Non-Hispanic	2,000,506	100.0%	2,040,919	100.0%	2.0%
Hispanic					
White	20,653	48.2%	45,618	55.4%	120.9%
Black	384	0.9%	876	1.1%	128.1%
American Indian	532	1.2%	1,189	1.4%	123.5%
Asian	143	0.3%	255	0.3%	78.3%
Native Hawaiian/ Pacific Islander	79	0.2%	120	0.1%	51.9%
Other	17,815	41.6%	28,245	34.3%	58.5%
Two or More Races	3,200	7.5%	6,036	7.3%	88.6%
Total Non-Hispanic	42,806	100.0%	82,339	100.0%	92.4%
Total Population	2,043,312	100.0%	2,123,258	100.0%	3.9%

The change in race and ethnicity between 2010 and 2016 is shown in Table IV.6. During this time, the total non-Hispanic population was 2,056,321 persons in 2016. The Hispanic population was 94,773.

Table IV.6
Population by Race and Ethnicity

Non-Entitlement Area
2010 Census & 2016 Five-Year ACS

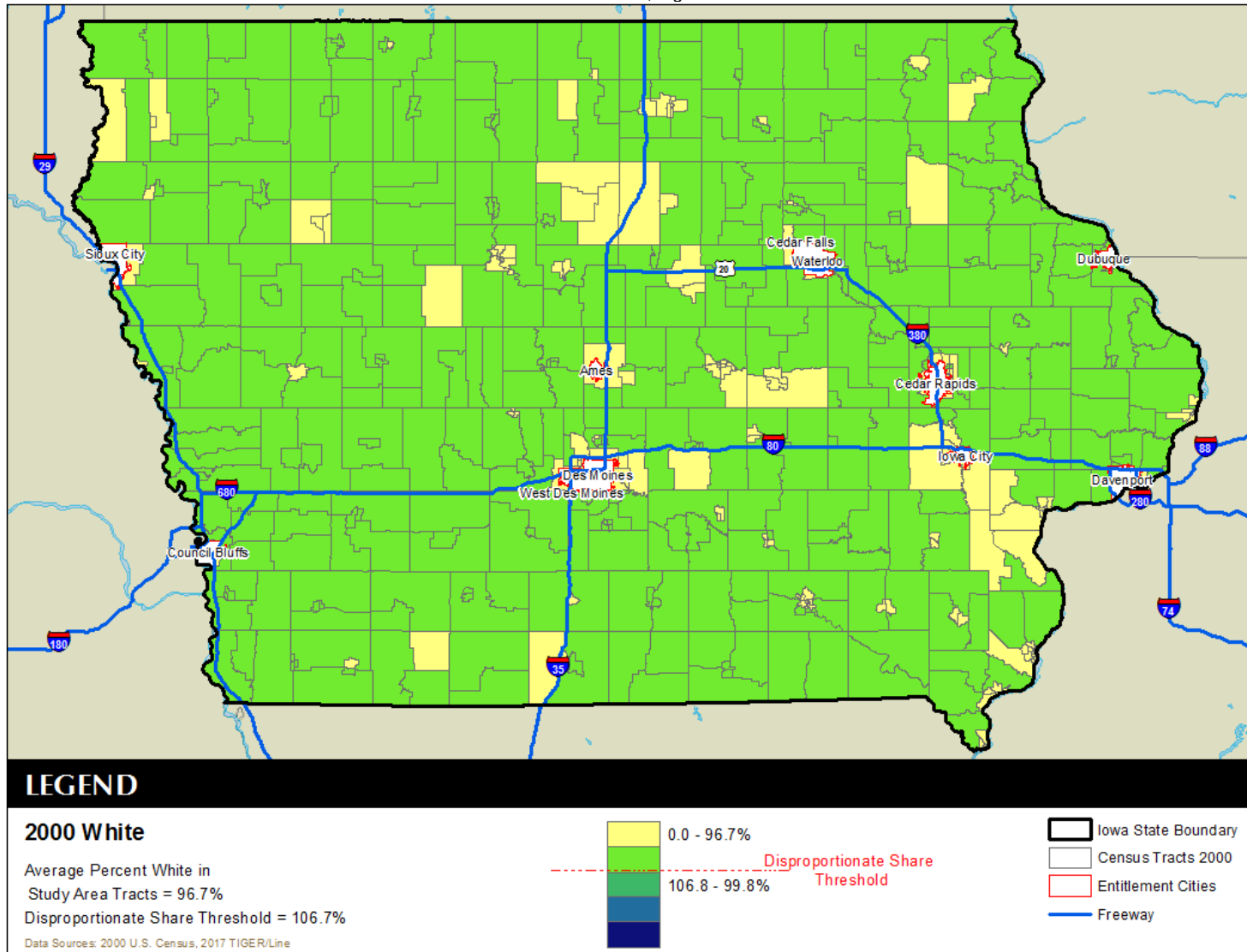
Race	2010 Census		2016 Five-Year ACS	
	Population	% of Total	Population	% of Total
Non-Hispanic				
White	1,967,503	96.4%	1,963,110	95.5%
Black	24,596	1.2%	31,127	1.5%
American Indian	4,874	0.2%	5,054	0.2%
Asian	21,330	1.0%	26,191	1.3%
Native Hawaiian/ Pacific Islander	882	0.0%	1,097	0.1%
Other	941	0.0%	1,316	0.1%
Two or More Races	20,793	1.0%	28,426	1.4%
Total Non-Hispanic	2,040,919	100.00%	2,056,321	100.0%
Hispanic				
White	45,618	55.4%	66,967	70.7%
Black	876	1.1%	883	0.9%
American Indian	1,189	1.4%	833	0.9%
Asian	255	0.3%	265	0.3%
Native Hawaiian/ Pacific Islander	120	0.1%	78	0.1%
Other	28,245	34.3%	20,601	21.7%
Two or More Races	6,036	7.3%	5,146	5.4%
Total Non-Hispanic	82,339	100.0%	94,773	100.0%
Total Population	2,123,258	100.0%	2,151,094	100.0%

The 2000 white population is shown in Map IV.2. The state has a large proportion of white households, which are fairly evenly across the state, as shown in Maps IV.2 and IV.3.

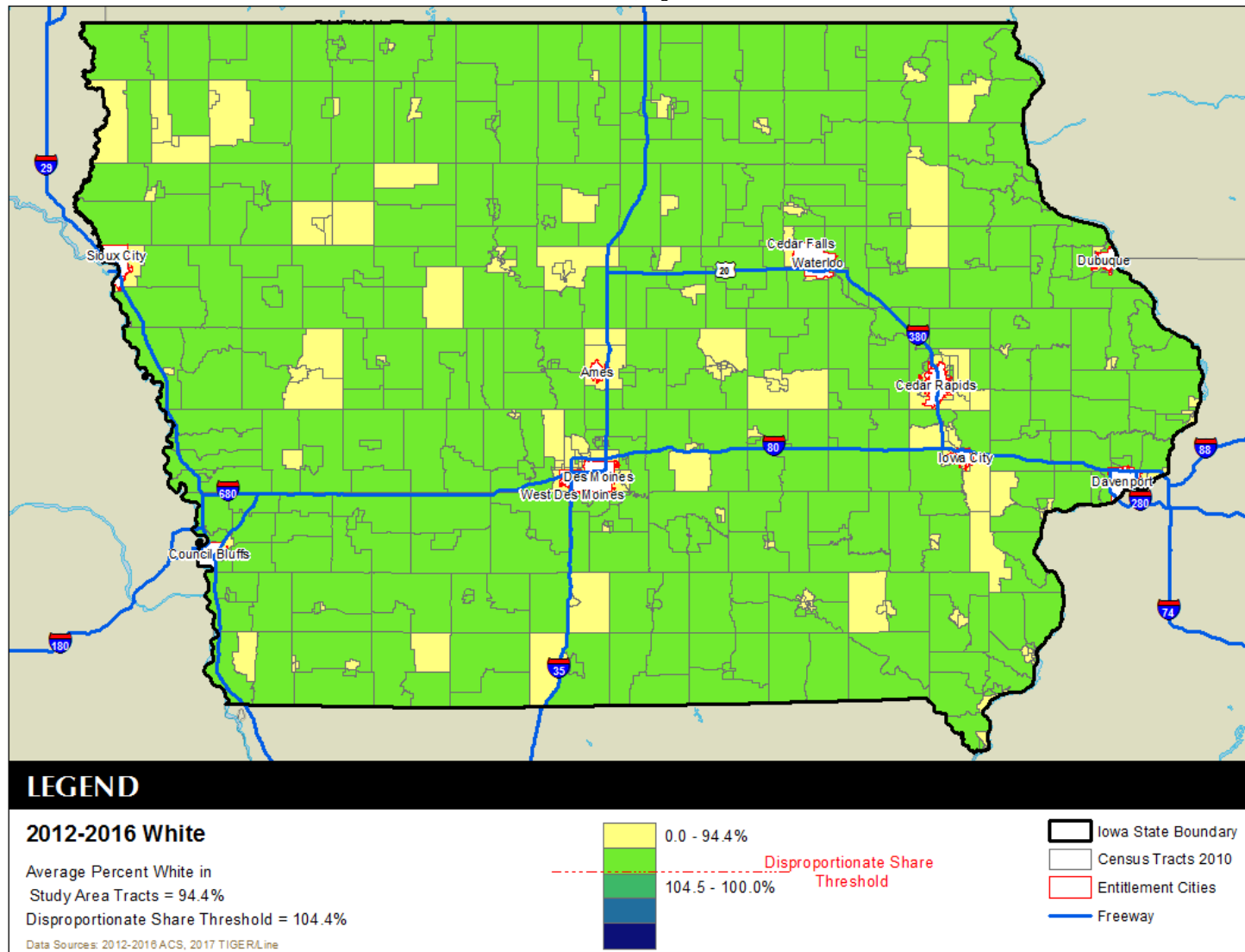
The black population, by contrast, only accounted for 1.5 percent of the non-entitlement population in 2016. A disproportionate share exists if a population exceeds the jurisdiction average by at least ten percentage points. While there are no areas with a disproportionate share of black households in 2000, there are a couple areas in 2016. Two census tracts have a disproportionate share of black households in Webster County in 2016.

The Hispanic population saw certain areas with disproportionate share of households in 2010, as seen in Map IV.7. The areas with the highest concentrations of Hispanic households exceeded 26.9 percent and were found in Louisa, Muscatine, Crawford, and Buena Vista Counties.

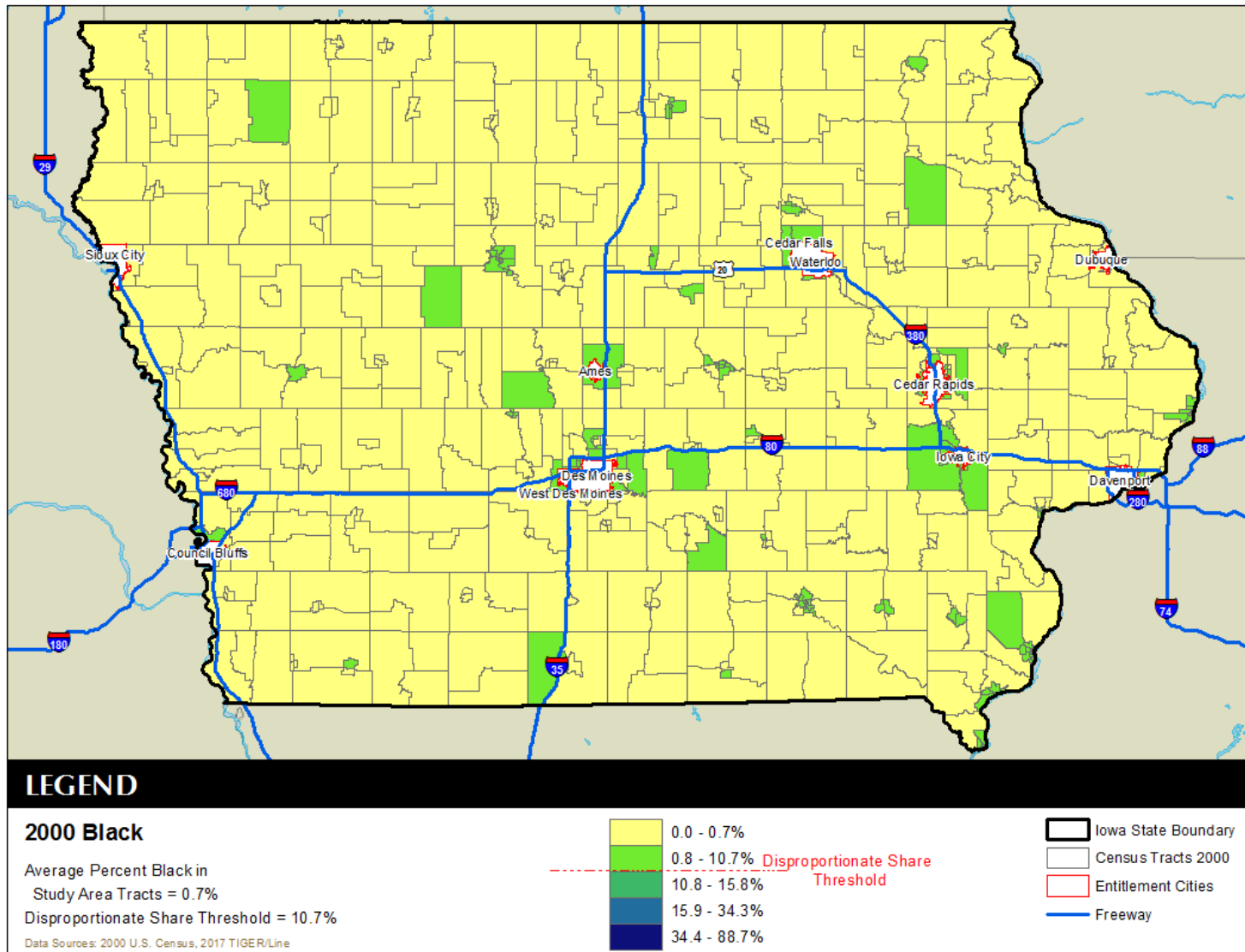
Map IV.2
2000 White Population
 Non-Entitlement Areas of Iowa
 2000 Census, Tigerline



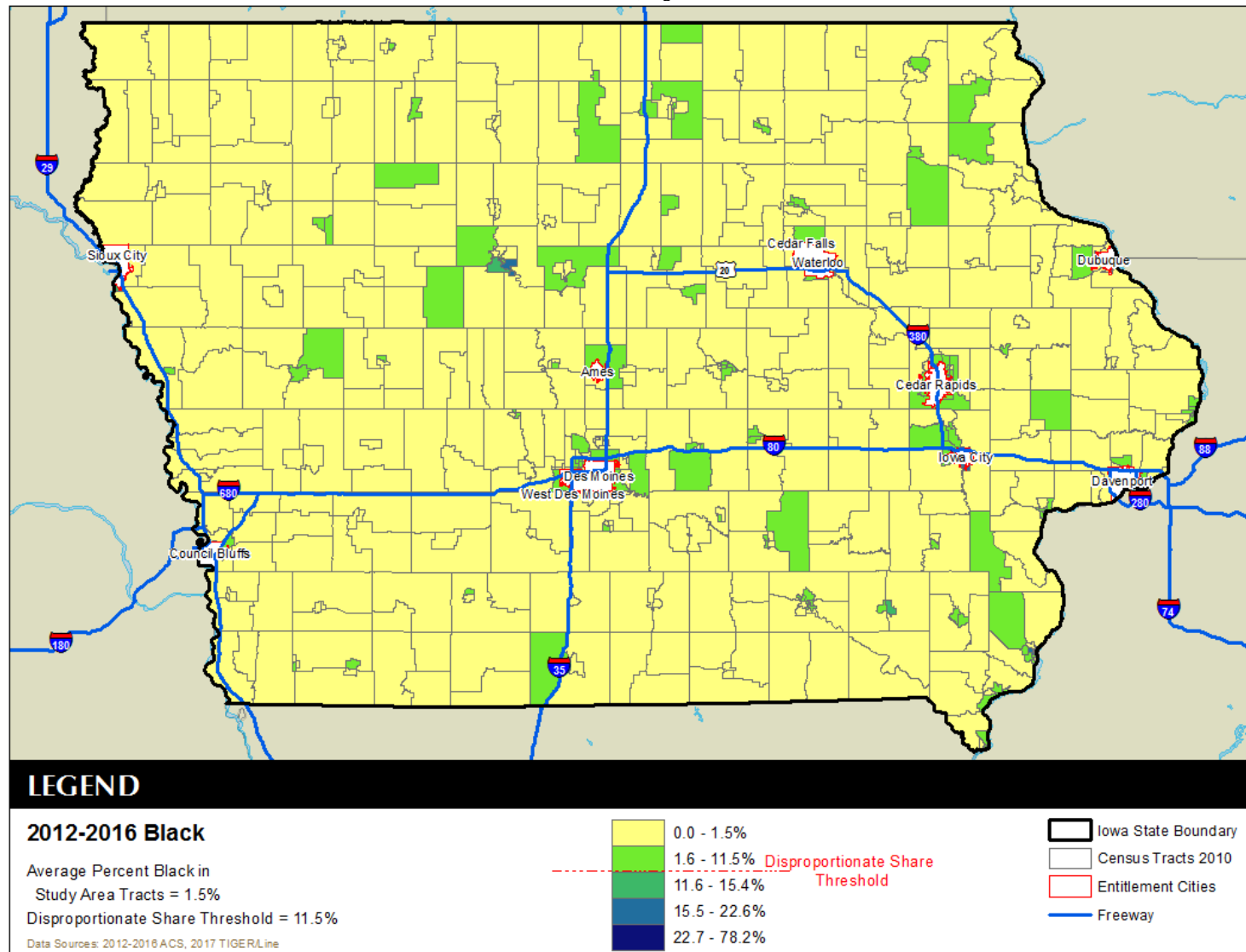
Map IV.3
2016 White Population
 Non-Entitlement Areas of Iowa
 2016 ACS, Tigerline



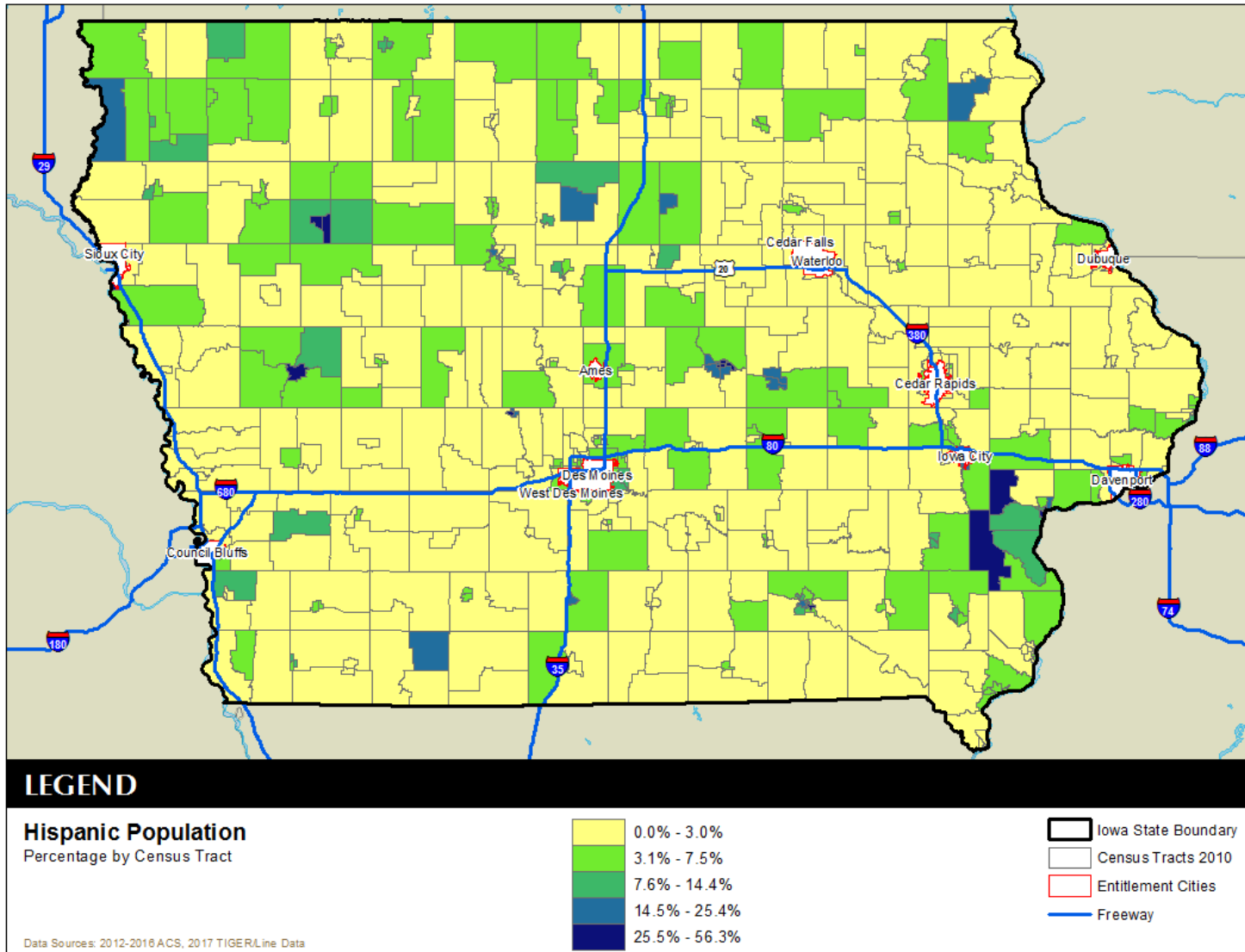
Map IV.4
2000 Black Population
 Non-Entitlement Areas of Iowa
 2000 Census, Tigerline



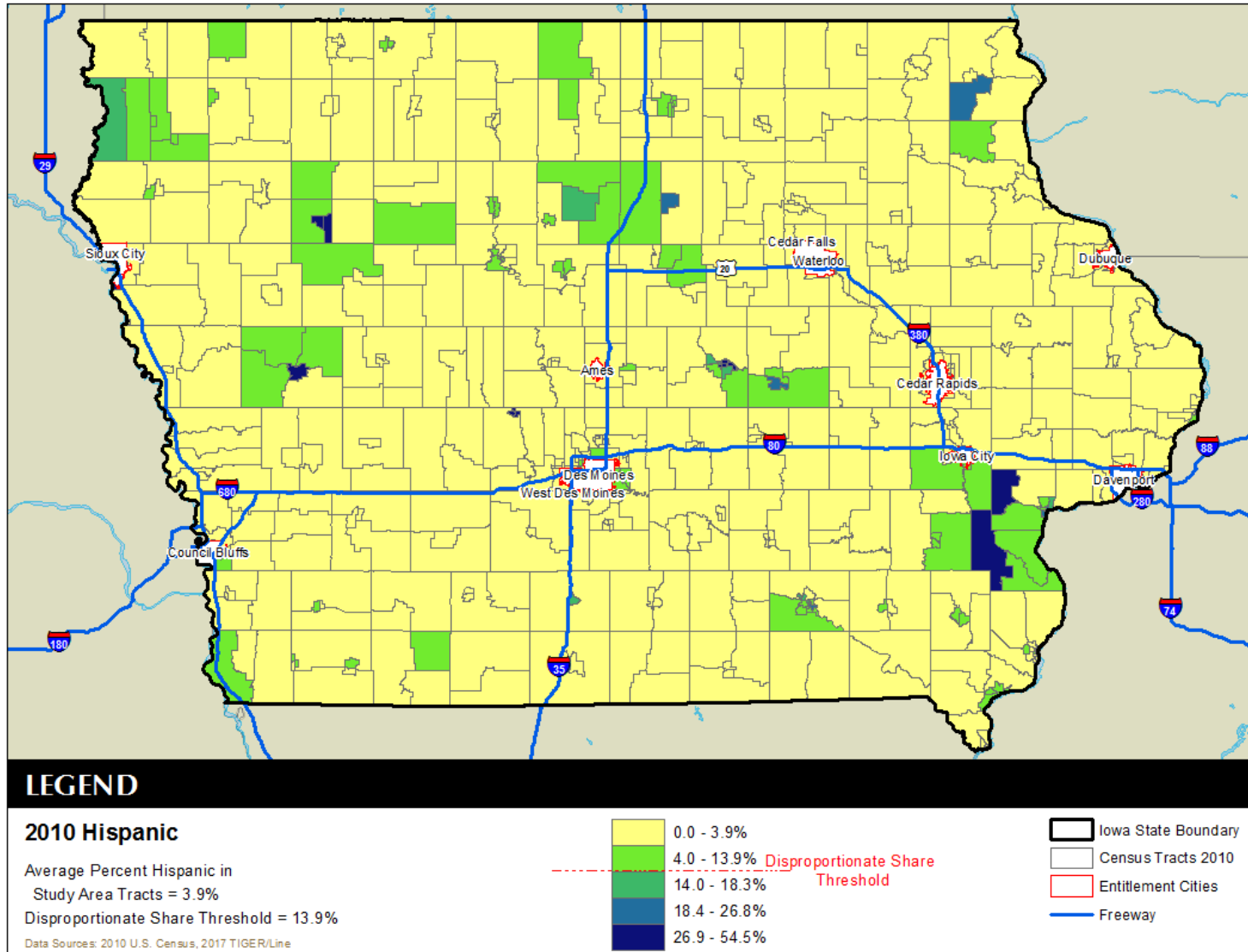
Map IV.5
2016 Black Population
 Non-Entitlement Areas of Iowa
 2016 ACS, Tigerline



Map IV.6
2000 Hispanic Population
 Non-Entitlement Areas of Iowa
 2000 Census, Tigerline



Map IV.7
2010 Hispanic Population
 Non-Entitlement Areas of Iowa
 2010 Census, Tigerline



Households by type and tenure are shown in Table IV.7. Family households represented 67.5 percent of households, while non-family households accounted for 32.5 percent. These changed from 67.9 and 32.1 percent, respectively.

Table IV.7
Household Type by Tenure

Non-Entitlement Area
2010 Census SF1 & 2016 Five-Year ACS Data

Household Type	2010 Census		2016 Five-Year ACS	
	Households	Households	Households	% of Total
Family Households	576,334	67.9%	581,271	67.5%
Married-Couple Family	473,079	82.1%	475,275	81.8%
Owner-Occupied	424,846	89.8%	423,380	89.1%
Renter-Occupied	48,233	10.2%	51,895	10.9%
Other Family	103,255	17.9%	105,996	17.8%
Male Householder, No Spouse Present	34,026	33.0%	36,057	32.1%
Owner-Occupied	21,975	64.6%	23,958	66.4%
Renter-Occupied	12,051	35.4%	12,099	33.6%
Female Householder, No Spouse Present	69,229	67.0%	69,939	65.3%
Owner-Occupied	39,532	57.1%	37,967	54.3%
Renter-Occupied	29,697	42.9%	31,972	45.7%
Non-Family Households	272,205	32.1%	279,416	32.5%
Owner-Occupied	164,550	60.5%	168,141	60.2%
Renter-Occupied	107,655	39.5%	111,275	39.8%
Total	848,539	100.0%	860,687	100.0%

The group quarters population was 56,515 in 2010, compared to 61,440 in 2000. Institutionalized populations experienced a 13.5 percent decrease between 2000 and 2010. Non-institutionalized populations experienced a 1.8 percent change during this same time period.

Table IV.8
Group Quarters Population

Non-Entitlement Area
2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	9,513	24.1%	11,031	32.3%	16.0%
Juvenile Facilities	.	.	1,401	4.1%	.
Nursing Homes	26,503	67.2%	21,183	62.1%	-20.1%
Other Institutions	3,404	8.6%	485	1.4%	-85.8%
Total	39,420	100.0%	34,100	100.0%	-13.5%
Noninstitutionalized					
College Dormitories	15,091	68.5%	17,418	77.7%	15.4%
Military Quarters	3	0.0%	0	0.0%	-100.0%
Other Noninstitutionalized	6,926	31.5%	4,997	22.3%	-27.9%
Total	22,020	100.0%	22,415	100.0%	1.8%
Group Quarters Population	61,440	100.00%	56,515	100.00%	-8.0%

The number of foreign born persons are shown in Table IV.9. An estimated 1 percent of the population was born in Mexico. Some 0.2 percent were born in India, and another 0.2 percent were born in Bosnia and Herzegovina.

Table IV.9
Place of Birth for the Foreign-Born Population

Non-Entitlement Area
2016 Five-Year ACS

Number	Country	Number of Person	Percent of Total Population
#1 country of origin	Mexico	22,563	1.0%
#2 country of origin	India	4,747	0.2%
#3 country of origin	Bosnia and Herzegovina	3,247	0.2%
#4 country of origin	Guatemala	2,763	0.1%
#5 country of origin	China excluding Hong Kong and Taiwan	2,688	0.1%
#6 country of origin	Korea	2,627	0.1%
#7 country of origin	Germany	2,201	0.1%
#8 country of origin	Canada	2,130	0.1%
#9 country of origin	Philippines	2,060	0.1%
#10 country of origin	El Salvador	1,828	0.1%

Limited English Proficiency and the language spoken at home are shown in Table IV.10. An estimated 1.4 percent of the population speaks Spanish at home, followed by 0.2 percent speaking Other Asian and Pacific Island languages.

Table IV.10
Limited English Proficiency and Language Spoken at Home

Non-Entitlement Area
2016 Five-Year ACS

Number	Country	Number of Person	Percent of Total Population
#1 LEP Language	Spanish	27,660	1.4%
#2 LEP Language	Other Asian and Pacific Island languages	3,588	0.2%
#3 LEP Language	German or other West Germanic languages	2,881	0.1%
#4 LEP Language	Russian, Polish, or other Slavic languages	2,344	0.1%
#5 LEP Language	Chinese	2,327	0.1%
#6 LEP Language	Other Indo-European languages	1,609	0.1%
#7 LEP Language	Other and unspecified languages	1,290	0.1%
#8 LEP Language	Vietnamese	915	0.0%
#9 LEP Language	Tagalog	685	0.0%
#10 LEP Language	Arabic	630	0.0%

Economics

Households by income is shown in Table IV.11. Households earning more than \$100,000 per year represented 21.8 percent of households in 2016, compared to 7 percent in 2000. Households earning between \$50,000 and \$74,999 represented 20.1 percent of households in 2010, compared to 21.4 percent in 2000. Meanwhile, households earning less than \$15,000 accounted for 9.7 percent of households in 2016, compared to 14.5 percent in 2000.

Table IV.11
Households by Income

Non-Entitlement Area
2000 Census SF3 & 2016 Five-Year ACS Data

Income	2000 Census		2016 Five-Year ACS	
	Households	% of Total	Households	% of Total
Less than \$15,000	115,493	14.5%	83,678	9.7%
\$15,000 to \$19,999	55,059	6.9%	41,338	4.8%
\$20,000 to \$24,999	59,255	7.4%	43,250	5.0%
\$25,000 to \$34,999	117,623	14.7%	86,569	10.1%
\$35,000 to \$49,999	154,478	19.3%	121,169	14.1%
\$50,000 to \$74,999	171,227	21.4%	172,912	20.1%
\$75,000 to \$99,999	69,694	8.7%	124,139	14.4%
\$100,000 or More	55,795	7.0%	187,632	21.8%
Total	798,624	100.0%	860,687	100.0%

The rate of poverty for Non-Entitlement Areas is shown in Table IV.12. In 2016, there were an estimated 212,007 persons living in poverty. This represented a 10.1 percent poverty rate, compared to 7.9 percent poverty in 2000. In 2016, some 11.3 percent of those in poverty were under age 6, and 12.1 percent were 65 or older.

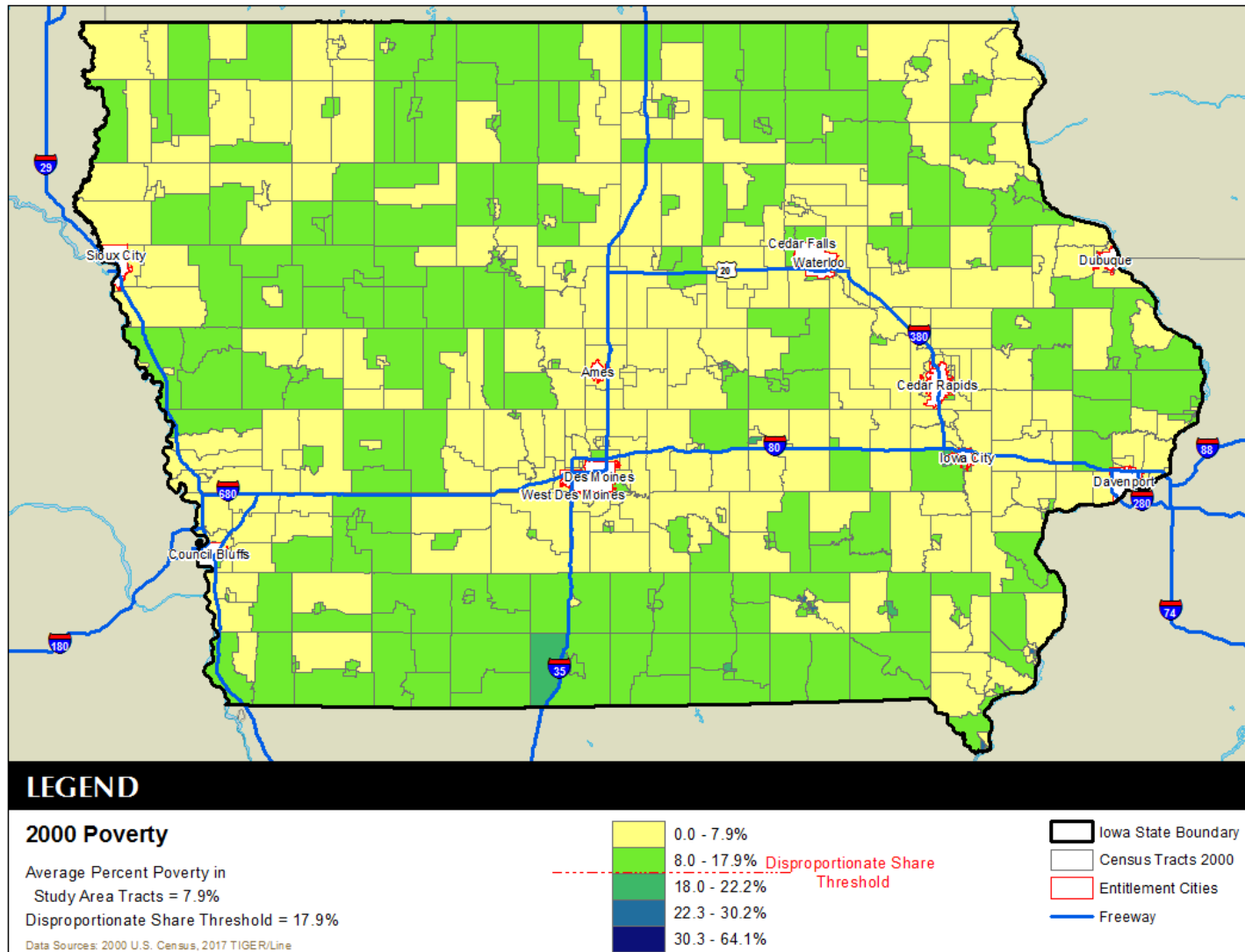
Table IV.12
Poverty by Age

Non-Entitlement Area
2000 Census SF3 & 2016 Five-Year ACS Data

Age	2000 Census		2016 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	17,853	11.4%	23,873	11.3%
6 to 17	33,050	21.2%	42,860	20.2%
18 to 64	81,826	52.4%	119,672	56.4%
65 or Older	23,473	15.0%	25,602	12.1%
Total	156,202	100.0%	212,007	100.0%
Poverty Rate	7.90%	.	10.10%	.

As the proportion of people in poverty grew between 2000 and 2016, so did the areas that saw a disproportionate share of poverty. As seen in Map IV.9, there were numerous areas with poverty that exceeded ten percentage points than the non-entitlement average. The areas with the highest concentrations of poverty were found in Crawford, Decatur, Jackson, Monona, Montgomery, Page, Wayne, and Webster Counties.

Map IV.8
2000 Poverty
 Non-Entitlement Areas of Iowa
 2000 Census, Tigerline



Map IV.9
2016 Poverty
 Non-Entitlement Areas of Iowa
 2016 ACS, Tigerline

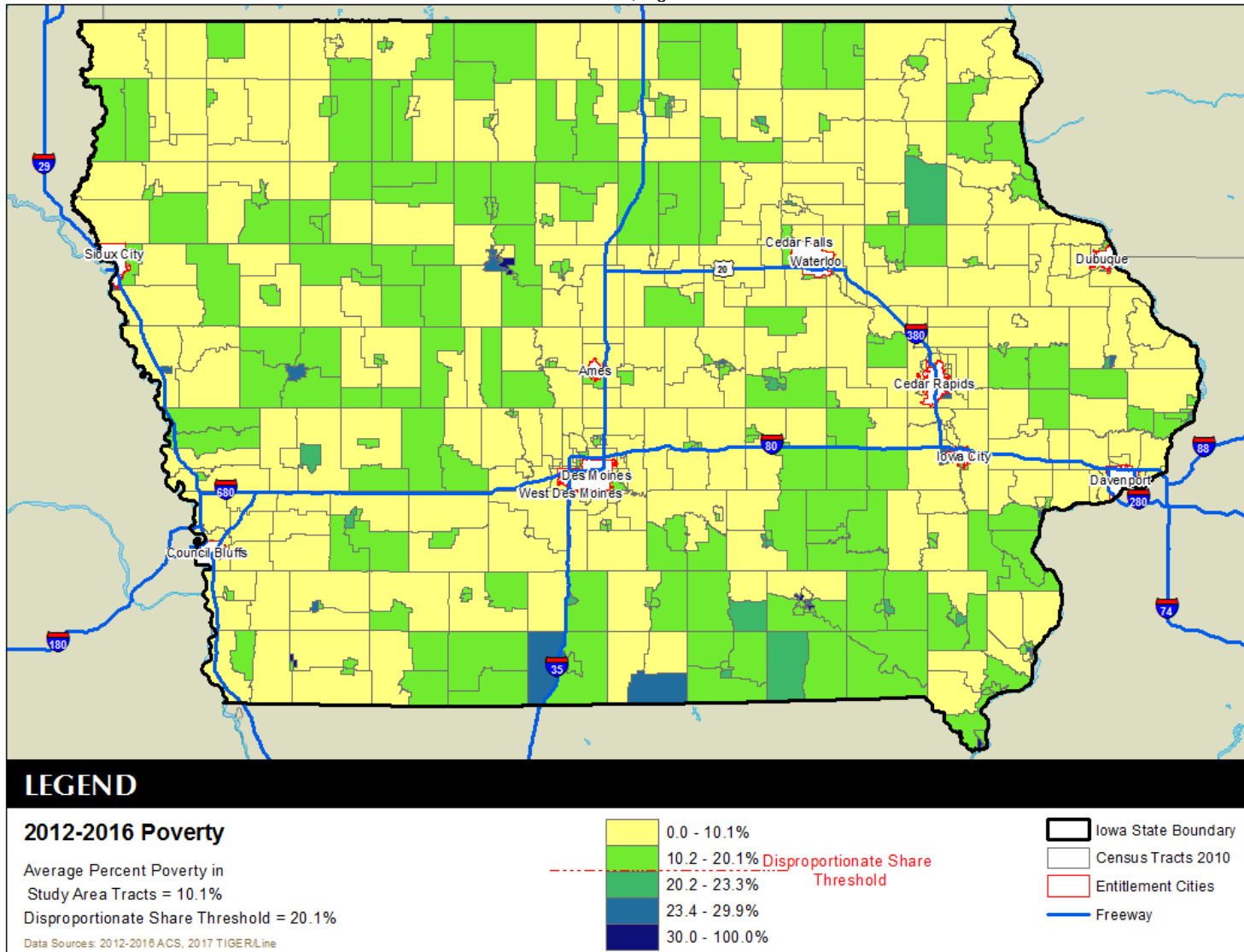


Table IV.13 shows the labor for statistics for Non-Entitlement Area from 1990 to the present. Over the entire series the lowest unemployment rate occurred in 1999 with a rate of 2.5 percent. The highest level of unemployment occurred during 2009 rising to a rate of 6.6 percent. This compared to a statewide low of 2.6 in 1999 percent and statewide high of 6.4 percent in 2009. Over the last year the unemployment rate in Non-Entitlement Areas decreased from 3.6 percent in 2016 to 3.1 percent in 2017, which compared to a statewide decrease to 3.1 percent.

Table IV.13
Labor Force Statistics
 Non-Entitlement Area of Iowa
 1990 - 2017 BLS Data

Year	Non-Entitlement Area				Statewide Unemployment Rate
	Unemployment	Employment	Labor Force	Unemployment Rate	
1990	41,875	958,280	1,000,155	4.2%	4.4%
1991	45,320	969,466	1,014,786	4.5%	4.7%
1992	44,662	993,836	1,038,498	4.3%	4.5%
1993	41,781	1,024,993	1,066,774	3.9%	4.0%
1994	37,456	1,045,515	1,082,971	3.5%	3.5%
1995	37,370	1,049,696	1,087,066	3.4%	3.4%
1996	38,159	1,064,317	1,102,476	3.5%	3.5%
1997	33,505	1,064,832	1,098,337	3.1%	3.1%
1998	29,514	1,058,475	1,087,989	2.7%	2.7%
1999	27,715	1,062,148	1,089,863	2.5%	2.6%
2000	28,291	1,076,848	1,105,139	2.6%	2.6%
2001	36,396	1,085,760	1,122,156	3.2%	3.3%
2002	43,587	1,087,976	1,131,563	3.9%	4.0%
2003	48,082	1,060,302	1,108,384	4.3%	4.5%
2004	47,193	1,058,134	1,105,327	4.3%	4.5%
2005	50,944	1,086,731	1,137,675	4.5%	4.3%
2006	44,078	1,114,784	1,158,862	3.8%	3.7%
2007	44,280	1,114,354	1,158,634	3.8%	3.7%
2008	50,203	1,119,782	1,169,985	4.3%	4.2%
2009	77,269	1,094,644	1,171,913	6.6%	6.4%
2010	70,688	1,094,523	1,165,211	6.1%	6.0%
2011	64,237	1,088,677	1,152,914	5.6%	5.5%
2012	57,424	1,087,012	1,144,436	5.0%	5.0%
2013	54,490	1,103,645	1,158,135	4.7%	4.7%
2014	49,538	1,127,316	1,176,854	4.2%	4.2%
2015	44,260	1,136,930	1,181,190	3.7%	3.8%
2016	42,340	1,136,222	1,178,562	3.6%	3.6%
2017	35,538	1,126,630	1,162,168	3.1%	3.1%

Diagram IV.1 shows the employment and labor force for Non-Entitlement Areas. The difference between the two lines represents the number of unemployed persons. In the most recent year, employment stood at 1,126,630 persons, with the labor force reaching 1,162,168, indicating there were a total of 35,538 unemployed persons.

Diagram IV.1
Employment and Labor Force
 Non-Entitlement Area
 1990 – 2017 BLS Data

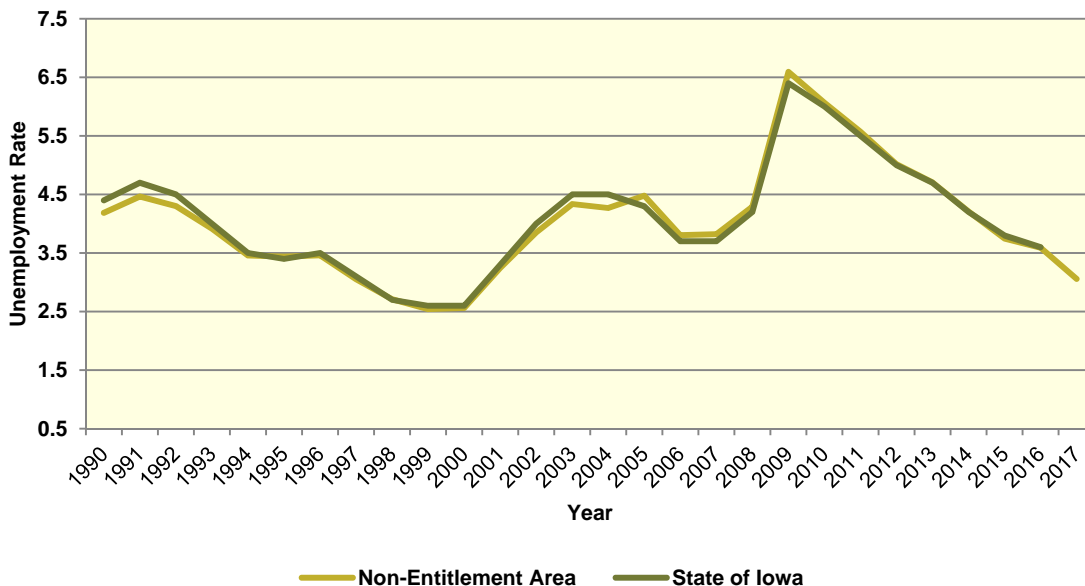


Diagram IV.2 shows the unemployment rate for both the state and Non-Entitlement Areas. During the 1990’s the average rate for Non-Entitlement Area was 3.5, which compared to 3.6 statewide. Between 2000 and 2010 the unemployment rate had an average of 4.1, which compared to 4.1 statewide. Since 2010 the average unemployment rate was 4.5. Over the course of the entire period Non-Entitlement Area had an average unemployment rate lower than the state, 4.0 percent for Non-Entitlement Area, versus 4.1 percent statewide.

Diagram IV.2
Annual Unemployment Rate
 Non-Entitlement Area
 1990 – 2017 BLS Data



HOUSING AND HOUSEHOLDS

Housing types by unit are shown in Table IV.14, below. In 2016, there were 951,218 housing units, up from 863,578 in 2000. Single-family units accounted for 82.3 percent of units in 2016, compared to 80.8 in 2000. Apartment units accounted for 8.5 percent in 2016, compared to 7 percent in 2000.

Table IV.14
Housing Units by Type

Non-Entitlement Area

2000 Census SF3 & 2016 Five-Year ACS Data

Unit Type	2000 Census		2016 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	697,924	80.8%	783,084	82.3%
Duplex	22,377	2.6%	18,287	1.9%
Tri- or Four-Plex	31,764	3.7%	29,698	3.1%
Apartment	60,278	7.0%	80,688	8.5%
Mobile Home	50,571	5.9%	39,222	4.1%
Boat, RV, Van, Etc.	664	0.1%	239	0.0%
Total	863,578	100.0%	951,218	100.0%

In 2010, there were 926,576 housing units, compared with 951,218 in 2016. Single-family units accounted for 82.3 percent of units in 2016, compared to 82.1 in 2010. Apartment units accounted for 8.5 percent in 2016, compared to 7.7 percent in 2010.

Table IV.15
Housing Units by Type

Non-Entitlement Area

2010 & 2016 Five-Year ACS Data

Unit Type	2010 Five-Year ACS		2016 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	760,903	82.1%	783,084	82.3%
Duplex	19,828	2.1%	18,287	1.9%
Tri- or Four-Plex	31,310	3.4%	29,698	3.1%
Apartment	71,293	7.7%	80,688	8.5%
Mobile Home	43,013	4.6%	39,222	4.1%
Boat, RV, Van, Etc.	229	0.0%	239	0.0%
Total	926,576	100.0%	951,218	100.0%

Some 90.7 percent of housing was occupied in 2010, compared to 92.4 percent in 2000. Owner-occupied housing changed 7 percent between 2000 and 2010, ending with owner-occupied units representing 76.7 percent of unit. Vacant units changed by 33.7 percent, resulting in 87,232 vacant units in 2010.

Table IV.16
Housing Units by Tenure

Non-Entitlement Area
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	798,210	92.4%	848,539	90.7%	6.3%
Owner-Occupied	608,569	76.2%	650,903	76.7%	7.0%
Renter-Occupied	189,641	23.8%	197,636	23.3%	4.2%
Vacant Housing Units	65,244	7.6%	87,232	9.3%	33.7%
Total Housing Units	863,454	100.0%	935,771	100.0%	8.4%

Table IV.17 shows housing units by tenure from 2010 to 2016. By 2016, there were 951,218 housing units. An estimated 75.9 percent were owner-occupied, and 9.5 percent were vacant.

Table IV.17
Housing Units by Tenure

Non-Entitlement Area
2010 Census & 2016 Five-Year ACS Data

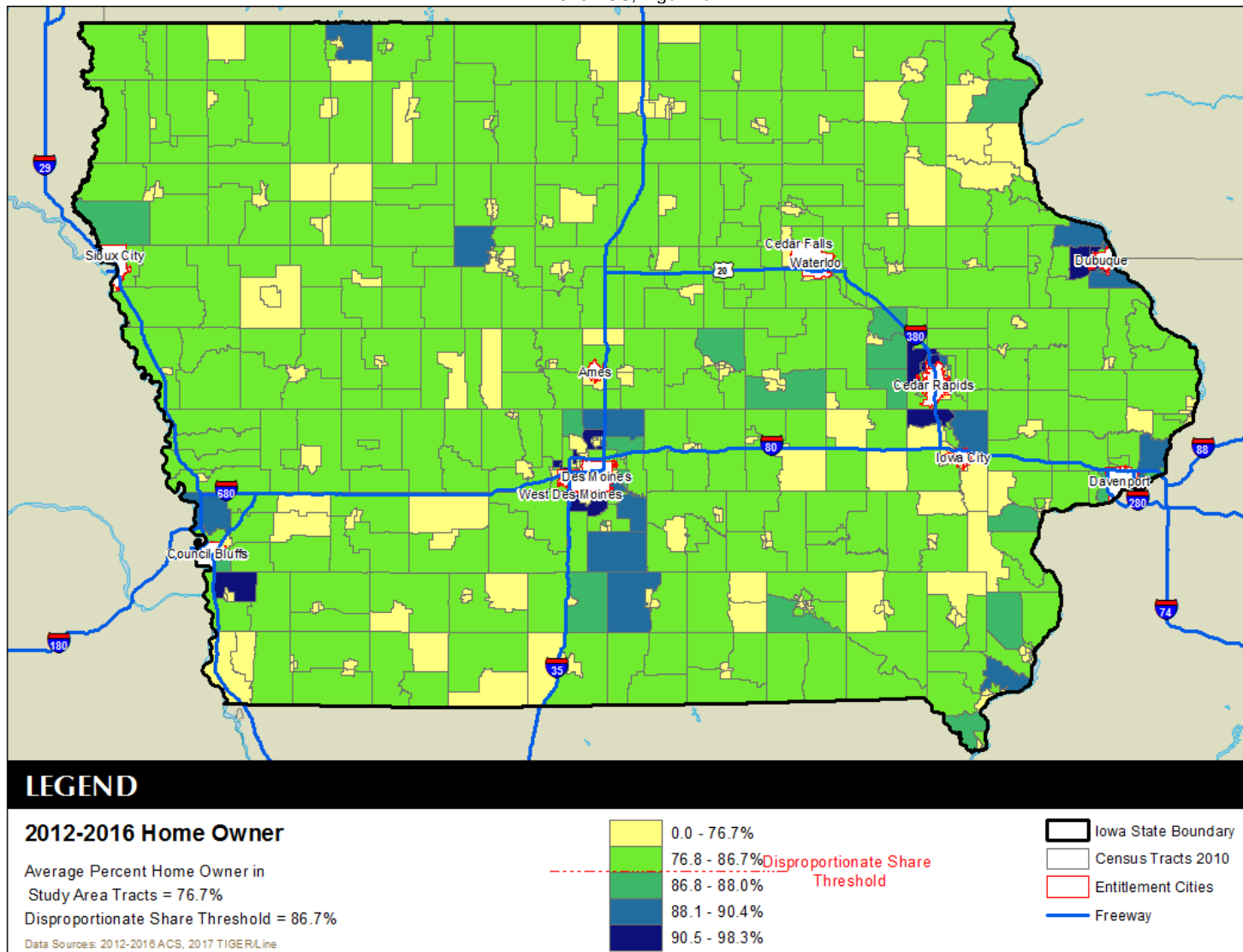
Tenure	2010 Census		2016 Five-Year ACS	
	Units	% of Total	Units	% of Total
Occupied Housing Units	848,539	90.7%	860,687	90.5%
Owner-Occupied	650,903	76.7%	653,446	75.9%
Renter-Occupied	197,636	23.3%	207,241	24.1%
Vacant Housing Units	87,232	9.3%	90,531	9.5%
Total Housing Units	935,771	100.0%	951,218	100.0%

The highest rate of homeownership tended to be in areas adjacent to urban areas in the State, as seen in Map IV.10. Conversely, higher rates of renter households were found in more rural areas of the State.

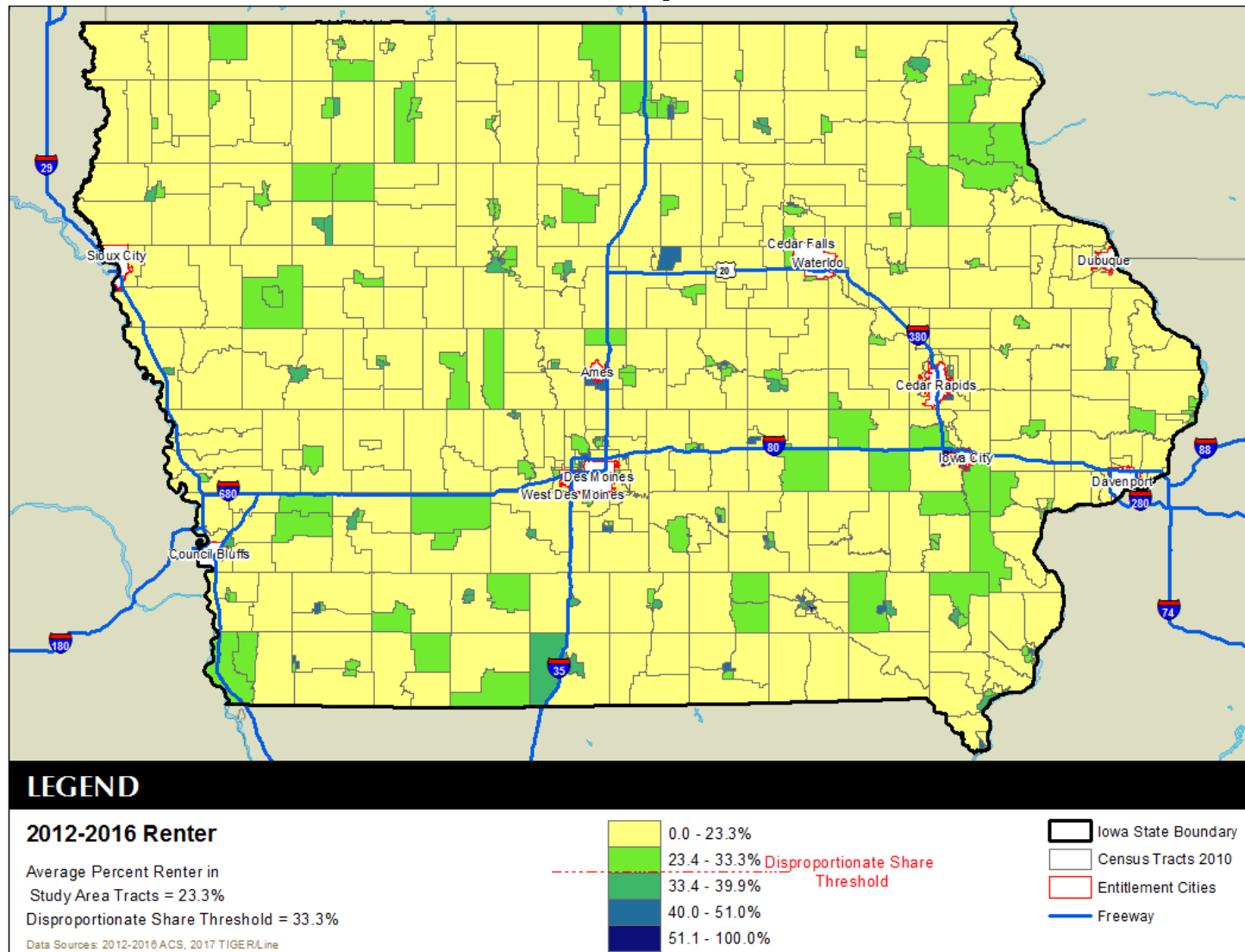
The highest median rates were also seen in areas surrounding urban centers in the State. Some of these areas saw median rents exceeding \$665, while more rural areas in the State saw median rents below \$415.

Median home value trends echoed the disbursement of rent costs in the non-entitlement areas of the State. Areas adjacent to larger cities saw median home values exceeding \$163,900, while other more rural areas saw median home values below \$84,500.

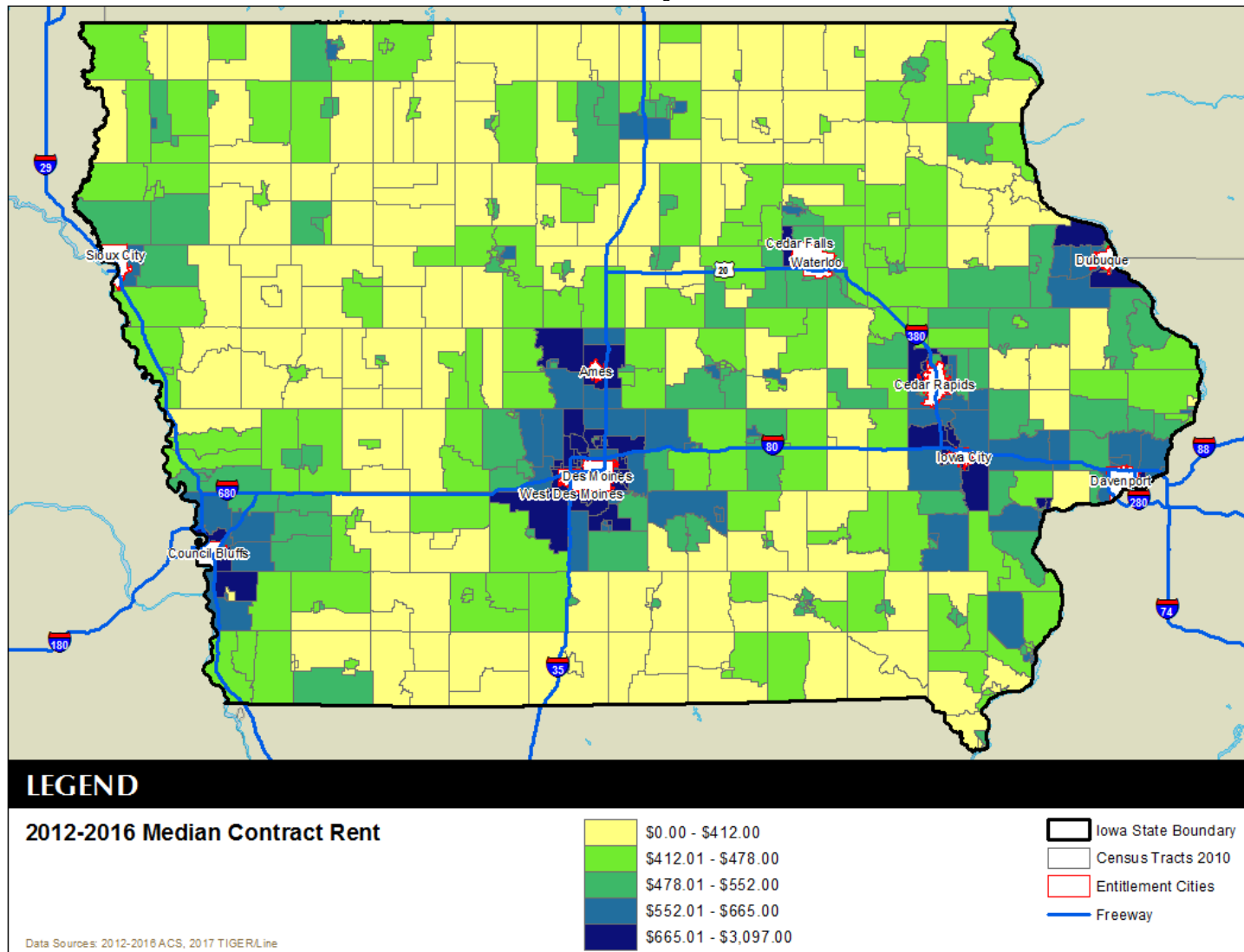
Map IV.10
2016 Homeowner Households
 Non-Entitlement Areas of Iowa
 2016 ACS, Tigerline



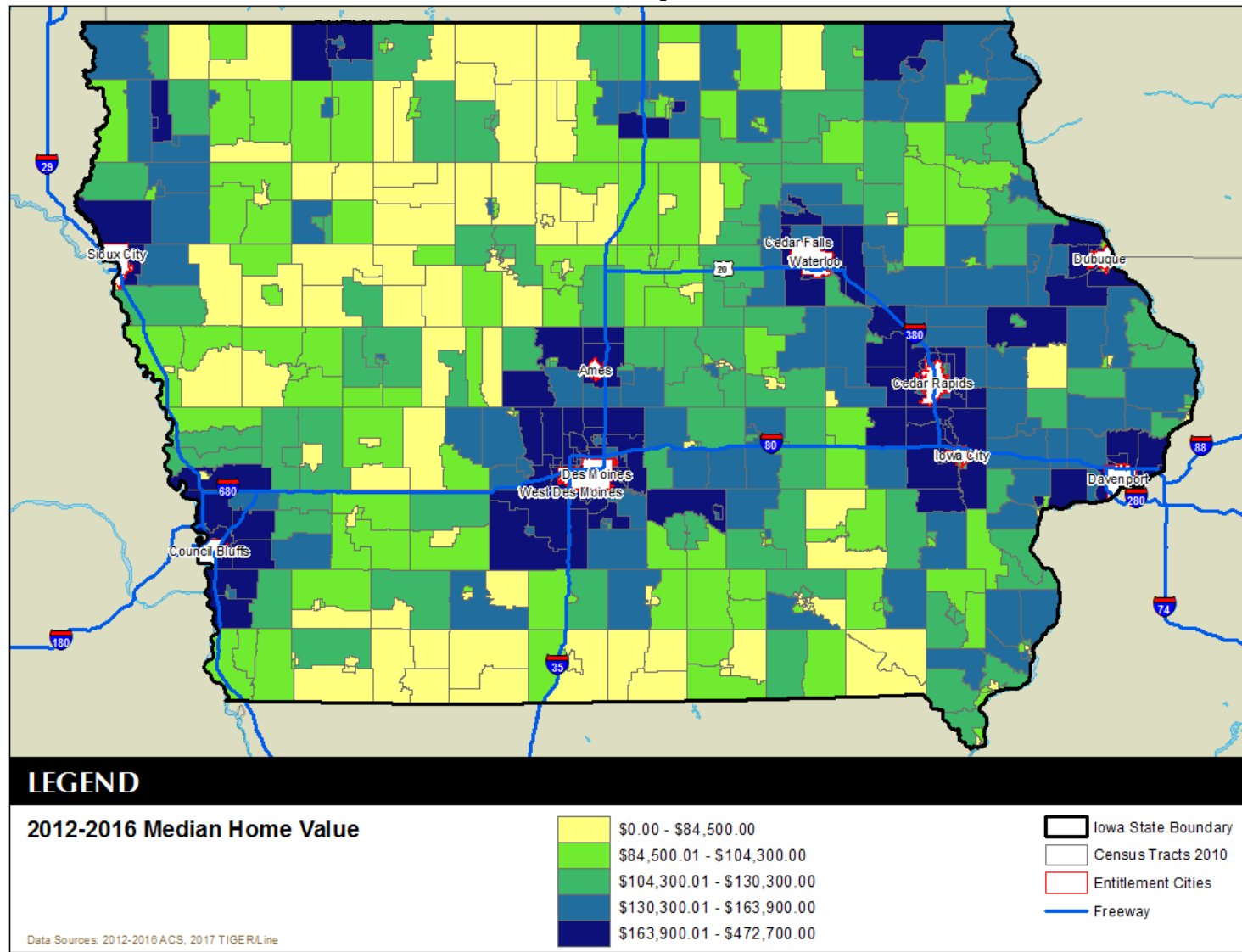
Map IV.11
2016 Renter Households
 Non-Entitlement Areas of Iowa
 2016 ACS, Tigerline



Map IV.12
2016 Median Contract Rent
 Non-Entitlement Areas of Iowa
 2016 ACS, Tigerline



Map IV.13
2016 Median Home Value
 Non-Entitlement Areas of Iowa
 2016 ACS, Tigerline



Households by household size are shown in Table IV.18. There were a total of 848,539 households in 2010, up from 798,210 in 2000. One person households changed by 798,210 percent between 2000 and 2010, while two person households changed by 10.3 percent. Three and four person households changed by 1 and -5.3 respectively, representing 13.9 percent and 12.3 percent of the population in 2010.

Table 1.21
Households by Household Size
Non-Entitlement Area
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	207,038	25.9%	229,100	27.0%	10.7%
Two Persons	290,165	36.4%	320,084	37.7%	10.0%
Three Persons	117,059	14.7%	118,287	13.9%	1.0%
Four Persons	110,542	13.8%	104,685	12.3%	-5.3%
Five Persons	50,756	6.4%	50,171	5.9%	-1.2%
Six Persons	15,932	2.0%	17,377	2.0%	9.1%
Seven Persons or More	6,718	0.8%	8,835	1.0%	31.5%
Total	798,210	100.0%	848,539	100.0%	6.3%

Table IV.19 shows households by year home built. Housing units built between 2000 and 2009, and 2010 or later, account for 12.4 percent and 2.8 percent of households, respectively. Households built in the 1970's, 1980's, and 1990's account for 15.2 percent, 7.2 percent, and 11, respectively. Housing units built prior to 1939 represented 26.7 percent of households in 2016.

Table IV.19
Households by Year Home Built
Non-Entitlement Area
2000 Census SF3 & 2016 Five-Year ACS Data

Year Built	2000 Census		2016 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	269,015	33.7%	229,761	26.7%
1940 to 1949	58,147	7.3%	44,374	5.2%
1950 to 1959	84,293	10.6%	81,412	9.5%
1960 to 1969	89,000	11.1%	87,164	10.1%
1970 to 1979	136,216	17.1%	131,204	15.2%
1980 to 1989	63,176	7.9%	61,669	7.2%
1990 to 1999	98,499	12.3%	94,384	11.0%
2000 to 2009	.	.	106,773	12.4%
2010 or Later	.	.	23,946	2.8%
Total	798,346	100.0%	860,687	100.0%

The Census Bureau reports building permit authorizations and “per unit” valuation of building permits by county annually. Single-family construction usually represents most residential development in the State. Single-family building permit authorizations in Non-Entitlement Areas increased from 6,470 authorizations in 2016 to 6,490 in 2017. In 2017, there were 9,502 total units permitted, including 2,656 multi-family units. Since 1980, the peak housing

production was seen in 2005 with 12,234 permitted units. This dropped to a low of 5,052 units in non-entitlement areas in 2010. These data are shown in Table IV.20 and illustrated in Diagram IV.3.

Table IV.20
Building Permits and Valuation

Non-Entitlement Area
Census Bureau Data, 1980–2017

Year	Authorized Construction in Permit Issuing Areas					Per Unit Valuation, (Real 2017\$)	
	Single-Family	Duplex Units	Tri- and Four-Plex	Multi-Family Units	Total Units	Single-Family Units	Multi-Family Units
1980	3,499	276	622	1,574	5,971	123,176	62,256
1981	2,656	120	483	577	3,836	114,636	66,322
1982	2,644	86	350	728	3,808	100,218	53,903
1983	3,055	116	309	957	4,437	110,965	52,664
1984	2,917	70	170	1,092	4,249	110,151	54,221
1985	2,040	68	130	679	2,917	118,105	60,535
1986	2,018	68	66	772	2,924	120,939	51,005
1987	2,501	56	129	589	3,275	123,076	50,448
1988	2,866	98	180	691	3,835	134,433	58,492
1989	3,326	154	211	531	4,222	137,873	56,786
1990	3,725	100	257	752	4,834	141,994	52,065
1991	4,369	120	154	713	5,356	145,306	62,612
1992	5,259	170	349	621	6,399	151,816	59,940
1993	5,527	210	190	893	6,820	158,870	58,801
1994	6,049	236	331	1,558	8,174	154,340	58,493
1995	5,783	154	202	1,252	7,391	163,917	57,605
1996	6,251	298	356	1,834	8,739	157,953	62,795
1997	5,756	266	204	1,305	7,531	164,850	67,151
1998	6,768	240	319	1,847	9,174	171,323	74,041
1999	7,354	270	427	1,647	9,698	176,885	74,322
2000	6,622	294	260	1,291	8,467	179,363	79,318
2001	6,933	256	355	1,863	9,407	185,680	87,027
2002	7,953	320	276	1,517	10,066	183,910	78,406
2003	9,533	274	258	1,346	11,411	188,095	96,658
2004	9,741	304	209	1,003	11,257	200,605	97,596
2005	10,192	256	274	1,512	12,234	200,582	101,464
2006	8,267	252	174	1,108	9,801	199,956	115,235
2007	6,840	204	178	803	8,025	205,012	113,580
2008	4,902	122	99	360	5,483	202,470	93,712
2009	4,304	126	111	748	5,289	205,357	127,385
2010	4,401	158	75	418	5,052	207,092	93,287
2011	4,472	130	100	498	5,200	211,324	88,270
2012	5,137	158	139	758	6,192	221,733	128,654
2013	5,770	174	87	831	6,862	231,825	119,627
2014	5,506	268	171	1,804	7,749	234,778	110,891
2015	5,989	488	174	1,584	8,235	243,004	109,914
2016	6,470	284	158	2,339	9,251	241,366	116,385
2017	6,490	214	142	2,656	9,502	230,702	102,338

While single-family unit production decreased dramatically in 2005, it has increased slightly in recent years. The value of single-family homes continued to grow during this time period,

reaching a peak of \$243,004 in 2015. From 2015 to 2017, the value of single-family home decreased to \$230,702, as illustrated in Diagram IV.4.

Diagram IV.3
Total Permits by Unit Type
 Non-Entitlement Area
 Census Bureau Data, 1980–2017

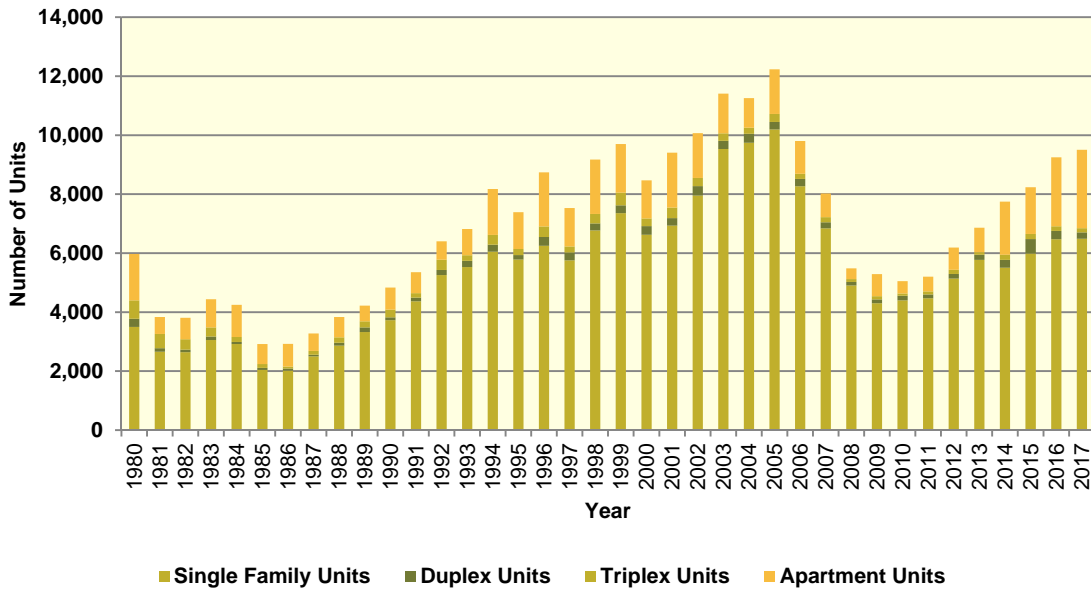
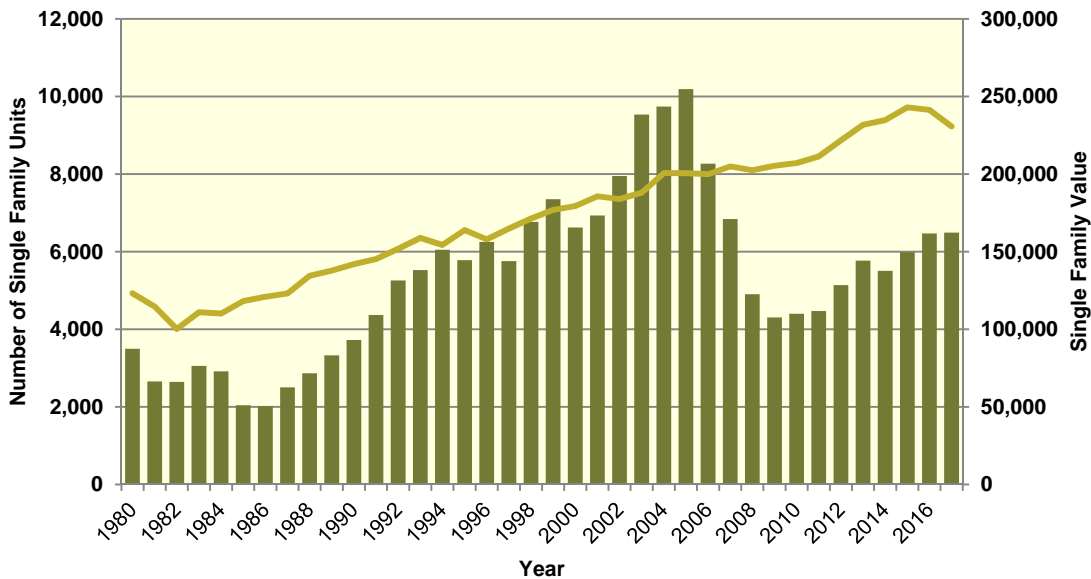


Diagram IV.4
Single Family Permits
 Non-Entitlement Area
 Census Bureau Data, 1980–2017



The distribution of unit types by race are shown in Table IV.21. An estimated 84.5 percent of white households occupy single family homes, while 46.7 percent of black households do. Some 7.4 percent of white households occupy apartments, while 31.3 percent of black households do. An estimated 65.4 percent of Asian, and 84.3 percent of American Indian households occupy single family homes.

Table IV.21
Distribution of Units in Structure by Race

Non-Entitlement Area
2016 Five-Year ACS Data

Unit Type	White	Black	American Indian	Asian	Native Hawaiian/Pacific Islanders	Other	Two or More Races
Single-Family	84.5%	46.7%	84.3%	65.4%	65.2%	64.3%	68.7%
Duplex	1.7%	4.7%	0.8%	2.6%	7.9%	2.9%	4.2%
Tri- or Four-Plex	2.8%	13.9%	4.4%	3.4%	0.0%	6.5%	6.1%
Apartment	7.4%	31.3%	6.8%	23.0%	21.5%	15.9%	15.4%
Mobile Home	3.6%	3.1%	3.8%	5.1%	2.9%	10.4%	5.6%
Boat, RV, Van, Etc.	0.0%	0.4%	0.0%	0.5%	2.5%	0.0%	0.1%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

The disposition of vacant housing units in 2000 and 2010 are shown in Table IV.22. An estimated 23.2 percent of vacant units were for rent in 2010, a 35.9 percent change since 2000. In addition, some 15 percent of vacant units were for sale, a change of 20.1 percent between 2000 and 2010. "Other" vacant units represented 32.8 percent of vacant units in 2010. This is a change of 59 percent since 2000. "Other" vacant units are not for sale or rent, or otherwise available to the marketplace. These units may be problematic if concentrated in certain areas and may create a "blighting" effect.

Table IV.22
Disposition of Vacant Housing Units

Non-Entitlement Area
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
For Rent	14,924	22.9%	20,281	23.2%	35.9%
For Sale	10,913	16.7%	13,109	15.0%	20.1%
Rented or Sold, Not Occupied	5,931	9.1%	5,651	6.5%	-4.7%
For Seasonal, Recreational, or Occasional Use	15,441	23.7%	19,522	22.4%	26.4%
For Migrant Workers	55	0.1%	75	0.1%	36.4%
Other Vacant	17,980	27.6%	28,594	32.8%	59.0%
Total	65,244	100.0%	87,232	100.0%	33.7%

The disposition of vacant units between 2010 and 2016 are shown in Table IV.23. By 2016, for rent units accounted for 16.9 percent of vacant units, while for sale units accounted for 10.7 percent. "Other" vacant units accounted for 41.4 percent of vacant units, representing a total of 37,445 "other" vacant units.

Table IV.23
Disposition of Vacant Housing Units

Non-Entitlement Area
2010 Census & 2016 Five-Year ACS Data

Disposition	2010 Census		2016 Five-Year ACS	
	Units	% of Total	Units	% of Total
For Rent	20,281	23.2%	15,294	16.9%
For Sale	13,109	15.0%	9,727	10.7%
Rented Not Occupied	1,237	1.4%	2,929	3.2%
Sold Not Occupied	4,414	5.1%	5,661	6.3%
For Seasonal, Recreational, or Occasional Use	19,522	22.4%	19,317	21.3%
For Migrant Workers	75	0.1%	158	0.2%
Other Vacant	28,594	32.8%	37,445	41.4%
Total	87,232	100.0%	90,531	100.0%

In 2016, the highest proportion of vacant units was seen in Allamakee, Cerro Gordo, Dickinson, Poweshiek, Ringgold, and Sac Counties. These areas had vacant housing that exceeded 28.9 percent, compared to the non-entitlement average of 9.3 percent.

The concentration of “other” vacant housing units is shown in Map IV.15. There are numerous areas statewide that have higher concentration of these potentially problematic units.

EDUCATION AND EMPLOYMENT

Education and employment data, as estimated by the 2016 ACS, is presented in Tables IV.24 and 25. In 2016, some 1,090,843 persons were employed and 46,068 were unemployed. This totaled a labor force of 1,136,911 persons. The unemployment rate for Non-Entitlement Areas was estimated to be 4.1 in 2016.

Table IV.24
Employment, Labor Force and Unemployment

Non-Entitlement Area
2016 Five-Year ACS Data

Employment Status	2016 Five-Year ACS
Employed	1,090,843
Unemployed	46,068
Labor Force	1,136,911
Unemployment Rate	4.1%

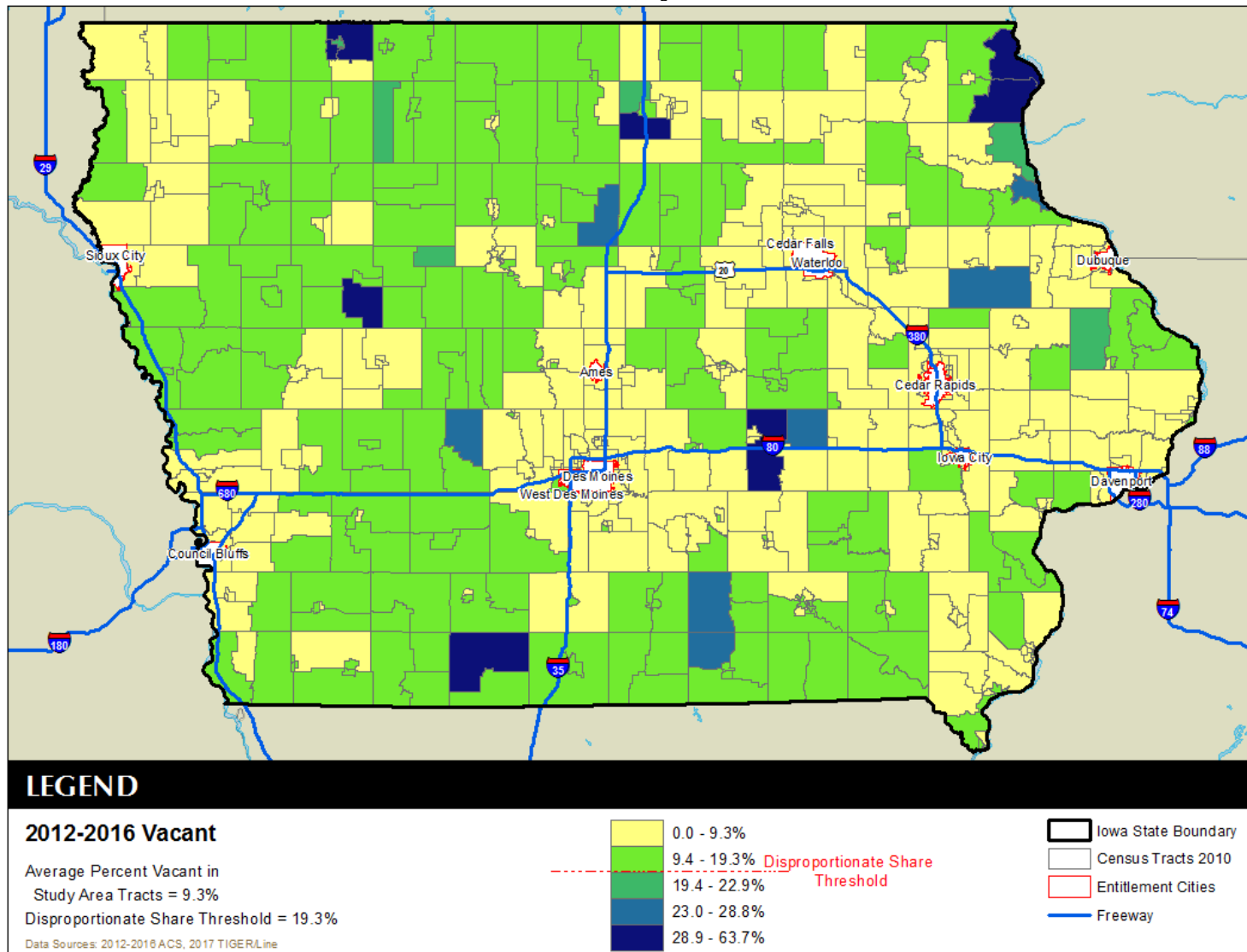
In 2016, 92.8 percent of households in Non-Entitlement Areas had a high school education or greater.

Table IV.25
High School or Greater Education

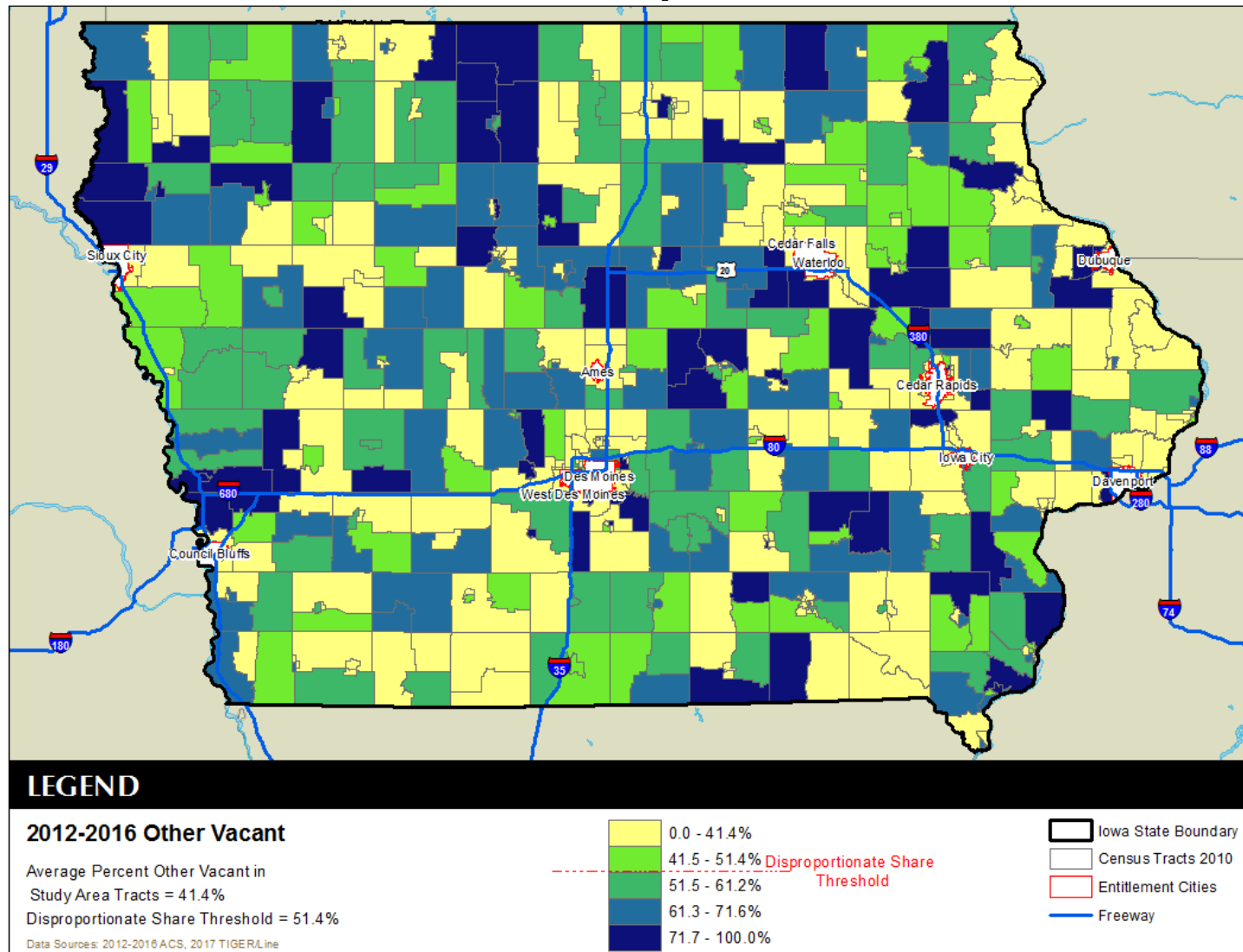
Non-Entitlement Area
2010 & 2016 Five-Year ACS Data

Education Level	2010 5-year ACS	2016 5-year ACS
High School or Greater	766,206	798,880
Total Households	843,760	860,687
Percent High School or Above	90.80%	92.8%

Map IV.14
2016 Vacant Units
 Non-Entitlement Areas of Iowa
 2016 ACS, Tigerline



Map IV.15
2016 “Other” Vacant Units
 Non-Entitlement Areas of Iowa
 2016 ACS, Tigerline



As seen in Table IV.26, some 33.1 percent of the population had a high school diploma or equivalent, another 35.1 percent have some college, 16.6 percent have a Bachelor's Degree, and 6.8 percent of the population had a graduate or professional degree.

Table IV.26
Educational Attainment

Non-Entitlement Area
2010 & 2016 Five-Year ACS Data

Education Level	2010 Five-Year ACS	Percent	2016 5-year ACS	Percent
Less Than High School	162,735	10.3%	137,263	8.4%
High School or Equivalent	567,682	35.8%	541,414	33.1%
Some College or Associates Degree	524,758	33.1%	573,617	35.1%
Bachelor's Degree	239,444	15.1%	271,951	16.6%
Graduate or Professional Degree	92,428	5.8%	110,682	6.8%
Total Population Above 18 years	1,634,927	100.0%	1,634,927	100.0%

COMMUTING PATTERNS

Table IV.27 shows the place of work by county of residence. In 2010 72.2 percent of residents worked within the county they reside in with 24 percent working outside their home county. This compared to 72 percent of residents who worked within the county in which they resided and 24.3 percent of residents worked outside their home county.

Table IV.27
Place of Work

Non-Entitlement Area
2010 & 2016 5 year ACS data

Place of work	2010 5-year ACS	% of Total	2016 5-year ACS	% of Total
Worked in county of residence	762,993	72.2%	772,434	72.0%
Worked outside county of residence	253,272	24.0%	260,909	24.3%
Worked outside state of residence	39,847	3.8%	39,367	3.7%
Total	1,056,112	100.0%	1,072,710	100.0%

Table IV.28 shows the aggregate travel time to work based on place of work and residence. In Non-Entitlement Areas the total aggregate travel time was 20,005,755, with residents working in their home county spending a total of 10,161,705.

Table IV.28
Aggregate Travel Time to Work (in Minutes)

Non-Entitlement Area
2010 & 2016 5 year ACS data

Place of Work	2010 5-year ACS	% of Total	2016 5-year ACS	% of Total
Worked in county of residence	9,578,615	49.9%	10,161,705	50.8%
Worked outside county of residence	8,211,440	42.7%	8,402,495	42.0%
Worked outside State of residence	1,421,940	7.4%	1,441,560	7.2%
Aggregate travel time to work (in minutes):	19,211,970	100.0%	20,005,755	100.0%

Table IV.29, shows the average travel time to work based on place of work and residence. In 2016 the overall average travel time was 19,211,970 minutes. Residents working within their

home county spent an average of 13.2 minutes commuting to work, with those working outside their county of residence spending an average of 32.2 minutes on the commute.

Table IV.29
Average Travel Time to Work (in Minutes)

Non-Entitlement Area
2010 & 2016 5 year ACS data

Place of Work	2010 5-year ACS	2016 5-year ACS
Worked in county of residence	12.6	13.2
Worked outside county of residence	32.4	32.2
Worked outside State of residence	35.7	36.6
Average travel time to work (in minutes):	18.2	18.6

Table IV.30 shows the means of transportation to work. In 2016, 81.3 percent of commuters drove alone in a car, truck or van. Only 8.6 percent carpooled, with an additional 0.5 percent taking public transportation. There were also 54,568 persons or 5.1 percent who worked at home.

Table IV.30
Means of Transportation to Work

Non-Entitlement Area
2010 & 2016 5 year ACS data

Means	2010 5-year ACS	% of Total	2016 5-year ACS	% of Total
Car, truck, or van: Drove alone	832,667	78.8%	872,582	81.3%
Car, truck, or van: Carpooled:	109,733	10.4%	91,807	8.6%
Public transportation (excluding taxicab):	4,950	0.5%	5,231	0.5%
Taxicab	368	0.0%	822	0.1%
Motorcycle	2,438	0.2%	2,082	0.2%
Bicycle	3,982	0.4%	4,130	0.4%
Walked	36,758	3.5%	33,725	3.1%
Other means	6,096	0.6%	7,763	0.7%
Worked at home	59,120	5.6%	54,568	5.1%
Total	1,056,112	100.0%	1,072,710	100.0%

Table IV.31 shows the breakdown of the means of transportation by tenure. In 2016, some 66.5% percent of commuters owned their home and commuted alone by car, which compares to 66.5% percent in 2010. There were also 164,609 renters who drove alone in 2016 and accounted for 15.5% percent of the total commuter population. Commuters who owned their own home and took public transportation represented 0.2% percent of the population, which compared to 2,197 renters, or 0.2 percent taking public of commuters

Table IV.31
Means Of Transportation To Work By Tenure

Non-Entitlement Area
2010 & 2016 5 year ACS data

Tenure	2010 5-year ACS	% of Total	2016 5-year ACS	% of Total
Car, truck, or van - drove alone:				
Owner	694,974	66.5%	705,687	66.5%
Renter	135,704	13.0%	164,609	15.5%
Car, truck, or van - carpooled:				
Owner	83,104	8.0%	66,427	6.3%
Renter	25,635	2.5%	25,008	2.4%
Public transportation (excluding taxicab):				
Owner	2,568	0.2%	2,117	0.2%
Renter	1,881	0.2%	2,197	0.2%
Walked:				
Owner	21,303	2.0%	17,668	1.7%
Renter	11,473	1.1%	10,639	1.0%
Taxicab, motorcycle, bicycle, or other means:				
Owner	9,214	0.9%	9,996	0.9%
Renter	3,505	0.3%	4,480	0.4%
Worked at home:				
Owner	48,618	4.7%	44,613	4.2%
Renter	6,958	0.7%	7,459	0.7%
Total:	1,044,937	100.0%	1,060,900	100.0%

B. HOMELESSNESS

HOMELESS POPULATION

The homeless population in the State of Iowa has remained relatively steady since 2011, according to Point-in-Time Counts. These counts are conducted annually to get a “snapshot” of the homeless population in the jurisdiction. This count may not reflect the actual number of persons homeless in the State, which may be much higher. The Balance of State Continuum of Care (CoC) serves populations outside the Sioux City/Dakota, Woodbury Counties CoC and the Des Moines/ Polk County CoC. The Balance of State CoC counted 1,782 total persons who were homeless in 2011. By 2017, that number was 1,792. In 2017, the balance of state CoC counted 766 persons in emergency shelters, some 976 in transitional housing, and 50 persons unsheltered.

Table IV.32
Homeless Population

Iowa Balance of State CoC
PIT Count

Place of Shelter	2011	2013	2015	2017
Emergency Shelter	667	710	737	766
Transitional Housing	1,087	1,149	1,139	976
Unsheltered	28	61	99	50
Total	1,782	1,920	1,975	1,792

The statewide homeless count has seen the same steady homeless population between 2011 and 2017 as well. This is shown in the table below.

Table IV.33
Homeless Population
 State of Iowa
 PIT Count

Place of Shelter	2011	2013	2015	2017
Emergency Shelter	1,179	1,203	1,225	1,373
Transitional Housing	1,834	1,747	1,653	1,279
Unsheltered	121	134	203	104
Total	3,134	3,084	3,081	2,756

RACIAL DISPARITIES IN HOMELESS SERVICES

In August, 2018, the Institute for Community Alliances, the HMIS Lead Agency for the State of Iowa, conducted an *Analysis of the Impacts of Race on Homelessness and Homeless Service Provisions in Iowa*. This report found that there is significant racial disparity in those experiencing homelessness, as well as in placing persons within emergency shelters in Continuums of Care (CoC) throughout the State. The report indicated that service providers should take care to mediate any systematic racial biases when placing homeless persons with appropriate services.

C. SEGREGATION AND INTEGRATION

The “dissimilarity index” provides a quantitative measure of segregation in an area, based on the demographic composition of smaller geographic units within that area. One way of understanding the index is that it indicates how evenly two demographic groups are distributed throughout an area: if the composition of both groups in each geographic unit (e.g., Census tract) is the same as in the area as a whole (e.g., city), then the dissimilarity index score for that city will be 0. By contrast; and again using Census tracts as an example; if one population is clustered entirely within one Census tract, the dissimilarity index score for the city will be 1. The higher the dissimilarity index value, the higher the level of segregation in an area.

A Technical Note on the Dissimilarity Index Methodology

The dissimilarity indices included in this study were calculated from data provided by the Census Bureau according to the following formula:

$$D_j^{WB} = 100 * \frac{1}{2} \sum_{i=1}^N \left| \frac{W_i}{W_j} - \frac{B_i}{B_j} \right|$$

Where i indexes a geographic unit, j is the j th jurisdiction, W is group one and B is group two, and N is the number of geographic units, starting with i , in jurisdiction j .²

This is the formula that HUD uses to calculate dissimilarity index values. In most respects (including the use of tract-level data available through the Brown Longitudinal Tract Database), the methodology employed in this study exactly duplicates HUD’s methodology for calculating the index of dissimilarity.

The principle exception was the decision to use Census tract-level data to calculate dissimilarity index values through 2010. While HUD uses tract level data in 1990 and 2000, HUD uses block group-level data in 2010. The decision to use tract-level data in all years included in this study was motivated by the fact that the dissimilarity index is sensitive to the geographic base unit from which it is calculated. Concretely, use of smaller geographic units produces dissimilarity index values that tend to be higher than those calculated from larger geographic units.³

As a general rule, HUD considers the thresholds appearing in Table IV.34 to indicate low, moderate, and high levels of segregation:

² Affirmatively Furthering Fair Housing Data Documentation. HUD. December 2015.

³ Wong, David S. “Spatial Decomposition of Segregation Indices: A Framework Toward Measuring Segregation at Multiple Levels.” *Geographical Analyses*, 35:3. The Ohio State University. July 2003. P. 179.

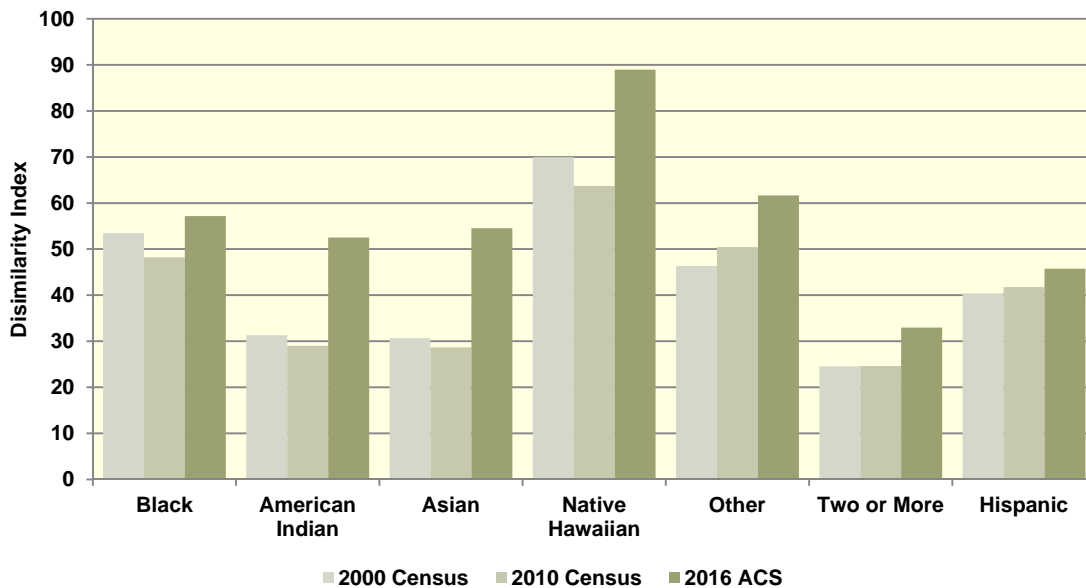
Table IV.34
Dissimilarity Index Values

Measure	Values	Description
Dissimilarity Index [range 0-100]	<40	Low Segregation
	40-54	Moderate Segregation
	>55	High Segregation

Segregation Levels

Diagram IV.6 shows the dissimilarity index by racial type in 2000, 2010, and in 2016. In 2016, black, Native Hawaiian, and “other” race households had a high level of segregation in non-entitlement areas. Asian, American Indian, and Hispanic households saw moderate levels of segregation. The levels of segregation saw considerable growth for American Indian, Asian, Native Hawaiian, and “other” race households between 2000 and 2016. However, these racial groups make up very small proportions of the population. Black and Hispanic households saw moderate levels of increase in segregation.

Diagram IV.6
Dissimilarity Index by Race/Ethnicity
Non-Entitlement Areas of Iowa
2000, 2010 and 2016 5-year ACS data



D. RACIALLY OR ETHNICALLY CONCENTRATED AREAS OF POVERTY

Racially or ethnically concentrated areas of poverty (R/ECAPs) are Census tracts with relatively high concentrations of non-white residents and these residents living in poverty. Formally, an area is designated a R/ECAP if two conditions are satisfied: first, the non-white population, whether Hispanic or non-Hispanic, must account for at least 50 percent of the Census tract population. Second, the poverty rate in that Census must exceed a certain threshold, at 40 percent.

R/ECAPs Over Time

The non-entitlement areas of Iowa do not have any R/ECAPs. There are no areas in the non-entitlement areas of Iowa that meet the criteria for Racially or Ethnically Concentrated Areas of Poverty. Therefore, this AI will focus on the other fair housing issues, including segregation, access to opportunity, disproportionate housing needs, and disability and access.

E. DISPARITIES IN ACCESS TO OPPORTUNITY

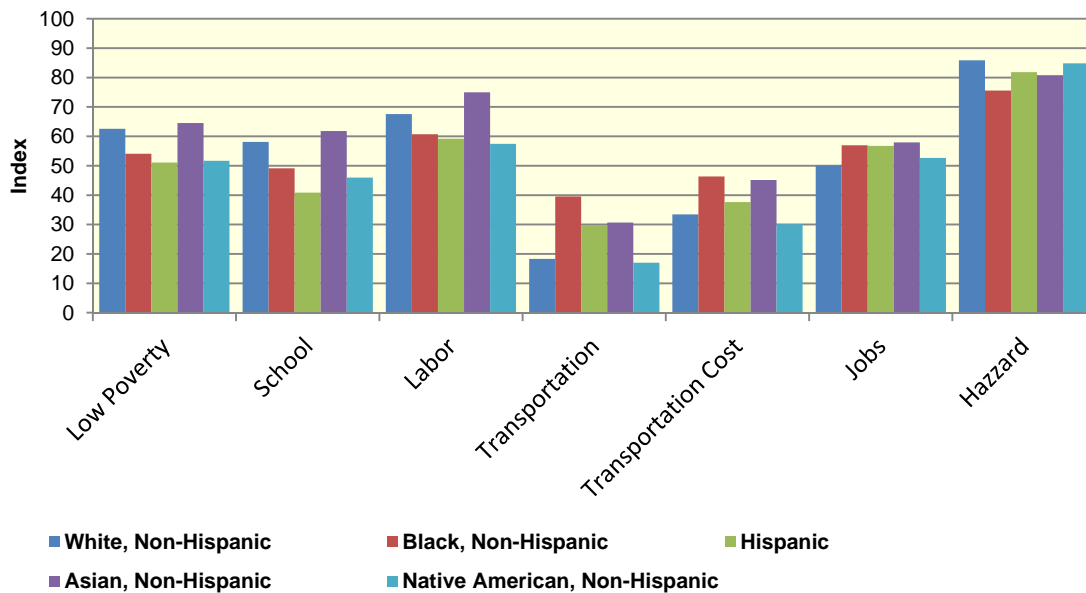
Areas of opportunity are physical places, areas within communities that provide things one needs to thrive well, including quality employment, good schools, affordable housing, efficient public transportation, safe streets, good services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes. Disparities in access to opportunity inspects whether a select group, or certain groups, have lower or higher levels of access to these community assets. HUD expresses several of these community assets through the use of an index value, with 100 representing total access by all members of the community, and zero representing no access.

The HUD opportunity indices are access to Low Poverty areas; access to School Proficiency; characterization of the Labor Market Engagement; residence in relation to Jobs Proximity; Low Transportation Costs; Transit Trips Index; and a characterization of where you live by an Environmental Health indicator. For each of these a more formal definition is as follows:

- Low Poverty – A measure of the degree of poverty in a neighborhood, at the Census Tract level.
- School Proficiency - School-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing schools.
- Jobs Proximity - Quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a Core Based Statistical Area (CBSA)
- Labor Market Engagement - Provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood
- Low Transportation Cost – Estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region
- Transit Trips - Trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters
- Environmental Health - summarizes potential exposure to harmful toxins at a neighborhood level

All the indices are presented in Diagram IV.7. As seen therein, black and-Hispanic households have a much lower access to low poverty areas than white and Asian households. A similar trend is seen for school proficiency and labor engagement, in which black and Hispanic households have index ratings markedly lower than white non-Hispanic households. Transit trips and transportation costs have relatively low index ratings for all races and ethnicities. Job proximity and environmental health indices are fairly even across all racial and ethnic groups.

Diagram IV.7
Access to Opportunity by Race and Ethnicity by Index
 Non-Entitlement Areas of Iowa
 2017 HUD AFFH Database



EDUCATIONAL OPPORTUNITIES

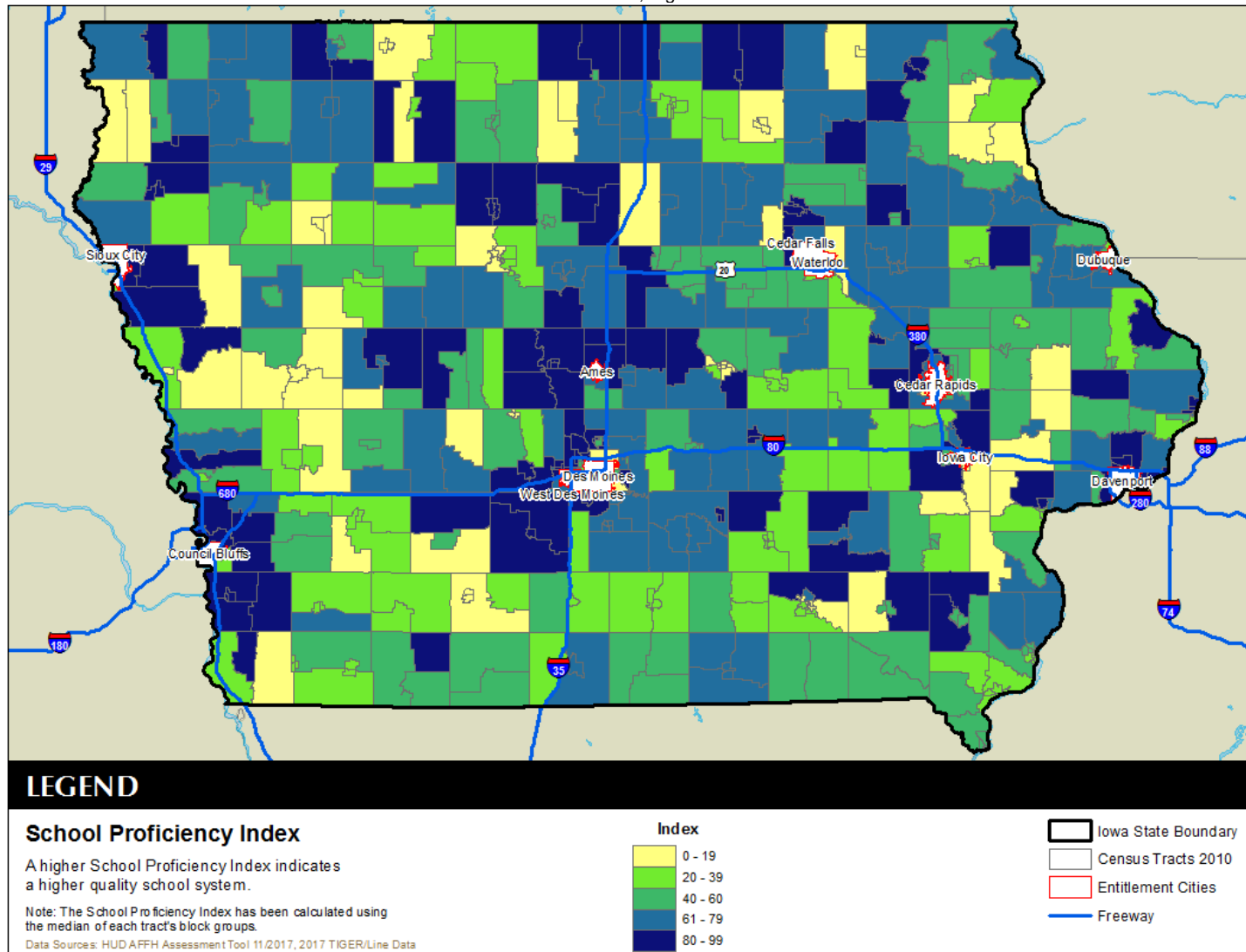
The School Proficiency Index measures the proficiency of elementary schools in the attendance area (where this information is available) of individuals sharing a protected characteristic or the proficiency of elementary schools within 1.5 miles of individuals with a protected characteristic where attendance boundary data are not available. The values for the School Proficiency Index are determined by the performance of 4th grade students on state exams.

Map IV.16 shows the school proficiency. The School Proficiency Index measures the proficiency of elementary schools in the attendance area (where this information is available) of individuals sharing a protected characteristic or the proficiency of elementary schools within 1.5 miles of individuals with a protected characteristic where attendance boundary data are not available. The values for the School Proficiency Index are determined by the performance of 4th grade students on state exams.

White non-Hispanic households and Asian households had the highest school proficiency index at 58.1 and 61.78, respectively. This is compared to 49.1 for black non-Hispanic households and 40.8 for Hispanic households.

While high performing schools were dispersed throughout the State, as seen in the map on the following page, there are large areas with poorer performing schools. This is particularly true for the more rural areas of the State. The access to higher performing schools for black and Hispanic households is limited when compared to white and Asian households in non-entitlement areas of the State.

Map IV.16
School Proficiency Index
 Non-Entitlement Areas of Iowa
 HUD AFFH, Tigerline



EMPLOYMENT

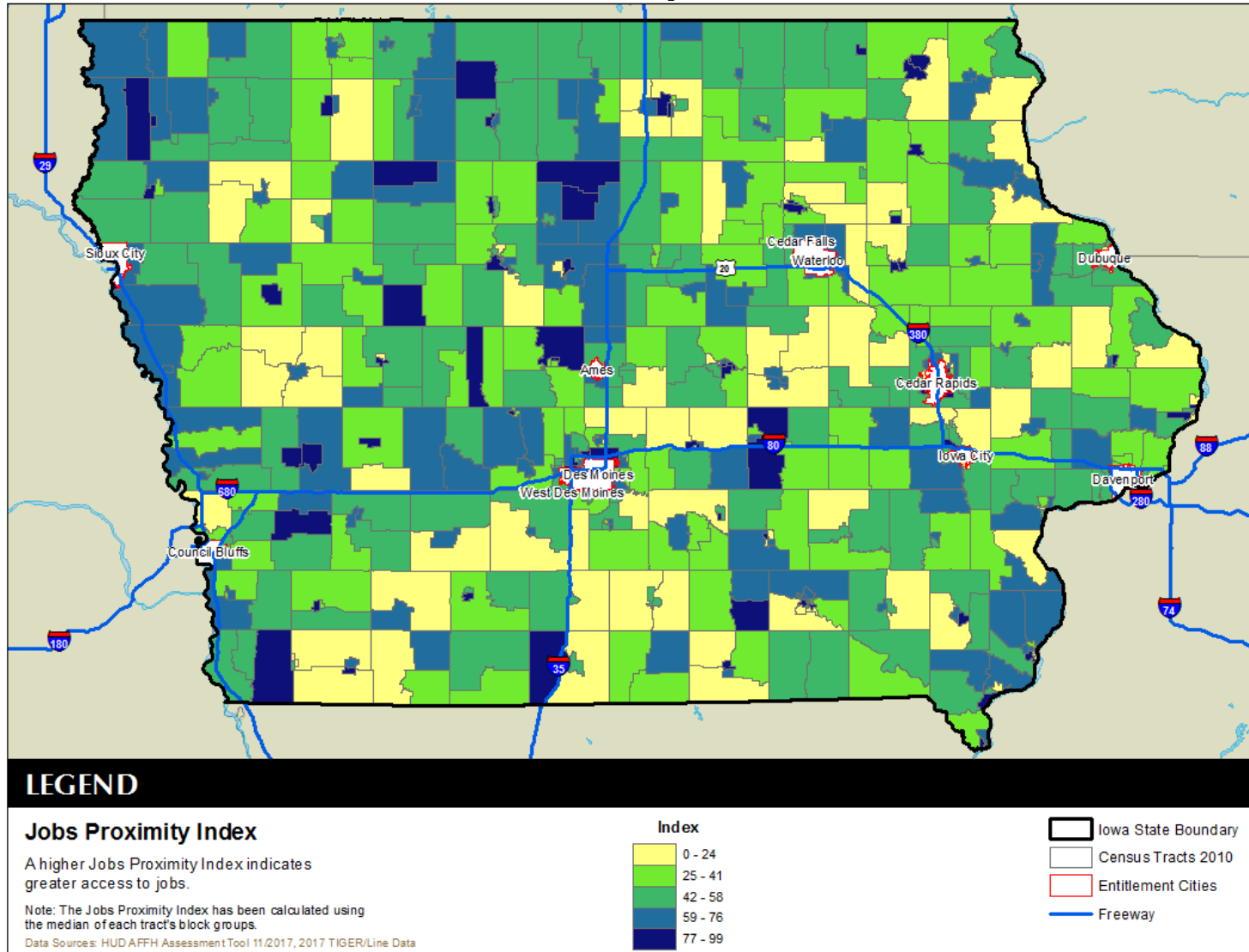
The Jobs Proximity Index measures the physical distances between place of residence and jobs by race/ethnicity, and is shown in Map IV.17. Job proximity varied widely across the State. As one would expect, more rural areas of the State tended to have lower job proximity indices. White, non-Hispanic households had the lowest jobs proximity index at 50.2, compared to black households at 56.9. However, there was little different across racial and ethnic groups in job proximity.

The Labor Market Engagement Index provides a measure of unemployment rate, labor-force participation rate, and percent of the population ages 25 and above with at least a bachelor's degree, by neighborhood. Map IV.18 shows the labor market engagement for the State. Areas adjacent to larger cities and entitlement areas had the highest rates of labor market engagement. These areas saw a labor market engagement index above 77, while some census tracts in the rural part of the State had index ratings less than 24. Hispanic households had labor market engagement index rates of 59.2 and black at 60.7, while white labor market engagement index levels were 67.6.

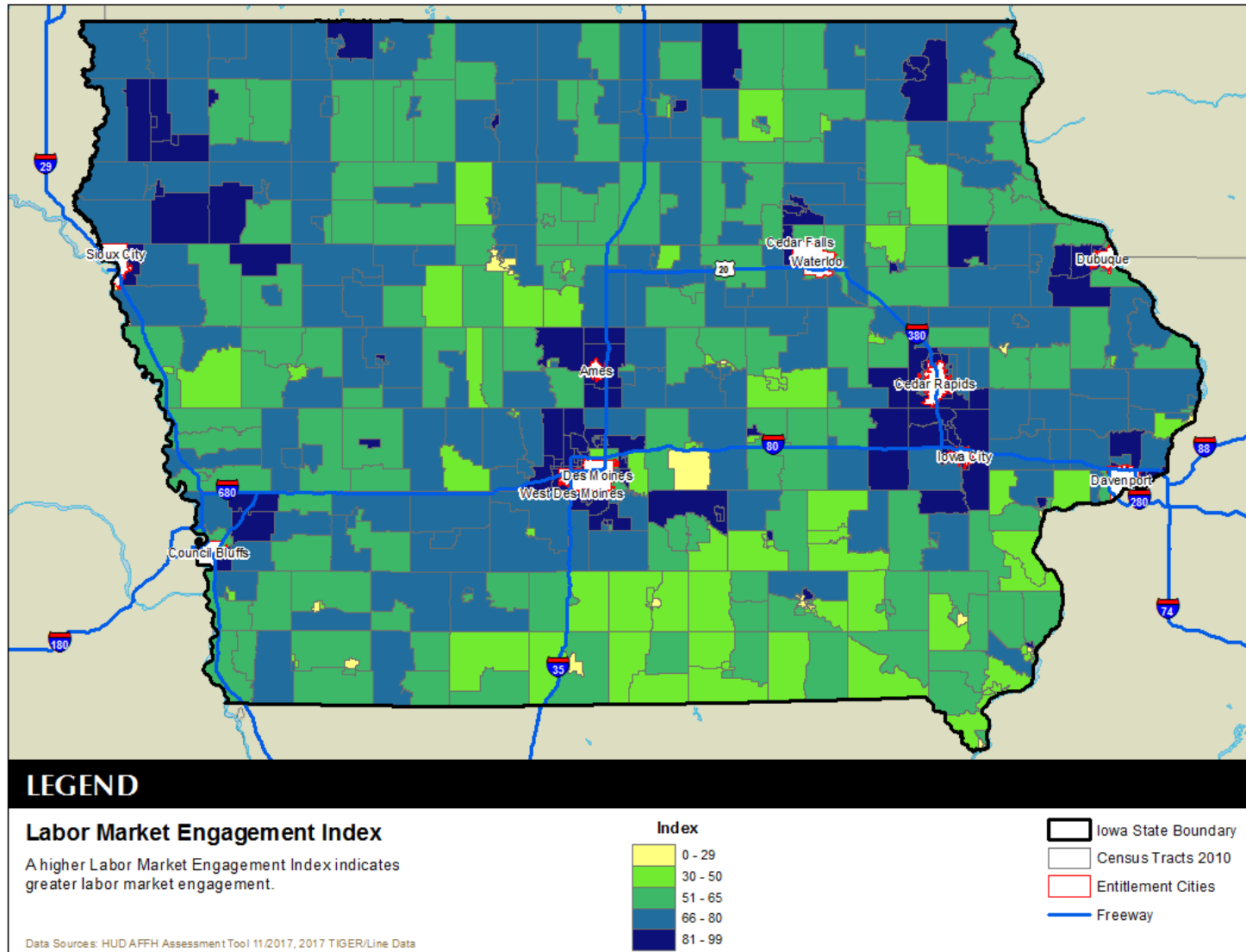
Groups with Little Job Access

Rural areas tended to have the lowest job proximity indices in the State, as well as the lowest rates of labor engagement, as seen in Maps IV.17 and IV.18. While the State does not see heavy concentrations of black or Hispanic households in any particular area of the State, black and Hispanic households tended to have lower labor market engagement than white and Asian households.

Map IV.17
Job Proximity Index
 Non-Entitlement Areas of Iowa
 HUD AFFH, Tigerline



Map IV.18
Labor Market Index
 Non-Entitlement Areas of Iowa
 HUD AFFH, Tigerline



TRANSPORTATION

The Transportation Trip Index measures proximity to public transportation by neighborhood. There was little difference in index rating across racial and ethnic groups. The State saw the highest transit trip index ratings in areas adjacent to larger cities and urban areas.

Black households had the highest transportation trip index ratings, meaning the highest rates of public transit use. White households, on the other hand, had the lowest transportation trip index rating in the non-entitlement areas of the State.

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

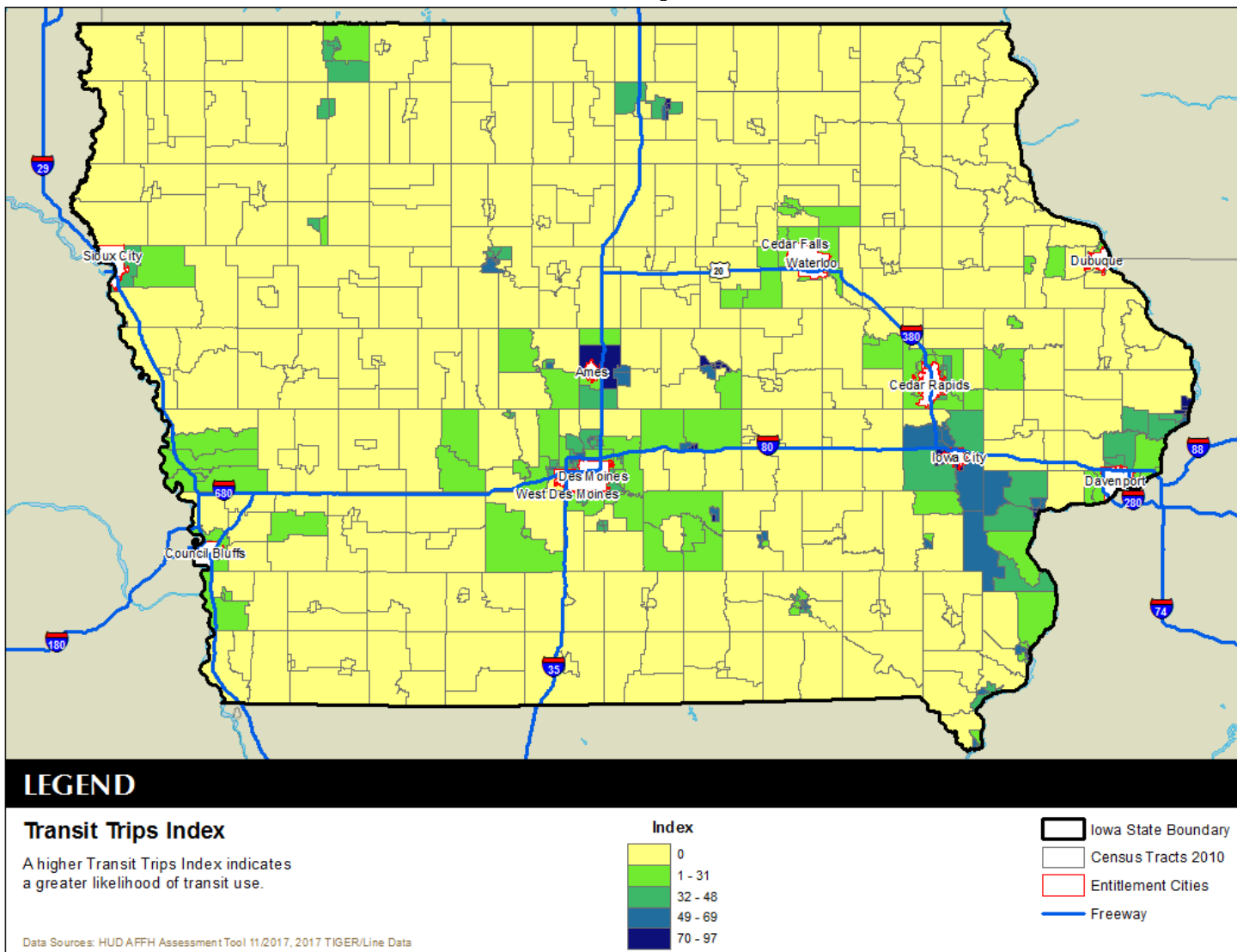
The Low Transportation Cost Index measures cost of transport and proximity to public transportation by neighborhood. This is shown in Map IV.20. Areas adjacent to larger cities and urban areas saw the highest transportation cost index rates, meaning the lowest cost of transportation. Conversely, the rest of the State saw low transportation cost index ratings, meaning higher costs for transportation. Black and Asian households had the highest transportation cost index ratings, while white and Hispanic households had lower indices.

Groups Lacking Affordable Transit from Home to Work

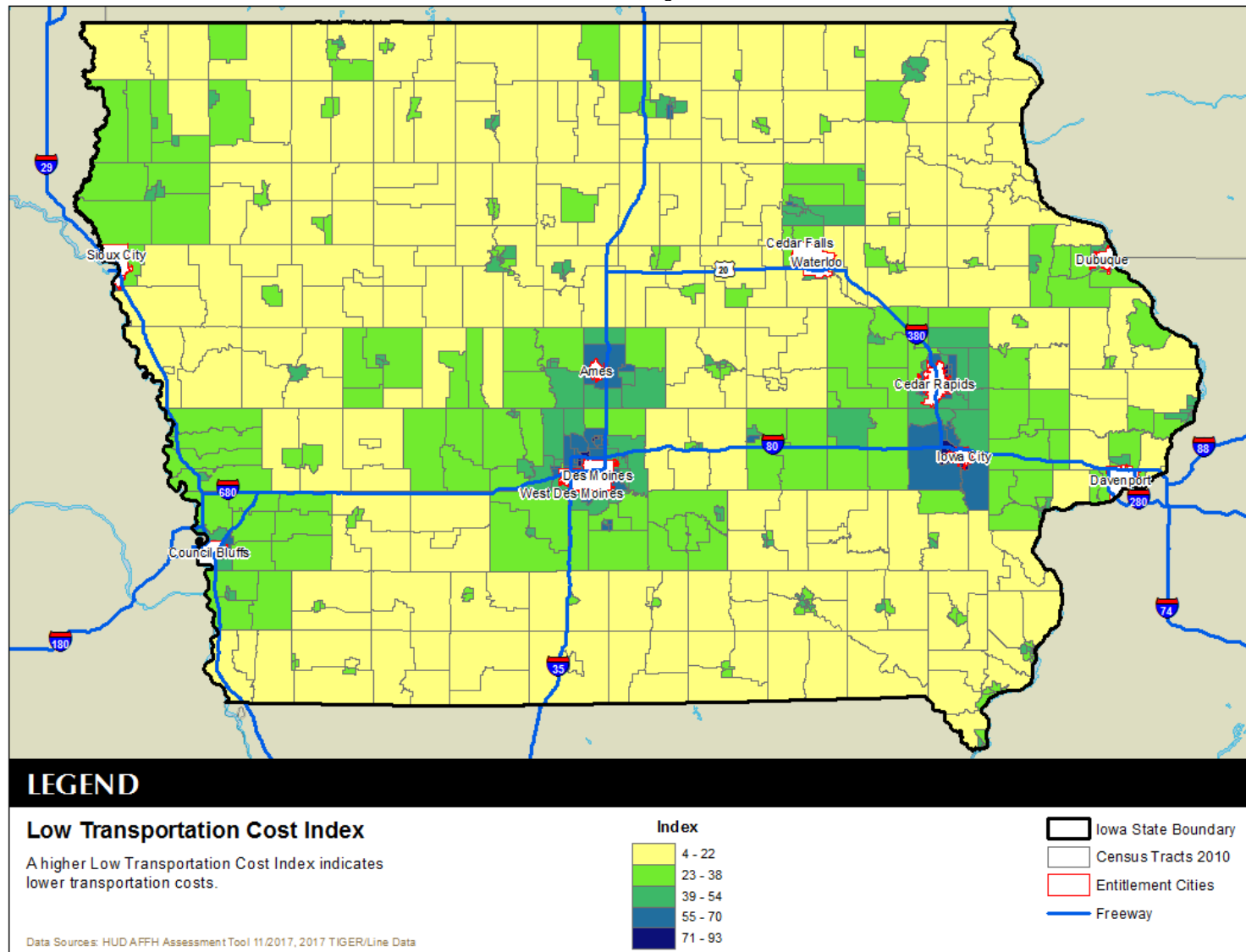
Households in rural areas of the State had less access to public transportation. In addition, white households had less access to public transportation than other racial and ethnic groups.

The Disability and Access workgroups found that transportation was a major barrier for persons with disabilities. This is discussed further in the ***Section G. Disability and Access.***

Map IV.19
Transit Trip Index
 Non-Entitlement Areas of Iowa
 HUD AFFH, Tigerline



Map IV.20
Transit Cost Index
 Non-Entitlement Areas of Iowa
 HUD AFFH, Tigerline



LOW POVERTY EXPOSURE OPPORTUNITIES

The Low Poverty Index uses rates of family poverty by household (based on the federal poverty line) to measure exposure to poverty by neighborhood. A higher score is more desirable, generally indicating less exposure to poverty at the neighborhood level.

The low poverty index is shown in Map IV.21. The Low Poverty Index uses rates of family poverty by household (based on the federal poverty line) to measure exposure to poverty by neighborhood. A higher score is more desirable, generally indicates less exposure to poverty at the neighborhood level. A higher index represents a lower level of exposure to poverty.

As mentioned previously, Hispanic households had the lowest low poverty index, at 51.1, followed by black households at 54.1. By contrast, white non-Hispanic households had a low poverty index of 62.6 and Asian households had an index of 64.5. Areas surrounding larger cities and urban areas tended to have higher low poverty index ratings.

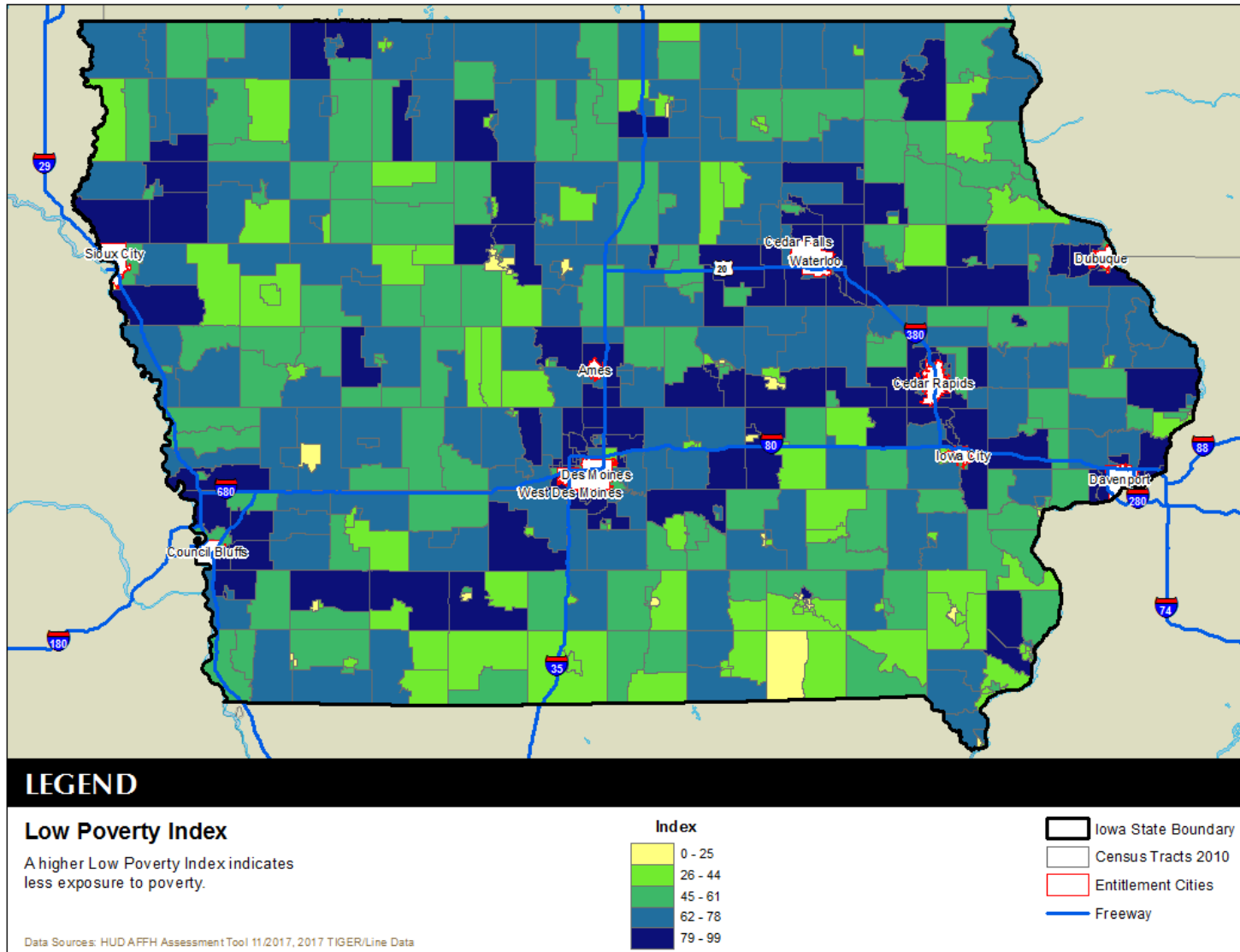
Place of Residence and Exposure to Poverty

As one might expect after looking at the labor market engagement index ratings, and previous poverty maps, households in rural areas of the state are more likely to be exposed to poverty. These households also tend to lack access to public transportation, have higher transportation costs, and lower school proficiency.

Groups Most Affected by Poverty

As shown in Diagram IV.7 on page 53, white and Asian/Pacific Islander residents had the greatest access to low poverty areas. By contrast, black and Hispanic residents faced considerably higher levels of exposure to poverty.

Map IV.21
Low Poverty Index
 Non-Entitlement Areas of Iowa
 HUD AFFH, Tigerline



ACCESS TO ENVIRONMENTALLY HEALTHY NEIGHBORHOODS

The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood. Large parts of the State do not have any data, and there is little to no variance among the areas that do have data available. Place of resident seems to have little impact on access to healthy neighborhoods.

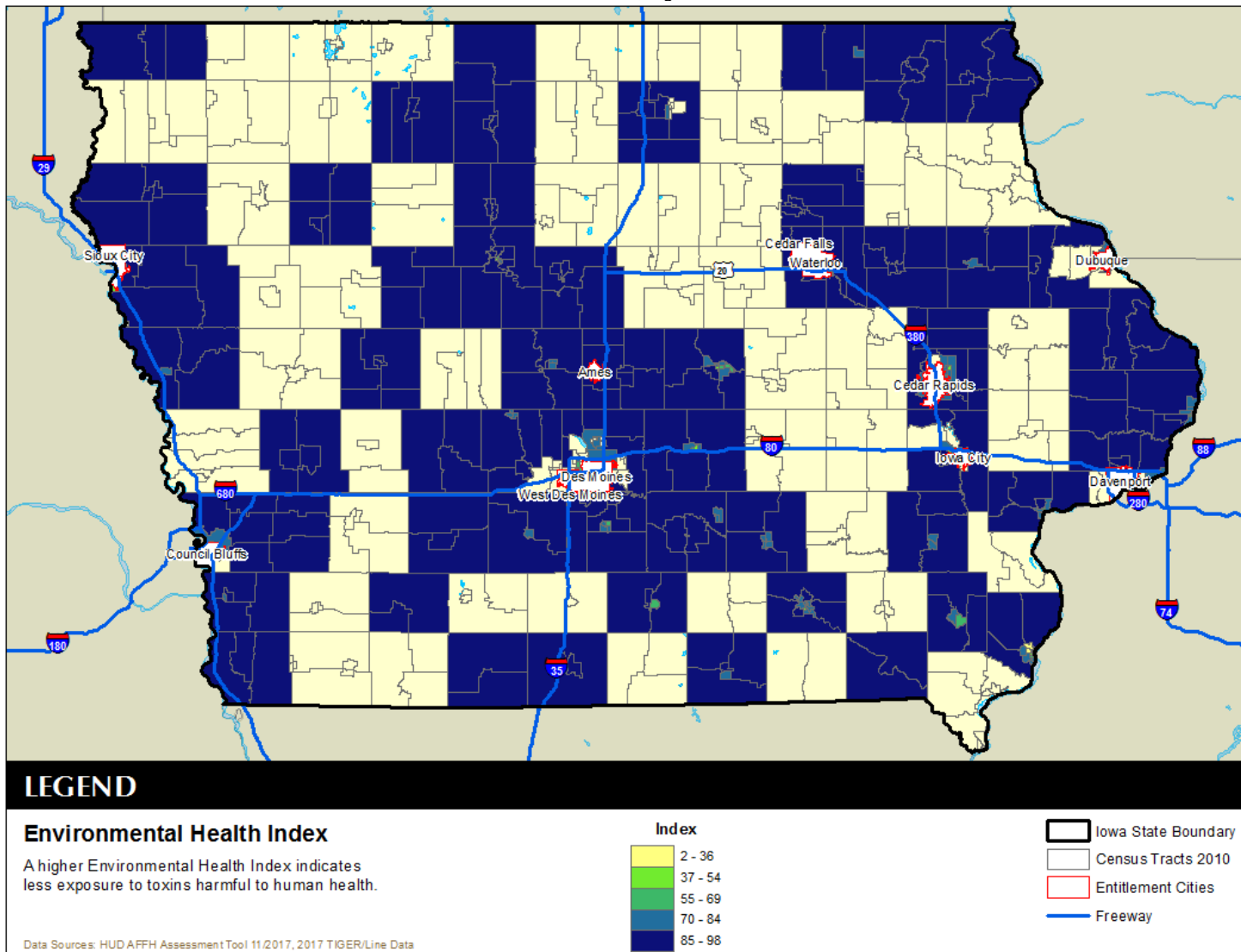
Access to Healthy Neighborhoods

Neither Diagram IV.10 nor Map IV.22 suggests that most racial and ethnic groups see a relatively high level of environmental health index ratings throughout the non-entitlement areas of the State. All environmental health index ratings were between 75.6 and 85.9. Black households do tend to have lower access to areas with environmental health, as this group has the lowest environmental health index. Overall, however, this index does not vary substantially by race or ethnicity.

PATTERNS IN DISPARITIES IN ACCESS TO OPPORTUNITY

The degree to which residents had access to low poverty areas and proficient grade schools differed depending on their race or ethnicity, particularly resulting in lower index rating for black and Hispanic households in the State. Labor market engagement also has a noticeable difference in index ratings by race, with black and Hispanic households experiencing a lower rating on those indices than other racial and ethnic groups. Other measures of opportunity (use of public transit, transportation costs, and environmental quality) did not differ dramatically by race or ethnicity.

Map IV.22
Environmental Health Index
 Non-Entitlement Areas of Iowa
 HUD AFFH, Tigerline



F. DISPROPORTIONATE HOUSING NEEDS

The Census Bureau collects data on several topics that HUD has identified as “housing problems”. For the purposes of this report, housing problems include overcrowding, incomplete plumbing or kitchen facilities, and cost-burden.

Overcrowding is defined as having from 1.1 to 1.5 people per room per residence, with severe overcrowding defined as having more than 1.5 people per room. Households with overcrowding are shown in Table IV.35. In 2016, an estimated 1.1 percent of households were overcrowded, and an additional 0.3 percent were severely overcrowded.

Table IV.35
Overcrowding and Severe Overcrowding

Non-Entitlement Area
2010 & 2016 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2010 Five-Year ACS	649,855	99.2%	4,278	0.7%	912	0.1%	655,045
2016 Five-Year ACS	647,289	99.1%	5,196	0.8%	961	0.1%	653,446
Renter							
2010 Five-Year ACS	184,453	97.7%	3,287	1.7%	975	0.5%	843,760
2016 Five-Year ACS	201,803	97.4%	4,002	1.9%	1,436	0.7%	207,241
Total							
2010 Five-Year ACS	834,308	98.9%	7,565	0.9%	1,887	0.2%	843,760
2016 Five-Year ACS	849,092	98.7%	9,198	1.1%	2,397	0.3%	860,687

Incomplete plumbing and kitchen facilities are another indicator of potential housing problems. According to the Census Bureau, a housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower. Likewise, a unit is categorized as deficient when any of the following are missing from the kitchen: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator.

There were a total of 3,614 households with incomplete plumbing facilities in 2016, representing 0.3 percent of households in Non-Entitlement Areas. This is compared to 0.3 percent of households lacking complete plumbing facilities in 2000.

Table IV.36
Households with Incomplete Plumbing Facilities

Non-Entitlement Area

2000 Census SF3 & 2010, 2016 Five-Year ACS Data

Households	2000 Census	2010 Five-Year ACS	2016 Five-Year ACS
With Complete Plumbing Facilities	794,732	840,174	858,058
Lacking Complete Plumbing Facilities	3,614	3,586	2,629
Total Households	798,346	843,760	860,687
Percent Lacking	0.3%	0.4%	0.3%

There were 3,911 households lacking complete kitchen facilities in 2016, compared to 798,346 households in 2000. This was a change from 0.5 percent of households in 2000 to 0.8 percent in 2016.

Table IV.37
Households with Incomplete Kitchen Facilities

Non-Entitlement Area

2000 Census SF3 & 2010, 2016 Five-Year ACS Data

Households	2000 Census	2010 Five-Year ACS	2016 Five-Year ACS
With Complete Kitchen Facilities	794,435	837,513	853,552
Lacking Complete Kitchen Facilities	3,911	6,247	7,135
Total Households	798,346	843,760	860,687
Percent Lacking	0.5%	0.7%	0.8%

Cost burden is defined as gross housing costs that range from 30.0 to 50.0 percent of gross household income; severe cost burden is defined as gross housing costs that exceed 50.0 percent of gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent and selected electricity and natural gas energy charges.

In Non-Entitlement Area, 12.6 of households had a cost burden and 8.3 percent had a severe cost burden. Some 18.7 percent of renters were cost burdened, and 16.6 percent were severely cost burdened. Owner-occupied households without a mortgage had a cost burden rate of 6.7 percent and a severe cost burden rate of 4.1 percent. Owner occupied households with a mortgage had a cost burden rate of 13.4 percent, and severe cost burden at 6.8 percent.

Table IV.38
Cost Burden and Severe Cost Burden by Tenure
 Non-Entitlement Area
 2010 & 2016 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2010 Five-Year ACS	302,559	75.9%	64,948	16.3%	30,369	7.6%	736	0.2%	398,612
2016 Five-Year ACS	305,536	79.4%	51,654	13.4%	26,304	6.8%	1,100	0.3%	384,594
Owner Without a Mortgage									
2010 Five-Year ACS	223,679	87.2%	19,934	7.8%	11,383	4.4%	1,437	0.6%	256,433
2016 Five-Year ACS	237,688	88.4%	18,047	6.7%	10,938	4.1%	2,179	0.8%	268,852
Renter									
2016 Five-Year ACS	102,185	54.1%	33,763	17.9%	31,259	16.6%	21,508	11.4%	188,715
2016 Five-Year ACS	112,092	54.1%	38,796	18.7%	34,417	16.6%	21,936	10.6%	207,241
Total									
2000 Census	628,423	74.5%	118,645	14.1%	73,011	8.7%	23,681	2.8%	843,760
2016 Five-Year ACS	655,316	76.1%	108,497	12.6%	71,659	8.3%	25,215	2.9%	860,687

Housing problems are more prominent for certain racial and ethnic groups in the non-entitlement areas of the State. Overall, black households are more likely than average to experience housing problems, with 44.7 percent of black households experiencing housing problems versus 21.6 percent of households overall. In addition, Hispanic experience housing problems at a rate of 36.5 percent. American Indian and “other” race households also experience housing problems at a disproportionate rate, but these households represent less than one percent of the population each.

Diagram IV.8
Percent of Households Experiencing a Housing Problem by Race
 Non-Entitlement Area of Iowa
 2010–2014 CHAS Data

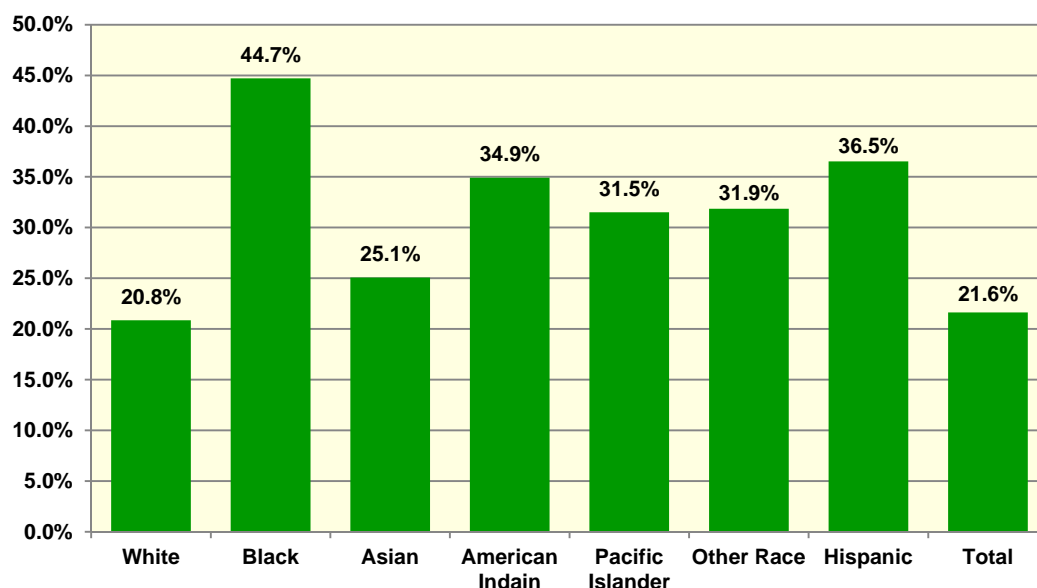


Table IV.39
Total Households with Housing Problems by Income and Race

Non-Entitlement Area
 2011–2015 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
30% HAMFI or less	60,290	2,130	476	302	14	778	3,000	66,990
30.1-50% HAMFI	46,980	980	322	166	35	515	2,561	51,559
50.1-80% HAMFI	34,770	259	436	122	10	202	1,970	37,769
80.1-100% HAMFI	11,590	117	141	21	0	46	392	12,307
100.1% HAMFI or more	15,930	117	319	55	4	150	510	17,085
Total	169,560	3,603	1,694	666	63	1,691	8,433	185,710
Total								
30% HAMFI or less	81,180	2,425	799	397	54	992	3,604	89,451
30.1-50% HAMFI	94,910	1,426	482	281	46	833	4,253	102,231
50.1-80% HAMFI	144,535	1,357	1,111	478	45	1,063	6,191	154,780
80.1-100% HAMFI	93,975	833	550	212	15	623	2,807	99,015
100.1% HAMFI or more	398,645	2,017	3,814	540	40	1,797	6,235	413,088
Total	813,245	8,058	6,756	1,908	200	5,308	23,090	858,565

While some 20.0 percent of the total population experiences a cost burden, according to 2014 CHAS data, different households are impacted at various rates. Elderly non-family households are impacted at the highest rate, with 33.5 percent of these households facing cost burdens or severe cost burdens. For household earning less than 30 percent HAMFI large families face cost burdens and severe cost burdens at a rate of 83.5 percent, while small families face cost burdens at this income level face cost burdens at a rate of 82.4 percent.

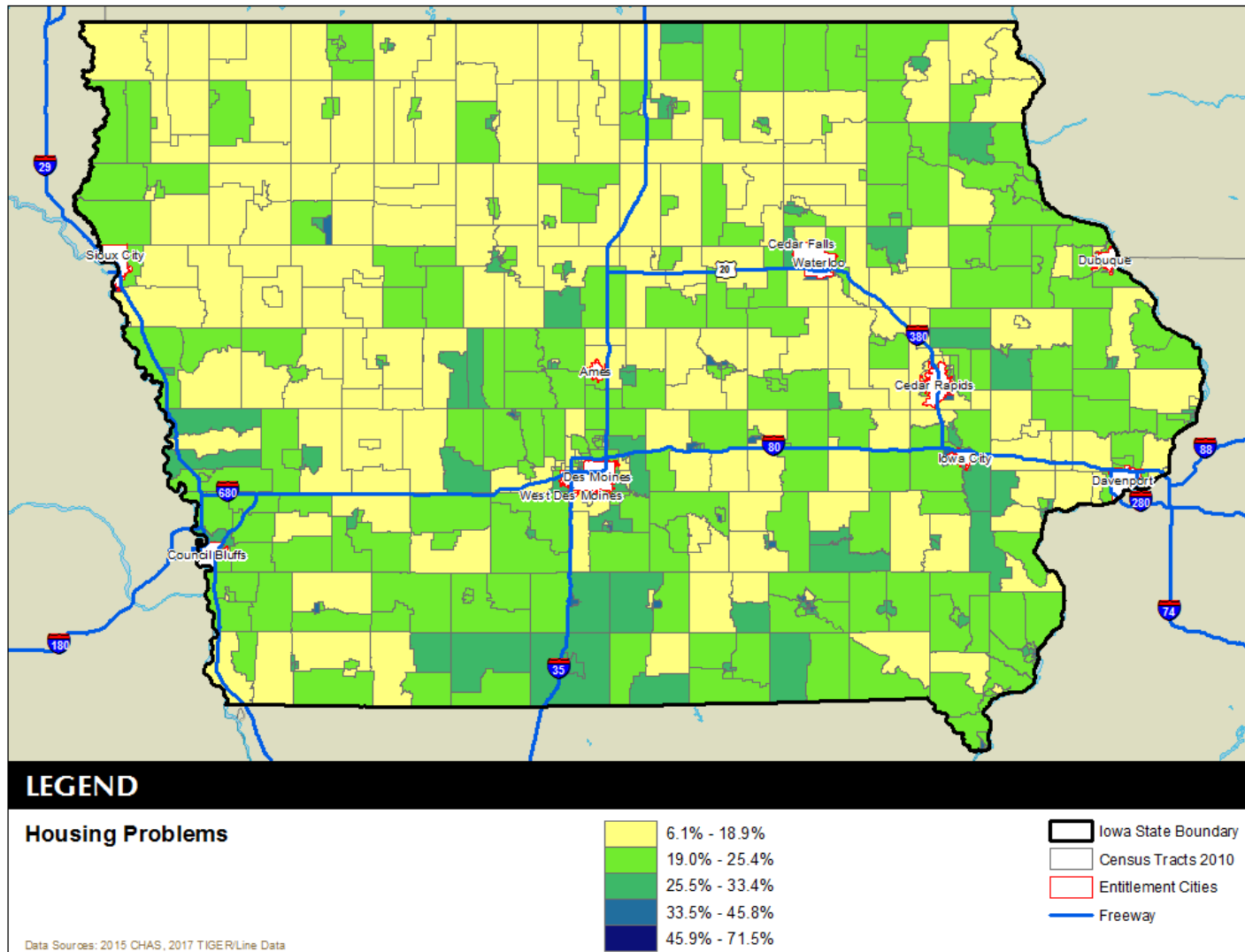
Table IV.40
Households by Income and Family Status and Cost Burden
 Non-Entitlement Area
 2011–2015 HUD CHAS Data

Income	Elderly Family	Small Family	Large Family	Elderly Non- Family	Other Household	Total
Cost Burden						
30% HAMFI or less	1,732	4,200	861	7,755	5,450	19,998
30.1-50% HAMFI	3,372	10,470	2,710	9,190	8,935	34,677
50.1-80% HAMFI	4,227	10,190	2,361	3,801	6,830	27,409
80.1% -100.0% HAMFI	1,690	4,185	746	814	1,851	9,286
100.1% HAMFI or more	2,221	5,916	835	662	1,871	11,505
Total	13,242	34,961	7,513	22,222	24,937	102,875
Severe Cost Burden						
30% HAMFI or less	2,490	14,005	2,300	11,720	15,300	45,815
30.1-50% HAMFI	1,726	4,100	993	4,975	3,160	14,954
50.1-80% HAMFI	1,137	1,986	365	1,160	1,230	5,878
80.1% -100.0% HAMFI	271	610	100	202	192	1,375
100.1% HAMFI or more	213	551	30	331	154	1,279
Total	5,837	21,252	3,788	18,388	20,036	69,301
Total						
30% HAMFI or less	5,895	22,086	3,787	29,571	28,037	89,376
30.1-50% HAMFI	15,608	24,265	6,250	34,135	21,955	102,213
50.1-80% HAMFI	31,364	49,216	12,816	26,526	34,795	154,717
80.1% -100.0% HAMFI	20,011	39,230	9,301	10,026	20,438	99,006
100.1% HAMFI or more	77,954	227,112	36,300	20,988	50,735	413,089
Total	150,832	361,909	68,454	121,246	155,960	858,401

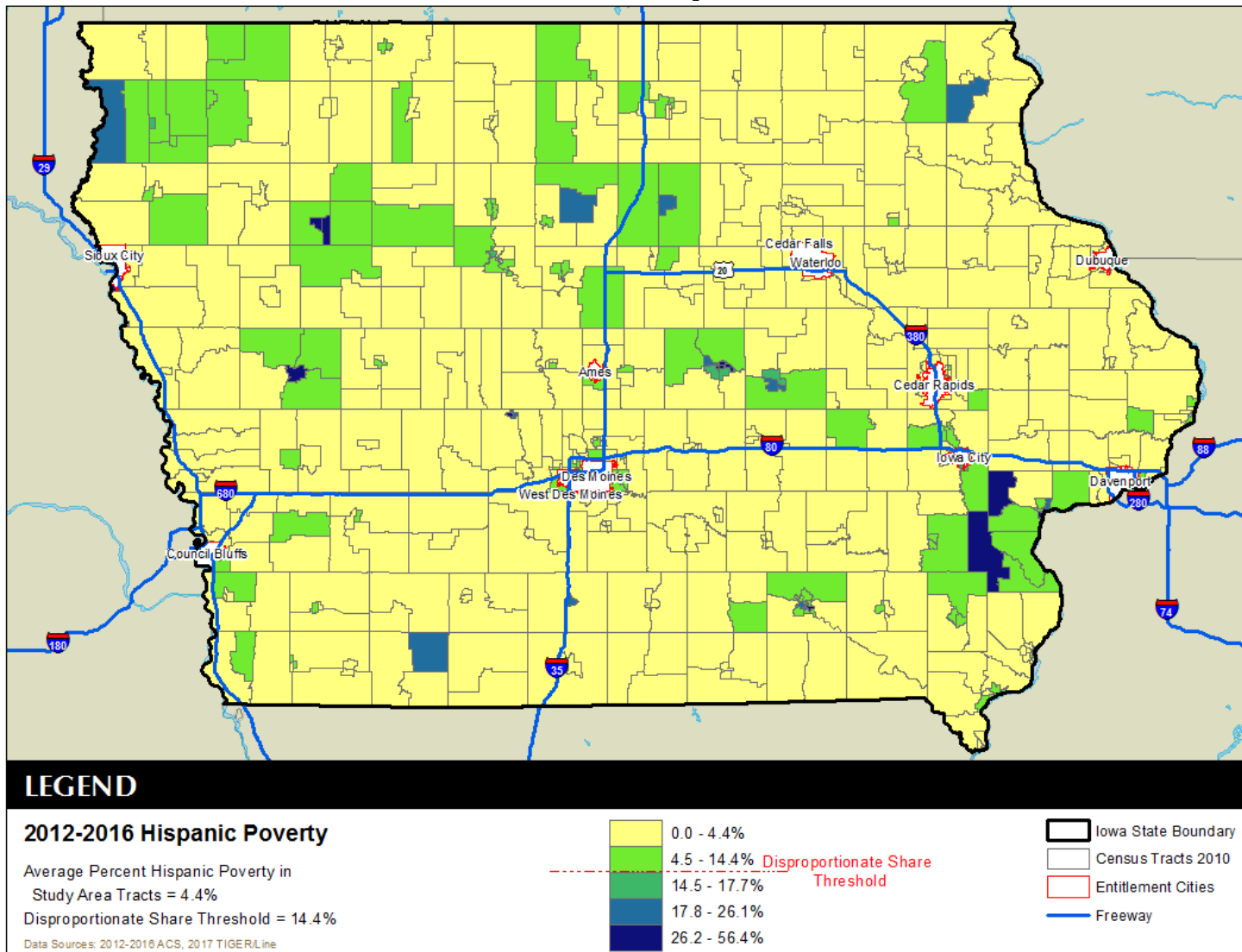
Geographic Distribution of Housing Problems

There are certain areas in the non-entitlement areas of State that experienced a higher rate of housing problems than others. Several census tracts in rural areas of the State, as well as areas adjacent to Des Moines and Iowa City had households that experienced housing problems at rates exceeding 33.5 percent. These census tracts with higher rates of housing problems corresponded with some areas with higher concentrations of poverty for Hispanic and black households. These are shown in Maps IV.24 and IV.25.

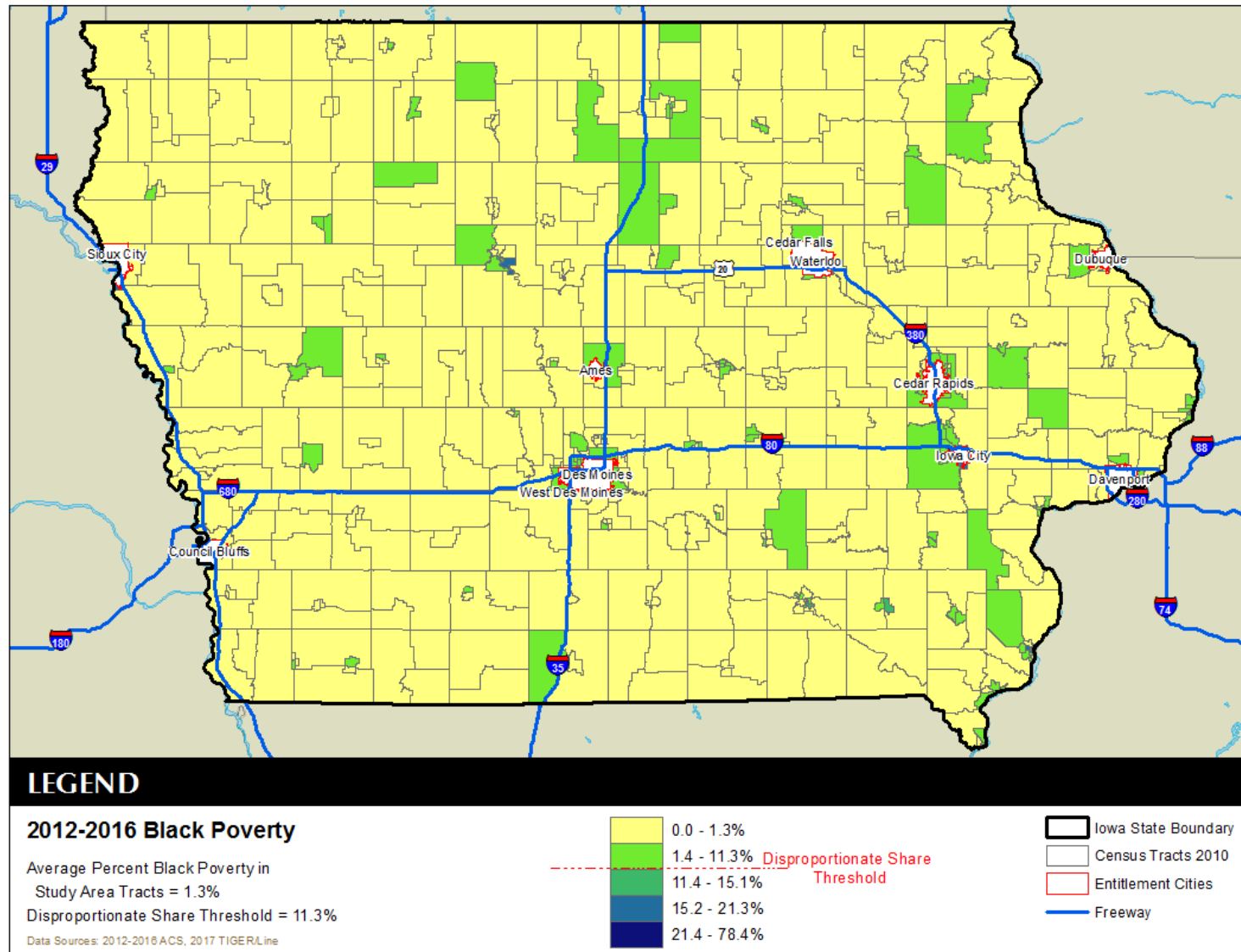
Map IV.23
Housing Problems
 Non-Entitlement Areas of Iowa
 2015 CHAS, Census Tigerline



Map IV.24
Hispanic Poverty
 Non-Entitlement Areas of Iowa
 2016ACS, Census Tigerline



Map IV.25
Black Poverty
 Non-Entitlement Areas of Iowa
 2016ACS, Census Tigerline



ACCESS TO MORTGAGE FINANCE SERVICES

Congress enacted the Home Mortgage Disclosure Act in 1975, permanently authorizing the law in 1988⁴. The Act requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans. Under the HMDA, financial institutions are required to report the race, ethnicity, sex, loan amount, and income of mortgage applicants and borrowers by Census tract. Institutions must meet a set of reporting criteria. For depository institutions, these are as follows:

1. The institution must be a bank, credit union, or savings association;
2. The total assets must exceed the coverage threshold;⁵
3. The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA);
4. The institution must have originated or refinanced at least one home purchase loan secured by a first lien on a one- to four-family dwelling;
5. The institution must be federally insured or regulated; and
6. The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac.

For other institutions, including non-depository institutions, the reporting criteria are:

1. The institution must be a for-profit organization;
2. The institution's home purchase loan originations must equal or exceed 10 percent of the institution's total loan originations, or more than \$25 million;
3. The institution must have had a home or branch office in an MSA or have received applications for, originated, or purchased five or more home purchase loans, home improvement loans, or refinancing on property located in an MSA in the preceding calendar year; and
4. The institution must have assets exceeding \$10 million or have originated 100 or more home purchases in the preceding calendar year.

In addition to reporting race and ethnicity data for loan applicants, the HMDA reporting requirements were modified in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

1. If they are HOEPA loans;
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
3. Presence of high-annual percentage rate loans (HALs), defined as more than three percentage points for purchases when contrasted with comparable treasury instruments or five percentage points for refinance loans.

For the purposes of this analysis, these flagged originations will be termed predatory, or at least predatory in nature. Overall, the data contained within the HMDA reporting guidelines represent the best and most complete set of information on home loan applications. This report

⁴ Prior to that year, Congress had to periodically reauthorize the law.

⁵ Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

includes HMDA data from 2008 through 2016, the most recent year for which these data are available.

Table IV.41 shows the purpose of loan by year for non-entitlement areas from 2008 to 2016. As seen therein, there were over 1,148,833 loans during this time period, of these some 413,189 were for home purchases. In 2016, there were 121,899 loans, of which 57,024 were for home purchases.

Table IV.41
Purpose of Loan by Year

Non Entitled Area
2008–2016 HMDA Data

Purpose	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total
Home Purchase	45,371	44,496	38,480	36,966	40,409	48,325	48,274	53,844	57,024	413,189
Home Improvement	12,751	9,760	8,853	7,271	7,401	8,092	8,118	9,018	9,035	80,299
Refinancing	67,895	106,539	90,282	77,639	100,941	73,303	35,597	47,309	55,840	655,345
Total	126,017	160,795	137,615	121,876	148,751	129,720	91,989	110,171	121,899	1,148,833

Table IV.42 shows the occupancy status for loan applicants. A vast majority of applicants were or owner-occupied units, accounting for 93.6 percent between 2008 and 2016, and for 93.5 percent in 2016 alone.

Table IV.42
Occupancy Status for Applications

Non Entitled Area
2008–2016 HMDA Data

Status	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total
Owner-Occupied	117,311	153,598	130,110	113,662	139,394	119,999	84,582	102,272	114,023	1,074,951
Not Owner-Occupied	8,448	6,774	7,184	7,955	8,973	9,322	7,195	7,753	7,731	71,335
Not Applicable	258	423	321	259	384	399	212	146	145	2,547
Total	126,017	160,795	137,615	121,876	148,751	129,720	91,989	110,171	121,899	1,148,833

Owner-occupied home purchase loan applications by loan types are shown in Table IV.43. Between 2008 and 2016, some 64.7 percent of home loan purchases were conventional loans, another 22.2 percent were FHA insured, some 7.5 percent were Rural Housing Service or Farm Service Agency, and 5.6 were VA Guaranteed.

Table IV.43
Owner-Occupied Home Purchase Loan Applications by Loan Type

Non Entitled Area
2008–2016 HMDA Data

Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total
Conventional	27,919	21,995	18,787	19,377	23,302	30,668	31,101	34,371	37,444	244,964
FHA - Insured	10,180	14,785	13,115	9,735	7,703	6,677	5,942	7,890	8,052	84,079
VA - Guaranteed	1,416	1,809	1,590	1,848	2,071	2,471	2,935	3,357	3,564	21,061
Rural Housing Service or Farm Service Agency	1,599	2,977	1,832	2,379	3,622	4,434	4,259	3,912	3,596	28,610
Total	41,114	41,566	35,324	33,339	36,698	44,250	44,237	49,530	52,656	378,714

Denial Rates

After the owner-occupied home purchase loan application is submitted, the applicant receives one of the following status designations:

- “Originated,” which indicates that the loan was made by the lending institution;
- “Approved but not accepted,” which notes loans approved by the lender but not accepted by the applicant;
- “Application denied by financial institution,” which defines a situation wherein the loan application failed;
- “Application withdrawn by applicant,” which means that the applicant closed the application process;
- “File closed for incompleteness” which indicates the loan application process was closed by the institution due to incomplete information; or
- “Loan purchased by the institution,” which means that the previously originated loan was purchased on the secondary market.

As shown in Table IV.44, just over 235,228 home purchase loan applications were originated over the 2008-2016 period, and 27,972 were denied.

Table IV.44
Loan Applications by Action Taken
Non Entitled Area
2008–2016 HMDA Data

Action	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total
Loan Originated	23,884	24,872	21,215	20,177	22,853	27,308	28,833	31,759	34,327	235,228
Application Approved but not Accepted	1,946	1,423	1,200	1,239	1,058	1,298	1,127	1,217	1,340	11,848
Application Denied	3,304	3,008	2,566	2,380	2,748	3,143	3,280	3,662	3,881	27,972
Application Withdrawn by Applicant	2,006	2,067	1,829	1,648	1,574	1,854	2,299	2,602	2,987	18,866
File Closed for Incompleteness	601	327	243	249	264	312	253	232	291	2,772
Loan Purchased by the Institution	9,370	9,857	8,271	7,646	8,201	10,334	8,443	10,058	9,830	82,010
Preapproval Request Denied	1	12	0	0	0	1	0	0	0	14
Preapproval Approved but not Accepted	2	0	0	0	0	0	2	0	0	4
Total	41,114	41,566	35,324	33,339	36,698	44,250	44,237	49,530	52,656	378,714

The most common reasons cited in the decision to deny one of these loan applications related to the credit history of the prospective homeowner, as shown in Table IV.45. Debt-to-income ratio and collateral were also commonly given as reasons to deny home purchase loans.

Table IV.45
Loan Applications by Reason for Denial
Non Entitled Area
2008–2016 HMDA Data

Denial Reason	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total
Debt-to-Income Ratio	498	534	433	382	411	527	489	588	604	4,466
Employment History	101	104	94	92	108	87	92	111	130	919
Credit History	723	676	674	556	614	567	548	670	712	5,740
Collateral	346	393	328	254	299	325	313	353	361	2,972
Insufficient Cash	92	79	89	63	79	87	92	93	100	774
Unverifiable Information	104	71	46	54	88	78	68	71	93	673
Credit Application Incomplete	234	145	108	68	95	173	301	397	431	1,952
Mortgage Insurance Denied	16	7	9	7	7	3	6	5	2	62
Other	209	180	154	94	99	131	169	206	214	1,456
Missing	981	819	631	810	948	1,165	1,202	1,168	1,234	8,958
Total	3,304	3,008	2,566	2,380	2,748	3,143	3,280	3,662	3,881	27,972

Denial rates were observed to differ by race and ethnicity, as shown in Table IV.46. While white applicants had a denial rate of 10.2 over the period from 2008 through 2016, black had a denial rate of 15.9 percent. Hispanic denial rates were also higher than average, at 17.3 percent.

Table IV.46
Denial Rates by Race/Ethnicity of Applicant

Non Entitled Area
2004–2016 HMDA Data

Race/Ethnicity	2008	2009	2010	2011	2012	2013	2014	2015	2016	Average
American Indian	17.1%	13.8%	31.8%	17.8%	26.6%	16.7%	12.6%	17.2%	18.3%	18.4%
Asian	13.5%	11.8%	12.3%	6.1%	10.9%	12.1%	10.0%	6.3%	8.6%	9.9%
Black	20.5%	16.5%	18.2%	15.8%	13.4%	17.3%	16.7%	15.1%	12.1%	15.9%
Pacific Islander	17.4%	12.5%	11.4%	20.7%	24.1%	2.8%	11.6%	4.5%	20.7%	13.9%
White	11.5%	10.4%	10.3%	10.2%	10.3%	9.7%	9.9%	10.1%	10.0%	10.2%
Not Available	18.8%	15.0%	15.4%	15.9%	18.0%	19.5%	15.2%	14.8%	12.9%	16.0%
Not Applicable	10.0%	7.1%	10.0%	0.0%	0.0%	6.2%	0.0%	33.3%	0.0%	7.3%
Average	12.2%	10.8%	10.8%	10.6%	10.7%	10.3%	10.2%	10.3%	10.2%	10.6%
Hispanic	18.4%	20.7%	18.6%	18.4%	15.9%	16.8%	17.3%	16.6%	15.0%	17.3%
Non-Hispanic	11.5%	10.2%	10.2%	10.0%	10.2%	9.6%	9.6%	9.9%	9.8%	10.1%

As shown in Table IV.47, the denial rate for prospective female homeowners was 11.2 percent, just over one percentage points higher than the denial rate for male applicants at 10.0 percent. Denial rates for male and female applicants differed considerably by year, but each year the rate of female denials were higher than that of males.

Table IV.47
Denial Rates by Gender of Applicant

Non Entitled Area
2008–2016 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2008	11.1%	13.3%	22.7%	10.5%	12.2%
2009	10.4%	10.8%	18.5%	7.1%	10.8%
2010	10.4%	11.0%	15.9%	18.2%	10.8%
2011	9.8%	11.5%	17.8%	0.0%	10.6%
2012	9.8%	11.7%	22.0%	0.0%	10.7%
2013	9.6%	10.7%	22.2%	0.0%	10.3%
2014	9.8%	10.4%	18.8%	0.0%	10.2%
2015	9.7%	11.2%	15.7%	33.3%	10.3%
2016	9.8%	10.6%	12.4%	0.0%	10.2%
Average	10.0%	11.2%	18.0%	7.3%	10.6%

Predatory Lending

In addition to modifications implemented in 2004 to correctly document loan applicants' race and ethnicity, the HMDA reporting requirements were changed in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

1. If they are HOEPA loans;
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and

- Presence of high annual percentage rate (APR) loans (HALs), defined as more than three percentage points higher than comparable treasury rates for home purchase loans, or five percentage points higher for refinance loans.

Home loans are designated as “high-annual percentage rate” loans (HALs) where the annual percentage rate on the loan exceeds that of a comparable treasury instruments by at least three percentage points. As shown in Table IV.48, some 4,467 loans between 2008 and 2016 were HALs, accounting for 1.9 percent. The highest rate of HAL loans was seen in 2008, at 9.7 percent, which fell to 0.3 percent in 2016.

Table IV.48
Originated Owner-Occupied Loans by HAL Status

Non Entitled Area
2008–2016 HMDA Data

Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total
HAL	2,312	1,316	111	145	169	121	70	107	116	4,467
Other	21,572	23,556	21,104	20,032	22,684	27,187	28,763	31,652	34,211	230,761
Total	23,884	24,872	21,215	20,177	22,853	27,308	28,833	31,759	34,327	235,228
Percent HAL	9.7%	5.3%	0.5%	0.7%	0.7%	0.4%	0.2%	0.3%	0.3%	1.9%

While white households experienced HAL rates at 1.9 percent between 2008 and 2016, black households had a rate of HALs at 2.7 percent, and black households at 1.7 percent. In addition, Hispanic households had HAL rates of 2.8 percent between 2008 and 2016.

Table IV.49
Originated Owner-Occupied Loans by HAL Status

Non Entitled Area
2008–2016 HMDA Data

Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total
HAL	2,312	1,316	111	145	169	121	70	107	116	4,467
Other	21,572	23,556	21,104	20,032	22,684	27,187	28,763	31,652	34,211	230,761
Total	23,884	24,872	21,215	20,177	22,853	27,308	28,833	31,759	34,327	235,228
Percent HAL	9.7%	5.3%	0.5%	0.7%	0.7%	0.4%	0.2%	0.3%	0.3%	1.9%

HAL rates were above average for borrowers earning less than \$50,000 per year as shown in Table I.20. For those earning between \$75,001 and above, the HAL rate was 1.3 percent.

Table IV.50
Rates of HALs by Income of Borrower

Non Entitled Area
2008–2016 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	2015	2016	Average
\$30,000 or Below	17.0%	7.9%	0.9%	1.3%	1.2%	1.0%	0.9%	0.9%	0.5%	4.1%
\$30,001–\$50,000	11.2%	5.0%	0.4%	0.5%	0.9%	0.4%	0.2%	0.4%	0.4%	2.2%
\$50,001–\$75,000	8.5%	4.8%	0.5%	0.6%	0.6%	0.5%	0.2%	0.3%	0.2%	1.7%
\$75,001–\$100,000	6.8%	4.9%	0.4%	0.8%	0.7%	0.4%	0.2%	0.2%	0.2%	1.3%
\$100,00–\$150,000	6.6%	4.0%	0.5%	1.0%	0.4%	0.3%	0.1%	0.1%	0.3%	1.1%
Above \$150,000	6.1%	6.0%	0.8%	0.5%	0.8%	0.2%	0.2%	0.2%	0.5%	1.2%
Data Missing	8.1%	5.8%	0.2%	1.0%	0.8%	0.3%	0.2%	1.3%	1.4%	1.9%
Average	9.7%	5.3%	0.5%	0.7%	0.7%	0.4%	0.2%	0.3%	0.3%	1.9%

G. PUBLICLY SUPPORTED HOUSING ANALYSIS

There are a variety of types and locations of public housing units outside entitlements in Iowa. Found in both rural settings and adjacent to urban centers in the State. According to the HUD AFFH database, there are 21,714 total publicly supported housing units in the non-entitlement areas of the State. Some 6,067 of these units are for persons with disabilities. The most common assisted units are housing choice vouchers, as seen in Table IV.51, below.

Table IV.51
Residents with Disabilities by Subsidized Housing Type

Non-Entitlement Area
HUD AFFH Raw Database

Program	Total	Total Disabled Units
Public Housing	3,126	896
Project Based Section 8	5,270	1,713
Other HUD Multifamily	800	130
Housing Choice Vouchers	12,518	3,328
Total	21,714	6,067

Map IV.26 shows the public housing units in the non-entitlement areas of the State. While units are found throughout the State, there are more units found in the southern portion of the State.

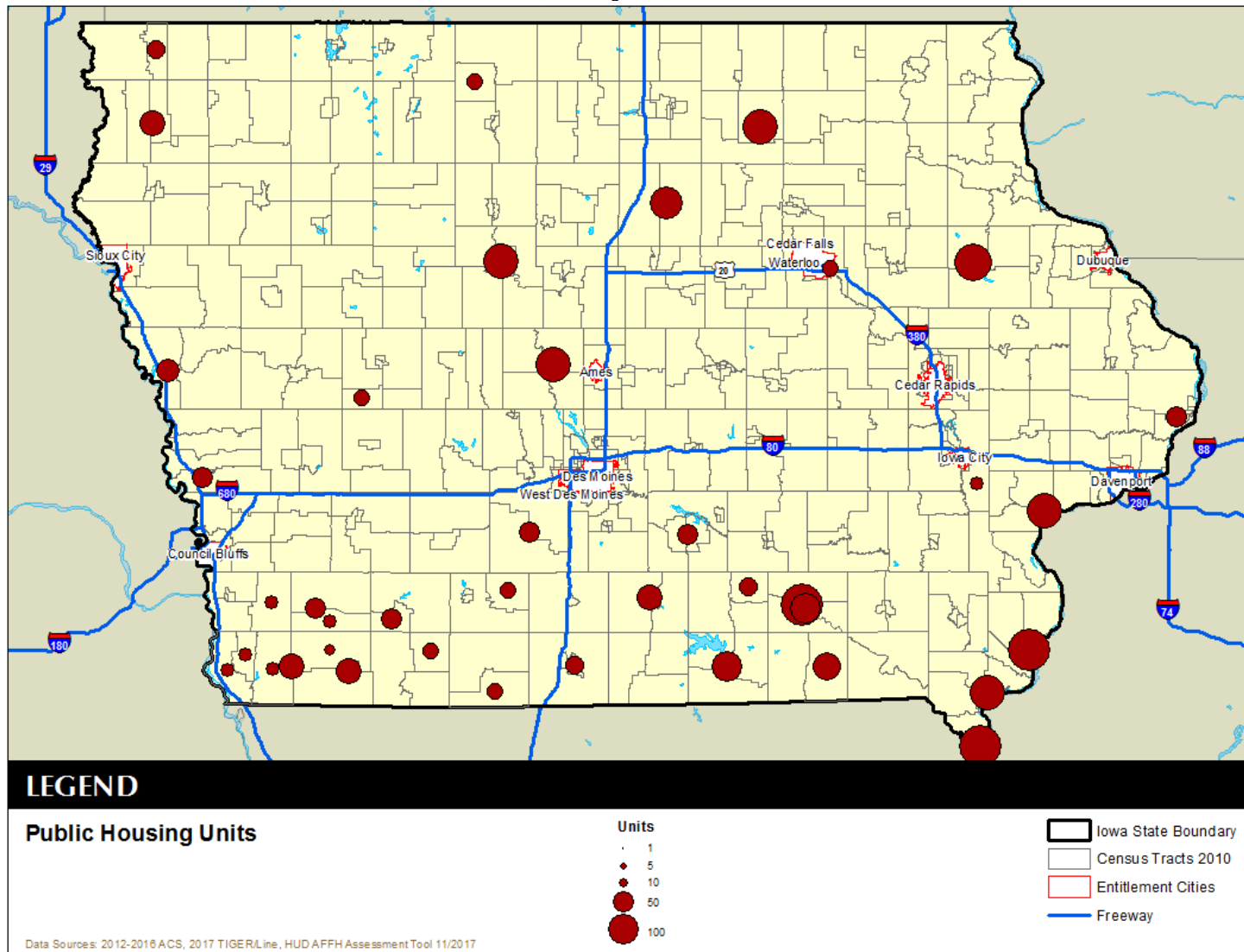
Project-based Section 8 units are shown in Map IV.27. These units are spread more throughout the State, and found in more rural areas as well as areas adjacent to urban centers. Other assisted multi-family units are shown in Map IV.28.

Housing choice voucher units are shown in Map IV.29. Voucher use is prevalent throughout the State and more heavily concentrated near urban areas, assumedly due to larger populations.

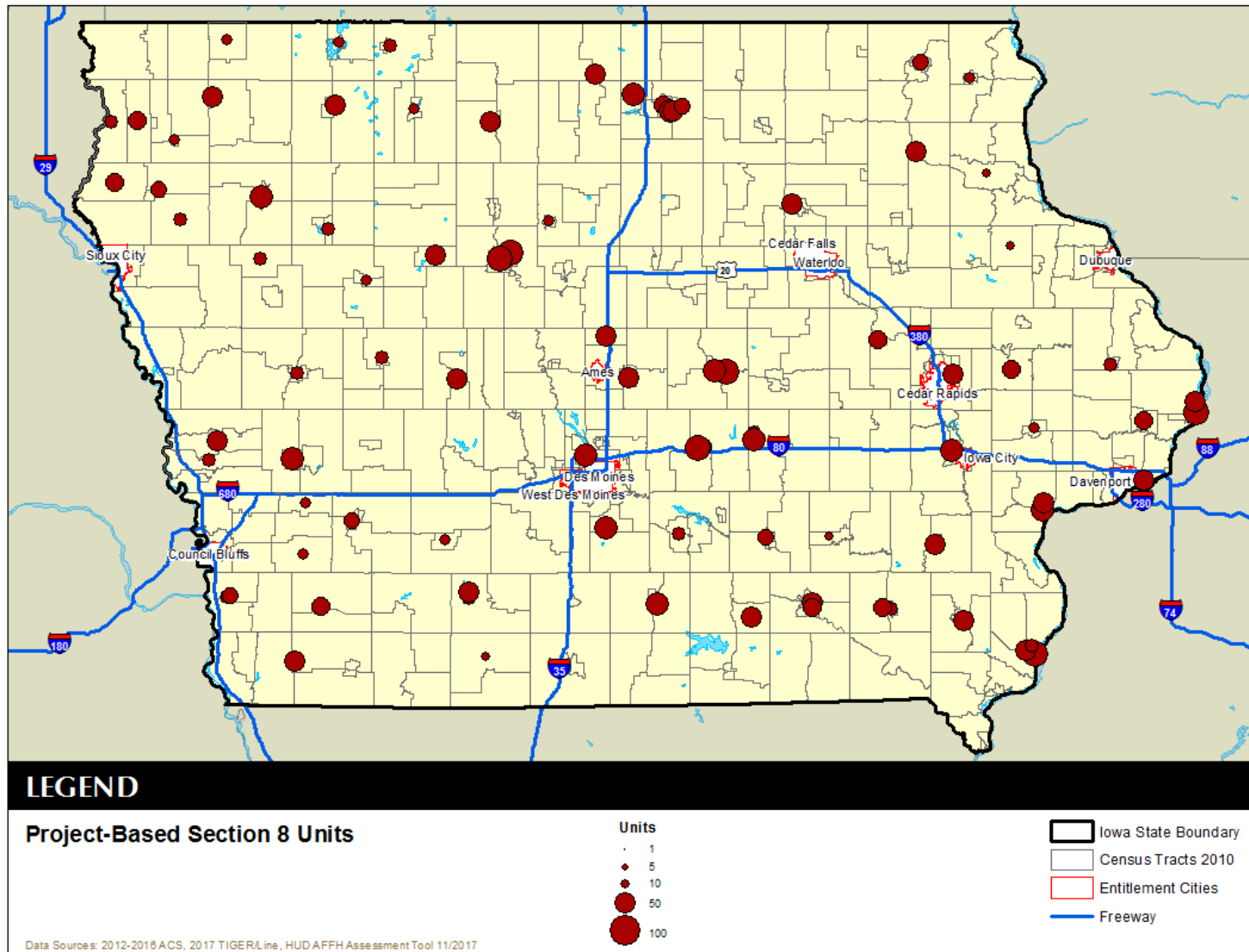
Disparities in Access to Opportunity

The locations of publicly supported housing units are in areas with both high and low access to opportunity, such as low poverty areas. Even when considering the rural nature of parts of the State, the availability of public housing units throughout the State does not appear to impede access to services and opportunity areas.

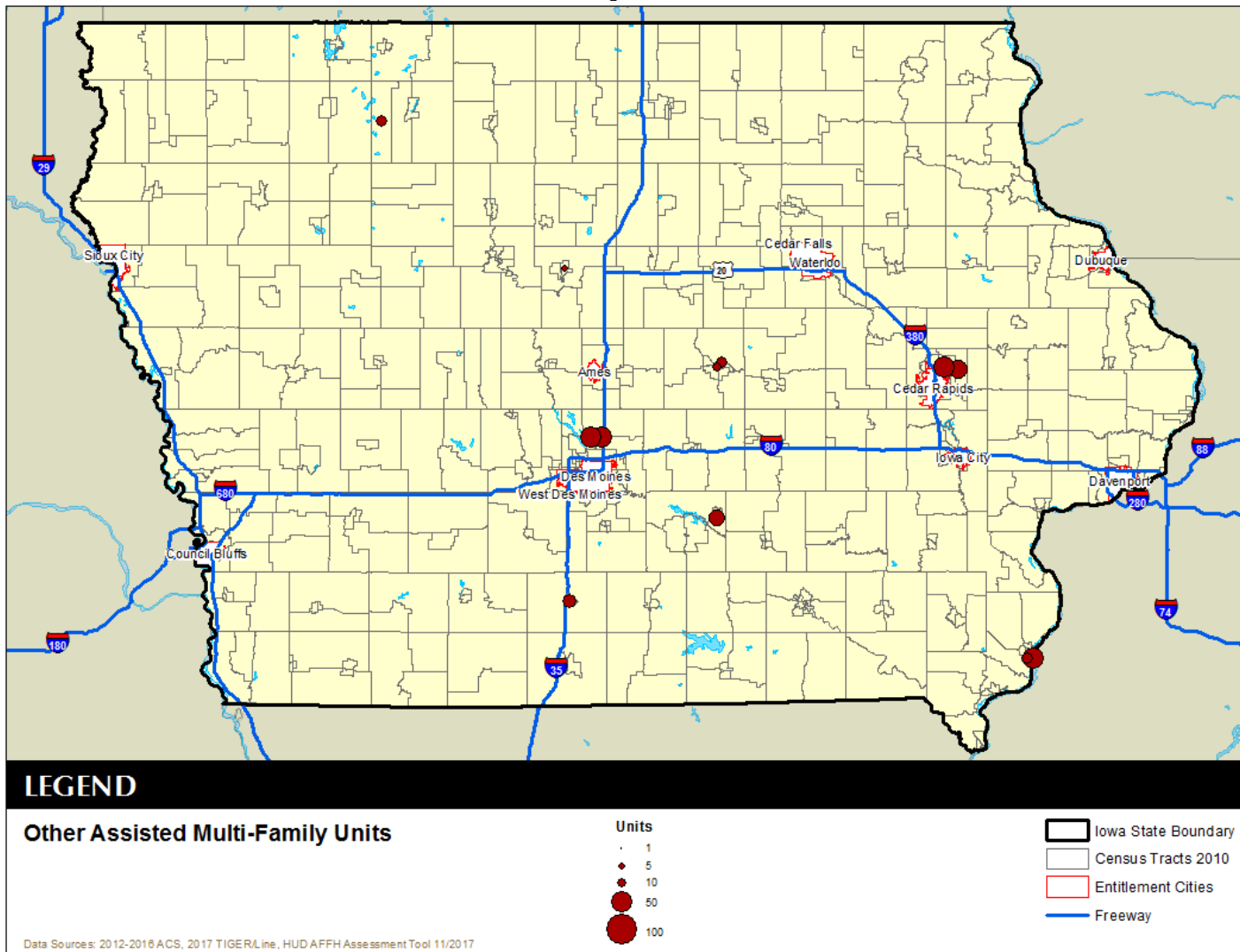
Map IV.26
Public Housing Units
 Non-entitlement Areas of Iowa
 2016 ACS, 2017 Tigerline, HUD AFFH Tool



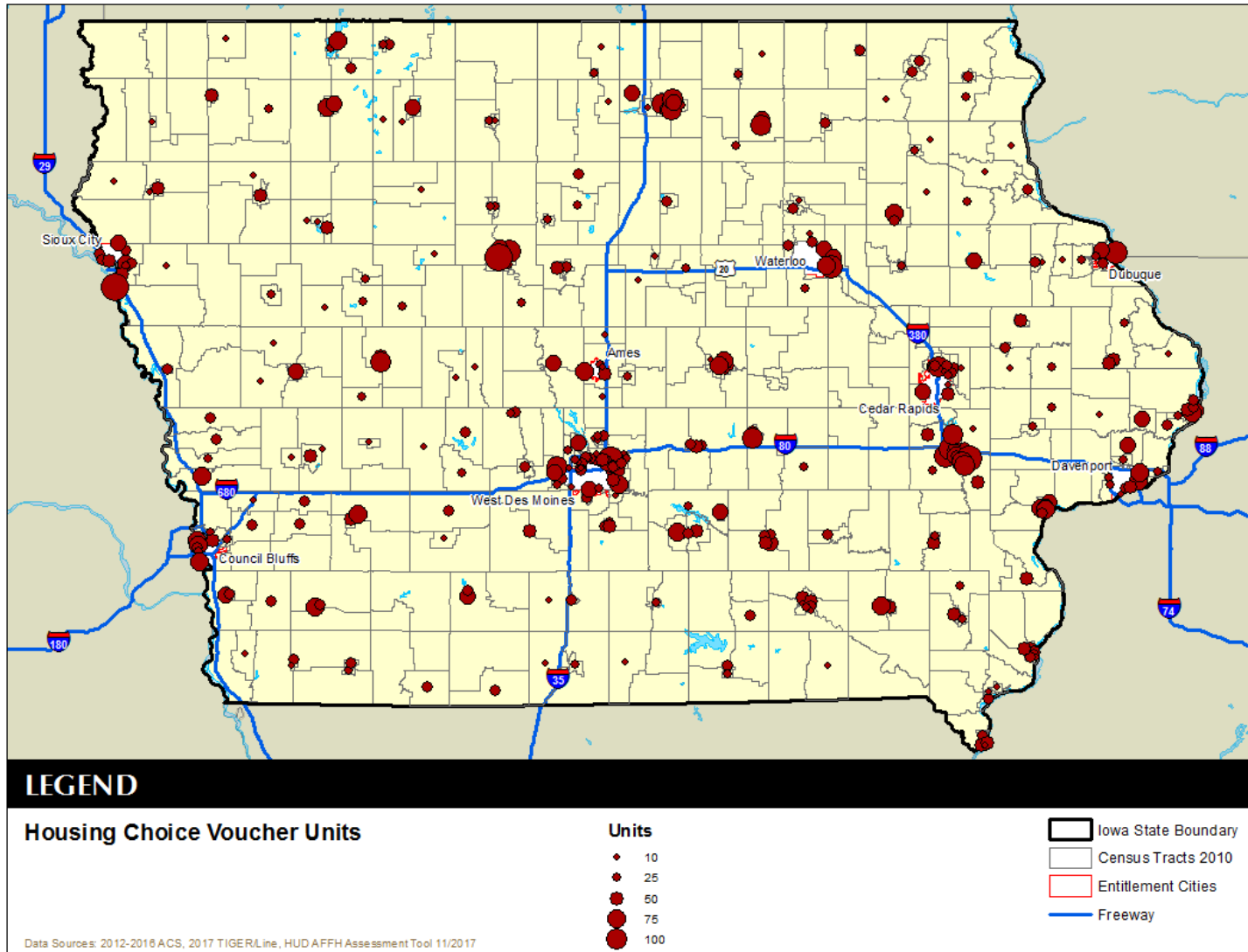
Map IV.27
Project-Based Section 8 Housing Units
 Non-entitlement Areas of Iowa
 2016 ACS, 2017 Tigerline, HUD AFFH Tool



Map IV.28
Other Assisted Multi-Family Housing Units
 Non-entitlement Areas of Iowa
 2016 ACS, 2017 Tigerline, HUD AFFH Tool



Map IV.29
Housing Choice Voucher Units
 Non-entitlement Areas of Iowa
 2016 ACS, 2017 Tigerline, HUD AFFH Tool



H. DISABILITY AND ACCESS ANALYSIS

The disability rate from the 2000 Census is shown in Table IV.52. Some 16.3 percent of the population was disabled in 2000, or a total of 306,309 persons. The disability rate was highest for those over 65, with 37.1 percent disabled.

Table IV.52
Disability by Age
Non-Entitlement Area
2000 Census SF3 Data

Age	Total	
	Disabled Population	Disability Rate
5 to 15	16,693	5.1%
16 to 64	177,781	14.3%
65 and older	111,835	37.1%
Total	306,309	16.3%

Table IV.53 shows disability by type in 2000. There were 140,852 physical disabilities in 2000, some 113,516 employment disabilities, and 93,981 go-outside-home disabilities.

Table IV.53
Total Disabilities Tallied: Aged 5 and Older
Non-Entitlement Area
2000 Census SF3 Data

Disability Type	Population
Sensory disability	67,666
Physical disability	140,852
Mental disability	74,860
Self-care disability	37,565
Employment disability	113,516
Go-outside-home disability	93,981
Total	528,440

Disability by age, as estimated by the 2016 ACS, is shown in Table IV.54. The disability rate for females was 11.5 percent, compared to 12.1 percent for males. The disability rate grew precipitously higher with age, with 43.7 percent of those over 75 experiencing a disability.

Table IV.54
Disability by Age
 Non-Entitlement Area
 2016 Five-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	528	0.8%	521	0.8%	1,049	0.8%
5 to 17	12,704	6.5%	7,219	3.9%	19,923	5.2%
18 to 34	13,822	6.6%	11,664	5.8%	25,486	6.2%
35 to 64	46,636	11.1%	44,314	10.6%	90,950	10.8%
65 to 74	23,596	25.3%	19,070	19.1%	42,666	22.1%
75 or Older	29,596	45.4%	39,418	42.6%	69,014	43.7%
Total	126,882	12.1%	122,206	11.5%	249,088	11.8%

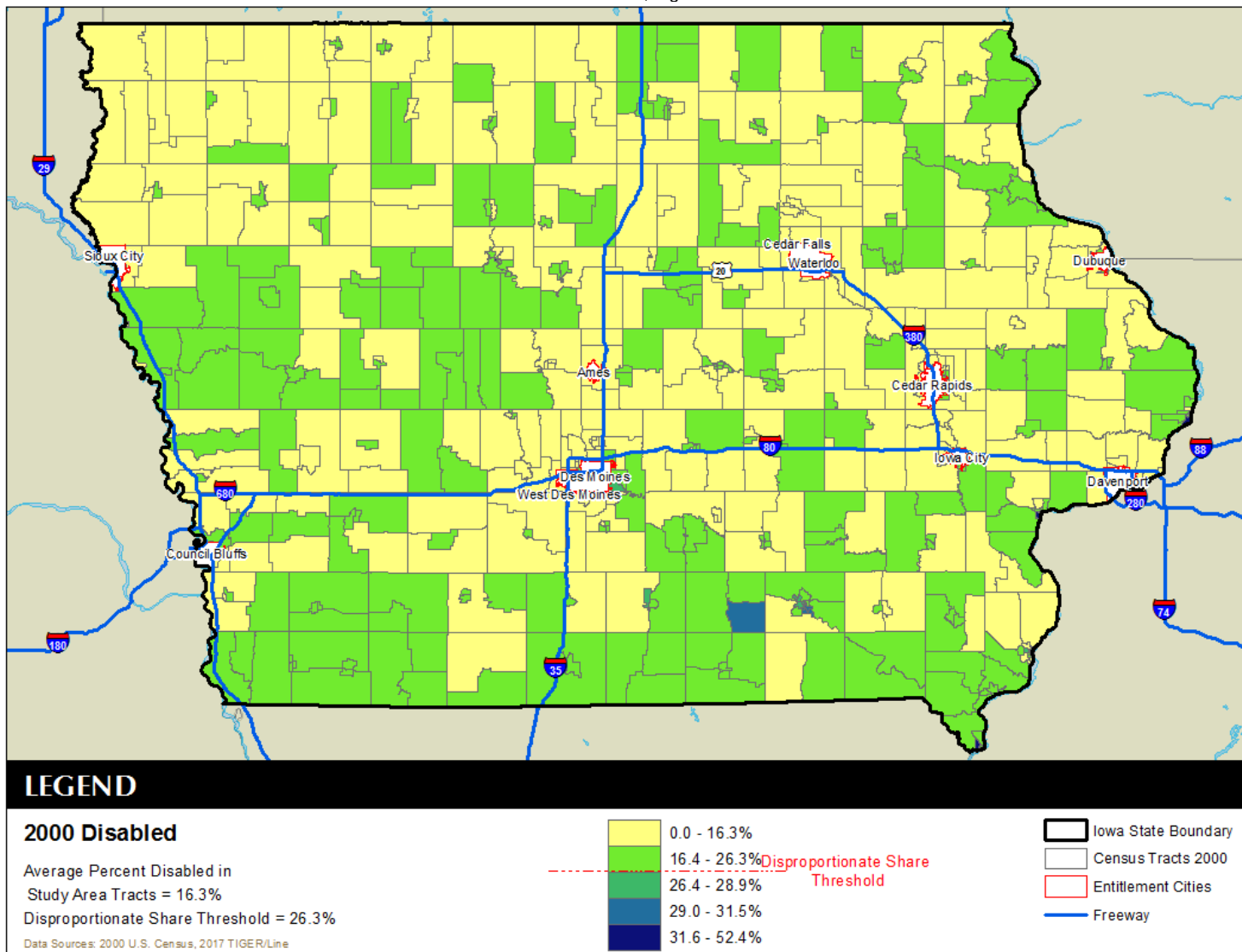
The number of disabilities by type, as estimated by the 2016 ACS, is shown in Table IV.55. Some 5.9 percent have an ambulatory disability, 4.6 have an independent living disability, and 2.1 percent have a self-care disability.

Table IV.55
Total Disabilities Tallied: Aged 5 and Older
 Non-Entitlement Area
 2016 Five-Year ACS

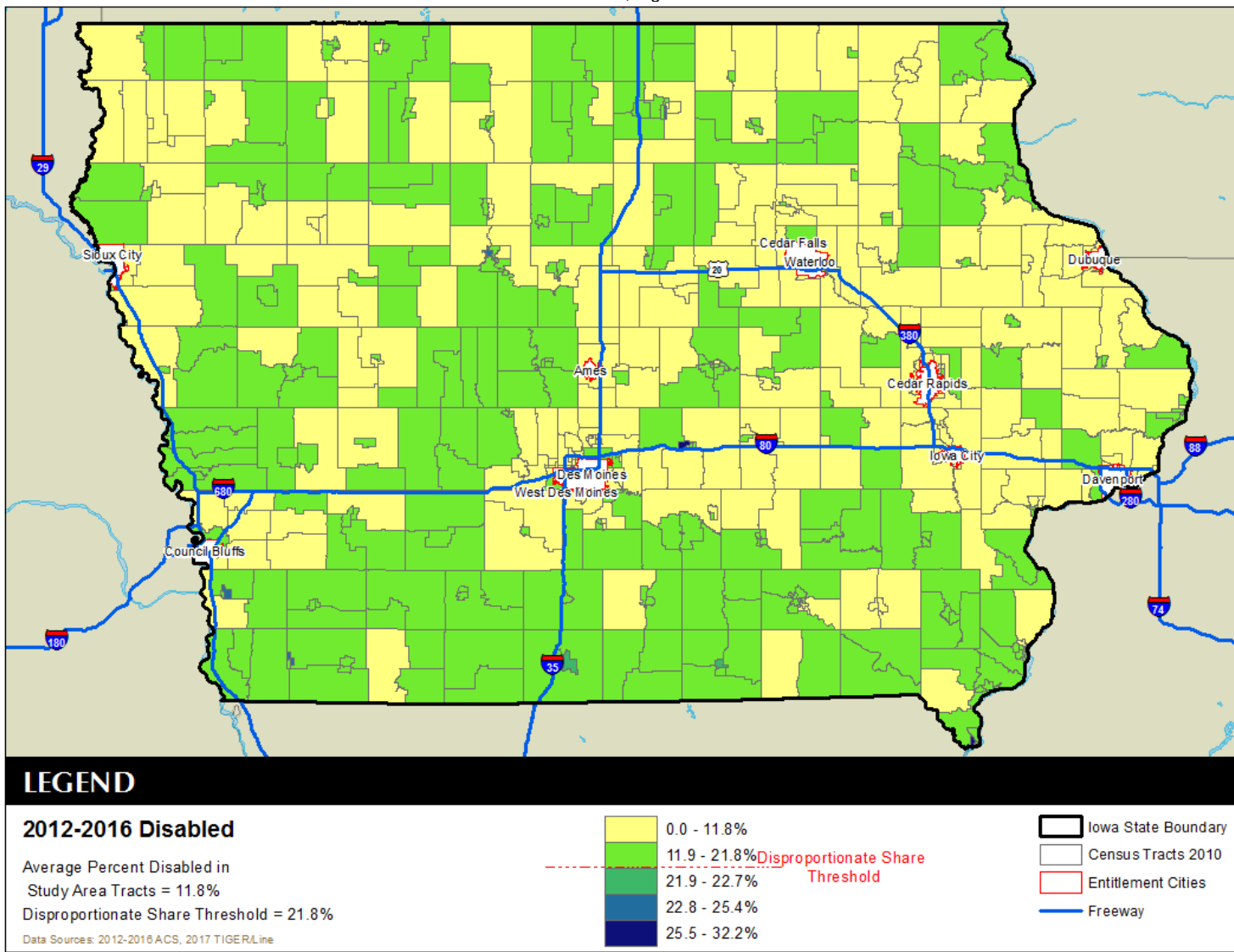
Disability Type	Population with Disability	Percent with Disability
Hearing disability	84,372	4.0%
Vision disability	37,035	1.7%
Cognitive disability	85,053	4.3%
Ambulatory disability	117,571	5.9%
Self-Care disability	41,721	2.1%
Independent living difficulty	73,223	4.6%

The distribution of persons with disabilities is shown in Maps IV.30 and IV.31. In both 2000 and 2016, there were areas with disproportionate shares of persons with disabilities in a couple areas of the southern part of the State. However, persons with disabilities are fairly evenly spread throughout the State.

Map IV.30
2000 Persons with Disabilities
 Non-Entitlement Areas of Iowa
 2000 Census, Tigerline



Map IV.31
2016 Persons with Disabilities
 Non-Entitlement Areas of Iowa
 2016 ACS, Tigerline



The concentrations of persons with various types of disabilities are shown in the following maps. There are areas with higher concentration of persons with various disabilities, found in both urban and rural areas of the State. Disability types did not show an overarching disbursement in specific areas in the State.

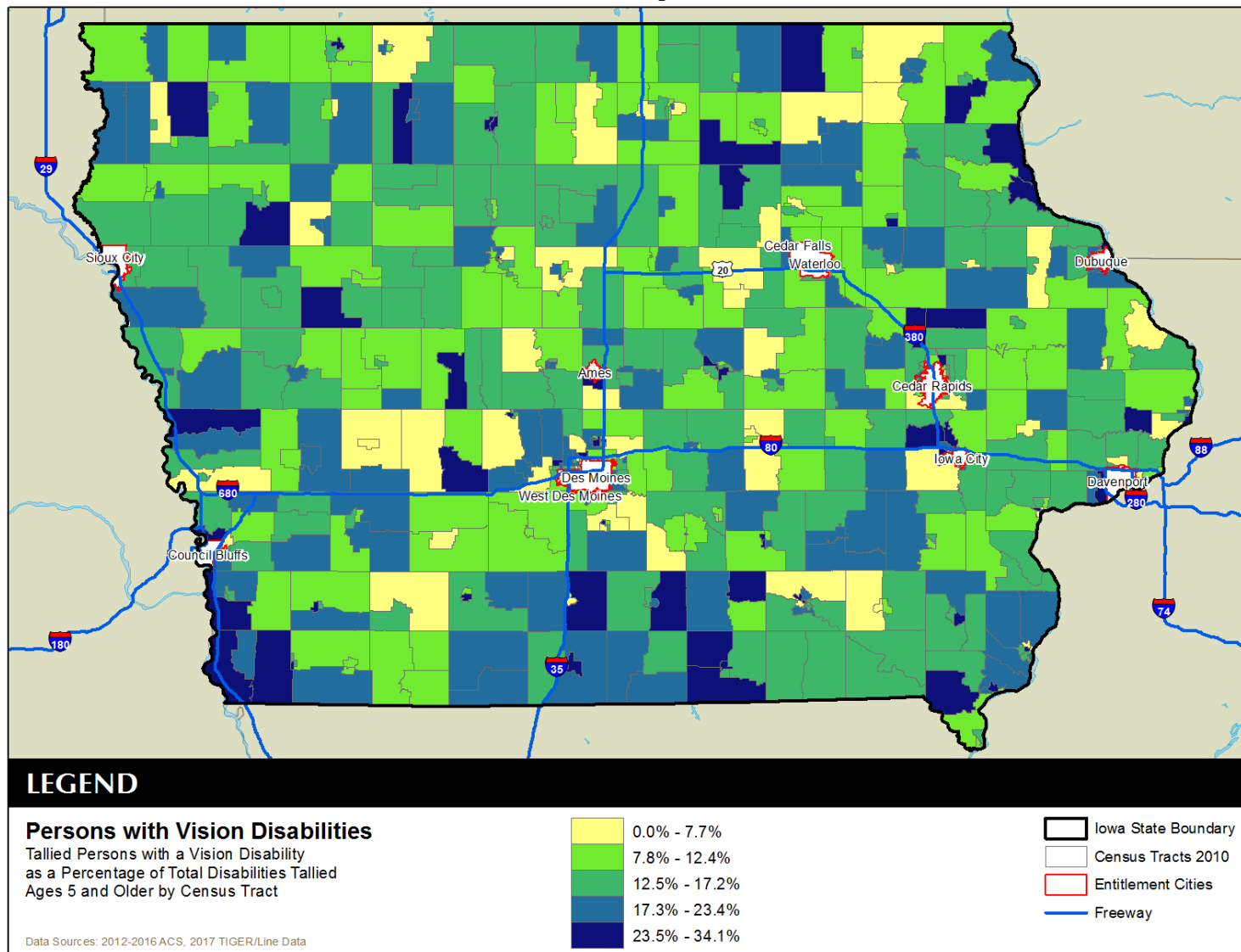
HOUSING ACCESSIBILITY

Accessible housing units are located throughout the State. However, many newer housing units are located outside city center areas. These newer housing units are more likely to have the mandatory minimum accessibility features. As seen in Table IV.51, on page 81, some 6,067 publicly supported housing units in the non-entitlement areas of the State are accessible. This accounts for some 27.9 percent of publicly supported housing units in the non-entitlement areas of the State.

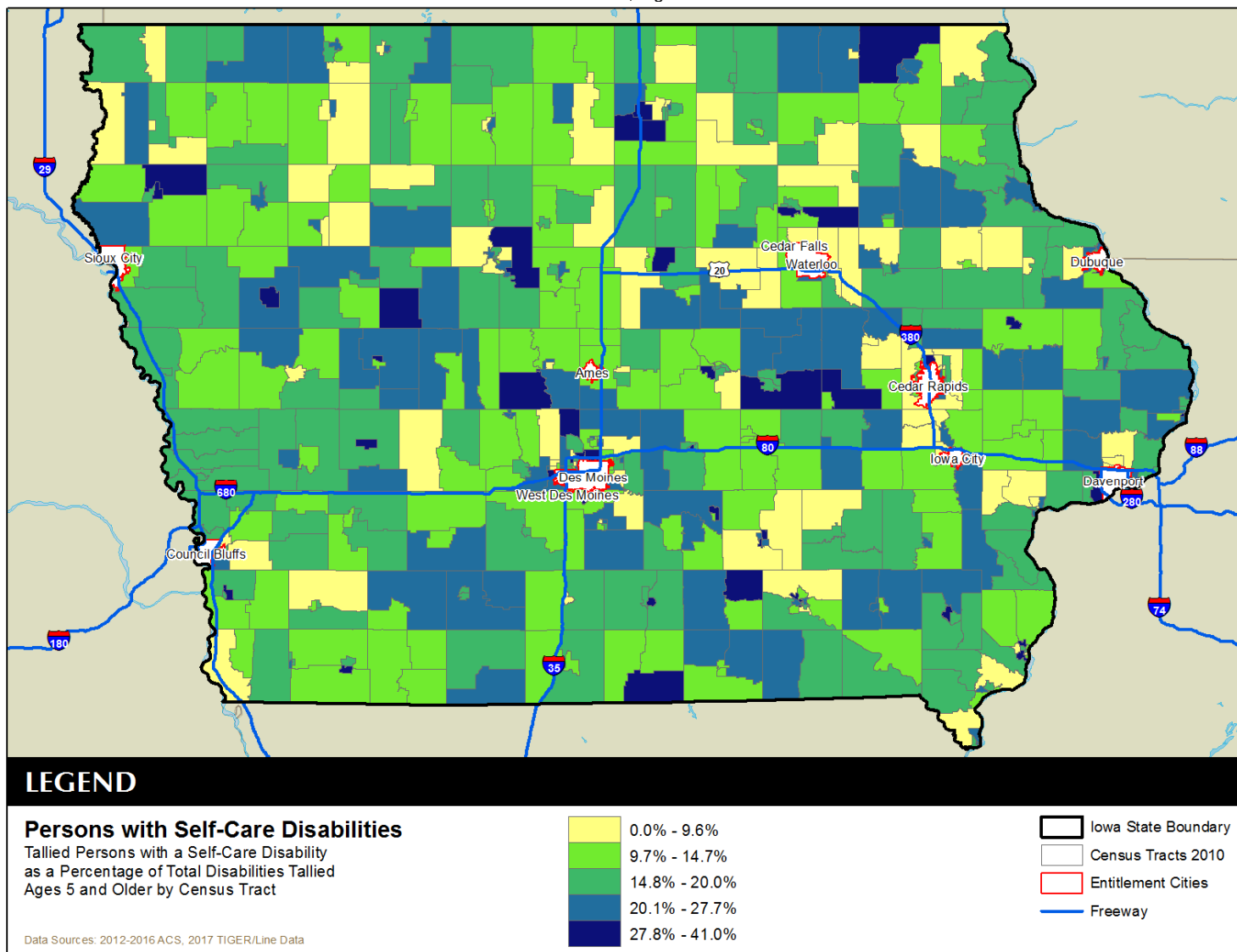
Public input suggested that the development of fully accessible units is cost prohibitive in rural areas in the State. This may present a barrier for disabled households in finding accessible affordable housing in the State.

The Disability and Access Work Group also had comments about the ability for persons with disabilities to access affordable homeownership opportunities. The difference in income for persons with disabilities may be a barrier to access other state programs for homeownership and may present undue hardship on these households.

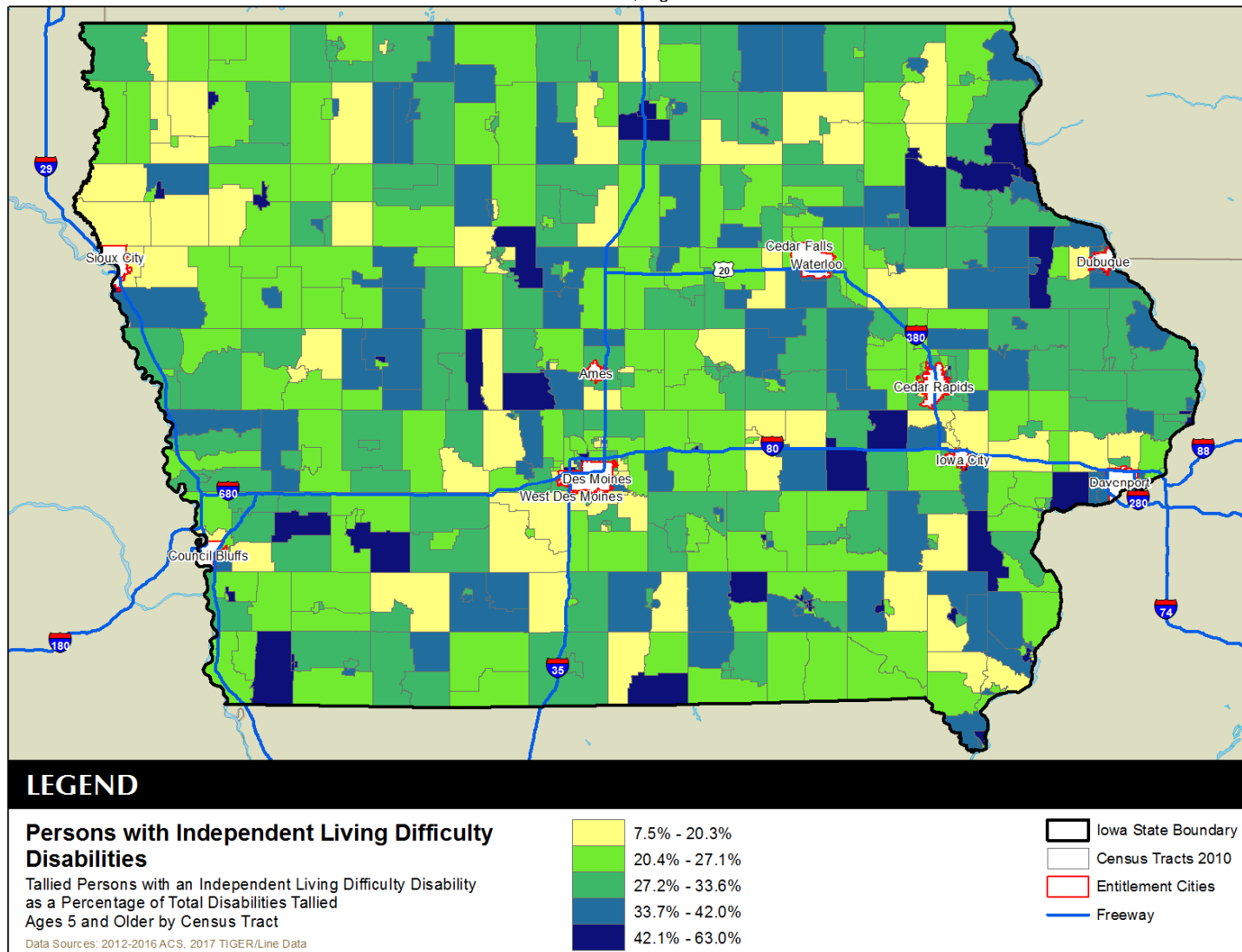
Map IV.32
Persons with Vision Disabilities
 Non-Entitlement Areas of Iowa
 2016 ACS, Tigerline



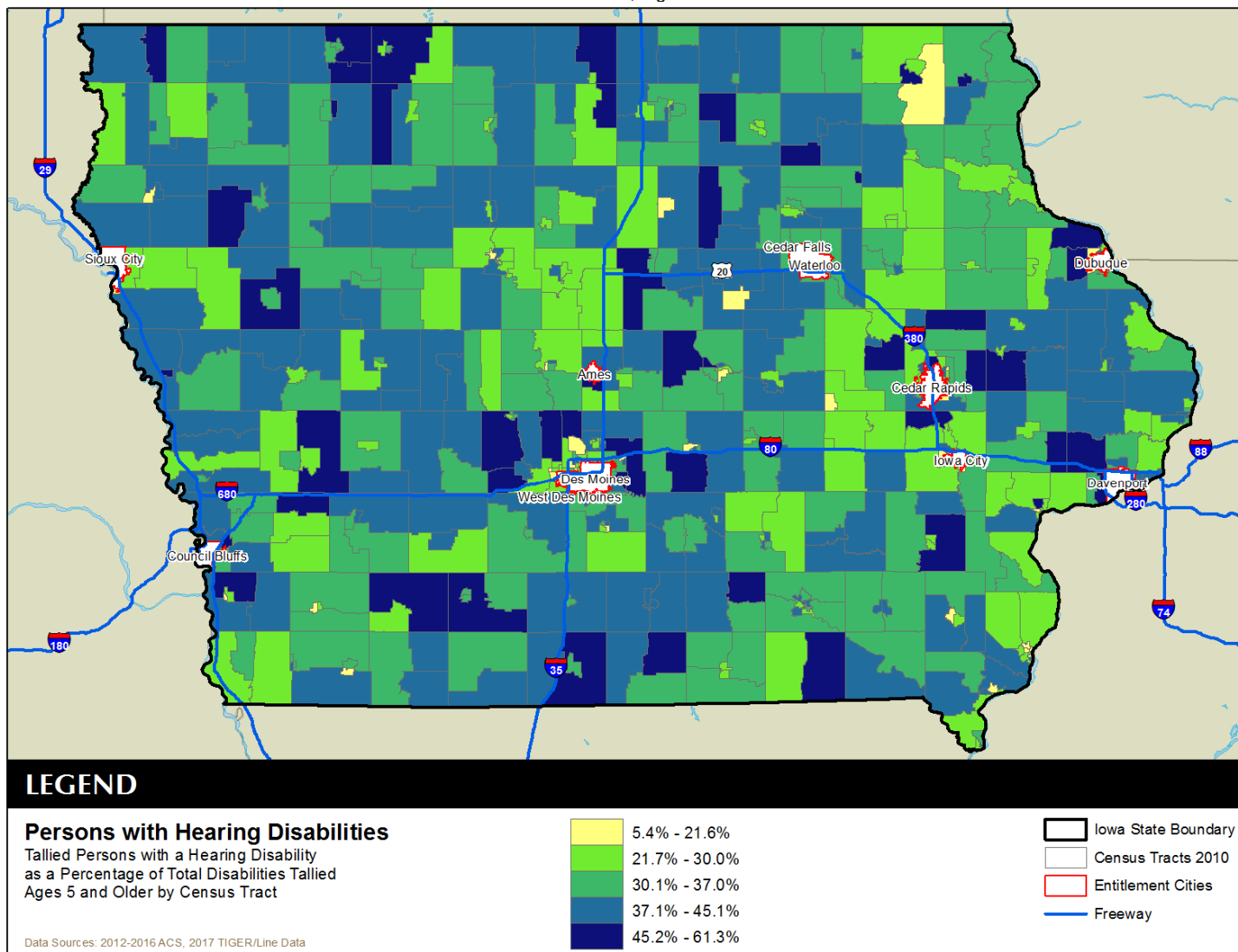
Map IV.33
Persons with Self-Care Disabilities
 Non-Entitlement Areas of Iowa
 2016 ACS, Tigerline



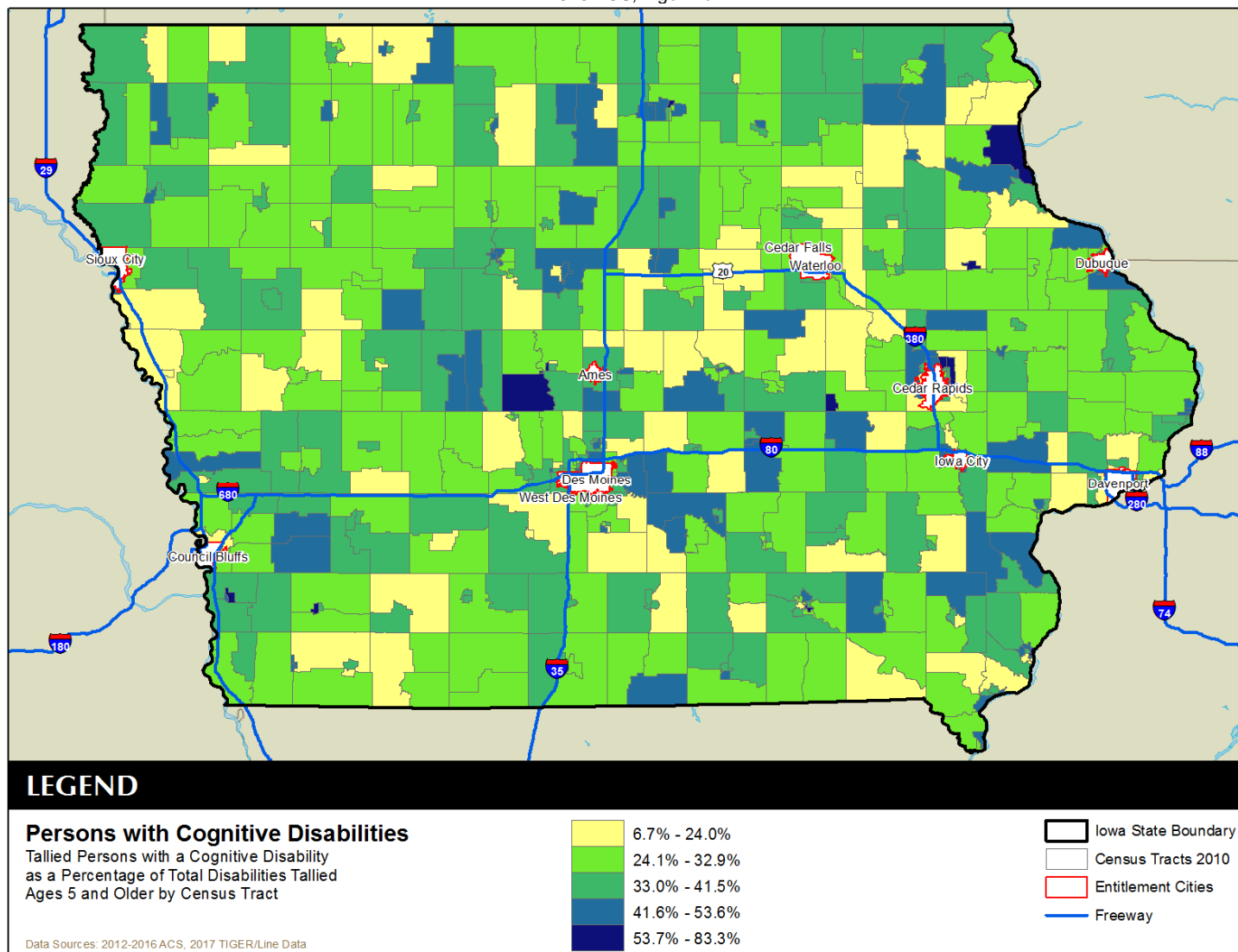
Map IV.34
Persons with Independent Living Difficulty Disabilities
 Non-Entitlement Areas of Iowa
 2016 ACS, Tigerline



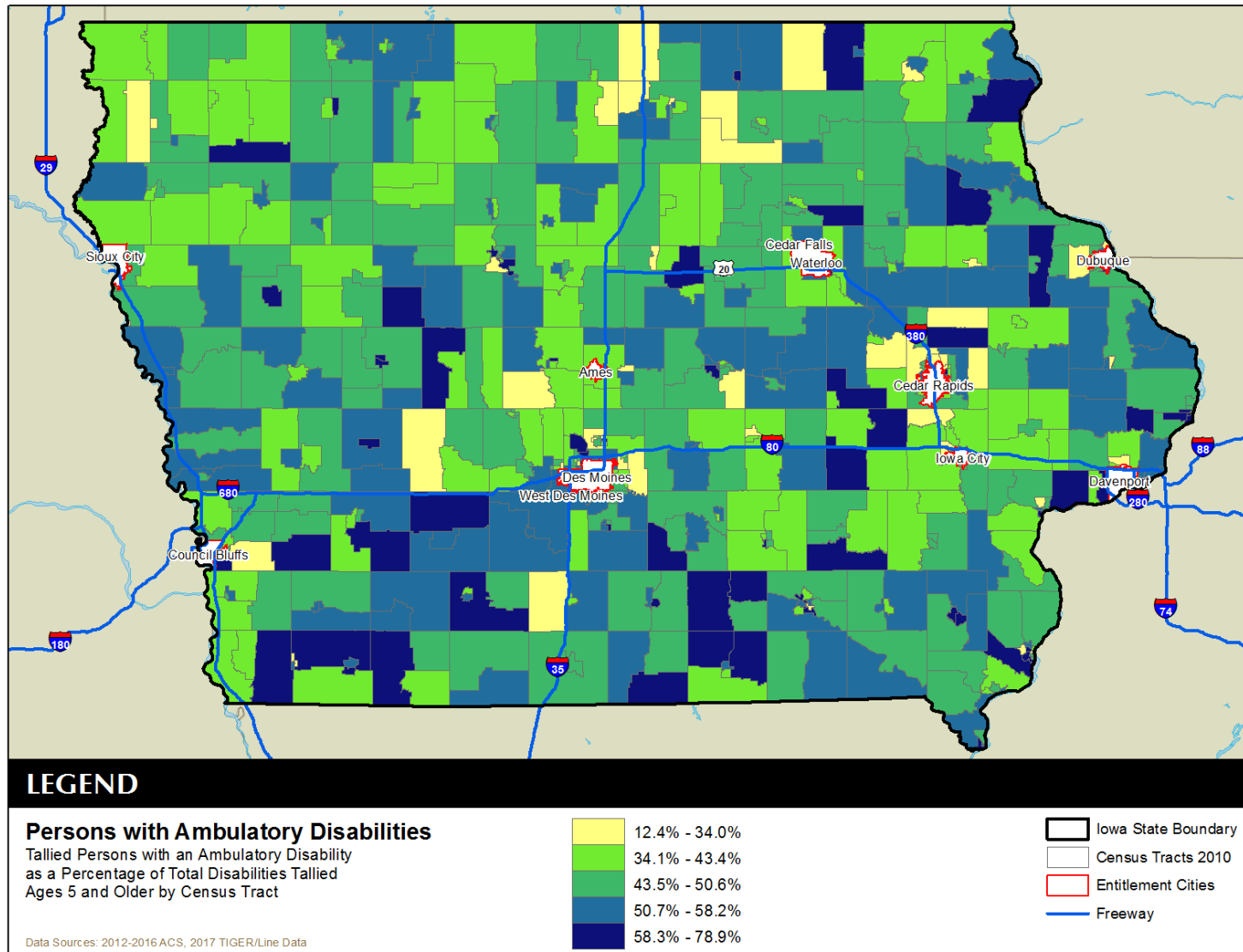
Map IV.35
Persons with Hearing Disabilities
 Non-Entitlement Areas of Iowa
 2016 ACS, Tigerline



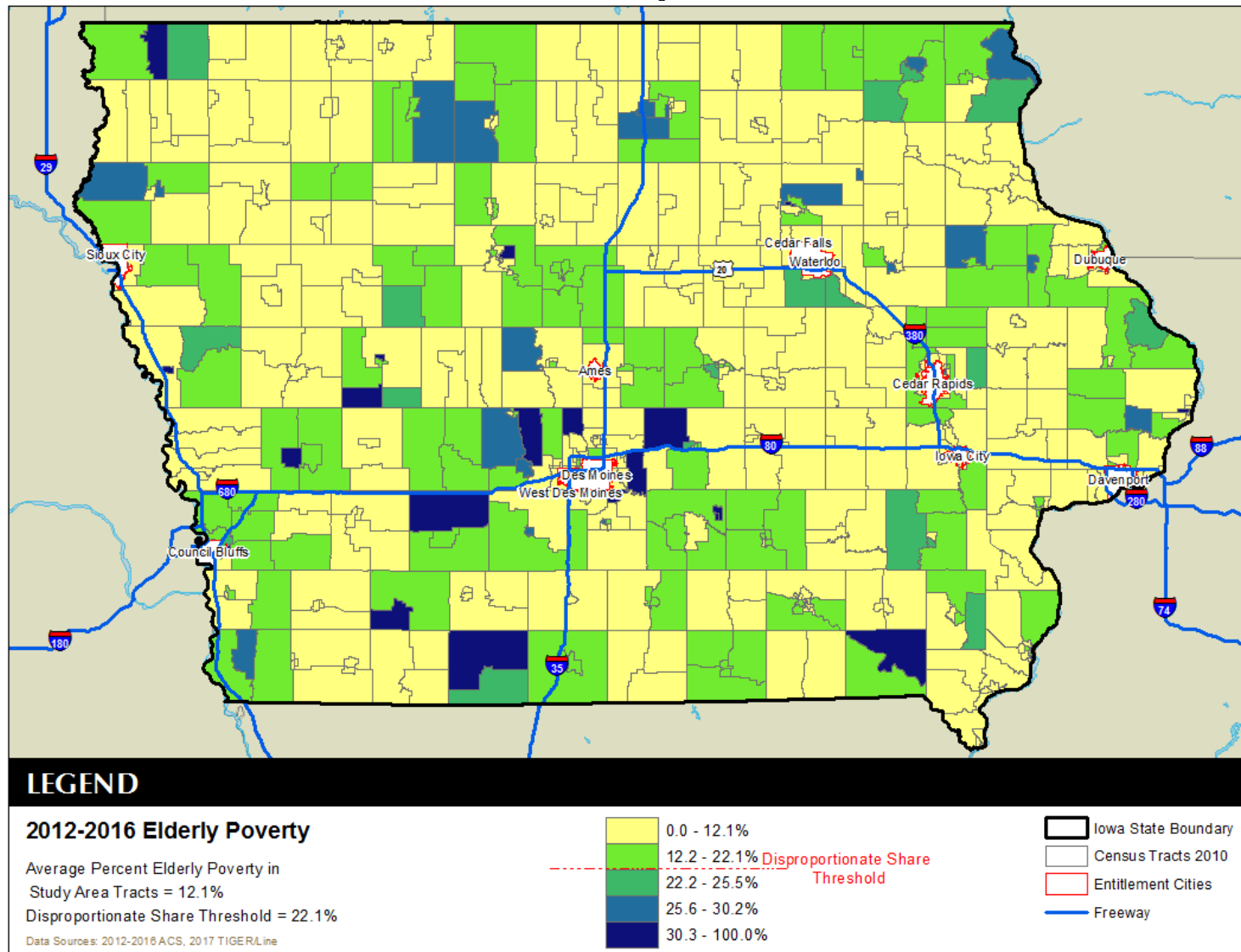
Map IV.36
Persons with Cognitive Disabilities
 Non-Entitlement Areas of Iowa
 2016 ACS, Tigerline



Map IV.37
Persons with Ambulatory Disabilities
 Non-Entitlement Areas of Iowa
 2016 ACS, Tigerline



Map IV.38
Elderly Poverty
 Non-Entitlement Areas of Iowa
 2016 ACS, Tigerline



Disparities in Access to Opportunity

Transportation

The Disability and Access Work Groups found that transportation was a major issue for persons with disabilities to access services in the State. This was particularly true for persons with disabilities in more rural areas without access to public transportation. Looking back at Map IV.19, most areas outside the entitlement communities do not have access to public transit. This is to be expected due to the rural nature of many of these areas. However, the concentration of persons with disabilities, particularly those with vision and ambulatory disabilities, is not correlated with areas with access to transit. This may present a barrier in access to services and opportunities for persons with disabilities, especially for low income households.

The elderly population, which experiences disabilities at a rate exceeding 43 percent, may be one targetable community with limited access to transportation in the non-entitlement areas of the State. As seen in Map IV.38, elderly households living in poverty are concentrated in several counties in the State. These include Polk and Jasper Counties outside Des Moines, Madison County, Lyon County, Adams County, Ringgold County, Van Buren County, and several small census tracts in other areas of the State.

The State does offer transportation options to link individuals with service providers throughout the State. The **Iowa Mobility Management** program focuses on meeting individual customer needs through identification of a wide range of transportation options and service providers.⁶ Regional mobility coordinators educate local communities and enhance awareness of available mobility options, helping to identify transportation options.

Proficient schools and educational programs

The distribution of persons with disabilities did not correspond with the quality of public schools in the non-entitlement areas of the State. Public input did not suggest any lack of access to proficient schools for households with disabilities.

Jobs

The distribution of persons with disabilities did not correspond with access to jobs or labor market engagement in the non-entitlement areas of the State. Public input did not suggest any lack of access to jobs for households with disabilities, outside issues with available transportation.

⁶ <https://iowadot.gov/iowamobilitymanagement/home>

I. FAIR HOUSING ENFORCEMENT, OUTREACH CAPACITY, & RESOURCES

FEDERAL FAIR HOUSING LAWS

Federal laws provide the backbone for U.S. fair housing regulations. While some laws have been previously discussed in this report, a brief list of laws related to fair housing, as defined on the U.S. Department of Housing and Urban Development's (HUD's) website, is presented below:

Fair Housing Act Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18), and handicap (disability).⁷

Title VIII was amended in 1988 (effective March 12, 1989) by the *Fair Housing Amendments Act* . . . In connection with prohibitions on discrimination against individuals with disabilities, the Act contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.⁸

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

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

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

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

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

⁷ "HUD Fair Housing Laws and Presidential Executive Orders."

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws

⁸ "Title VIII: Fair Housing and Equal Opportunity."

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/progdesc/title8

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

Title IX of the Education Amendments Act of 1972 Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.⁹

STATE FAIR HOUSING LAWS

The following are the protected classes under Chapter 216 of the Iowa Code:¹⁰

- Age
- Color
- Creed
- Familial Status
- Gender Identity
- Marital Status
- Mental Disability
- National Origin
- Physical Disability
- Race
- Religion
- Retaliation
- Sex
- Sexual Orientation

Under the Iowa Civil Rights Act it is an unfair or discriminatory practice for any person, owner, or person acting for an owner:¹¹

- To refuse to sell, rent, lease, assign, sublease, refuse to negotiate, or to otherwise make unavailable, or deny any real property or housing accommodation ... to any person because of the race, color, creed, sex, sexual orientation, gender identity, religion, national origin, disability, or familial status of such person.
- To discriminate against any person because of the person's race, color, creed, sex, sexual orientation, gender identity, religion, national origin, disability, or familial status, in the terms, conditions or privileges of the sale, rental, lease assignment or sublease of any real property or housing accommodation ...
- To directly or indirectly advertise, or in any other manner indicate or publicize that the purchase, rental, lease, assignment, or sublease of any real property or housing accommodation ... by persons of any particular race, color, creed, sex, sexual orientation, gender identity, religion, national origin, disability, or familial status is unwelcome, objectionable, not acceptable or not solicited.
- To discriminate against the lessee or purchaser of any real property or housing accommodation ... or against any prospective lessee or purchaser ... because of the race, color, creed, religion, sex, sexual orientation, gender identity, disability, age or

⁹ "HUD Fair Housing Laws and Presidential Executive Orders."

¹⁰ <https://icrc.iowa.gov/your-rights/protected-classes>

¹¹ <https://icrc.iowa.gov/your-rights/protected-areas/housing>

national origin of persons who may from time to time be present in or on the lessee's or owner's premises for lawful purposes at the invitation of the lessee or owner as friends, guests, visitors, relatives or in any similar capacity.

The Iowa Civil Rights Commission is responsible for enforcing the Iowa Civil Rights Law:

Iowa Civil Rights Commission
 Grimes State Office Building
 400 E. 14th Street
 Des Moines, IA 50319-0201
 515-281-4121, 1-800-457-4416
 Fax 515-242-5840

IEDA AND IFA

Iowa Economic Development Authority (IEDA) and Iowa Finance Authority (IFA) have a number of policies to promote Fair Housing in the State.

IFA requires HOME, National Housing Trust Fund (NHTF), and Low Income Housing Tax Credit (LIHTC) recipients to develop an Affirmative Fair Housing Marketing Plan. These plans must meet certain criteria including:

- Direct efforts might be *minority or specialized* publications i.e. magazine, newspaper, radio or television or building relationships with organizations, churches, agencies or businesses who work directly with an underserved population.
- Consider the use of alternate advertising formats i.e. by translation to a language used by a minority population; providing alternate formats i.e. braille, large print, audio tapes, electronic methods, etc.
- Periodically review the special marketing efforts and evaluate successes and failures. Determine how to expand on the successes or make changes on areas needing improvement.

All programs are following the requirements at HUD Subpart M, CFR24 Part 200.620. LIHTC allocations can also reference the Iowa LIHTC Qualified Allocation Plan (QAP) for the year the allocation was made.

At a minimum, the AFHMP for multifamily rental projects should be reviewed every five years by pulling current demographics, comparing them with current resident percentages then describing successes and/or failures with community contacts and marketing methods. Then successes should be described or a new plan with changes should be provided. For HOME Tenant Based Rental Assistance or Homebuyer Programs a new plan is required for each new contract.

The Iowa Finance Authority requires all properties to target Persons with Disabilities, regardless of percentages listed.

The State's Affirmative Fair Housing Marketing Guide is included as an Attachment.

IFA's Low-Income Housing Tax Credit (LIHTC) Program's Qualified Allocation Plan provides encouragement to LIHTC applicants to develop units in areas with less concentration of LIHTC units, as well as to develop accessible units. These are outlined below.

Density

Projects that are located in a census tract that has a lower concentration of existing LIHTC units will be awarded extra points. Projects that are located in a census tract that has less than 10.00% of LIHTC Units per household are awarded 10 points. Projects that are located in a census tract that has between 10.00% and 20.00% of LIHTC Units per household are awarded 5 points.

Olmstead Goals

Projects advancing the goals of Iowa Department of Human Services Olmstead Plan for Mental Health and Disability Services to build a consumer- and family-driven system that expands people's choices about the supports and services they need and where they are provided, in other words, a system that operates the way the U.S. Supreme Court says it should in its' landmark Olmstead decision, where people with disabilities, of any age, receive supports in the most integrated setting consistent with their needs. Accessible Units shall be dispersed throughout the Project and in different bedroom sizes rather than segregated.

FAIR HOUSING COMPLAINTS

Federal Fair Housing Law prohibits housing discrimination based on race, color, national origin, religion, sex, familial status, or disability. An individual may file a complaint if they feel their rights have been violated. HUD maintains records of complaints that represent potential and actual violations of federal housing law.

Fair Housing and Equal Opportunity (FHEO) begins its complaint investigation process shortly after receiving a complaint. A complaint must be filed within one year of the last date of the alleged discrimination under the Fair Housing Act. Other civil rights authorities allow for complaints to be filed after one year for good cause, but FHEO recommends filing as soon as possible. Generally, FHEO will either investigate the complaint or refer the complaint to another agency to investigate. Throughout the investigation, FHEO will make efforts to help the parties reach an agreement. If the complaint cannot be resolved voluntarily by an agreement, FHEO may issue findings from the investigation. If the investigation shows that the law has been violated, HUD or the Department of Justice may take legal action to enforce the law.

Over the 2008 through 2016 study period, the agency received a total of 1,005 complaints alleging discrimination in the non-entitlement areas of Iowa. Some 458 of these complaints were on the basis of disability, 202 for race, 114 for sex, 110 for familial status, 57 for retaliation, 54 for national origin, 6 for religion, and 4 for color.

Table IV.56
Fair Housing Complaints by Basis
 Non-Entitlement Areas
 HUD Fair Housing Complaints

Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total
Disability	33	35	74	44	56	73	61	40	42	458
Race	32	23	22	20	31	12	23	17	22	202
Sex	20	14	11	9	32	11	5	7	5	114
Familial Status	7	16	19	13	29	9	12	0	5	110
Retaliation	10	5	10	3	5	8	10	0	6	57
National Origin	8	10	6	4	9	5	3	3	6	54
Religion	0	2	1	2	0	1	0	0	0	6
Color	1	1	1	1	0	0	0	0	0	4
Total Basis	111	106	144	96	162	119	114	67	86	1,005
Total Complaints	92	87	130	88	142	112	106	66	75	898

As shown in Table IV.57, some 427 of those complaints was successfully conciliated or settled, and 298 had no caused determination. Another 80 were closed after the complainant failed to cooperate, and 39 more complaints were withdrawn by complainant after resolution.

Table IV.57
Fair Housing Complaints by Closure
 Non-Entitlement Areas
 HUD Fair Housing Complaints

Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total
Conciliation/settlement successful	25	24	71	36	64	70	60	38	39	427
No cause determination	50	36	38	34	39	29	29	22	21	298
Complainant failed to cooperate	10	11	7	8	13	5	11	4	11	80
Complaint withdrawn by complainant after resolution	4	7	7	4	4	4	3	2	4	39
Complaint withdrawn by complainant without resolution	1	4	1	3	0	1	1	0	0	11
FHAP judicial consent order	1	0	0	0	7	2	0	0	0	10
Dismissed for lack of jurisdiction	0	2	4	0	1	1	1	0	0	9
DOJ dismissal	0	0	0	0	9	0	0	0	0	9
FHAP judicial dismissal	0	1	1	0	3	0	0	0	0	5
Litigation ended - discrimination found	0	1	0	1	0	0	0	0	0	2
Litigation ended - no discrimination found	0	1	1	0	0	0	0	0	0	2
Unable to locate complainant	0	0	0	1	1	0	0	0	0	2
Untimely Filed	1	0	0	0	0	0	0	0	0	1
ALJ consent order entered after issuance of charge	0	0	0	1	0	0	0	0	0	1
Administrative hearing ended - discrimination found	0	0	0	0	1	0	0	0	0	1
Administrative hearing ended - no discrimination found	0	0	0	0	0	0	1	0	0	1
Total Closures	92	87	130	88	142	112	106	66	75	898
Total Complaints	92	87	130	88	142	112	106	66	75	898

Those who file fair housing complaints with the Department of Housing and Urban Development may include more than one discriminatory action, or *issue*, in those complaints. Fair housing complaints in non-entitlement areas cited 1,491 issues total, with the most

common being discriminatory terms, conditions, privileges, or services and facilities. This was followed by failure to make reasonable accommodation and discriminatory refusal to rent, as seen in Table IV.58.

Table IV.58
Fair Housing Complaints by Issue
 Non-Entitlement Areas
 HUD Fair Housing Complaints

Issue	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total
Discriminatory terms, conditions, privileges, or services and facilities	25	26	44	30	34	80	68	55	57	419
Failure to make reasonable accommodation	15	11	57	24	32	66	40	28	33	306
Discriminatory refusal to rent	10	11	31	23	36	59	38	16	30	254
Discrimination in terms/conditions/privileges relating to rental	33	27	51	28	52	7	1	2	0	201
Discriminatory acts under Section 818 (coercion, Etc.)	22	15	16	6	29	13	12	8	8	129
Discriminatory advertising, statements and notices	2	4	10	5	24	4	10	7	5	71
Discrimination in services and facilities relating to rental	5	4	1	3	4	0	0	0	0	17
Non-compliance with design and construction requirements (handicap)	0	0	0	0	0	0	3	3	6	12
Otherwise deny or make housing unavailable	0	0	1	0	0	0	7	4	0	12
Discriminatory refusal to rent and negotiate for rental	1	2	0	0	5	1	0	0	2	11
Discriminatory acts under Section 901 (criminal)	0	0	0	0	9	0	0	0	0	9
Discriminatory advertisement - rental	4	1	0	0	2	0	0	0	0	7
Failure to permit reasonable modification	0	1	0	0	3	0	2	1	0	7
Discriminatory refusal to sell	0	0	0	1	2	0	2	0	1	6
False denial or representation of availability - rental	0	0	0	2	2	1	0	0	0	5
Steering	0	0	0	0	2	0	0	1	1	4
Discrimination in the selling of residential real property	1	0	0	0	1	0	0	1	0	3
Discrimination in the making of loans	0	1	0	0	1	0	1	0	0	3
Discriminatory refusal to negotiate for rental	0	1	0	0	1	0	0	0	0	2
Discrimination in the terms/conditions for making loans	0	0	0	1	1	0	0	0	0	2
Using ordinances to discriminate in zoning and land use	0	1	0	0	0	1	0	0	0	2
Discriminatory refusal to sell and negotiate for sale	1	0	0	0	0	0	0	0	0	1
Blockbusting - sale	0	1	0	0	0	0	0	0	0	1
Discriminatory financing (includes real estate transactions)	0	0	0	0	1	0	0	0	0	1
Failure to provide an accessible route into and thru the covered unit	0	0	0	0	0	1	0	0	0	1
Discrimination in the brokering of residential real property	0	0	0	0	0	0	1	0	0	1
Discrimination in terms/conditions/privileges relating to sale	1	0	0	0	0	0	0	0	0	1
False denial or representation of availability	1	0	0	0	0	0	0	0	0	1
Refusing to provide municipal services or property	0	0	0	0	1	0	0	0	0	1
Failure to provide usable kitchens and bathrooms	0	0	0	0	0	1	0	0	0	1
None	0	0	0	0	0	0	0	0	0	0
Total Issues	121	106	211	123	242	234	185	126	143	1,491
Total Complaints	92	87	130	88	142	112	106	66	75	898

Table IV.59 shows fair housing complaints in non-entitlement areas of the State found with causes by basis. Of those with cause, 312 were on the basis of disability, 66 by familial status, 59 by race, 39 by sex, 24 by retaliation, and 16 by national origin.

Table IV.59
Fair Housing Complaints Found With Cause by Basis
 Non-Entitlement Areas
 HUD Fair Housing Complaints

Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total
Disability	17	13	56	28	37	56	41	29	35	312
Familial Status	1	6	10	6	23	6	11	0	3	66
Race	6	7	10	5	5	5	9	7	5	59
Sex	7	5	3	4	11	6	1	2	0	39
Retaliation	2	4	1	2	3	5	4	0	3	24
National Origin	3	3	2	0	1	2	1	2	2	16
Color	0	0	0	0	0	0	0	0	0	0
Religion	0	0	0	0	0	0	0	0	0	0
Total Basis	36	38	82	45	80	80	67	40	48	516
Total Complaints Found with Cause	30	32	78	41	76	76	63	40	43	479

Fair Housing complaints with cause by issue are shown in Table IV.60. For the 928 total complaints with cause, there were a total of 17 issues. The most common issues include discriminatory terms, conditions, privileges, or services and facilities, accounting for 263. This was followed by failure to make reasonable accommodation, accounting for 244, and discriminatory refusal to rent, accounting for 188.

Table IV.60
Fair Housing Complaints Found With Cause by Issue
 Non-Entitlement Areas
 HUD Fair Housing Complaints

Issue	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total
Discriminatory terms, conditions, privileges, or services and facilities	10	7	26	19	26	60	44	37	34	263
Failure to make reasonable accommodation	11	6	47	17	27	52	33	23	28	244
Discriminatory refusal to rent	2	2	27	14	28	50	28	13	24	188
Discrimination in terms/conditions/privileges relating to rental	9	12	31	8	25	4	0	0	0	89
Discriminatory advertising, statements and notices	1	2	7	3	19	4	8	3	3	50
Discriminatory acts under Section 818 (coercion, Etc.)	7	7	3	4	8	7	4	1	3	44
Non-compliance with design and construction requirements (handicap)	0	0	0	0	0	0	3	3	6	12
Discrimination in services and facilities relating to rental	4	3	0	2	2	0	0	0	0	11
Otherwise deny or make housing unavailable	0	0	1	0	0	0	7	3	0	11
Failure to permit reasonable modification	0	1	0	0	2	0	2	0	0	5
Discriminatory advertisement - rental	0	1	0	0	2	0	0	0	0	3
Discriminatory refusal to rent and negotiate for rental	0	1	0	0	0	0	0	0	1	2
Steering	0	0	0	0	0	0	0	1	1	2
Discrimination in the selling of residential real property	0	0	0	0	1	0	0	0	0	1
Discriminatory refusal to sell	0	0	0	1	0	0	0	0	0	1
Failure to provide an accessible route into and thru the covered unit	0	0	0	0	0	1	0	0	0	1
Failure to provide usable kitchens and bathrooms	0	0	0	0	0	1	0	0	0	1
Total Issues	44	42	142	68	140	179	129	84	100	928
Total Complaints Found with Cause	30	32	78	41	76	76	63	40	43	479

ICRC Complaint Data

In 2016, the Iowa Civil Rights Commission (ICRC) received 854 calls and intakes, including 126 new housing complaints to investigate and documented probable cause in two (2) cases. In 2017, ICRC received 1,050 calls and intakes. These included 115 new housing complaints to investigate and documented probable cause in 1 case. Complete tables are included in the Appendix.

J. FAIR HOUSING SURVEY RESULTS

The Fair Housing survey has a total of 443 responses to date. The majority of survey respondents, to-date, are advocates/service providers, representing 86 respondents, or renter/tenants renters or tenants, representing 84 of the 443 total responses. Another 78 respondents represent local government, followed by 71 in real estate, and 57 in law or legal services. This is shown in Table IV.61.

Table IV.61
Role of Respondent
 Non-Entitled Areas of Iowa
 2018 Fair Housing Survey Data

Primary Role	Total
Advocate/Service Provider	86
Renter/Tenant	84
Local Government	78
Real Estate	71
Law/Legal Services	57
Banking/Finance	16
Insurance	8
Homeowner	4
Construction/Development	2
Property Management	1
Appraisal	0
Service Provider	0
Other Role	32
Missing	4
Total	443

As seen in Table IV.62, some 71 respondents are renters, while 119 are homeowners. The other respondents either classified their housing situation as “other,” or did not answer the question.

Table IV.62
What is Your Current Housing Situation?
 Non-Entitled Areas of Iowa
 2018 Fair Housing Survey Data

Tenure	Total
Homeowner with Mortgage	119
Renter	71
Other	58
Missing	195
Total	443

Some 12.2 percent, or 54 respondents, were not familiar with fair housing laws. However, some 33.6 percent, or 149 respondents, were somewhat familiar, and another 27.1 percent, or 21 respondents, were very familiar with fair housing laws.

Table IV.63
How Familiar are you with
Fair Housing Laws?

Non-Entitled Areas of Iowa
 2018 Fair Housing Survey Data

Familiarity	Total
Not Familiar	54
Somewhat Familiar	149
Very Familiar	120
Missing	120
Total	443

As seen in Table IV.64, some 60.2 percent of respondents think that fair housing laws are useful, while 2.3 percent of respondents do not. Some 26.0 percent of respondents feel that fair housing laws are difficult to understand, while 31.2 percent of respondents do not feel they are difficult to understand. Some 15.6 percent of respondents think fair housing laws should be changed, while 21.4 percent do not, and 33.6 percent do not know. However, only 15.1 percent of respondents think fair housing laws are adequately enforced, while 24.6 percent of respondents do not think they are adequately enforced.

Table IV.64
Federal, State, and Local Fair Housing Laws

Non-Entitled Areas of Iowa
 2018 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws are useful?	267	10	44	122	443
Are fair housing laws difficult to understand or follow?	115	138	67	123	443
Do you think fair housing laws should be changed?	69	95	149	130	443
Do you think fair housing laws are adequately enforced?	67	109	140	127	443

Respondents were told that disability and race are protected classes in fair housing law, and were asked to identify any additional protected classes. As seen in Table IV.65, some 186 respondents identified religion as a protected class, 165 identified gender, 148 identified sexual orientation, and 107 identified age.

Table IV.65
Protected Classes Listed
 Non-Entitled Areas of Iowa
 2018 Fair Housing Survey Data

Protected Class	Total
Religion	186
Gender	165
Sexual Orientation	148
Family Status	121
Age	107
National Origin	93
Color	74
Income	29
Disability	26
Marital Status	23
Military	13
Ethnicity	12
Race	10
Domestic Violence	7
Criminal History	6
Retaliation	3
Ancestry	2
AIDS	1
AIDS	1

Some 103 respondents, or 23.3 percent, are aware of a training process available to learn about fair housing laws. Some 32 respondents, or 7.2 percent of respondents, are aware of fair housing testing. While almost 30 percent of respondents feel there is too much outreach and education activity, some 28.2 percent do not know. Similarly, while 16.2 percent of respondents feel there is too much fair housing testing, some 47.2 percent do not know.

Table IV.66
Fair Housing Activities
 Non-Entitled Areas of Iowa
 2018 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total	
Is there a training process available to learn about fair housing laws?	103	171	20	149	443	
Are you aware of any fair housing testing?	32	162	101	148	443	
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	4	34	131	125	149	443
Is there sufficient testing?	1	13	72	209	148	443

Barriers to fair housing in the private sector are shown in Table IV.67. Respondents were most likely to be aware of questionable practices or barriers to fair housing choice in the rental housing market with 66 respondents indicating barriers. This is followed by the mortgage and home lending industry and the housing construction or accessible housing design fields, with 33 respondents indicating there are barriers or questionable practices in each category.

Table IV.67
Barriers to Fair Housing in the Private Sector

Non-Entitled Areas of Iowa
 2018 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	66	117	83	177	443
The real estate industry?	28	106	133	176	443
The mortgage and home lending industry?	33	99	133	178	443
The housing construction or accessible housing design fields?	33	108	124	178	443
The home insurance industry?	14	99	153	177	443
The home appraisal industry?	18	101	147	177	443
Any other housing services?	21	94	141	181	443

Barriers to fair housing in the public sector are shown in Table IV.68. The most respondents identify questionable practices or barriers to fair housing choice in limited access to governmental services, such as employment services, with 89 respondents indicating this barrier, as well as 35 respondents indicating public administrative actions or regulations. Some 31 respondents indicated land use policies, and another 30 cited occupancy standards or health and safety codes.

Table IV.68
Barriers to Fair Housing in the Public Sector

Non-Entitled Areas of Iowa
 2018 Fair Housing Survey Data

Question	Yes	No	Don't Know	Other	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:						
Land use policies?	31	94	98	.	220	443
Zoning laws?	23	90	108	.	222	443
Occupancy standards or health and safety codes?	30	83	107	.	223	443
Property tax policies?	21	84	117	.	221	443
Permitting process?	16	85	119	.	223	443
Housing construction standards?	21	87	112	.	223	443
Neighborhood or community development policies?	27	85	107	.	224	443
Limited access to government services, such as employment services?	89	72	57	.	225	443
Public administrative actions or regulations?	35	76	106	.	226	443
Barriers to affordable housing developments	13	12	38	0	240	443

Table IV.69 rates how respondents feel that individual contributing factors affect their communities. Access to parks, libraries, other public facilities was seen as a strongly negative contributing factor for 36 respondents, followed by 30 stating that access to proficient public schools was a strongly negative factor. On the other hand, lack of affordable housing and lack of affordable public housing was seen as a strongly positive affect on the community by 95 and 87 respondents, respectively.

Table IV.69
How do these contributing factors affect y our community?
 Non-Entitled Areas of Iowa
 2018 Fair Housing Survey Data

Factor	Strongly Negative	Moderately Negative	No Effect	Moderately Positive	Strongly Positive	Missing	Total
Access to public transportation to schools, work, health care, services	13	12	38	74	66	240	443
Access to good nutrition, healthy food, fresh vegetables, etc.	21	22	64	60	35	241	443
Access to school choice	31	33	52	50	36	241	443
Access to proficient public schools	30	36	61	43	32	241	443
Access to parks, libraries, other public facilities	36	32	69	44	19	243	443
Access to health care	27	18	42	61	54	241	443
Access to mental health care	14	14	29	58	88	240	443
Access for seniors and/or people with disabilities to public transportation	18	15	37	58	77	238	443
Lack of affordable housing	12	14	36	47	95	239	443
Lack of affordable public housing	11	15	42	45	87	243	443
Lack of acceptance of housing choice vouchers	20	17	51	55	56	244	443
Access to education about fair housing laws	14	37	53	52	44	243	443
Gentrification and displacement due to economic pressures	26	34	60	41	38	244	443
Lack of Collaboration between agencies	28	40	49	42	43	241	443
Other	21	2	2	4	7	407	443

The effect of fair housing issues on communities, as seen by survey respondents, is shown in Table IV.70. Challenges for persons with disabilities were seen as extremely affecting the community by 56 respondents. Concentrations of poverty and concentrations of racial and ethnic minorities and poverty were seen as extremely affecting communities by 49 respondents, each.

Table IV.70
How greatly do each of the following fair housing issues affect our community?
 Non-Entitled Areas of Iowa
 2018 Fair Housing Survey Data

Factor	None	Slightly	Moderately	Significantly	Extremely	Missing	Total
Segregation	36	40	51	35	28	253	443
Concentrations of racial or ethnic minorities	29	33	55	43	36	247	443
Concentrations of poverty	18	29	46	53	49	248	443
Concentrations of racial and ethnic minorities and poverty	24	35	44	47	49	244	443
Disparities in access to opportunity	25	29	49	47	48	245	443
Disproportionate share of housing problems	20	33	47	49	44	250	443
Inequality to access to public housing	29	35	51	45	36	247	443
Challenges for persons with disabilities	19	31	44	51	56	242	443
Lack of fair housing enforcement	33	34	41	39	45	251	443
Other	18	0	6	1	4	414	443

As seen in Table IV.71, some 23 respondents were aware of any city or county fair housing ordinances, regulations, or plans. Some 22 respondents indicated that there were specific geographic areas that have fair housing problems.

Table IV.71
Local Fair Housing
 Non-Entitled Areas of Iowa
 2018 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any city or county fair housing ordinance, regulation, or plan?	23	97	87	236	443
Are there any specific geographic areas that have fair housing problems?	22	105	80	236	443

SECTION V. FAIR HOUSING GOALS AND PRIORITIES

OVERVIEW

Title VIII of the 1968 Civil Rights Act, also known as the Federal Fair Housing Act, made it illegal to discriminate in the buying, selling, or renting of housing based on a person's race, color, religion, or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected characteristics. Federal fair housing statutes are largely covered by the following three pieces of U.S. legislation:

1. The Fair Housing Act,
2. The Housing Amendments Act, and
3. The Americans with Disabilities Act.

The purpose of fair housing law is to protect a person's right to own, sell, purchase, or rent housing of his or her choice without fear of unlawful discrimination. The goal of fair housing law is to allow everyone equal opportunity to access housing.

ASSESSING FAIR HOUSING

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. These provisions come from Section 808(e) (5) of the federal Fair Housing Act, which requires that the Secretary of HUD administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG)¹², and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As a part of the consolidated planning process, and entitlement communities that receive such funds as a formula allocation directly from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH). This was the Analysis of Impediments to Fair Housing Choice and a Fair Housing Planning Guide offering methods to conduct such as study was released in March of 1993.

In 2015, HUD released a new AFFH rule, which gave a format, a review process, and content requirements for the newly named "Assessment of Fair Housing" or AFH. The assessment would now include an evaluation of equity, the distribution of community assets, and access to opportunity within the community, particularly as it relates to concentrations of poverty among minority racial and ethnic populations. Areas of opportunity are physical places, areas within communities that provide things one needs to thrive, including quality employment, good schools, affordable housing, efficient public transportation, safe streets, good services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes.

¹² The Emergency Shelter Grants program was renamed the Emergency Solutions Grants program in 2011.

The AFH would also include measures of segregation and integration and provide some historical context about how such concentrations became part of the community's legacy. Together, these considerations were intended to better inform public investment decisions that would lead to amelioration or elimination of such segregation, enhancing access to opportunity, promoting equity, and hence housing choice. Equitable development requires thinking about equity impacts at the front end, prior to the investment occurring. That thinking involves analysis of economic, demographic, and market data to evaluate current issues for citizens who may have previously been marginalized from the community planning process. All this would be completed by using an on-line Assessment Tool.

However, on January 5, 2018, HUD issued a notice that extended the deadline for submission of an AFH by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020. Then, on May 18, 2018, HUD released three notices regarding the AFFH; one eliminated the January 5, 2018, guidance; a second withdrew the on-line Assessment Tool for local government program participants; and, the third noted that the AFFH certification remains in place. HUD went on to say that the AFFH databases and the AFFH Assessment Tool guide would remain available for the AI and encouraged jurisdictions to use them, if so desired.

Hence, the AI process involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, housing transactions, locations of public housing authorities, areas having racial and ethnic concentrations of poverty and access to opportunity. The development of an AI also includes public input, focus groups, and interviews with stakeholders, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified fair housing issues/impediments.

In accordance with the applicable statutes and regulations governing the Consolidated Plan, IEDA and IFA certify that they will affirmatively further fair housing, by taking appropriate actions to overcome the effects of any impediments identified in the Analysis of Impediments to Fair Housing Choice, and maintaining records that reflect the analysis and actions taken in this regard.

OVERVIEW OF FINDINGS

As a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback, IEDA and IFA have identified a series of fair housing issues/impediments and other contributing factors that contribute to the creation or persistence of those issues.

Table V.1, on the following page, provides a list of the contributing factors that have been identified as causing these fair housing issues/impediments and prioritizes them according to the following criteria:

1. High: Factors that have a direct and substantial impact on fair housing choice
2. Medium: Factors that have a less direct impact on fair housing choice or that IEDA or IFA has a comparatively limited capacity to address
3. Low: Factors that have a slight or largely indirect impact on fair housing choice or that IEDA or IFA has little capacity to address.

Table V.1
Contributing Factors
 State of Iowa

Contributing Factors	Priority	Justification
Discriminatory terms/conditions	High	The fair housing survey and public input. HUD complaint data indicated that discriminatory terms and condition were the most frequently cited fair housing complaint issue between 2008 and 2016 in non-entitlement areas of the state.
Discriminatory patterns in lending	High	As demonstrated by 2008-2016 HMDA data, black and Hispanic loan denial rates exceeded 15.9 percent and 17.3 percent respectively, compared with 10.2 percent for white households
Access to proficient schools	Low	School proficiency index are almost markedly lower for black and Hispanic populations than white school proficiency, indicating inequitable access for black and Hispanic households to proficient schools. There are various areas in the State, particularly in rural areas, with low school proficiency. However, IEDA and IFA have little control over increasing access on a large scale.
Lack of access to services for persons with disabilities	High	Public input during the access to opportunity workgroups indicated that persons with disabilities have barriers in access to services vary across the state, and are lacking in rural areas
Access to low poverty areas	High	Black and Hispanic households have a lower low poverty index than white households for non-entitlement areas, as demonstrated by low poverty indices.
Moderate levels of segregation for black and Hispanic households	High	Black and Hispanic households have moderate levels of segregation in the State, which has increased since 2000. Other racial minorities also have moderate to high levels of segregation in the non-entitlement areas of the State, but represent a small proportion of the overall population.
Black and Hispanic households tend to have higher rates of housing problems	High	Some 44.7 percent of black households and 36.5 percent of Hispanic households experienced cost burden or severe cost burdens in 2014, according to CHAS data, compared to the jurisdiction average of 21.6 percent
Insufficient accessible affordable housing	High	Public input and the Disability and Access Workgroup indicated that persons with disabilities have a lower level of access to financial services to access accessible affordable housing. In addition, the availability of accessible housing is limited, particularly in the more rural areas of the State.
Failure to make reasonable accommodation	High	The second most frequent HUD fair housing complaint issue with cause between 2008 and 2016 was failure to make reasonable accommodation, accounting for 244 complaints. The basis of 312 complaints during this time period was based on disability.
Lack of fair housing infrastructure	High	The fair housing survey and public input indicated a lack of collaboration among agencies to support fair housing
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education
Insufficient understanding of credit	High	The fair housing survey and public input indicated an insufficient understanding of credit

ADDITIONAL FINDINGS

In addition to the table above, there are several significant findings or conclusions summarized here. Overall, non-entitlement areas of the State have a moderate level of segregation by race and ethnicity, particularly for black and Hispanic households. The non-entitlement areas of the State do not have any Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) at the time of this report.

Black and Hispanic households have lower access to areas of opportunity, including access to proficient school and low poverty areas. Rural areas tended to have lower access to transportation, jobs, and proficient schools than more urban areas.

Black and Hispanic households have a higher incidence of housing problems, as well as a higher incidence of mortgage denials in the non-entitlement areas of the State.

Persons with disabilities may have difficulty locating accessible and affordable housing, particularly in the more rural areas of the State. Households with disabilities may face discriminatory terms and conditions or lack of reasonable accommodations in housing choices.

The survey and public input revealed there is a continued need for fair housing outreach and education in the non-entitlement areas of the State.

FAIR HOUSING ISSUES, CONTRIBUTING FACTORS, AND PROPOSED ACHIEVEMENTS

The Table V.2, on the following page, summarizes the fair housing issues/impediments and contributing factors. It includes metrics and milestones, and a timeframe for achievements as well as designating a responsible agency.

Table V.2
Fair Housing Issues, Contributing Factors, and Recommended Actions
 State of Iowa

Fair Housing Issues/ Impediments	Contributing Factors	Recommended Action to be Taken	Responsible Agency
Segregation	Moderate levels of segregation for black and Hispanic households	Promote the development of affordable housing units in high opportunity areas	IFA & IEDA
Disparities in Access to Opportunity	Access to proficient schools	Promote the development of affordable housing units in low poverty areas and areas with proficient schools	IFA & IEDA
	Access to low poverty areas		
	Lack of access to services for persons with disabilities	Continue to work with the Olmstead Task Force to reduce barrier to affordable housing for persons with disabilities	
Disproportionate Housing Needs	Black and Hispanic households tends to have higher rates of cost burdens	Continue to preserve affordable housing options through owner-occupied and rental rehabilitation and expand affordable housing options throughout the State. Review programs on an annual basis.	IEDA & IFA
Publically supported housing	Insufficient accessible affordable housing	Continue to require projects under LIHTC, HOME, and NHTF to establish Affirmative Fair Marketing Plans (AFHMP) that reduce barriers to housing	IFA
Disability and Access	Insufficient accessible affordable housing	Continue to work with the Olmstead Task Force to reduce barrier to affordable housing for persons with disabilities Explore the option of creating a program to provide home loan opportunities targeted to people with disabilities. Encourage a percentage of new LIHTC and HOME units are accessible in areas with higher access to needed services. Continue use of LIHTC's Qualified Action Plan (QAP) Olmstead Goals.	IFA
	Failure to make reasonable accommodation		
Fair Housing Enforcement and Outreach	Failure to make reasonable accommodation	Continue to work with Iowa Civil Rights Commission (ICRC) to provide trainings, CDBG grantee requirements on an annual basis. Promote outreach and education related to credit for prospective homebuyers. Include enhanced financial literacy for senior high school students	IEDA
	Insufficient fair housing education		
	Insufficient understanding of credit		
	Discriminatory patterns in lending		
	Discriminatory terms and conditions		

SECTION VI. APPENDICES

A. DISABILITY AND ACCESS WORK GROUPS

Disability and Access Work Group 1

Presentation: Good Morning everyone. It is a pleasure to be here with you. My name is Rob Gaudin. I am representing Western Economic Services. I also have with me our project manager Megan Brace.

Comment: Hi everybody.

Presentation: We are going to walk through at least initially some of the issues related to the Analysis of Impediments and give you some background about why we are doing this study. Then get into more specific discussion of Disability and Access Work Group and the experiences persons with disabilities have. Now, I want to emphasis here that this rule to affirmatively further fair housing is kind of an interesting thing. We will talk through that. Our purpose is to gather local knowledge and your perspective. I certainly want to get your commentary about how this AI process is proceeding and what we are doing, but I also want to introduce you to the fact that we do have a fair housing survey out there right now. We can take a look at it. It is right down here in the bottom row, this link. It is an online survey. You should and if you haven't yet been receiving an announcement from the Iowa Economic Development Authority about responding to that. I certainly want you all to participate today. The idea is to get help from you in identifying fair housing issues and impediments and the related contributing factors for person with disabilities and get your recommendations on perspective actions that could be taken by the Iowa Economic Development Authority or the Iowa Finance Authority to address these fair housing issues/impediments. This is really a significant issue. At the conclusion, I really want your feedback on the draft report. There will be a draft report coming out eventually, like in a few months, and that is what we really want to hear from all of you. So I really want to thank you for coming to today's meeting.

As I mentioned at the onset, at this first meeting I want to take a look at how this Affirmatively Furthering Fair Housing rule has evolved, and present some basics of HUD provided data and maps. We can talk about that and really orient you to where we are going with this Disability and Access Work Group. We are going to have two more sessions and hopefully each will build on the previous on. Now this particular study is done by many jurisdictions. These listed here, Ames, Cedar Falls, and Cedar Rapids; and so on they also do an Analysis of Impediments. In many ways they are "entitlement communities" who receives funding from HUD; in exchange they need to do some reporting back to HUD. There is a Consolidated Plan, there are Annual Action Plans, there are is a Consolidated Annual Performance Evaluation Report and there is also an Analysis of Impediments, because all of these communities do their own that leaves the remainder

of the state, which looks something like this. Notice these communities here; they are not part of this particular study. So this is called the non-entitlement area. That is in particular what we are going to address today. Those communities and that are outside the entitlement areas. Now the protections found under this particular rule, under both federal and state fair housing law give protection to several groups, federal are race, gender, religion, familial status, disability, national origin, and color and the state also has sexual orientation and sexual identity. I noted earlier that communities, the state jurisdiction must certify that they are affirmatively furthering fair housing as a condition of receiving funds from HUD. This is an important concern and for the last 20 years we have been conducting AIs for jurisdictions throughout the country and that is identifying barriers to fair housing choice. These impediments or barriers if we find them then we need to determine what the jurisdiction is going to do, what they might wish to do, and response to those actions. The idea here is to we get on a plan that goes along with the Consolidated Plan, but starting in 2015, HUD didn't really think that that was enough. So they provided a revised rule for affirmatively furthering fair housing. They gave this a new name called Assessment of Fair Housing. They provided data and a mapping system and an electronic tool which asked certain questions. You could also add local knowledge and data, but it was specifically to identify fair housing issues, address those contributing factors, and prioritize your fair housing goals and actions. Now what does that mean? If our fair housing issue is condition that restricts fair housing choice and the key difference was more access to opportunity. Opportunity areas are physical places. They have safe neighborhoods, high quality of schools, good grocery stores, good transit, and the contributing factors creates or contributes to, perpetuates, or increases the severity of the fair housing issues. So we are really seeing areas of opportunity and areas that may have opportunity. So we really are adding this element into our analysis of fair housing. So our fair housing goals are actually commitments to take to go after those barriers or restrictions to fair housing choice or those barriers to accessing high quality neighborhoods. So these are the issues. Some fair housing issue examples segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, disproportionate housing needs. In each case we are talking about those protected classes and whether they have a higher share than normal in housing needs or unmet housing. Here we have disability and access, the particular topic of today's discussion or we see discrimination or violation of the civil rights law or regulations. Contributing factor examples, we have lending discrimination; we have lack of local fair housing enforcement; lack of affordable accessible housing in a range of unit sizes. We might have community opposition to a particular housing facility or housing type for a particular group. We also have steering and redlining for either home sales or realtors or others. Other examples might also be impediments to mobility and inaccessible government facilities, lack of governmental coordination and corporations. We certainly have challenges with all site selections and policies and maybe it is access to financing or lack of knowledge of fair housing law. These are general examples of the contributing factors. Now the assessment tool it was actually never made available for states and so when you try to use it and you can go to this here, egis.hud.gov, and you can select a state or insular area and select Iowa and you get this issue right here: No data provided. You would I think that that would be the end of it. The reality is all the data really is there, but

you just cannot select it. You can and we will be downloading everything that is available. So just to illustrate what this looks like, I would like to go to a local government. Even though Des Moines is an entitlement and it is not part of the study, at least I would like to show you what that data looks like. You can select tables or maps from a dropdown list, but this. Data version was released November 17th, 2017. So when we go to this source and here I have selected Des Moines, this is the city and this is what all this means here, these dots. This is what the geographic mapping system looks like. It is not particularly goes. When we look at publically supported housing, each one of these colors is a different type of public housing. These gray shadings are the share of vouchers. So there is definitely too much information on these maps. Even when we go to persons with disabilities, this data source, here we have a hearing disability, these orange dots, 75 people for each dot in each Census tract. Vision disability, these green and I really can't tell them apart, purple and green are very close for cognitive disability. There are three other disabilities which produce a different map, so it is not that good. Here is severe cost burden, again Des Moines, and we don't know which year of the Comprehensive Housing Affordability Strategy data this was from. What has transpired since this was released; HUD issued another rule on January 5 where they postponed submittal of the Assessment of Fair Housing. They had gotten a bunch of people to submit and a third of them were not approved by HUD. So they decided to postpone it to allow people time to prepare them. HUD however still encouraged agencies to utilize the assessment tool data and some of the rules in the guidebook, use the AFH framework. So that is how we are going to be doing, using the AFH framework. We are going to update, correct, and use more current data. We are going to be doing several of the steps laid out in our process. The outline of the report looks like this and of course there is an executive summary, and how we did with our community participation process and how we engaged the public. We will also take a look at what we have done in the past, what were the fair housing goals and actions that we have taken in the past, but the real key is the fair housing analysis. It really goes on with assessing the segregation again in the non-entitlement areas of the state. It takes a look at RCAP and ECAP. This is a huge concern of HUD's with lots of rules and the reality is Iowa's non-entitled areas of the state have zero RCAPS, if you will, so we really cannot do much with that. There may be disparities with access to opportunity. What is the ability of the community to access the mortgage market for example. There may be disproportionate housing needs I selected protected classes. Maybe they have a higher cost burden than others. There is also and we need to do a bit of analysis on publicly supported housing. All of that data is in the assessment tool. We can't get it to create tables, because there is no state tool, but we can extract the data and present it in geographic maps and other types of data. Then there is the whole topic on disability and access, particularly as it relates to persons with disabilities and of course we have our fair housing enforcement housing complaint and so on. I think most people who have been in attendance have now dialed in. I would like to take a moment if you don't mind and for each person to take a moment to tell us about why you are attendance of today's meeting.

Introductions

Presentation: Thank you all for attending. I do have some issues here; we have some 2016 American Community Survey Data (ACS). These are persons with disabilities. The interesting thing is of course is older citizens, 65 to 74, 75 or older have a significant portion of our citizens have disabilities in the non-entitled areas of the state. It is around 110,000 people. So especially the 75 or older group, 44 percent of that group has some disability challenges. Where these disabilities are is another of the concerns, but first I want to show you a tally. Individuals can have one or more disabilities, but this is just a tally of persons with disabilities and the type of disability they have. Recall that when we looked at the assessment tool map, we have these funny little dots and we had hearing, vision, and cognitive disability. I also noted there is ambulatory, self-care, and independent living difficulties significantly there are 117,000 of person according to the 2016 5-Year ACS that have an ambulatory disability. Now I want to emphasis one of the really important parts of this is for you all to offer your opinion, you perspective and commentary. Tell us a little bit about your clientele, because in a way the assessment tool asks us six sets of questions. Now where we are going with this is I am going to summarize after this meeting is over, we actually have to also give a registrant of this session, who is also hearing impaired, a transcript as well as this presentation for them to comment upon, but the idea is I will go over what everybody has suggested and lay out the fair housing issues, contributing factors, and identify either IFA or IEDA, the two agencies that might be able to do something and what that action might be. So in a way we are trying to formulate policy for the state. Of course IEDA and IFA will need to approve that and so on, but at least we can get your input. So the first question we need to talk about are whether persons with disabilities and how they are geographically dispersed or concentrated. I have prepared a map and there do seem to be areas with some concentrations. Again, this is the non-entitled areas and we are not talking about the larger communities throughout the state, but more the rural areas. Maybe somebody can comment about this.

Comment: I think it is true. We actually serve all 99 counties here at the Iowa Department for the Blind and while we do have a lot of concentration of our applicants and clients that we serve in the larger metro area. We also have a large concentration in rural Iowa where are teachers who serve and we have independent living and trying to keep people in their homes longer, we do find that in the rural areas that that is where we are finding it harder and harder to find enough affordable housing for these individuals who want to stay in their homes. They are talking about and it seems to them that their only option is to look into transitioning into assisted living or a nursing home, which we assess as really not needed if there were affordable housing available.

Presentation: Thank you. Do these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges? I have prepared some geographic maps for us to look at. So in this first case, this is person with ambulatory disabilities. We see significant challenges in some communities outside major cities of Iowa and these issues are challenges. Is there anyone who can offer commentary about the differences between these Census tracts? Some of the persons and this is calculated from a tally of total disabilities. It appears that of the disabled community some of these Census

tracts tend to have a higher concentration of persons with ambulatory disabilities. Why would that be so varied throughout the state? Anybody have an opinion?

Comment: I have an opinion. I think we are seeing the population is aging, we are seeing more people that we are serving even though they are blind or experiencing significant vision loss, they are also experiencing secondary medical conditions and much of it is ambulatory in nature. A lot of our folks are moving to the support canes and needing to have walkers for various reasons. So those are also ambulatory disabilities. Some of them actually that we serve also are wheelchair users and many of them do live in rural Iowa.

Presentation: Thank you. So we have persons with cognitive disabilities, it is a lower rate, but it does show that there are a couple of areas outside the major communities that trend to have a higher incidences of higher cognitive disabilities. Again is there a particular reason for that?

Comment: Is the state facility there?

Presentation: There?

Comment: No the one closer to Des Moines would that be Woodward?

Comment: That is exactly that is around the cities and not particularly right by them, but it is probably (Not Discernable).

Presentation: Thank you. How about persons with hearing disabilities? Would there be some particular reason that many of these Census tracts tend to have a higher incidence of persons with hearing disabilities?

Comment: I would guess access to services plays a role.

Presentation: Alright. Independent living difficulties. Again we do have this area here, but there are certain communities if you will that tend to have some challenges. Can you offer any perspective on this particular issue?

Comment: I think all of these in general; you know Woodward kind of jumped out to me as that one pocket outside of Des Moines. Woodward would be in Dallas County, but there are, unfortunately there are institutional facilities left throughout our state, scattered throughout our state and I do not know if there is some ability to overlay where those institutional facilities are at in comparison to your map. I would guess that explains some of the concentrated areas, but I am not sure about all of them.

Presentation: We also have self-care disabilities. Some of these seem to have multiple challenges and then we have vision disability.

Comment: I have a question if I can digress to the last one on the self-care. Is that more geared toward the health care system? Is the self-care, because they can't or don't have

proper access. It could be financially related that they don't have the adequate financial support to get what they need to access proper self-care, insurance wise or maybe it is based on their location. Maybe there is not enough service providers that provide the self-care.

Presentation: The ACS is a survey of individuals, so it is whatever the individual expressed at that time. It could be a variety of reasons that they feel they are having difficulty taking care of themselves. Here is the vision again. The interesting thing is we do have some differences by age. Here is 0-17, 18-64, but significant differences for those seniors. It is just statewide. It is significant problem. We can go back here and not so bad, a little bit, and the significant challenges as she was saying earlier for those citizens who are older. That is important when we talk about these things, the kind of questions that this tool asks us to reply to. I am just going to pose these questions to you and ask for your reaction to them. Do the non-entitled areas of the state have sufficient affordable accessible housing in a range of unit sizes? She said that this is not the case. Would anyone else care to comment about that? So where are the affordable accessible housing units located in the non-entitled areas of the state? So the idea here is offering you an opportunity to express your opinion. Even if you feel you are making all of the conversation. I would certainly like to hear what you have to say. So to what extent are persons with disabilities able to access and live in different categories of publically supported housing? Anything you would like to say about that?

Comment: I am hearing people tell me that there are wait lists. That they don't know where they are going to go, they are on a wait list. They can't afford \$3,000 a month for housing while they are waiting. I just got a call the other day from someone who said that there had been some changes; they are being asked to move out of an independent living facility because of some changes. This is an elderly person who is 89 years old. They do not know where they are going to move and she can't afford the cost of moving into a place while she is waiting for the housing, the public housing and so I know it is a problem. I am not saying to is a problem everywhere so let me be clear about that. But I think there are definitely some pockets around the state that this is a problem and that there are some folks with limited income that really truly can't afford housing and they are either trying to have to move in with son or daughter, if son or daughter live here or maybe even move out of state. They don't want to do that. I just had somebody move back for Colorado who was living with daughter who did not want to live with daughter anymore and is struggling to meet the rent and hoping to get onto public housing assistance. So I do know that it is a struggle for folks to find affordable public housing.

Presentation: Thank you. I do see that they have offered us another comment. I will read that to you. This was related to the ambulatory disability map and their comment says: Could these be related to farm related accidents that resulted in ambulatory disabilities? I am not certain, but it is certainly possible. The third set of questions that we need to consider, do persons with disabilities in the non-entitled areas reside in segregated or integrated settings? What is the range of options with persons with disabilities to access

affordable housing and supportive services? What are the state's efforts to access segregated settings for persons with disabilities? Anyone have any reaction to these issues?

Comment: I think the goal is certainly to maintain community based housing options and make sure that people are in integrated settings and I think that the state has made some strides in that area typically as under the Medicaid waiver program. That is a requirement, but clearly there is still a long ways to go in that regard and I don't think that we are as far along, particularly in rural areas on the road to fully integrated settings as, many of us would like.

Presentation: Also, there are and there might be disparities in access to opportunity for persons with disabilities. Remember access to opportunity, we are talking about opportunity areas which are desirable neighborhoods. Maybe they have good jobs, high paying jobs, proficient schools, great grocery stores, sidewalks with cutouts. The idea here is to what extent are persons with disabilities able to access the following: government services, public infrastructure, proficient schools or educational programs, maybe there are special needs programs as well, state funded transportation, a system or state jobs. So do you have any reaction to these?

Comment: We could probably spend a day and a half, so I just totally think all of these things are relevant to everything that we are discussing. I know in smaller communities infrastructure is often a problem. The sidewalks obviously, most small communities, especially the one I came from often did not have sidewalks or cutout for that matter. So all of those things are important things and access in general for individuals with disabilities is always going to be a consideration, but you know I also say at the same time sometimes it is a two way street here. Sometimes I think people with disabilities may need to make good choices about where they want to live in order to access good services too. I know it is hard sometimes to leave the farm, if you will, to move to an area that might offer better opportunities to live independently, but sometimes we all have to make those choices in life. So Iowa is a great place to live and grow, but not all places in Iowa offer great things. There are great little towns, but not all great little towns have good public infrastructure.

Presentation: Thank you. Also, the last couple of issues that the assessment tool asks us to address, disproportionate housing need. What that represents are households who may have a cost burden, or severe cost burden, being overcrowded or severely overcrowded, or households that might have incomplete kitchen or plumbing facilities. These are all unmet housing needs. So the question is do persons with disabilities experience these things the same as the general population or more frequently than the general population?

Comment: I just have a question. Do we have any data on that?

Presentation: I do not. I can tell you how many people have this particular set of unmet housing needs, but I do not have data on how many of those in that situation have a disability. I am hoping to defer to you as an expert to provide your commentary about that for the non-entitled parts of the state.

Comment: So cost burden is that one of those categories or is that...

Presentation: Yes it is cost burden, or severe cost burden, being overcrowded or severely overcrowded, as well as households that might have incomplete kitchen or plumbing facilities. So those are all of the different types of unmet housing needs. So with those housing needs they fall disproportionate more upon persons with disabilities?

Comment: This is just really antidotal from IFA's perspective, it does seem to me that cost burden; the cost burden share amongst persons with disabilities seems to be higher. Obviously people at SSI level incomes in particular, by definition are almost even in rural areas where rents might be, where housing costs might be a little lower it seems disproportionate share of income on that SSI level.

Presentation: Thank you.

Comment: I would agree with that it depends on their income level and it is also going to depend if they are in public housing where we know that typically public housing has to meet specific state guidelines for the upkeep. They usually have managers that upkeep it verses private housing where a lot of times you will see the actual manager or homeowner and I have been in homes before where it was pretty ugly. Plumbing wasn't kept up and there were maybe kitchenettes and they were not working properly like the sinks were not working, but that is privately owner. A lot of it depends on if the person is on SSI verses SDI on their income situations, because not all people who are on Social Security Disability and they may have a second income in the house. They may be living just fine.

Presentation: Thank you. Another thing I wanted to consider here are the contributing factors for person with disabilities. To what extent can again in the non-entitled areas in the state, do land use or zoning laws influence persons with disabilities occupancy codes or restrictions, community opposition, just to name a few. We are wrapping up our conversation here, so this is really another opportunity for you to give us your perspective and commentary.

Comment: I would like to comment on the lending discrimination. I think lending is one of the toughest ones for folks with disabilities, because often they do and those who are on restricted incomes such as social security disability, social security retirement, or supplemental security income, SSI, they do have more restricted income and the least to give in terms of security interest to banks and that sort of thing. So I don't know if I would call it discrimination, but certainly they are not in a position, if you will. It is a contributing factor for them not typically be considered for housing loans and that sort of things and that is where IFA could help a little bit more maybe somehow, but I do not know how. You know having programs more readily available for people who are maybe in that income level that have a little bit less to give, but need affordable housing and could make the monthly payments, but be at a lesser interest rate and a little bit more affordable payment.

Presentation: Thank you very much. Anybody else?

Comment: I will just echo that as a staff person we get a lot of calls from people with disabilities who want to become homeowners and are in search of a program, a lending program or maybe a downpayment assistance program that is specific to persons with disabilities and to my knowledge there is no such program so that does seem to be a significant need.

Presentation: Thank you. Anyone else? We have two more workgroup meetings, September 13th and October 18th. The 13th we will get review our fair housing issues and some contributing factors and decide on some actions. Then we will review those things on our October 18th meeting.

Comment: Are you going to send this presentation to us so that we could share it? Maybe to folks who couldn't make the call today to share some input?

Presentation: Yes, there were a few folks who registered who did not make it. We have their email, but we will be sure to send you the transcripts and the presentation. It should be about a week. That will be soon coming. If you have any other questions or concerns, please feel free to email Nichole, but we will make sure that you get the presentation and transcripts. I can send you the presentation right away, but it will take a little bit to transcribe that. So that concludes our presentation. If there is something that you would like to add, please this is a great time to do it. Thank you. I look forward to our next productive meeting.

Disability and Access Work Group 2

Presentation: Our purpose here today is to review what we talked about last time. I put some slides together that talk about those things. I want to emphasize our duty to affirmatively further fair housing. Now this particular task is required by HUD in exchange for receiving money for housing and community development purposes. I will also like to review briefly some preliminary findings from the Fair Housing Survey. Then we can discuss fair housing issues and impediments and their contributing factors and what should be done about them. I am not going to play the role of advocate or anything like that. I just am trying to make sure to document what we did last time, what was said last time, and what we might do about what we said last time. First I want to take a quick overview of the Fair Housing Survey as it stands to date. We have got 362 replies as of a couple of days ago. It is a good sample for the rural areas of Iowa. So this is great. We have a good advocate service provider response, 75; renters and tenants, 73; units of local government, 72; real estate, 55; law and legal services, 42; and then a smattering of some other roles and responses within the industry. So these are good places to start with this survey. So, I am delighted that we are having these kinds of responses thus far. We have asked several questions about fair housing laws. Do you think they are useful? A huge majority saying yes. Are they difficult to understand? A significant number say they are actually difficult to understand. Note that these first questions only four responses were missing. When we are here it has jumped up to 100 roughly. Never the less we think if they are difficult to understand there might be a role for some outreach and education. Should they be changed? Not that many people are saying yes. A portion, but many people are saying don't know as it says right here and the number of people missing is increasing a little bit. Are they adequately enforced? Even fewer say yes, but a number are saying don't know. Barriers to fair housing in the public sector. Really not that many, 362, but look how missing is increasing. Not too many people are saying yes in each of these things in the public sector. This one is a little bit higher; limited access to government services such as employment services. There are a number of people who are saying yes to that. So there are some, but not significant. Again, we have a number of people who are answering don't know. Particularly when we look at the permitting process. So we have some challenges there. In the private sector, we have a number of people saying yes, but in the home insurance industry, home appraisal industry, any other housing services provided, not so much. The only one that gives us any indication is the rental housing market, but it is almost 2 to 1 in favor of no, but these other sectors such as the real estate industry, mortgage and home lending, housing construction, very few people are saying that yes they see questionable practices or barriers in those areas. How do these contributing factors affect your community? Lack of affordable housing, access to mental health, lack of affordable public housing, access for seniors and people with disabilities to public transportation. Quite a number of extreme votes over here, but notice missing. This is almost 200 of the 362. So people are skipping these questions quite often. How greatly does each of the following fair housing issues affect your community? Again, lots of people skipping these questions, note segregation is extremely, moderately, none. It is almost even across this. Somewhat here for concentrations for racial and ethnic minority. It is moderate. The same now of extreme significant, moderate concentrations of poverty. Somewhat the

same 41, 34, 36 here concentrations of racial and ethnic minorities. That is gives us an idea about what we are seeing for the preliminary results of the survey. Now I would like to turn my attention, our attention back to our AI report and what we are doing. The content that HUD has directed us to have is this layout here. What we are really addressing today with the Disability and Access Workgroup is part of the fair housing analysis. There are seven pieces, topic areas; these are actually called fair housing issues. We need to address them in the non-entitled areas and more rural areas of Iowa there are no racial or ethnic concentrated areas of poverty. So that issue goes away for us, but when we were talking last time we were really discussing disability and access. Our ideas here really came out in four different ways. For people with disabilities, it was the group's belief that segregation is a problem and that is related to concentrations of persons with disabilities in select rural areas of the state. We also discussed disparities in access to opportunity, particularly for persons with disabilities who have lower income and due to a lack of housing programs. Furthermore what we have seen are some disproportionate housing needs, cost burdens, insufficient or incomplete plumbing, and publically supported housing those were insufficient. Now there are seven issues here, we decided for persons with disabilities that we have four problem areas. When we looked over our transcripts from the last meeting, we can see that was why segregation stated. If you see or disagree with anything here, please speak up, but there are really kind of five things. Access to disability services, concentrations of locations of disability services or accessible housing, lack of affordable accessible housing, those are the other things. What I would like to talk with you about, if you do not mind and I would like to get your feelings on what these mean. So when we do something about segregation, these are the things that people talked about last time. How do we wish to change access to disability services? That is a question for you all to answer. Any thoughts on that? Also, we had talked about changing concentrations of locations of disability services or accessible housing. Now I am thinking where we want to go with this is we want to contribute actions to the Iowa Economic Development Authority (IEDA) and the IFA, Finance Authority actions either one of those entities will be taking to overcome these fair housing issues/impediments. So when we talked about this it was said we want to change the location of disability services or accessible housing. So in this regard what does that mean to you? Anyone? When we enhance affordable accessible housing to me that means we are going to make an investment. We already know it is the more rural areas of the state. Is that and who is going to make this investment?

Comment: I was just actually clearing my throat, but you know it does come down to the public interest. Just my thoughts and it is just my opinion, but ultimately for something like this it sounds like the public tax payer ends up in general having to pay for any sort of changes in general because the monies have to come from someplace and so it would seem that the tax payer would have to pay for it. I am not saying it is good or bad, but I would think that is who would have to pay for it. So in terms of cost.

Presenter: Which agency should be responsible?

Comment: In terms of augmentation or paying for it?

Presenter: If we wish to enhance affordable accessible housing we can choose IFA or IEDA within this framework. We are trying to set up some goals and objectives and I am just trying to get your opinion. If we go to IEDA later and IFA as well and this will be the recommendation from this group.

Comment: I think it needs to be not one or the other, but I think it needs to be a collaboration, because if we get one agency making all of the decisions there may be some information that another agency could bring to the table that might be lost along the line of policies or procedures or information in the design making so I am not sure that just one agency should be the final maker of the rules or the processes.

Presenter: Anybody else care to comment on that?

Presentation: One of the other things that we had talked about last time was disparities in access to opportunity. Remember opportunity areas represent physical places. They are physical places that are desirable; they have good grocery stores, safe streets, and so on. This is in rural Iowa. So when we were talking about disparities and access to opportunity the kinds of things we were talking about are the location of services, or the lack of services. Now so many people with disabilities lack sufficient income to access services. So they also have a lack of accessible affordable housing. We need changes in the market place for accessible housing. We also, some stated last time, rural infrastructure is insufficient. So, what kind of things do we need to do to correct these? There are also additional disparities access to opportunity and those contributing factors relate to access to lending or lending discrimination. One thing that was mentioned was a lack of a lending program or downpayment assistance for person with disabilities. So my question to you when we look at this, what do we want to do about these things? What can IEDA or IFA do about these? Don't all speak at once? The kinds of things that were discussed last time we need to change the location of services; we need persons with disabilities to have higher incomes to access services; we need to enhance the availability of affordable accessible housing; we need to change the market for accessible housing; we need to enhance rural infrastructure. The question is of these two agencies how are we going to accomplish these things?

Comment: In the past the USDA used to get involved and offer some rural economic development. It sounds like again we are kind of putting it back on IFA and Economic Development and I think there needs to be more team players involved here than just maybe these two state agencies. I think we are leaving some other team players out that could help us as a state to develop some of these rural areas. I remember back in the day when USDA had some programs out there to do some rural economic development to strengthen communities in rural Iowa economically. I don't know if those grants still exist or if there would be funding out there to help to strengthen them economically and that would address some of these other areas in their community, but it just seems to me that we need to look at maybe some other players that can collaborate with IEDA and IFA and with the rest of us that would enhance to some of these other things like to lending and the pay down system and the economic growth that will help to enhance the lives of people

with disabilities that are maybe living in rural Iowa and would allow them to access these services and things in the smaller communities.

Presenter: Anyone else?

Comment: I hesitate to speak up because I feel a little odd contributing recommendation our agency and IFA will ultimately receive, but a comment on USDA. There are still USDA programs that are still available. As with any agency, those programs have all been changed some under time, but perhaps the way to address that with this in particular plan which really is IEDA and IFAs place, perhaps the recommendation if the group wanted to would be a suggestion and/or direct to the IEDA and IFA to collaborate more with USDA or explore additional partnerships with USDA or something along those lines.

Presenter: Thanks. This particular study again it is a requirement of HUD and the findings will go into the Five-Year Consolidated Plan for Housing and Community Development and the idea is that some of the activities in the Consolidated Plan will be guided by the findings in this AI. While I think it is a noble effort to coordinate with other agencies, we have a direct responsibility to HUD and in exchange from getting money from HUD to identify things that these two agencies can implement. It is what our effort here is today. Hopefully we can get some of that accomplished. What I am still looking for is in this sequence, what kinds of things do you think was meant when we talked last time about change location of services, increase income to access services, enhance rural infrastructure. Some things can be done by one agency and some things can be done by the other agency. So granted we can use CDBG funding to enhance rural infrastructure, but for persons with disabilities. We are probably talking about enhanced sidewalks, curb cuts, that kind of thing. I am assuming that is what you were meaning last time. Am I safe in thinking that? OK.

Comment: I think that gist that I got from the last conversation and from what I know about some of the rural Iowa communities where some of our clients live a lot of the older communities are simply, some of the buildings and some of just the general infrastructure is so out dated that there would need to be a lot of renovation within the community. So yes I think that what you mentioned the curb cuts would be just one of many things that would need to be addressed in that area.

Presenter: What are some other things?

Comment: I think we talked about affordable transportation and being able to get to and from different locations. Transportation is a huge concern for a lot of our clients who live in rural Iowa. Just being able to get to a medical appointment and finding affordable transportation or transportation at all. I realize that is not accessibility in terms of curbs cuts, but it is still access to services.

Presenter: OK. We also talked about how persons with disabilities have tended to have a disproportionate housing need. They seem to experience higher cost burdens in the rural areas. They have a higher incidence of housing problems. They can't or they have some

challenges in conducting repairs and maintenance on their homes or apartments. They lack some programs for repair and maintenance. So the question became what can we do about that? It is like the what and how again. How do we go about lowering the housing cost for these folks? How do we help them with repairs? Do we need a particular program to do that? Anyone care to comment on that?

Comment: I think a program would be great, but I also think it would be nice to have tax credits available for person who would qualify for a certain types of housing repairs that are needed. I think that would be especially if they were putting in ramps into their home or need some sort of modification for medically necessary reasons. Then also the other thing is it would be the programs necessary as we are aging in place and there are medically necessary reason again that they need to modify their homes or need repair to their homes and because of a disability they can't afford it. Often if they do not have enough equity built into their home and the banks they don't or aren't obviously going to lend unless they get a cosigner or it could be potentially a family member and family members don't want to cosign for one reason or another and the other family member can't or they don't have a family member. So this is where maybe and I can't speak for IFA, but I am suggesting maybe if I were to have a program available that might assist with or DEED have a low interest program available for persons with disabilities that they could access some sort of a loan to help pay for those kind of things.

Presenter: Could you respond to that? OK. I think that was a good position. I think we will try to explore that. So thank you.

Comment: Are you there? I am sorry. I was talking to myself that entire time. I really said some genius things and I am sorry you all missed it. To respond to her, the last couple of legislative session there has been a proposal that has not passed but would have created a program that would have provided grants or forgivable loans; I believe to home owners to help make handicapped accessibility improvements to their homes. So there has been some discussion of that. They actually started that out with a tax credit component, but revenues I believe did an analysis and I mean in order to benefit from a tax credit you have to have sufficient income and tax liability in such an amount that a tax credit would be beneficial to you and really it just didn't make sense to do it as a tax credit with my recollection of the analysis. So they were looking at and also the income levels of many who were targeted would really not be able to sustain that repayment. So I think it was structured as a grant or a forgivable loan, but that has not made its way out of the legislature. We certainly get calls all the time from people with disabilities in search of that kind of financial assistance. We do have some resources we can refer them to and many of the local housing trust funds across the state are doing that type of work, but there is always demand for that type of assistance. There is really not a program at the state level that I am aware of as she already mentioned.

Presenter: Thank you. The other piece was public housing and apparently there is not sufficient housing for person with disabilities. I am not exactly sure how we make a solution to this particular type of problem, but this is what we talked about. Enhance the

number of units, but I am just looking for your comments there. Again, the idea here is what would IEDA or IFA do. In the end we need to identify what they should be doing to mitigate these fair housing issues/impediments. When these agencies should do it and how might we measure the success. So that is where we are going to go with this. I am hoping we have some more commentary, but...

Comment: I am just curious that I assumed that there are a couple of hearings going on throughout the state that the general public in different counties how things are going with public housing and where there are shortages. Is that correct? Are there statistics being drawn from those community conversations? Is that correct or not?

Presenter: It is not a part of my work. I believe it would be a part of the Consolidated Plan, but my firm does not have that contract. So I am not really certain what is going to happen there.

Comment: I think I can answer that. So as he said another plan that we are required to complete as a state is what is called our Consolidated Plan and that is really where we outline community needs, community development priorities, and when we tell HUD as a state, here is how IEDA and the IFA intend to spend its HUD dollars and yes as part of that process there are several public hearings, a survey, a couple of webinars, all aimed at collecting input from across the state in regards to not just affordable housing needs, but all community development needs so that we can take a look at our HUD dollars and examine how those are programed and perhaps any changes that should be made based on what we hear. So it is not exclusive to housing needs, but housing needs certainly would be a component of that.

Presenter: Thank you. I thank you for attending. We have one more disability and access work group meeting, October 18th at 1 pm. I will go through today's transcript and specify a set of recommendation that come out of this and that is what we should talk about next. The way this works is we need to have some fair housing goals, some things that will be done and how often they will do them, meaning IEDA and IFA and how we might measure success. Those are the kind of recommendation we will be talking about at the October 18th meeting. Hopefully, you will talk about them and we can move to make a recommendation to IEDA and IFA about what has come out of this Disability and Access Workgroup. It is a little shorter than I had hoped for today's session. If you would like you could send her a short message or me, which ever you prefer. I look forward to our next meeting and we will review what we have been able to pull together thus far.

B. PUBLIC INPUT MEETING

Public Input Meeting 9/27/2018

Comment: We do put a narrative in there. So if you ever have a question about someone that you are calling just contact us.

Presenter: Thank you very much.

Presentation

Comment: I just want to make a comment. We were talking about...

Presenter: You are kind of fading in and out. Could you put your voice closer to the speaker?

Comment: I am actually not trying to, I am just listening to your thing and I put "I can" when you said can you hear me.

Presenter: Thank you.

Presentation

Comment: I work with people and I try to help them find housing and a lot of time it is hard to find landlords who are willing to take a risk when they see that somebody may have been dealing with addiction, mental health, especially in the rural areas. The amount of support for those types of individuals is lacking. So you don't have a lot of that support. So if people are struggling with those things then they may not keep their apartment clean or they may forget to pay their rent or they may whatever. So you are trying to find services that make them successful, but I do find that is a big area where with fair housing you don't necessarily want to get risk renting to somebody who has a dual diagnosis like that.

Presenter: Anyone else?

Presentation

Comment: That is definitely the case. Just trying to find the support that are and the funding; if you put someone or help someone get into housing, do they have the wraparound supports to help them be successful. Such as payees, or in-home supports that can help them through those situations. So and help the landlords to understand the need and the struggles for those individuals. I think you end up needing to have serious conversations with landlords to let them know, in my case, that we are not to just help them find housing, but we are going to enter into some of those referrals and help them to get the services they need, but unfortunately services are dwindling and they are hard to

come by. Limited funding and limited resources. So when you asked how we could solve that, I was like boy if we could solve that that would be a magnificent thing.

Presenter: Would anyone else like to make a comment on that?

Presentation

Comment: There are language barriers, legal status issues that prevent lending in rental. The screening process is a concern for black communities, especially criminals.

Presenter: You are self-muted. Would you like to comment on that?

Comment: Thank you for your assistance and I wish more people would have talked, but how do you get the landlords to come to the table?

Presenter: How do you get the landlords to come to the table?

Comment: Yes.

Presenter: I do not know. This type of format we use it from time to time and I think it is a great way to do it.

Comment: So the comment I wanted to make regards the development for housing for the disabled. A fully accessible unit is very expensive to develop and it is also risky for landlord or a housing developer, because they may not be able to fill that unit with a person who needs a fully accessible unit. I think one thing that I have been in the Economic Development Authority is to determine what types of disabled housing is really needed. I agree that disabled housing for mentally ill persons with wraparound services is extremely important. It is very difficult, especially in rural areas for someone with a mental illness to get services. They may have to drive an hour to two just to find a therapist and actually farther than that to find a therapist and even farther than that for a psychiatrist. So I think that is why you have issues developing these types of housing throughout the state in rural areas. I guess that was the point I wanted to make. Thank you.

Comment: In our community, the comment I've heard is "We do not want those types of people living here."

Presenter: They have left the meeting. So I cannot get them to explore that comment any further.

Comment: I can say that that is very common and they don't necessarily say it that way. It is like "Well we have better options to rent to." That is what I hear a lot. We have better quality options.

Comment: I think it is very important for everyone involved to understand that landlords need to be able to make enough money to be able to maintain their building and be able to support their staff and whatever. I work for an affordable housing developer. It is a non-

profit. That is not our goal. Our goal is not to make money, but we still have to pay our bills and that is why I think it is important for IFA and the Economic Development Authority to establish programing and funding sources in order to focus on these types of issues.

Presenter: Thank you. Would anyone else like to make a comment?

Public Input Meeting 12/18/2018

Comment: How can you compare Hispanics to whites if some of them are listed as white?

Presenter: In the diagrams we have non-Hispanic and each of the racial categories is non-Hispanic and then we have Hispanic. So then they are separated in that way. So that is how we can compare them. So then we have white non-Hispanic, black non-Hispanic, etc. I hope I have made that clear.

Presentation

Comment: I don't think I have anything else.

Presenter: Thank you for saying something.

Presentation

C. ADDITIONAL PLAN DATA

Fair Housing Filings and Disclosure – Iowa Civil Rights Commission (ICRC)

From January 1, 2016 – December 31, 2016, Civil Rights Specialist, Sylvia Owens along with several other Iowa Civil Rights staff:

- Received over 854 housing calls and intakes.
- Received 126 new housing complaints to investigate and documented probable cause in 2 cases.
- During this time period 2 cases underwent Litigation Review and 2 cases were filed with the District Court for further action.

Housing							
2016	Jan	Feb	Mar	Apr	May	Jun	Total (Jan-Jun)
Calls:	60	54	67	75	87	93	436
Intakes:	7	10	13	16	15	9	70
Tests:							
Attempted	42	52	15	55	53	51	268
Passed:	6	28	5	29	25	19	112
Failed:	2	3	1	4	4	4	18
Failc %	25	9.7	16.7	12.1	13.8	17.4	12.8%
New Complaints:	8	11	12	10	10	20	71
Comm'r:	2	3	3	1	2	4	15
Submitted:	12	11	15	6	14	16	74
Cause:	2	0	0	0	0	0	2
No Cause:	3	3	5	1	6	7	25
Administrative Closure (AC)	1	2	4	0	1	2	10
Withdrawn (WD)	0	0	0	0	0	0	0
Satisfactory adjustment (SA)	6	6	6	5	7	7	37
WD with SA	0	0	0	0	0	0	0
% < 100 Days:							0
Cause Issued:	0	2	0	0	0	0	2
Discrimination Determined:	0	0	0	0	0	0	2
Inventory:	47	47	46	45	43	48	288
Investigation:	47	47	46	45	43	48	276
Litigation Review (LR)	2	0	0	0	0	0	2
District court action filed (Court)	0	2	2	2	2	2	2

2016	Jul	Aug	Sep	Oct	Nov	Dec	Total (Jul- Dec)
Housing							
Calls:	105	93	77	72	65		406
Intakes:	14	12	7	13	10		57
Tests:							
Attempted	51	53	52	54	50		260
Passed:	20	31	29	37	26		143
Failed:	2	2	1	0	2		7
Failed %	9.1	6.1	.3	0	7.1		4.7%
New Complaints:	7	18	14	9	7		55
Comm'r:	1	4	6	4	2		17
Submitted:	10	6	14	9	15		54
Cause:	0	0	0	0	0		0
No Cause:	4	1	3	3	10		21
Administrative Closure (AC)	0	1	2	2	1		6
Withdrawn (WD)	0	0	0	0	0		0
Satisfactory adjustment (SA)	5	4	8	4	4		25
WD with SA	1	0	1	0	0		2
% < 100 Days:							
Cause Issued:	0	0	0	0	0		0
Discrimination Determined:	0	0	0	0	0		0
Inventory:	47	56	59	59	51		272
Investigation:	45	54	57	57	49		262
Litigation Review (LR)	0	0	0	0	0		0
District court action filed (Court)	2	2	2	2	2		10

Fair Housing Filings and Disclosure – Iowa Civil Rights Commission (ICRC)

From January 1, 2017 – December 31, 2017, Civil Rights Specialist, Sylvia Owens along with several other Iowa Civil Rights staff:

- Received over 1,050 housing calls and intakes.
- Received 115 new housing complaints to investigate and documented probable cause in 1 case.
- During this time period 1 case underwent Litigation Review and case was settled post probable-cause finding prior to filing of a district court action.

Housing							
2017	Jan	Feb	Mar	Apr	May	Jun	Total (Jan-Jun)
Calls:	53	57	65	72	88	101	436
Intakes:	9	6	17	10	13	14	69
Tests:							
Attempted	50	51	51	58	50	52	312
Passed:	25	26	21	14	13	19	118
Failed:	3	3	1	4	3	5	19
Failed %	10.7	10.3	4.5	2202	18.7	20.8	13.8%
New Complaints:	12	7	4	4	7	12	46
Comm'r:	5	2	3	0	5	2	17
Submitted:	8	12	12	8	5	8	53
Cause:	0	0	0	0	0	0	0
No Cause:	4	4	3	2	3	7	23
Administrative Closure (AC)	0	1	3	1	1	0	6
Withdrawn (WD)	0	0	0	0	0	0	0
Satisfactory adjustment (SA)	3	7	6	5	2	1	24
WD with SA	1	0	0	0	0	0	1
Cause Issued:	0	0	0	0	0	0	0
Discrimination Determined:	0	0	0	0	0	0	0
Inventory:	49	44	38	38	42	41	252
Investigation:	47	42	36	36	42	41	244
Litigation Review (LR)	0	0	0	0	0	0	0
District court action filed (Court)	2	2	2	2	0	0	0

2017	Jul	Aug	Sep	Oct	Nov	Dec	Total (Jul- Dec)
Housing							
Calls:	120	113	79	71	90	75	548
Intakes:	13	19	13	11	16	8	80
Tests:							
Attempted	49	44	50	10	47	0	200
Passed:	19	14	14	0	23	0	83
Failed:	1	1	2	0	3	0	7
Failed %	4.76	6.25	11.76	0	11.53	0	6.86
New Complaints:	11	18	19	14	7	13	82
Comm'r:	0	6	8	6	7	3	30
Submitted:	4	5	6	12	8	11	46
Cause:	0	0	0	1	0	0	1
No Cause:	0	0	0	2	2	2	6
Administrative Closure (AC)	0	1	0	0	0	0	1
Withdrawn (WD)	0	0	0	0	0	0	0
Satisfactory adjustment (SA)	4	4	6	5	6	8	33
WD with SA	0	0	0	1	0	1	2
Cause Issued:	0	0	0	0	1	0	1
Discrimination Determined:	0	0	0	0	1	0	1
Inventory:	33	39	53	64	70	70	329
Investigation:	33	39	51	56	70	70	319
Litigation Review (LR)	0	0	0	0	1	1	1
District court action filed (Court)	0	0	0	0	0	0	0

D. AFFIRMATIVE FAIR HOUSING MARKETING GUIDE

HOME/ NATIONAL HOUSING TRUST FUND/LIHTC

Affirmative Fair Housing Marketing Guide

Targeted Groups

- > Special Outreach Required
- > Find Specific Sources
- > Document Your Efforts



Affirmative Fair Housing Marketing Plan Guide

INTRODUCTION

Affirmative Fair Housing Marketing Plan (AFHMP) should demonstrate meaningful efforts to identify and attract underserved populations to the housing market area.

This guide was developed to assist someone developing or updating an Affirmative Fair Housing Marketing Plan (AFHMP) required by HUD or a Low-Income Housing Tax Credit (LIHTC) Qualified Allocation Plan.

Affirmative Fair Housing Marketing Plan Guide

WHAT IS AFFIRMATIVE MARKETING?

Affirmative Marketing means understanding the market demographics and underserved populations and extending marketing efforts beyond current or usual efforts. Taking extra effort to directly market to underserved populations living in the housing market area helps ensure that knowledge of housing opportunities and information on how to apply is reaching the underserved households.

- Direct efforts might be *minority or specialized* publications i.e. magazine, newspaper, radio or television or building relationships with organizations, churches, agencies or businesses who work directly with an underserved population.
- Consider the use of alternate advertising formats i.e. by translation to a language used by a minority population; providing alternate formats i.e. braille, large print, audio tapes, electronic methods, etc.
- Periodically review the special marketing efforts and evaluate successes and failures. Determine how to expand on the successes or make changes on areas needing improvement.

AFHMP REGULATIONS

The regulations can be found in Title 24 Housing and Urban Development, Part 200-Introduction to FHA Programs, Subpart M—Affirmative Fair Housing Marketing Regulations.

<http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&sid=5fb7a884564d7d6e4b3c44f3067d6d23&rgn=div6&view=text&node=24.2.1.1.1.1.11&idno=24>

IOWA HOME & NATIONAL HOUSING TRUST FUND & LIHTC PROGRAMS

Projects that have received HUD funding (HOME funds or National Housing Trust Fund) are required to provide an AFHMP. In addition, Projects allocated Low-Income Housing Tax Credits from 2009 forward are required to complete an AFHMP. All programs are following the requirements at HUD Subpart M, CFR24 Part 200.620. LIHTC allocations can also reference the Iowa LIHTC Qualified Allocation Plan (QAP) for the year the allocation was made.

At a minimum, the AFHMP for multifamily rental projects should be reviewed every five years by pulling current demographics, comparing them with current resident percentages then describing successes and/or failures with community contacts and marketing methods. Then successes should be described or a new plan with changes should be provided. For HOME Tenant Based Rental Assistance or Homebuyer Programs a new plan is required for each new contract.

The Iowa Finance Authority requires all properties to target Persons with Disabilities, regardless of percentages listed.

HOUSING PROTECTED CLASSES:

Federal	State
Color	Creed
Race	Sexual Orientation
Sex	Gender Identity
National Origin	Retaliation
Religion	
Disability	
Familial Status	

In addition, the Iowa Finance Authority (IFA) will be consistent with federal housing policy governing nondiscrimination as determined under HUD rules and regulations.

Affirmative Fair Housing Marketing Plan Guide

WHAT FORM DO I USE?

HOME & NATIONAL HOUSING TRUST FUND & LIHTC MULTIFAMILY RENTAL

Multifamily Rental - The use of the most current HUD form is required. As of the date of this publication HUD-935.2A (12/2011) OMB Approval No. 2529-0013 (exp. 1/31/2021). This form can be found at:

<https://www.hud.gov/sites/dfiles/OCHCO/documents/935-2A.pdf>

OTHER HOME PROGRAMS

Tenant-Based Rental Assistance (TBRA) - Iowa Finance Authority has developed a specific form for TBRA which was revised May 2016. The form is can be found on our website:

<http://www.iowafinanceauthority.gov/Home/DocumentSubCategory/114>

then click on Forms and Information for Civil Rights & Fair Housing

Homebuyer - Iowa Finance Authority has developed a specific form which was revised May 2016. The form is can be found on our website:

<http://www.iowafinanceauthority.gov/Home/DocumentSubCategory/112>

then click on Forms and Information for Civil Rights & Fair Housing

GETTING STARTED...

GENERAL PROPERTY INFORMATION

Regardless of the type of program, each form will request general project information. These sections should be self-explanatory.

GEOGRAPHIC AREAS

In order to complete an Affirmative Fair Housing Marketing Plan (AFHMP), demographics need to be pulled for the project from the geographic areas listed below:

- ⇒ Census Tract (if attainable),
- ⇒ Housing Market Area (town/city)
- ⇒ Expanded Market Area (county/MSA)

The US Census Bureau's American Fact Finder can be located at:

<http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

We suggest using a **Guided Search** then **"Let's Get Started"**

Step 1 - Start - Choose: I'm looking for information about **people**. Click on NEXT.

Step 2 - Topics - Click on NEXT if looking for Race and Ethnicity data. Click on DISABILITY and select disability if looking for disability data then click on NEXT.

Step 3 - Geographic Area - Choose a specific area. Each geographic category needed will be ran separately. Click on NEXT.

Step 4 - Race/Ethnicity Groups - Select from **Basic Groups**. Choose either; Alaska Native, American Indian, Asian, Black or African American, Hispanic or Latino, Native Hawaiian or Pacific Islander, White, then click on NEXT.

Step 5 - Search Results - Use the most current ACS Demographic and Housing Estimates - DP05.

Step 6- Table Viewer - Brings up the report. You can print or download and print.

NOTE: This is not the only way to pull demographic data from the census site but it's a simplified method. If you have questions on obtaining census information for your property, please contact Nancy Peterson at the Iowa Finance Authority (800)432-7230 or 515-725-4900.

Affirmative Fair Housing Marketing Plan Guide

DEMOGRAPHIC REPORTS

Demographic reports for each geographic area will need to be pulled for:

- **Race & Ethnicity** (one race) - White; American Indian or Native Alaskan; Asian; Hawaiian or Pacific Islander; or Hispanic/Latino.
- **Persons with Disabilities** - Choose the general Persons with Disabilities category which encompasses all types of disabilities to simplify.
- **Families with Children and/or "Other"** -(if applicable) should be pulled using same geographic areas.

Acquisition Rehab/Rehab/Existing Properties with Renters

If the property has existing tenants the Project's Resident column on the demographic worksheet should be completed.

If demographic information is gathered from applicants at time of application, please complete the Project's Applicant Data column. Otherwise, this can be left blank.

New Construction/Adaptive Reuse/Homebuyer

For these housing units, the Project's Resident column will be left blank.

Enter All Percentages Gathered

Once the above steps have been completed, it is time to enter the percentages into the worksheets available with each form. Next, determine minority/underserved populations in the housing area.

Majority

The initial AFHMP if a new construction or adaptive reuse identify the highest percentage race or ethnicity from the census data on Worksheet 1 this should represent the majority population. The majority will not typically need special outreach because general advertising methods and word of mouth will likely reach the majority population. For rehabilitation of an existing property or for a 5 year evaluations the demographic percentages for residents living at the property compared to census data on Worksheet 1 should be evaluated to identify the majority population and if the property has met or exceed percentages identified. Then majority of those living at the property should be considered when evaluating the majority.

Minority/Underserved Populations

Minority populations have lower percentages. Evaluate the demographics using a reliable method of measure. IFA suggests:

- ⇒ **IF 1% OR GREATER = IS A TARGETED POPULATION**
- ⇒ **IF LESS THAN 1% - DON'T TARGET**

Generally, there is not sufficient opportunity to directly reach populations with less than 1%.

ARE THERE EXCEPTIONS TO THE 1% MEASURE?

Yes, this guide cannot cover all exceptions or examples but here is a couple:

- If demographics do not have any minority populations with 1 percent or greater, the demographic area may need to be expanded to include a larger region multiple counties surrounding the housing market area. This area should be expanded until you can identify a minority population closest to the property that has greater than 1 percent.
- If an underserved population is known to exist in the housing area yet the demographics do not represent them in the census data, your knowledge of the community should be considered for direct marketing opportunities. If this occurs, list under "other" and specify the underserved population.

If "Other" is selected or other exceptions need explained, provide additional information. *Each form has a section called Additional Considerations. This is the best place to explain exceptions or why a population was added.* If necessary, attach an additional sheet with this information and place a note in this section.

Affirmative Fair Housing Marketing Plan Guide

CHECK TARGETED GROUPS

In the AFHMP form requires targeted groups to be marked by checking boxes in the "Targeted Marketing Activity" section. Using the demographic groups that have 1 percent or greater but less than the majority population. Remember, if exceptions or additions to this measure explain in "Additional Considerations".

IMPORTANT NOTE: The Iowa Finance Authority requires all properties to targeted Persons with Disabilities regardless of percentages found on demographic worksheets. Please always check Persons with Disabilities on the AFHMP form.

All selected groups shall be identified in the community contact and advertising method sections of the AFHMP.

MARKETING CONTACTS AND ADVERTISING SOURCES

- List each targeted group separately (preferred).
- Use local contacts and advertising sources, if any, before moving to county, region or state contacts.
- Develop positive relationships and have continued communication with these contacts.
- Advertising sources should be known to reach targeted populations prior to advertising.

PROPOSED MARKETING ACTIVITIES/MARKETING PROGRAM

A table or worksheet can be found in all AFHMP forms which requires the project to list the Methods of Advertising and what group is being targeted. If alternate formats have been used, list the dates and the time duration of ads. ATTACH A COPY OF EACH AD LISTED.

Advertising methods used for each targeted population selected should be listed.

MAINTAIN A FILE

A file helps you establish:

- **HOW** you determined what outreach was needed.
- **WHAT** was done to make a special effort.
- **WHEN** actions were taken.
- **WHY** decisions were made to change or expand efforts.

Community Contact Journal— is a good way to document all special outreach efforts. *A sample is shown on the next page.*



Affirmative Fair Housing Marketing Plan Guide

SAMPLE
Affirmative Fair Housing Marketing Plan
Community Contact Journal

For each underserved population identified in the Affirmative Fair Housing Marketing Plan (AFHMP), please keep records like this journal to document special outreach efforts. This will assist you when completing Community Contacts and Methods of Advertising in the plan. This information may be helpful in evaluating your marketing activities for future activities and updates.

Project Name: _____ Project Contract Number(s): _____
 Community Contact Name: _____
 Contact Person: _____
 Full Address: _____
 Telephone Number: _____
 Email Address: _____
 Fax Number: _____
 Website: _____

Describe the Organization:

Targeted Population:
 Describe previous experience working with this population:

Describe how they will assist you to reach the targeted population:

Will alternate format(s) be used? (Example: Braille, large print, alternate language) Yes / No
 If yes, briefly describe:

Date of Contact	Method of Communication (in person, telephone, email, US mail, etc.)	Description of Contact Made (highpoints of discussions, and outcome)	Person's Name Making the Contact

Attach a copy of the advertising or marketing material(s) used.

Affirmative Fair Housing Marketing Plan Guide

EQUAL HOUSING OPPORTUNITY ADVERTISING

All advertising of residential real estate for sale, rent, or financing should contain an equal housing opportunity logo, statement, or slogan as a means of educating the home seeking public that the property is available to all persons. The choice of logo, statement or slogan will depend on the type of media used (visual or auditory) and size of the advertisement.



- See Part 109 Fair Housing Advertising:
⇒ www.hud.gov/offices/fheo/library/part109.pdf
- See HUD Web Publishing Standards:
⇒ <http://portal.hud.gov/hudportal/documents/huddoc?id=WebPubStandards.pdf>

SECTION 504 ACCESSIBILITY REQUIREMENTS

Section 504 of the Rehab Act makes it illegal for federal agencies, programs or activities that receive federal financial assistance or are conducted by a federal agency, to discriminate against qualified individuals with disabilities. Requirements under Section 504 include reasonable accommodation for employees with disabilities, program accessibility, effective communication with people who have hearing or vision disabilities, and accessible new construction and alterations. HOME and Iowa LIHTC properties are required to meet or exceed Section 504 accessibility requirements in that 5% of the total units must be fully accessible for mobility impairments and 2% of the total units must be accessible for persons with visual and hearing impairments.

SYMBOLS OF ACCESSIBILITY

Accessible facilities which meet the Uniform Federal Accessibility Standards (UFAS) 4.1 Minimum Requirements, may use the international symbol of accessibility. The symbol shall be displayed as:



PUBLIC ACCESS

Fair Housing Posters, Affirmative Fair Housing Marketing Plans, Tenant Selection Criteria and other management policies should be displayed and made available for public review. Property signs (if applicable), should contain the EHO logo, statement or slogan and symbol of accessibility if meets UFAS minimum requirements. A picture should be taken of the sign and attached to the AFHMP.

INSTRUCTION/TRAINING

Agents and employees must be provided verbal and written instructions regarding policies of non-discrimination and fair housing. Training/instruction questions will be asked about Fair Housing Act and Affirmative Fair Housing Marketing. Dates, content and anticipated training should be tracked and copies of training materials should be kept.

HIRING PRACTICES

Owners are required to maintain a non-discriminatory hiring policy for staff engaged in the rental of properties under Affirmative Fair Housing Marketing Regulations.

Affirmative Fair Housing Marketing Plan Guide

EVALUATING THE PLAN (MINIMUM EVERY FIVE YEARS)

The Affirmative Fair Housing Marketing Plan must be reviewed at least every five years for multifamily projects. However, the AFHMP may need to be updated if the demographics have substantially changed. If limited success in attracting minorities and underserved populations the AFHMP may need to be updated.

Homebuyer and Tenant-Based Rental Assistance projects should have a new plan for each contract awarded. Evaluate the previous contracts' success or failure attracting minority or underserved populations. Then then change community contacts or advertising methods that have not been shown to attract targeted populations.

Tenants/Applicants should have opportunity to provide:

- How they heard about the property?
- If they could benefit from accessible features in the unit?
- Race and ethnicity information.

The Property should:

- Document advertising methods and maintain copies of ads used to attract targeted populations and the general public.
- New demographics should be pulled and input into a demographic worksheet. Compare with previous data to determine if changes have occurred.
- Does demographic data accurately represent the property over the last five years?
- Has targeted populations increased?
- Keep documentation of communication with community contacts assisting the property. Were relationship's successful?
- Were previous advertising methods successful in attracting targeted populations?
- Training and instructions current? If no, plan and document updated training for staff.
- Provide demographics and describe how previous plan has been successful and remains valid or provide an updated plan to implement going forward.

THE GOAL

- * **ATTRACT TARGETED APPLICANTS (Underserved)**—Ensure all persons have knowledge of housing opportunities and are offered housing without discrimination for persons who qualify.
- * **DIRECT MARKETING IS ONGOING**—Demonstrate meaningful attempts to increase underserved populations. (Race, ethnicity, Persons with Disabilities, Families with Children, etc.)
- * **REVIEW AND ADJUST**—Review demographics by making a conscience effort to understand the community and changes in underserved populations then adjusting, if needed, after the initial plan has been completed and approved.
- * **INCLUSIVE AND DIVERSE**—Strive to have similar or greater demographics as the housing marketing area. Balance to ensure that the majority regardless of race or ethnicity is accompanied with minorities and underserved populations.

Affirmative Fair Housing Marketing Plan Guide

ADDITIONAL PROPERTY INFORMATION GATHERED FOR RENTAL PROJECTS

Supply copies of these documents with your AFHMP:

- Lease
- Lease Addendums (NOTE: Some may be required by the Qualified Allocation Plan)
- Tenant Selection Criteria
- Community Rules and Regulations
- Waiting List Policies
- IowaHousingSearch.org advertising

COMMON ERRORS!

PROJECT NUMBER

The HOME, National Trust Fund and/or LIHTC project number is incorrectly listed. If there is more than one number, list both.

TARGETED MARKETING

All Race and Ethnicity boxes were checked. Please review your demographic data. In Iowa it is not likely that you can directly market to all demographic groups.

All awarded projects are required to target Persons with Disabilities by the Iowa Finance Authority. The form is often left unchecked.

COMMUNITY CONTACT WORKSHEET

1st Column—should list targeted populations the community contact can directly market to.

2nd Column—Follow instructions at the top of the page. In many cases only the name, organization, address, phone and/or email is listed. For each community contact, a brief description of their previous experience working with each population listed in column 1 is required. Note: Low income does not describe experience working with a specific Race, Ethnicity, Persons with Disabilities, etc. Dates of contact should be listed. Explain how they will assist you to reach the targeted populations.

PROPOSED MARKETING ACTIVITIES WORKSHEET/MARKETING PROGRAM SECTION

1st Column—Advertiser Name and identify advertising method.

2nd Column—List specifically what underserved population is being targeted by the advertisement method. For the multifamily form, please list each population targeted in separate columns. If alternative formats are being used identify the type e.g. braille, large print, alternate language, etc.

Copies of advertising are not attached. Please attach a copy of the advertising or marketing material.

SIGNATURE PAGE AND DATE

The Affirmative Fair Housing Marketing Plan is not signed or dated. The person responsible for implementing and reviewing the plan is required to sign and date the plan prior to approval.

QUESTIONS?

Please contact Nancy Peterson (Pete) with the Iowa Finance Authority if you have questions regarding your plan or need information on how to obtain demographic information. We want to assist you in achieving meaningful plans.

800#: 800-432-7230
 Phone: 515-725-4900
 Direct Line: 515-402-7563
 Email: nancy.peterson@iowa.gov

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SAMPLE WORKSHEET 4

Targeted Populations→ ----- Methods of Advertising ↓	General Advertising	Black/African American	Hispanic/Latino	Asian	American Indian	Persons with Disabilities
Newspapers: ABC Daily Journal XYZ Tribune	1 x 1 ad in apartment for rent section		El Conquistador 2x2 ad in Spanish		Reservation News 2 x 4 ad in English	
Radio Stations: Los El Radio KJJY KGGO			Ad in Spanish 6am, Noon, 5pm Monday-Friday			
TV Stations: KCCI WHO	Noon and Midnight 1 minute segments for both stations.					
Electronic Media: Facebook Apartment.com Property Management.com	Facebook post Apartment.com ad Property website ad					
Bulletin Boards: Restaurants Agencies			American/Mexican AM Vets Club 8 ½ x 11 in Spanish	8 ½ x 11 Mandarin Restaurant		8 ½ x 11 braille for hsg information board in English.
Brochures Notices, Flyers: HY Vee Price Chopper NAACP Urban Dreams Diamante Aging Resources	Hung 8 ½ x 11 flyer in English at local grocery stores	Hung 8 ½ X 11 flyer to Director at NAACP in English. Brochure & provided to staff at Urban Dreams	Brochure provided in Spanish to Diamante, Inc.			Brochure to Aging Services in large print in English
Other (specify): Churches	Area Churches bulletins apartment rental info in English	AME Monthly Community information sheet in English		Church bulletin translated in Korean at Korean Service		Flyer will be posted at ABC Church then translated in sign language during deaf services.

SAMPLE WORKSHEET 3

Worksheet 3: Proposed Marketing Activities – Community Contacts (See AFHMP, Block 4b)	
<p>For each targeted marketing population designated as least likely to apply in Block 3b, identify at least one community contact organization you will use to facilitate outreach to the particular population group. This could be a social service agency, religious body, advocacy group, community center, etc. State the names of contact persons, their addresses, their telephone numbers, their previous experience working with the target population, the approximate date contact was/will be initiated, and the specific role they will play in assisting with the affirmative fair housing marketing. Please attach additional pages if necessary.</p>	
TARGETED POPULATION(s)	COMMUNITY CONTACTS(s)
List a specific population	List Name, Address, Contact Name, Phone Number, email of contact. Date of Contact. Explain how this contact has experience working with the group listed to the left. If more than one group listed please specify experience with each group. Then explain how they have agreed to assist you in marketing to the group(s).
Example:	
Black/African American	NAACP, 123 Street, City, State, Bob Jones, Director bobi@naacp.org September 1, 2016, NAACP is an organization which supports rights of Black/African American persons in the community. They will include advertising for the property in the monthly newsletter.
Latino/Hispanic	El Rodeo, 345 Street, City, State, Michael Gomez mgomez@elrodeo.com . August 25, 2016 Serves the local Latino/Hispanic community by promoting cultural activities. They have agreed to display the brochure on their bulletin board and make staff aware of this apartment community.
Asian	Korean Methodist, 789 Street, City, State, Lee Min-ho, Pastor. Aug 3, 2016 Serves the Korean community in the XYZ area and holds Sunday services. Pastor will include information in the weekly bulletin translated in Korean and English to inform parishioners.
Persons with Disabilities	Aging Resources 1001 X Street, City, State, Lisa Smith, September 6, 2016, Works with a variety of individuals that have disabilities and provides referrals for services. Will provide brochures when housing assistance is needed.