



# **DRAFT 2025-2029 Analysis of Impediments to Fair Housing Choice**

For The County of Cumberland and Borough of Carlisle,  
Pennsylvania

**PREPARED FOR:**

Cumberland County and Cumberland County Housing and  
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# Table of Contents

<b>Chapter 1: Introduction</b> .....	<b>5</b>
A. Purpose of the Report	
B. Legal Framework	
<b>Chapter 2: Public Participation</b> .....	<b>9</b>
A. Public Review Draft of AI	
B. Public Meetings and Hearings	
C. Community Needs Survey	
D. Focus Group Meetings	
E. Housing Summit	
F. Community Engagement Activities	
<b>Chapter 3: Community Profile</b> .....	<b>13</b>
A. Locational Context	
B. Demographic Profile	
C. Housing Profile	
D. Race and Segregation	
E. R/ECAPs	
F. Income and Workforce	
G. Language Access	
<b>Chapter 4: Lending Practices</b> .....	<b>40</b>
A. Background Overall Lending Patterns	
B. Overall Lending Patterns	
C. Major Lenders	
<b>Chapter 5: Public Sector Policies</b> .....	<b>45</b>
A. County Programs	
B. County CDBG Program Project Proposal and Selection	
C. Fair Housing Program Outreach	
D. Housing Element	
E. Public Transit	

F. Annual Action Plan/Consolidated Plan	
G. Regional Collaboration	
H. Consolidated Annual Performance and Evaluation Report (CAPER)	
<b>Chapter 6: Fair Housing Profile .....</b>	<b>62</b>
A. Fair Housing Practices in the Homeownership Market	
B. Fair Housing Practices in the Rental Housing Market	
C. Fair Housing Services	
D. Bias and Hate Crimes	
<b>Chapter 7: Fair Housing Progress .....</b>	<b>78</b>
<b>Chapter 8: Fair Housing Action Plan .....</b>	<b>81</b>
A. Data Collection and Engagement Conclusions	
B. Setting Fair Housing Priorities and Goals	
C. Contributing Factors to Fair Housing Issues	
D. Priority Goals and Actions	

# List of Tables

Table 1: Census Population.....	15
Table 2: Municipal Population in Cumberland County .....	15
Table 3: Age Characteristics for Cumberland County .....	16
Table 4: Age Characteristics for Borough of Carlisle.....	17
Table 5: Language, All Persons 5 Years and Older in 2022 .....	18
Table 6: Cumberland County Race and Ethnicity.....	18
Table 7: Carlisle Borough Race and Ethnicity.....	18
Table 8: 2022 Race and Ethnicity Comparison.....	19
Table 9: Cumberland County Household Type .....	20
Table 10: Carlisle Household Type .....	20
Table 11: Household Size .....	21
Table 12: Elderly Percentage of Population.....	21
Table 13: Large Households in 2000, 2010, and 2022 .....	22
Table 14: Single Parent Households in 2022.....	22
Table 15: Cumberland County Homeless Point-In-Time Count 2021 to 2023.....	22
Table 16: Unemployment in 2022 .....	23
Table 17: Carlisle Median Home Sale Price.....	25
Table 18: Housing Size and Cost Patterns.....	25
Table 19: Cumberland County (including Carlisle) Home Sales (2020-2024) .....	25
Table 21: Changes in Value, Rent and Income, 2010-2022 .....	26
Table 22: Affordable Rental Housing Units, 2017 to 2022 .....	26
Table 23: Fair Market Rent (FMR).....	26
Table 24: Rent Percent Change in a 2-Year Timeframe .....	27
Table 25: Housing Affordability for LMI Families.....	27
Table 26: Cumberland County Housing Cost Burden.....	28
Table 27: Dissimilarity Indices, 2010-2020* .....	29
Table 28: RCAP/ECAP % Race/Ethnicity Per Block Group .....	30
Table 29: LMI Block Group and Minorities .....	30
Table 30: LMI Block Groups Having 22%.....	31
Table 31: LMI Block Groups with High Minority Concentration .....	31
Table 32: 2022 HUD Median Income Limits .....	33
Table 33: Cumberland And Carlisle Poverty Rate/Race.....	34
Table 34: Average Salary Per Gender .....	35
Table 35: Median Household Income Per Race .....	36
Table 36: Workforce by Industry .....	37
Table 37: 2022 Cumberland County Cumulative Mortgage Data .....	43
Table 38: Top Lenders – Cumberland County 2022.....	44
Table 39: Community Benchmark Scores .....	53
Table 40: Total CDBG & Home Expenditures 2022 .....	61
Table 41: Cumberland County Hate Crime Statistics, 2022 .....	77
Table 42: Summary of Accomplishments .....	78
Table 43: Contributing Factors to Fair Housing Issues.....	82
Table 44: Goals and Action Steps to Further Fair Housing .....	85

# List of Figures

- Figure 1: Population Increase 1990-2022 ..... 16
- Figure 4: Cumberland County Housing Tenure, 2018 and 2022 ..... 24
- Figure 5: Year Structure Built ..... 24
- Figure 6: RCAPS and ECAPS in Cumberland County..... 32
- Figure 7: Low- to Moderate-Income in Cumberland County..... 34
- Figure 8: Percentage of Families Below Poverty in Cumberland County ..... 35
- Figure 9: Percentage of Families Below Poverty in Carlisle Borough ..... 38
- Figure 10: Carlisle Borough CDBG & HOME Expenditure Categories ..... 62
- Figure 11: Cumberland County CDBG & HOME Expenditure Categories ..... 62

# List of Appendices

- Appendix A: Federal Fair Housing Laws ..... 89
- Appendix B: Public Outreach ..... 90
- Appendix C: Adoption ..... 91

# Chapter 1: Introduction

Cumberland County Housing and Redevelopment Authorities (CCHRA) and the Borough of Carlisle are committed to overcoming any and all obstacles to fair housing choice throughout the County and ensuring opportunities for all residents. This Analysis of Impediments to Fair Housing Choice (AI) draws on the County's previous AI, regional and local data sources, and planning documents to provide an overview of the laws, policies, and practices that may hinder residents' ability to choose housing in the County. This update includes a review of demographic and housing data, a comparison of trends and conditions, an assessment of the progress achieved since the previous AI, and establishes priority actions for the next five years.

HUD awards funds from the Community Development Block Grant (CDBG), HOME Investment Partnerships, and Emergency Solutions Grant (ESG) programs directly to eligible municipalities of a certain size. Cumberland County and the Borough of Carlisle are both federal entitlement grantees. As a condition of receiving HUD grants, the County and the Borough have specific fair housing planning responsibilities, including:

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

HUD interprets these five certifying elements to include:

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

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

## A. PURPOSE OF THE ANALYSIS

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

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

These requirements can be achieved through the preparation of an AI. An AI is a review of a jurisdiction’s laws, regulations, and administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing.

It is also an assessment of conditions, both public and private, affecting fair housing choice. An impediment to fair housing choice is defined as any action, omission, or decision that restricts or has the effect of restricting the availability of housing choices of members of the protected classes.

This AI will:

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

### **Organization of the AI**

This AI is divided into the following eight chapters:

1. **Introduction** defines “fair housing” and discusses the purpose of the report.
2. **Public Participation** provides detailed information on the engagement process undertaken for the AI including stakeholder, focus groups, public meetings, and housing summit.
3. **Community Profile** provides an overview of the socio-demographic, income, housing cost and affordability, housing characteristics and accessibilities in the County and Borough.
4. **Lending Practices** discusses public and private lending practices that shape the ability of individuals and households to obtain housing.
5. **Public Policies** discusses public policies that shape the ability of individuals and households to obtain housing.
6. **Fair Housing Profile** analyzes current public and private sector fair housing programs and activities, and identifies any findings regarding trends and patterns associated with discriminatory housing practices.
7. **Fair Housing Progress** summarizes the actions and recommendations outlined in the 2014 AI and the County and Borough’s progress to date.
8. **Fair Housing Action Plan** presents a set of recommended strategies and action steps to overcome the barriers to fair housing choice identified within the report.

### **Methodology**

The County and Borough prepared this report with the assistance of Michael Baker International, Inc. (Michael Baker) through CDBG funding. A variety of data sources and planning documents were consulted in the drafting of this AI to provide a quantitative and qualitative overview of past and current housing choice conditions within the County and Borough, and to ensure future compliance with fair housing regulations. Data sources include:

- U.S. Census Bureau (Census)
- American Community Survey (ACS)
- Federal Financial Institutions Examination Council (FFIEC)
- CoStar commercial real estate data ([www.costar.com](http://www.costar.com))
- Pennsylvania Housing and Finance Agency
- American Community Survey (ACS) 2018-2022 five-year estimates

- Comprehensive Housing Affordability Strategy (CHAS)

CHAS data demonstrates the extent of housing problems and housing needs, particularly for low-income households and is used by local governments to plan how to spend HUD funds. HUD uses CHAS data to help determine how to distribute grant funds. CoStar data was also pulled to better understand the region's multi-family and commercial/economic development real estate market conditions.

## **B. LEGAL FRAMEWORK**

Fair housing choice grants individuals the opportunity to choose where they wish to live. To ensure that all individuals and families are given equal access to housing, the federal government and the State of Pennsylvania have enacted the following laws to prohibit subtle and overt forms of housing discrimination.

HUD's Office of Fair Housing and Equal Opportunity has played a lead role in enforcing the Fair Housing Act since its adoption in 1968. The Act prohibits discrimination in the sale, rental, and financing of dwellings based on race, color, religion, national origin, sex, familial status (presence of child under age of 18, and pregnant women), and or disability. Because housing choice is so critical to personal development, fair housing is a goal that government, public officials, and private citizens must embrace if social equity is to become a reality.

### **1. Federal Fair Housing Act**

The Fair Housing Act (FHA) is the protection against discrimination in housing on the federal level. After a lengthy legislative battle, urban riots, and the assassination of Dr. Martin Luther King Jr., the FHA was enacted in 1968. It extended the general disclination protections included in the 1964 Civil Rights Act into the housing market. FHA prohibits discrimination in housing based on a person's race, color, religion, gender, disability, familial status, or national origin. In addition, HUD issued a Final Rule on February 3, 2012 that prohibits entitlement communities, public housing authorities, and other recipients of federal housing resources from discriminating on the basis of actual or perceived sexual orientation, gender identity, or marital status. Persons who are protected from discrimination by fair housing laws are referred to as members of the protected classes.

The Federal Fair Housing Act covers "dwellings" which are defined as structures designed or occupied as residences or land offered for sale where a residence will be built. A "dwelling" is broadly defined and can include a homeless shelter or a summer home. In some circumstances, exemptions to the Act include the following: owner-occupied buildings with no more than four units, single-family housing sold or rented without the use of a broker, and housing operated by organizations and private clubs that limit occupancy to members.

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

### **2. Pennsylvania Human Relations Act**

The Pennsylvania Human Relations Act prohibits discrimination in all housing transactions including but not limited to sales, rental, finance, providing reasonable accommodations or modifications to housing



or commercial properties based on the protected classes listed in the Federal Fair Housing Act and also including:

- Age (40 or over)
- Ancestry
- Pregnancy status

Housing for older persons can be provided under specific federal or state programs that are designed and operated to assist elderly persons. Housing requirements include:

- Housing intended for and solely occupied by persons 62 years of age or older; or,
- Housing intended and operated for occupancy by at least one person 55 years of age or older per unit.

Requirements used in determining whether housing qualifies as housing for older persons include, but are not limited to, the following:

- At least 80 percent of the units are occupied by at least one person 55 years of age or older.
- There is publication of and adherence to policies and procedures which demonstrate an intent by the owner or manager to provide housing for persons 55 years of age or older.
- The housing complies with regulations declared by Pennsylvania Human Rights Commission (PHRC) for verification of occupancy.

Familial status is defined as families with children under 18. Familial status is protected in housing, but not in other areas (employment, public accommodations, education). Familial status is defined as: A family in which one or more children under age 18 live with:

- A parent; a person who has legal custody of the child or children; the designee of the parent or legal custodian with the parent or custodian's permission.
- Pregnant women
- Anyone securing legal custody of a child under age 18.

Individuals who believe they have experienced housing discrimination can file a complaint with HUD's Office of Fair Housing and Equal Opportunity (FHEO) at no charge. FHEO funds and has working agreements with many state and local governmental agencies where "substantially equivalent" fair housing laws are in place. This is known as the Fair Housing Assistance Program (FHAP).

There is also a network of private, non-profit fair housing advocacy organizations throughout the country. Some are funded by FHEO's Fair Housing Initiatives Program (FHIP), and some operate with private donations or grants from other sources.

Additional Federal Fair Housing Laws can be found in Appendix A – Federal Fair Housing Laws

# Chapter 2: Public Participation

## A. PUBLIC REVIEW DRAFT OF AI

CCHRA and Carlisle Borough staff worked with Michael Baker to draft the AI and take it through the consultation and citizen participation process. Michael Baker, consultant to CCHRA, provided technical assistance for preparation of the AI. The research, analysis, and consultations required to complete the AI commenced in May 2024. The County and the Borough coordinated the production of this document with the undertaking of their Five-Year Consolidated Plans to ensure that recommendations are grounded firmly in fair housing principles. The AI report was completed by the end of April 2025.

Work on the AI was being completed concurrently with the drafting of the Cumberland County 2025-2028 Consolidated Plan and the Borough of Carlisle 2025-2028 Consolidated Plan. The Planning Program for the AI included the following public engagement activities and events:

- Public Meetings held throughout Cumberland County
- Community Needs Survey
- Focus Group Meetings
- Housing Summit event
- Public Hearings

Meeting summaries for the Stakeholder, Focus Group, and Housing Summit engagement activities are included in the Consolidated Plans for both the County and Borough.

## B. PUBLIC MEETINGS AND HEARINGS

As part of the Consolidated Plan and AI process, three public outreach meetings were held on XXXXXX and one public hearing was held on XXXXXXXX. The initial public meetings were held in three locations in the County including: XXXXXXXXX for the purpose of informing the public on the Consolidated Plan and AI planning process, educate attendees on the sources of funding and HUD requirements as well as solicit public comments on community facility and housing needs.

As part of the final AI review process, one public meeting was held at the date, time, and location as follows:

- Wednesday, January 15, 2025, 12:00 PM, Cumberland County Planning Office, 310 Allen Road, Carlisle, PA 17015

The county also held a 30-day public comment period from January 8, 2025 to February 7, 2025, in which the document was available at three locations within Carlisle and available on the [CCHRA website](#). A public notification was sent to stakeholders and residents, announcing the draft AI public review period and public meeting dates in both Carlisle Borough and Cumberland County. The final AI document was announced to the public and posted on the CCHRA's website.

Public notifications for public meetings and hearings are included in Appendix B – Public Outreach

## C. COMMUNITY NEEDS SURVEY

A Community Needs Survey was conducted as part of the Consolidated Plan and AI process. From June 2024 to January 2025, CCHRA made the survey available on their website and distributed to area-wide stakeholders, CDBG subgrantees and municipal contacts throughout the County. The survey was

conducted to solicit the community’s input on the County’s most pressing needs, particularly in the areas of housing, parks, community facilities, human services, accessibility, affordable housing, and fair housing. Respondents identified the top issues that limit housing options in the County. The Community Needs Summary is included in Appendix B – Public Outreach.

## **D. FOCUS GROUP MEETINGS**

Four Focus Group meetings were held at the Carlisle Borough offices and were well attended. Two focus group meetings were held virtually via video conferencing. The first five focus group meetings occurred from June 25-27, 2024, and the sixth meeting occurred on July 30, 2024. Questions similar to the stakeholder interview questions were asked. A topic of interest was the level of support local municipalities give towards affordable housing. Overwhelmingly, participants stated, in general, local municipalities do not support affordable housing and or multi-family housing development for a variety of reasons including:

- Land use policies and regulations do not generally support higher density housing development.
- Municipalities gain a large portion of their revenue form Earned Income Tax (EIT). Higher income homes will generate more tax revenues.
- The public generally opposes multi-family and or affordable housing projects

A second popular topic of interest was the need for innovative workforce development for County residents. Issues related to this topic included: transportation to work, childcare, soft skills training, promotion and development of trade school careers, and low number of qualified builders/contractors available in the region.

A Focus Group Summary is included in Appendix B – Public Outreach.

## **E. HOUSING SUMMIT**

Wednesday, September 18, 2024 CCHRA hosted a Housing Summit at Dickinson College in Carlisle. This well-attended event included keynote speakers and panel discussion. Event promotional materials were sent to the planning stakeholders, municipalities, and agencies associated with housing, homelessness, and healthy communities.

Keynote speaker topics included:

- Homelessness in PA 2024
- Local affordable housing projects
- Cumberland County Comprehensive Plan Update
- Landlord engagement and eviction trends

A four-person panel and session moderator facilitated a question and answer discussion. Three of the questions proposed were (Panel answers can be found in the Housing Summit Summary):

1. What do you see are the primary causes for the lack of affordable housing?
2. What are the solutions to creating more affordable housing?
3. What are the impediments to implementing the solutions you have talked about?

A Housing Summit Summary is included in Appendix B – Public Outreach.

## F. COMMUNITY ENGAGEMENT ACTIVITY RESULTS

AI engagement activities in 2024/2025 provided the following summary of information with regards to the major barriers to providing fair housing to all populations:

- a. PHRC's research and studies have all showed the major impediments to Fair Housing Act compliance includes but is not limited to:

- Lack of transportation
- Poor economic development
- Lack of affordable housing
- Gentrification
- Landlord use of credit scores and criminal background checks

PHRC provides the following fair housing harassment strategies for housing providers:

- **Leadership.** Recognize that residents hold them accountable if they behave inappropriately, know what the living environment is like, and take immediate and effective actions when harassment takes place.
  - **Tenant Engagement.** Be respectful and act professionally when interacting with tenants. If requested, bring in others to accompany you into any home where work is needed.
  - **Compliance and Prevention.** Communicate effectively to tenants, conduct fair investigations, and provide timely responses and resolutions. Complete compliance training that may include education on diversity, cultural competence, workplace civility, stress management, and effective skills to deal with those suffering from mental health or cognitive disabilities.
- b. In 2018, the County's Local Housing Options Team (LHOT) held its annual housing workshop in September, the following was determined to be the top barriers to overcoming homelessness:
    - Loss of confidence
    - Decline in health due to homelessness
    - Bad credit or no credit
    - Lack of childcare
    - Inadequate support system
    - Difficulty navigating assistance programs and maintaining requirements
    - Low wages
  - c. Focus group meetings with major social services and housing providers noted the following impediments:
    - Lack of quality affordable housing
    - Lack of small housing units for single person households
    - Lack of emergency and transitional housing
    - Disparity between housing costs and wages
    - Barriers to "second chance" housing
    - Local housing development regulations do not encourage affordable housing
    - Landlord willingness to accept housing choice vouchers and property reinvestment
    - Disparity between job location and housing location – many are commuting great distances and living outside the county
    - Lack of tradesman to build affordable housing

- d. A Community Housing Survey was conducted in 2024/25. Top answers to the question “What issues limit housing options in Cumberland County” include:
- COMING SOON
- e. Stakeholders in the Cumberland County and Carlisle noted the barriers to developing affordable housing:
- Negative public opinion – NIMBY, communities uncomfortable with affordable housing
  - Local regulations – Many municipalities lack affordable housing provisions in their land use regulations
  - Lack of integrated housing solutions - Affordable housing and market rate housing are segregated
  - Funding conditions – Housing programs come with many conditions, ‘strings attached’
  - Projects do not cash flow - High construction and land costs combined with lower rental rates; PA residential prevailing wage rates (for projects financed with public sector sources)
  - Disconnect between affordable housing location and jobs – Increasingly, jobs are not located near housing and vice versa

# Chapter 3: Community Profile

## A. LOCATIONAL CONTEXT

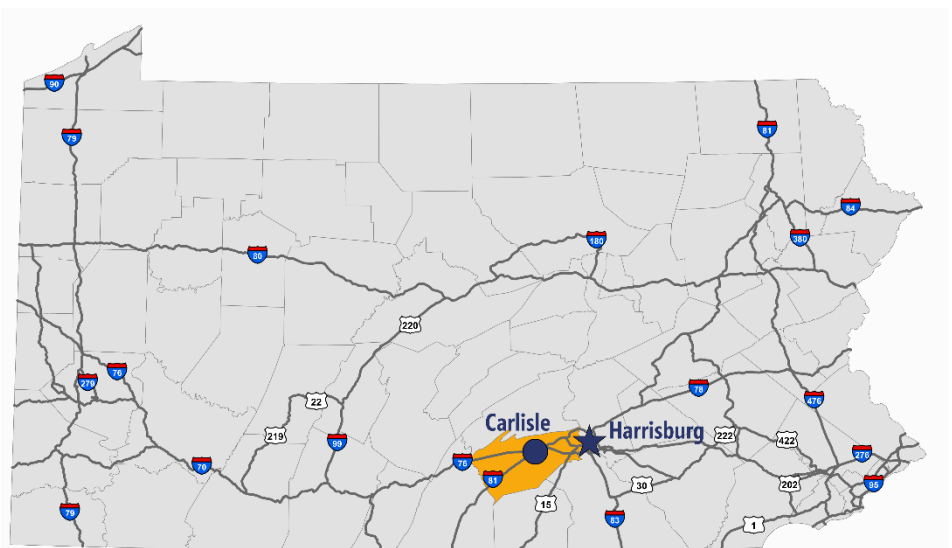
Understanding the social, racial, economic, and other characteristics of a population, as well as how those characteristics change over time, is crucial to evaluating current and future housing needs. Analyzing demographic trends can indicate places or people who may not be served by the housing market and who need assistance or intervention.

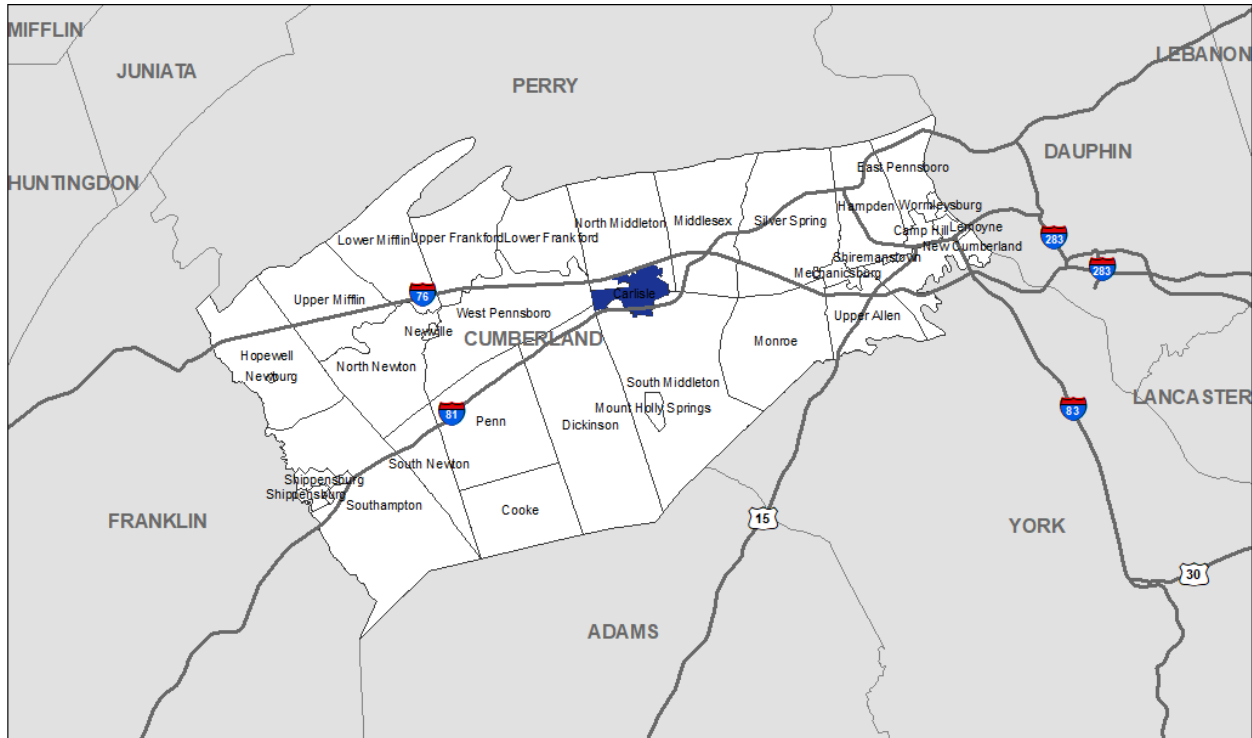
This chapter will explore demographic differences that affect housing choice among the population of Cumberland County and Carlisle Borough. It will provide context to existing conditions that reflect the effects of past policy decisions and will pinpoint issues to inform strategies for broadening the availability of housing opportunities for all residents. Data and analysis are presented for Cumberland County as a whole, as well as for Carlisle Borough and for the Urban County, which is the County's CDBG jurisdiction outside of Carlisle.

The County's transportation connections have greatly affected its land use characteristics and patterns. Easily accessible by I-81, I-83, and I-76, Cumberland County is within a three-hour drive of many major east coast cities, including Philadelphia, Pittsburgh, New York City, Washington D.C., and Baltimore. The County lies in close proximity to Harrisburg which provides valuable connections to the Harrisburg International Airport and Amtrak. The trucking companies and businesses have located along U.S. Route 11, I-81 and the PA Turnpike. The total amount of warehousing and distribution space combined with vehicle miles traveled for freight trucks, Cumberland County ranks third in the trucking industry in Pennsylvania.

Suburban development pressures generated in the greater Harrisburg area have caused higher densities in eastern Townships, with Townships becoming less densely populated moving westward. High population density patterns have also developed along the major transportation corridors connecting Carlisle with Harrisburg and in Townships surrounding the Borough. The presence of a state forest and steep slopes have limited development in the County's southwestern Townships. Western and central Townships are prime agricultural areas, which has played an important role in preserving their rural character. The northern fringes of the northern Townships lie on the flanks of Blue Mountain. State forests, state game lands, and topography account for the low density in those municipalities.

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





## B. DEMOGRAPHIC PROFILE

### Population

Over the past several decades, Cumberland County has grown at a faster rate than Pennsylvania and has been one of the most rapidly growing counties in the state. Census data and five-year estimates from the ACS show that from 1990 to 2020, the County’s population has grown by 28.8% while Pennsylvania’s increased by 9.4%. Rates of population increase for both jurisdictions have varied within that period. The County population increased by 8.7% from 2010 to 2020, while the state’s grew by just 1.4%. Out of the 33 municipalities in the Cumberland County, eight show a decrease in population from 2010 to 2022 while ten showed growth at double-digit rates. Table 2 shows the population changes for each individual municipality in the County from 2010 to 2022.

The Carlisle Borough’s population has not shown the same steady growth as Cumberland County, although it has been on the rise since the 2000 census. Population decreased from 1990 to 2000 by 2.4% while County population grew by 9.4%. However, from 2000 to 2010, Borough population jumped by 3% with a slightly more significant 3.6% growth from 2010 to 2020. The recent increase in population for Carlisle and Cumberland County suggests that housing needs will increase as well.

Table 1: Census Population

POPULATION					
	2000	2010	% Increase	2020	% Increase
<b>Cumberland County</b>	<b>213,704</b>	<b>235,406</b>	<b>9.2%</b>	<b>251,487</b>	<b>8.7%</b>
<b>Carlisle Borough</b>	<b>17,974</b>	<b>18,682</b>	<b>3.8%</b>	<b>19,188</b>	<b>3.6%</b>
<b>Pennsylvania</b>	<b>1,517,313</b>	<b>1,526,006</b>	<b>0.6%</b>	<b>1,569,657</b>	<b>1.4%</b>

Source: American Community Survey 2000, 2010, 2016-2020 Estimates

Table 2: Municipal Population in Cumberland County

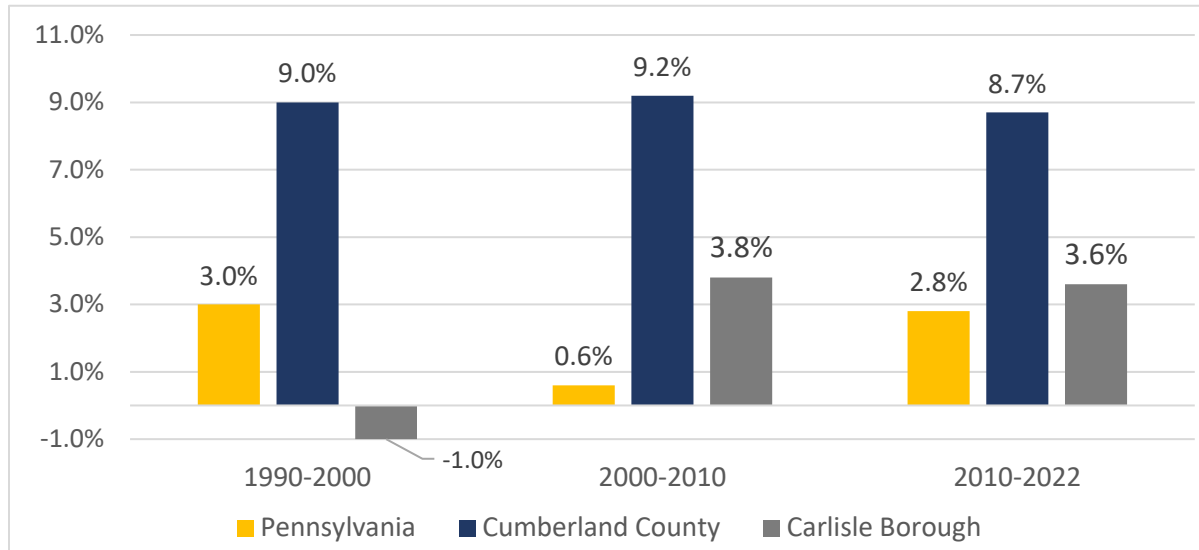
MUNICIPAL POPULATION				
Jurisdiction	2010	2022	Change (2010–2022)	
			Number	Percentage
Camp Hill Borough	7,888	8,133	245	3.1%
<b>Carlisle Borough</b>	<b>18,682</b>	<b>20,846</b>	<b>2,164</b>	<b>11.6%</b>
Cooke Township	179	179	0	0.0%
Dickinson Township	5,223	5,325	102	2.0%
East Pennsboro Township	20,228	20,937	709	3.5%
Hampden Township	28,044	32,973	4,929	17.6%
Hopewell Township	2,329	2,459	130	5.6%
Lemoyne Borough	4,553	4,663	110	2.4%
Lower Allen Township	17,980	20,211	2,231	12.4%
Lower Frankford Township	1,732	2,092	360	20.8%
Lower Mifflin Township	1,783	1,594	-189	-11.9%
Mechanicsburg Borough	8,981	9,402	421	4.7%
Middlesex Township	7,040	7,081	41	0.6%
Monroe Township	5,823	6,328	505	8.7%
Mouth Holly Springs Borough	2,030	2,325	295	14.5%
Newburg Borough	336	386	50	14.9%
New Cumberland Borough	7,277	7,515	238	3.3%
Newville Borough	1,326	1,359	33	2.5%
North Middleton Township	11,143	12,115	972	8.7%
North Newton Township	2,430	2,559	129	5.3%
Penn Township	2,924	2,895	-29	-1.0%
Shippensburg Borough	4,416	4,341	-75	-1.7%
Shippensburg Township	5,429	4,355	-1,074	-20.0%
Shiremanstown Borough	1,569	1,751	182	11.6%
Silver Spring Township	13,657	19,652	5,995	43.4%
Southampton Township	6,359	7,605	1,246	7.2%
South Middleton Township	14,663	16,226	1,563	10.7%
South Newton Township	1,383	1,162	-221	-16.0%
Upper Allen Township	18,059	23,038	4,979	27.6%
Upper Frankford Township	2,005	1,869	-136	-2.2%
Upper Mifflin Township	1,304	1,228	-76	-1.2%
West Pennsboro Township	5,561	5,605	44	0.6%



Wormleysburg Borough	3,070	3,060	-10	-0.4%
<b>Cumberland County</b>	<b>235,406</b>	<b>261,269</b>	<b>25,863</b>	<b>11.0%</b>
<b>Pennsylvania</b>	<b>12,702,873</b>	<b>12,989,208</b>	<b>286,335</b>	<b>2.3%</b>

Source: 2010 U.S. Decennial Census and 2022 Population Estimates

Figure 1: Population Increase 1990-2022



Source: 1990, 2000, 2010 Census and 2022 Census Population Estimates

### Age Distribution

Age groups tend to differ in housing needs and preferences that may be related to lifestyle, family situation, or income differences. Of particular importance are seniors, who have unique housing challenges related to affordability, accessibility, and the need for health services. A rural setting can exacerbate these problems for the senior population due to isolation. From 2010 to 2022, Cumberland County saw an increase in residents 65 and over from 15.6% to 18.5% of the overall population. This increase may need to be addressed by the County from a housing needs standpoint.

Outside of the change to the number of seniors, the age distribution of Cumberland County’s population was relatively stable from 2010 to 2022. The 2022 estimates suggest that 32.2% of the population is 20 to 44, and 23.9% is under 19 years of age. Carlisle’s population is shifted slightly younger with just 17% of residents at age 65 or over and 35.4% in the 20 to 44 range. The 19 and under age bracket makes up 28% of all Borough residents.

Table 3: Age Characteristics for Cumberland County

Cumberland County 2010			Cumberland County 2022		
Age Group	Number	Percentage	Age Group	Number	Percentage
Under 5	11,571	5.3%	Under 5	13,744	5.3%
5 to 9	12,359	5.7%	5 to 9	14,240	5.5%
10 to 14	13,033	6.0%	10 to 14	15,784	6.0%
15 to 19	15,216	7.0%	15 to 19	18,469	7.1%
20 to 24	14,848	6.9%	20 to 24	17,048	6.5%
25 to 29	13,173	6.0%	25 to 34	33,320	12.8%
30 to 34	12,482	5.8%			

35 to 39	13,424	6.2%	35 to 44	33,162	12.9%
40 to 44	14,958	6.9%			
45 to 49	16,706	7.7%	45 to 54	32,225	12.3%
50 to 54	16,475	7.6%			
55 to 59	15,246	7.0%	55 to 59	17,678	6.8%
60 to 64	13,450	6.2%	60 to 64	16,390	6.3%
65 to 69	9,795	4.5%	65 to 74	27,901	10.7%
70 to 74	7,445	3.4%			
75 to 79	6,341	2.9%	75 to 84	13,492	5.2%
80 to 84	5,264	2.4%			
85 and over	4,938	2.3%	85 and over	7,366	2.8%
<b>Total</b>	<b>216,724</b>	<b>100%</b>	<b>Total</b>	<b>261,269</b>	<b>100%</b>

Source: 2010 U.S. Decennial Census and 2018-2022 ACS 5-Year Estimates  
\*Percentages may not add up due to rounding.

Table 4: Age Characteristics for Borough of Carlisle

Borough of Carlisle 2010			Borough of Carlisle 2022		
Age Group	Number	Percentage	Age Group	Number	Percentage
Under 5	1,162	6.2%	Under 5	1,387	6.7%
5 to 9	979	5.2%	5 to 9	885	4.2%
10 to 14	875	4.7%	10 to 14	1,245	6.0%
15 to 19	1,672	8.9%	15 to 19	2,321	11.1%
20 to 24	2,282	12.2%	20 to 24	2,324	11.1%
25 to 29	1,439	7.7%	25 to 34	2,787	13.4%
30 to 34	1,079	5.8%			
35 to 39	982	5.3%	35 to 44	2,267	10.9%
40 to 44	972	5.2%			
45 to 49	1,091	5.8%	45 to 54	1,807	8.7%
50 to 54	1,112	6.0%			
55 to 59	1,051	5.6%	55 to 59	1,087	5.2%
60 to 64	1,024	5.5%	60 to 64	1,176	5.6%
65 to 69	734	3.9%	65 to 74	2,131	10.2%
70 to 74	565	3.0%			
75 to 79	528	2.8%	75 to 84	942	4.5%
80 to 84	487	2.6%			
85 and over	648	3.5%	85 and over	487	2.3%
<b>Total</b>	<b>18,682</b>	<b>100%</b>	<b>Total</b>	<b>20,846</b>	<b>100%</b>

Source: 2010 U.S. Decennial Census and 2018-2022 ACS 5-Year Estimates  
\*Percentages may not add up due to rounding

### Language Spoken

Housing may not be refused based on a resident's birthplace or ancestry, nor can housing providers take advantage of a person's inability to read, write, speak, or understand English to deny access. Those with limited English proficiency (LEP) can face unique challenges in meeting their housing needs, so recipients

of federal financial assistance are required to provide access to programs to LEP citizens. This condition applies to HUD funds that are allocated to Cumberland County or the Borough of Carlisle.

In Cumberland County, 2.7% of the residents speak English less than “very well” and therefore could be impeded in their access to housing. Of that group, speakers of Indo-European languages other than Spanish and Asian and Pacific Islander languages make up the largest portion; about 1% each. Within Carlisle, 3.7% of the population speaks English less than “very well.” Those speaking Indo-European languages other than Spanish make up the greatest share at 1.1%.

Table 5: Language, All Persons 5 Years and Older in 2022

Language	Cumberland County		Carlisle	
	Persons	Percentage	Persons	Percentage
English language	240,736	97.3%	18,734	96.3%
Other language (speak English less than “very well”)	6,789	2.7%	725	3.7%
All persons 5 and over	247,525	100%	19,459	100%

Source: 2018-2022 ACS-5 Year Estimates

### Race/Ethnicity

Race and ethnicity demographics for both the County and Borough are statistically low populations. Just over 11% of the County’s population is non-White. The largest differences in race/ethnicity is the concentration of Black or African American population and the concentration of Hispanic Origin population. This population in Carlisle Borough is 4.2% and 4.1% higher than the County, respectfully.

Table 6: Cumberland County Race and Ethnicity

Race/Ethnicity	Cumberland County 2010		Cumberland County 2022 Estimate	
	Number	Percentage	Number	Percentage
White	198,180	91.4%	221,159	84.6%
Black or African American	5,980	2.8%	11,297	4.3%
American Indian and Alaska Native	327	0.2%	188	0.1%
Asian	6,638	3.0%	12,995	5.0%
Native Hawaiian or Pacific Islander	60	0.0%	27	0.0%
Some other race	1,963	0.9%	3,524	1.3%
Two or more races	3,576	1.7%	12,079	4.6%
Hispanic Origin, all races	5,602	2.6%	12,076	4.6%
Total population	216,724	100%	261,269	100%

Source: 2010 U.S. Decennial Census; 2018-2022 ACS- 5 Year Estimates  
\* Percentages may not add up due to rounding

Table 7: Carlisle Borough Race and Ethnicity

Race/Ethnicity	Carlisle 2010		Carlisle 2022 Estimate	
	Number	Percentage	Number	Percentage
White	15,754	84.3%	16,712	80.2%
Black or African American	1,547	8.3%	1,774	8.5%
American Indian and Alaska Native	36	0.2%	30	0.1%
Asian	434	2.3%	524	2.5%

Native Hawaiian or Pacific Islander	5	0.0%	1	0.0%
Some other race	240	1.3%	503	2.4%
Two or more races	666	3.6%	1,302	6.2%
Hispanic Origin, all races	846	4.5%	1,823	8.7%
Total population	18,682	100%	20,846	100%

Source: 2010 U.S. Decennial Census; 2018-2022 ACS- 5 Year Estimates

\* Percentages may not add up due to rounding

**Minority Concentration**

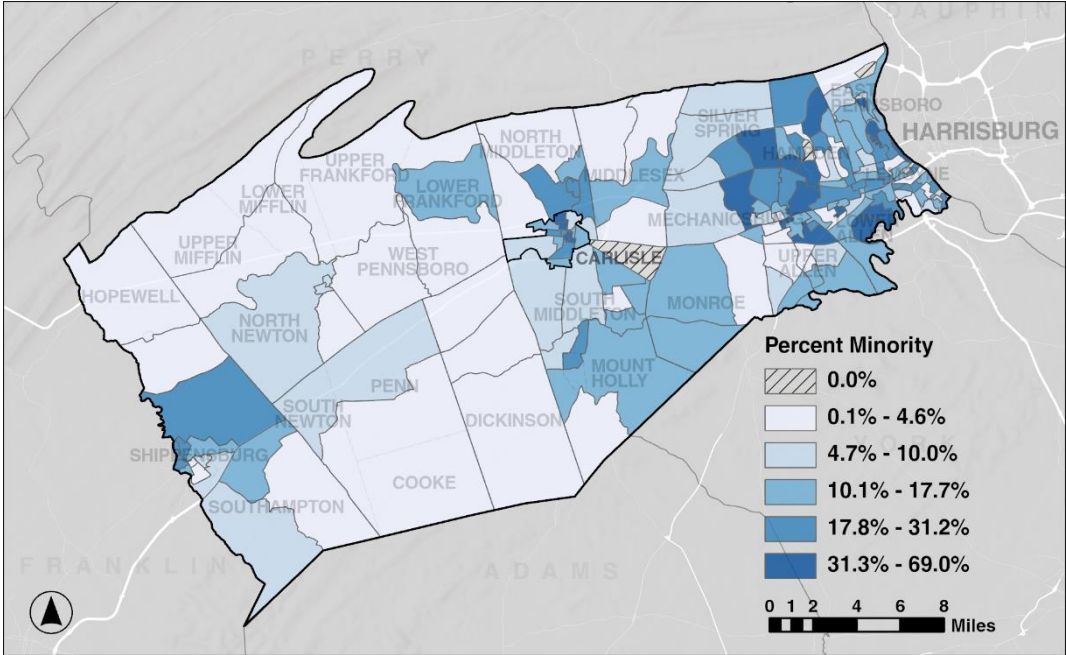
Minority populations in Cumberland County make up less than 15% of the total population. Those populations are concentrated in Carlisle Borough, Shippensburg Borough, Wormleysburg Borough, Enola (East Pennsboro Township), and small pockets of suburban municipalities located east of Carlisle Borough or the “West Shore” area.

Table 8: 2022 Race and Ethnicity Comparison

Race and Ethnicity	Cumberland County		Carlisle	
	Number	Percentage	Number	Percentage
Black or African American	11,297	4.3%	1,774	8.5%
Asian	12,995	5.0%	524	2.5%
Hispanic, all races	12,076	4.6%	1,823	8.7%
Some other race	3,524	1.3%	503	2.4%
Two or more races	12,079	4.6%	1,302	6.2%

2018-2022 ACS- 5 Year Estimates

Figure 2: Minority Population in Cumberland County



Source: 2018-2022 ACS 5-Year Estimate

## Household Type

Cumberland County households are largely smaller family households with and without children. Household type statistics have changed little from 2010-2022 for both County and the Borough, with the exception of female households with and without children in the County and Borough.

*Table 9: Cumberland County Household Type*

Household Type	Cumberland County 2010		Cumberland County 2022	
	Number	Percentage	Number	Percentage
All Households	86,158	100.00%	104,053	100.00%
Family Households	56,617	65.71%	65,295	62.80%
...with children	23,153	26.87%	28,631	27.50%
Married couple families	47,264	54.86%	52,809	50.80%
...with children	18,241	21.17%	17,102	18.91%
Male households, no wife	2,582	3.00%	3,704	3.60%
...with children	1,259	1.46%	1,830	2.02%
Female householder, no husband	6,771	7.86%	8,782	8.40%
...with children	3,653	4.24%	3,806	4.21%
Non-Family Households	29,541	34.29%	38,758	37.20%
...Living alone	24,256	28.15%	31,654	30.40%
...65 and over	9,200	10.68%	13,378	12.90%

*Source: 2018-2022 ACS- 5 Year Estimates*

*Table 10: Carlisle Household Type*

Household Type	Carlisle 2010		Carlisle 2022	
	Number	Percentage	Number	Percentage
All Households	7,581	100.00%	8,334	100.00%
Family Households	4,013	52.93%	4,033	48.40%
...with children	1,671	22.04%	2,064	24.80%
Married couple families	2,934	38.70%	2,782	33.40%
...with children	1,012	13.35%	1,053	14.42%
Male households, no wife	388	5.12%	338	4.10%
...with children	197	2.60%	228	2.53%
Female householder, no husband	691	9.11%	913	11.00%
...with children	462	6.09%	721	9.95%
Non-Family Households	3,568	47.07%	4,301	51.60%
...Living alone	2,927	38.61%	3,807	45.70%
...65 and over	1,008	13.30%	1,169	14.00%

*Source: 2018-2022 ACS- 5 Year Estimates*

## Household Size

The following table shows the average household size for both renters and owner-occupied housing units. A majority of Cumberland County’s households live in two- and three-bedroom homes, while Carlisle Borough has a high renter occupied population.

Table 11: Household Size

	Renter Occupied		Owner Occupied	
	Number of Units	% of all Units	Number of Units	% of all Units
<b>Cumberland County</b>				
0-1 Bedroom	8,927	28.7%	1,184	1.7%
2 -3 bedrooms	20,323	65.5%	47,115	64.5%
4 or more bedrooms	1,759	5.7%	24,745	33.9%
Total	31,009	100%	73,044	100%
<b>Carlisle</b>				
0-1 bedroom	1,873	42.9%	98	2.5%
2 -3 bedrooms	2,344	53.7%	2,584	65.1%
4 or more bedrooms	145	3.3%	1,290	32.5%
Total	4,362	100%	3,972	100%
Total	35,371	100%	77,016	100%

Source: 2018-2022 ACS- 5-Year Estimates

## Special Needs Populations

The population in Cumberland County is slowly aging. Every 10 years, the over 65 years of age population shows an increase between 1 and 2%. The number of large households of five or more people makeup roughly 8% in Cumberland County and has not changed significantly from 2000 to 2022. Single parent households makeup an estimated 6% in Cumberland County; however, in Carlisle Borough single parent households are more prominent at 11.4%. According to the 2018-2022 ACS data, there are close to 33,000 persons living with disabilities, of which almost 21% are living below the poverty level. The homeless population in Cumberland County is counted annually. Table 15 shows the total homeless population statistics. The Point-In-Time Counts reflect a large jump in sheltered and unsheltered populations with slight decreases heading into 2023.

Table 12: Elderly Percentage of Population

Age Category	Cumberland County		Carlisle	
	2010	2022	2010	2022
65 to 74	8.0%	10.7%	7.0%	10.2%
75 to 84	5.4%	5.2%	5.4%	4.5%
85 and over	2.3%	2.8%	3.5%	2.3%
Total 65 and over	15.6%	18.7%	15.9%	17.1%

Source: 2010 U.S. Decennial Census; 2018-2022 ACS 5-Year Estimates

Table 13: Large Households in 2000, 2010, and 2022

Household Size	Number	% of Households	Number	% of Households
<b>2000</b>	<b>Cumberland County</b>		<b>Carlisle Borough</b>	
5-person households	4,071	4.9%	270	3.6%
6- person households	1,166	1.4%	77	1.0%
7- person households	567	0.7%	29	0.4%
Total large households	5,804	7.0%	376	5.1%
<b>2010</b>	<b>Cumberland County</b>		<b>Carlisle Borough</b>	
5-person households	4,367	4.6%	275	3.6%
6- person households	1,371	1.5%	87	1.1%
7- person households	806	0.9%	58	0.8%
Total large households	6,544	7.0%	420	5.5%
<b>2022</b>	<b>Cumberland County</b>		<b>Carlisle Borough</b>	
5-person households	4,692	4.5%	470	5.6%
6-person households	1,777	1.7%	16	0.2%
7-person households	896	0.9%	96	1.2%
Total large households	7,365	7.8%	582	7.0%

Source: 2010 U.S. Decennial Census. 2018-2022 ACS 5-year estimates.

Table 14: Single Parent Households in 2022

Cumberland County		Carlisle	
Number	Percent of Households	Number	Percent of Households
5,636	6.2%	949	11.4%

Source: 2018-2022 ACS 5-Year Estimates

Table 15: Cumberland County Homeless Point-In-Time Count 2021 to 2023

	Sheltered			Unsheltered		
	2021	2022	2023	2021	2022	2023
Total Households	74	77	94	*	72	56
Total Persons	113	121	145	*	110	83

Source: Cumberland County Annual Point-In-Time Count \*PIT Count was not conducted in 2021 due to COVID-19

## Employment

Cumberland County traditionally has had a low unemployment rate. The County’s unemployment rate reached an all-time high of 6.7% in 2008 and the current unemployment is 2.6% in 2024. The Bureau of Labor Statistics reports that the Harrisburg-Carlisle area’s unemployment rate is 2.9% as of November 2024. Table 16 below reports on unemployment rates per race. The highest unemployment rates reported in 2022 for both the County and the Borough, belonged to three different racial groups: Black or African American and those populations that were two or more races, and those with disabilities.

Table 16: Unemployment in 2022

Race	Unemployment Rate	
	Cumberland County (including Carlisle)	Carlisle
Total population 16 years and over	3.7%	4.1%
White	3.4%	4.3%
Black or African American	8.8%	0.0%
Asian	2.9%	2.3%
Some other race	3.2%	5.6%
Two or more races	6.7%	4.9%
Hispanic or Latino (of any race)	6.0%	3.9%
Male (population 20-64)	3.8%	2.8%
Female (population 20-64)	2.9%	3.4%
With a disability	67.7%	*
<i>Source: 2018-2022 ACS 5-Year Estimates *data unavailable for 2018-2022 ACS 5-year Estimates.</i>		

## C. HOUSING PROFILE

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

By analyzing the costs, affordability, physical characteristics, location, and other factors of Cumberland County’s housing stock, in combination with the conclusions already drawn from other sources of data, impediments to fair housing choice can be identified, scrutinized, and, eventually, mitigated. This chapter will explore baseline housing market conditions through the lens of members of the protected classes, identifying and contextualizing barriers that may exist to a household’s choice to live in a given area of Cumberland County.

### **General Inventory Trends**

Cumberland County’s total housing stock expanded by 14.8% between 2000 and 2012. Between 2010 and 2018, the County Housing stock expanded by 12.5%, representing a slightly slower pace of growth. During the same years (2010-2022), total population expanded by 8.7%.

From 2010 to 2022 (Census estimates), changes in population varied across the County, ranging from a loss or stagnation in population in eight municipalities to growth exceeding 10% in ten others. The largest gains by number occurred in Upper Allen, Hampden, Lower Allen, and Silver Spring. Cumberland County is seeing great shifts in population change whereby the suburban areas just outside the City of Harrisburg or the “West Shore” area are seeing decreases; however, the rents and home prices continue to be on the rise.

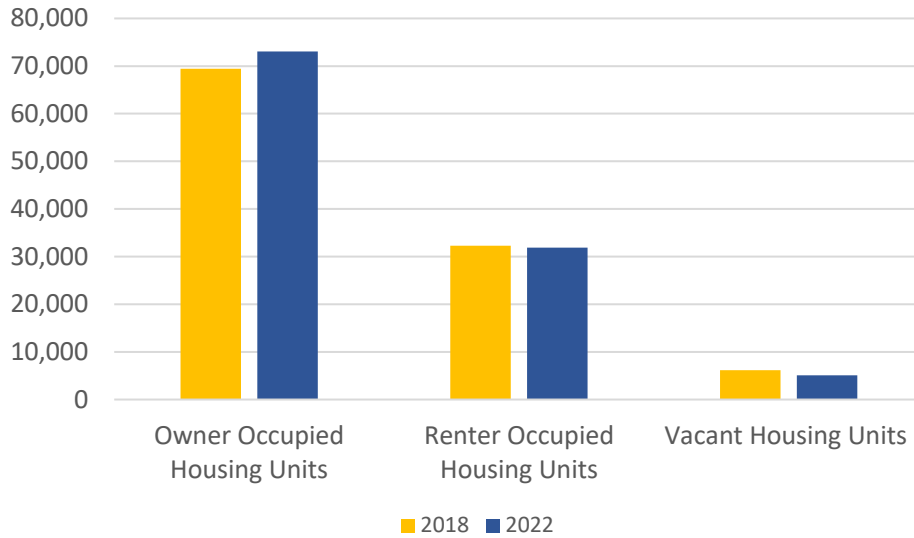
The number of new housing units built continues to decrease since in Carlisle Borough since 1939. New housing units being built in Cumberland County has significantly decreased since 2010. Various reasons for this include:

- Stagnant household incomes
- Rising cost of housing
- Increases construction cost per square foot



- Stagnant population growth
- Slight rise in aging population

Figure 2: Cumberland County Housing Tenure, 2018 and 2022

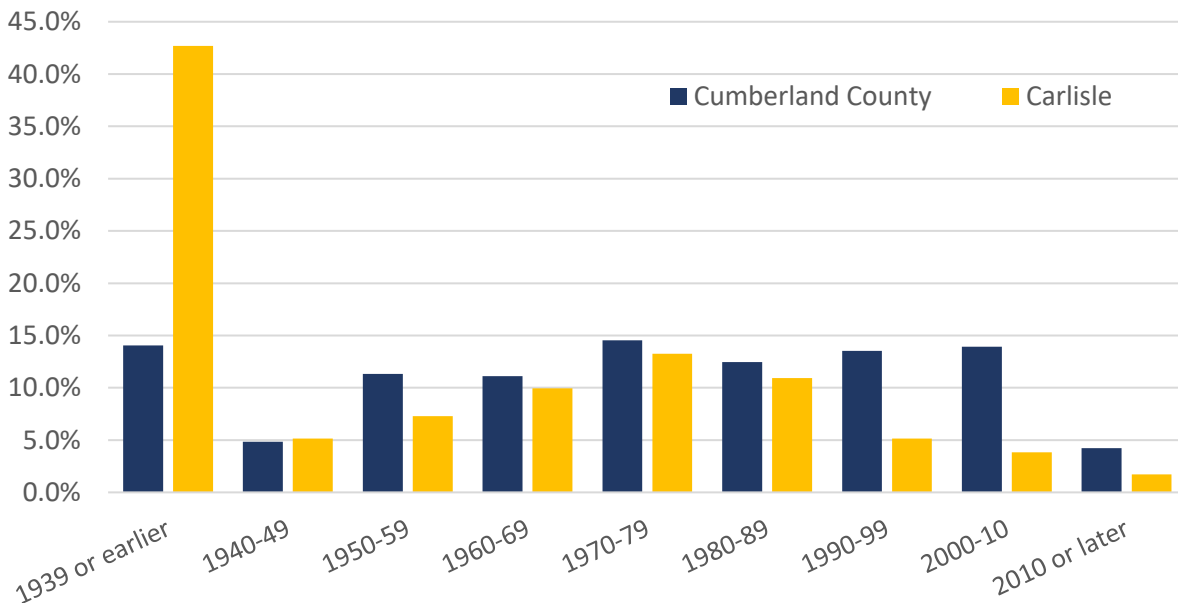


Source: 2018-2022 ACS 5-Year Estimates

### Housing Conditions

Housing in Carlisle Borough was primarily built prior to 1940 and as seen in the amount of CDBG fund expenditures, the largest percentage of funds are spent on housing rehab and codes enforcement initiatives.

Figure 3: Year Structure Built



Source: 2018-2022 ACS 5-Year Estimates

### Housing Costs and Affordability

Stakeholders interviewed for this AI noted that the local housing market is tight and renters and first-time home buyers are finding it difficult to find affordable housing options. Even working families who qualify for the County’s First Time Homebuyers Program are increasingly having a difficult time finding homes within their price range. .

Table 17: Carlisle Median Home Sale Price

Home Size	Nov '24	3 Months Prior	1 year prior	5 years prior
All Properties	\$302,318	\$299,895	\$291,936	\$202,838

Source: Zillow Real Estate, November 2024

Table 18: Housing Size and Cost Patterns

Home Size	Cumberland County	
	2019	2024
1 bedroom	\$94,500	\$140,900
2 bedroom	\$140,000	\$220,400
3 bedroom	\$179,900	\$285,500
4 bedroom	\$295,000	\$419,800
4+ bedroom	\$301,500	\$622,500

Source: Rocket Homes, July 2024

### Housing Costs

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

There is a limited inventory of housing at lower price ranges. When reviewing actual real estate market sites including Rocket Homes, 2024 home prices for a two- to three- bedroom home in Cumberland County is really between \$220,000 and \$285,000. The median household income in the Carlisle area is \$55,756 and Cumberland County is \$82,849 according to Data USA.com. Table 19 provides consistent data about home sales during 2020-2024. There are fewer units on the market, and these units are being sold at a substantially higher cost.

In Cumberland County, from 2017 to 2022, there were 6,438 new apartment units added to the market. In Carlisle Borough, 138 units were added. In Cumberland County, from 2017 to 2022, the number of units renting for less than \$1,000/month decreased 39%, while the number of units that cost more than \$1,000/month increased 82%. In Carlisle Borough, the number of units that cost more than \$1,000/month increased 60%. The increases in rentals on the market over \$1,000/month shows that more market-rate priced apartments are being added to the rental inventory.

Table 19: Cumberland County (including Carlisle) Home Sales (2020-2024)

	2020	2021	2022	2023	2024
Units Sold	327	299	295	214	240

Average Sales Price	\$268,457	\$285,849	\$340,291	\$322,312	\$361,873
Average Days on Market	28	18	18	21	28
Median Sales Price	\$238,000	\$245,000	\$300,000	\$302,000	\$314,297
<i>Source: Greater Harrisburg Association of Realtors (GHAR)</i>					

The median household income in Cumberland County has increased nearly 38% from 2010 to 2022; however, rents have increased 51% and home prices increased 41%. Household incomes have not kept up with housing cost increases, creating even larger affordability and cost burden issues.

*Table 20: Changes in Value, Rent and Income, 2010-2022*

	Median Housing Value	Median Gross Rent	Median Household Income
<b>Cumberland County (including Carlisle)</b>			
2010	\$174,600	\$757	\$60,219
2022	\$246,200	\$1,146	\$82,849
Change	41.0%	51.4%	37.6%
<b>Carlisle</b>			
2010	\$165,200	\$666	\$43,922
2022	\$208,900	\$964	\$55,756
Change	70.0%	44.7%	26.9%
<i>Source: 2018-2022 ACS- 5 Year Estimates</i>			

*Table 21: Affordable Rental Housing Units, 2017 to 2022*

Units Renting for:	2017	2022	Change	
			Number	Percentage
<b>Cumberland County (excluding Carlisle)</b>				
Less than \$500	1,642	1,379	-263	-19.0%
\$500 to \$699	3,135	9,475	-1,914	-20.2%
\$700-\$999	8,254			
\$1,000 or more	10,454	19,069	8,615	82.4%
<b>Carlisle Borough</b>				
Less than \$500	473	458	-15	-3.3%
\$500 to \$699	704	1,796	-565	-31.5%
\$700-\$999	1,657			
\$1,000 or more	1,195	1,913	718	60.1%
<i>Source: 2013-2017 ACS- 5 Year Estimates and 2018-2022 ACS 5-Year Estimates</i>				

*Table 22: Fair Market Rent (FMR)*

Unit Size	FY-2022 FMR
0 Bedroom	\$732
1 Bedroom	\$843
2 Bedrooms	\$1,074
3 Bedrooms	\$1,364
4 Bedrooms	\$1,456

Table 22: Fair Market Rent (FMR)

Unit Size	FY-2022 FMR
<i>Source: HUD 2022 Fair Market Rent Documentation System</i>	

The National Low Income Housing Coalition provides annual information on the HUD Fair Market Rent (FMR) and affordability of rental housing in counties and cities in the U.S. for 2024. FMR for a two-bedroom apartment is \$1,670. To afford this level of rent and utilities without paying more than 30% of income on housing, a household must earn \$5,137 monthly or \$66,788 annually. Assuming a 40-hour work week, 52 weeks per year, the level of income translates into a Housing Wage of \$32.11. The continued high price of both owner-occupied and rental housing reduces the ability of low-income households to find affordable housing. According to 2018-2022 ACS data, the number of apartments renting for less than \$500 decreased 46% between 2017 and 2022. In addition, median contract rents increased 29% between 2017-2022, adjusted for inflation. As a result, the inventory of affordable rental units significantly decreased while rental rates increased.

The median monthly rent for a one-bedroom and a two-bedroom in the Borough of Carlisle is \$815 and \$1,019 (2022 Census) respectively; and \$909 and \$1,157 (2022 Census) for Cumberland County. The largest percentage increase in rents occurs with one- and two-bedroom units. On average, there is a \$110 increase in monthly rent. Rental agencies calculate median rents as available housing units coming onto the market in real time. As shown below, 2022 estimated median rents in Cumberland County are higher than 2020 estimates.

Table 23: Rent Percent Change in a 2-Year Timeframe

2020-2022		
Bedrooms	Carlisle Borough	Cumberland County
1	12.9%	15.5%
2	9.8%	14.7%
3	6.3%	12.2%
4	-17%	4.7%
<i>Source: U.S. Census Bureau 2020 &amp; 2022 Estimates</i>		

Average median rents for a one-bedroom is \$909 per month, \$1,157 for a two-bedroom unit, and \$1,200-\$1,376 for a three-bedroom unit. The total average rent is \$1,146 per month. . Preserving affordable housing is an ongoing challenge for the Borough and the County. Developing additional units of affordable housing, particularly rental housing for families, continues to be a goal.

Table 24: Housing Affordability for LMI Families

AFFORDABLE MORTGAGE/RENT AMOUNTS IN CUMBERLAND COUNTY (INCLUDING CARLISLE BOROUGH)				
	1 Person	2 Persons	3 Persons	4 Persons
Very Low (50%)				
Annual Income	\$26,900	\$30,750	\$34,600	\$38,450
Monthly Income	\$2,240	\$2,560	\$2,880	\$3,200
Affordable Purchase Price	\$45,000	\$50,000	\$60,000	\$65,000
Affordable Monthly Rent	\$672	\$768	\$864	\$960
Low (80%)				
Annual Income	\$43,050	\$49,200	\$55,350	\$61,500

Monthly Income	\$3,590	\$4,100	\$4,610	\$5,130
Affordable Purchase Price	\$75,000	\$85,000	\$95,000	\$105,000
Affordable Rent	\$1,077	\$1,230	\$1,383	\$1,539
<b>Moderate (120%)</b>				
Annual Income	\$64,570	\$73,800	\$83,030	\$92,270
Monthly Income	\$5,380	\$6,150	\$6,920	\$7,690
Affordable Purchase Price	\$110,000	\$130,000	\$145,000	\$160,000
Affordable Rent	\$1,614	\$1,845	\$2,076	\$2,307

Source: PA Department of Housing and Community Development; 2018-2022 ACS- 5 Year Estimates

Assumptions: 2019 State Department of Housing and Community Development (HCD) income limits; Health and Safety code definitions of affordable housing costs (between 30 and 35% of household income depending on tenure and income level); 15% of monthly income for taxes, insurance and utilities based on Cumberland County average; 10% down payment; and 6.19% interest rate for a 30-year fixed-rate mortgage loan. Taxes and insurance apply to owner costs only; renters do not usually pay taxes or insurance.

Sources:

1. HCD 2022 Income Limits. Note: Lower income exceeding median income is an anomaly for Cumberland due to HUD historical high cost adjustments to median. Household lower income figures are derived based on very-low income figures not adjusted by HUD to account for any exceptions.
2. 2018-2022 ACS- 5 Year Estimates

### Housing Cost Burden

Data collection over housing affordability indicates the median home value increased 8% between 2020 and 2024. In addition, the median contract rent rose by 13.5%, reflecting the increased demand for rental units, most likely due to the difficulty households were having in qualifying for a mortgage.

According to the [Out of Reach 2024 report](#) from the National Low Income Housing Coalition, an average worker in the U.S. must work 113 hours per week to afford a two-bedroom rental home at fair market rent, or 95 hours per week to afford a one-bedroom rental home.

Table 25: Cumberland County Housing Cost Burden

	Total Renters	Total Owners	Total Households
<b>Household income:</b>			
≤ 30% MFI	5,795	3,165	8,960
>30% but ≤ 50% MFI	4,825	5,825	10,650
> 50% MFI	6,950	11,065	18,015
<b>% cost burden:</b>			
≤ 30% MFI	61.2%	84.0%	77.3%
> 30% but ≤ 50% MFI	19.4%	9.8%	12.6%
> 50%	18.4%	6.0%	9.6%

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2018-2022 data, 2018-2022 ACS- 5 Year Estimates

Cost-burdened households refer to households that pay 30% or more on housing costs. Data for Carlisle Borough from the 2018-2022 CHAS/ACS reveals an increasing cost burden for both owner-occupied households and renter-occupied households. The percent of owner-occupied households in Carlisle Borough that are cost-burdened fell from 47% in 2017 to 18.4% in 2022.

## D. RACE AND SEGREGATION

Residential segregation is a measure of the degree of separation of racial or ethnic groups living in a community. An extreme example of segregation would be a perfect split between predominantly high-

income, White, suburban communities and low-income, minority, inner-city neighborhoods. The dissimilarity index measures the relative separation or integration of groups across all neighborhoods of a city or metropolitan area. If a city's white-black dissimilarity index were 65, that would mean that 65% of White people would need to move to another neighborhood to make whites and blacks evenly distributed across all neighborhoods.

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

In 2010, the dissimilarity indices countywide by census tract for all non-White groups were principally in the low range, with the exception of the index for Blacks. By 2020, most of the indices had increased significantly. Segregation can be reinforced both unintentionally and by deliberate actions. The highest concentrations of non-White residents in the County occur within Carlisle, Wormleysburg, the Enola area, and small pockets of Hampton, Upper Allen, and Lower Allen Townships. The increases in the dissimilarity indices are more likely the result of natural changes in settlement patterns due to urbanization than deliberate segregation. Dissimilarity indices are changing but not in a healthy way. Severe segregation seems to be happening.

*Table 26: Dissimilarity Indices, 2010-2020\**

	2010	2020
Black	47.8	57.5
Asian	38.9	43.4
Other	23.9	24.1
Two or more races	32.2	39.3
Hispanic	34.1	44.2

*Source: 2010 and 2020 ACS*

\* When a group's population is small, its dissimilarity index may be high even if the group's members are evenly distributed throughout the area. Thus, when a group's population is less than 1,000, exercise caution in interpreting its dissimilarity indices.

## E. R/ECAPs

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

### 1. Borough of Carlisle

In order to analyze the RCAPs/ECAPs in the Borough of Carlisle at a meaningful geographic scale, data was collected for census block groups for both Carlisle and Cumberland County. Block group data was collected from the 2018-2022 American Community Survey 5-Year Estimates, which HUD currently uses for its most up-to-date low- to moderate-income designations.

For the purpose of this analysis, racial minorities are all ACS respondents who identified as a race other than White, and ethnic minorities are all those who claimed Hispanic origins. Areas where racial and ethnic minorities are concentrated were determined to be where rates of those groups were more than

twice the County’s average rates (11.2% and 3.5%, respectively). As a proxy for poverty, any block groups where at least 51% of households qualify as low- to moderate-income by HUD standards were considered to be a low-income concentration.

There are seven Census Blocks that could be classified as an RCAP located in the Borough of Carlisle. Five block groups across the Borough are ECAPs. See attached mapping. The block groups for RCAP and ECAP are generally the same with three additional RCAP block groups.

Table 27: RCAP/ECAP % Race/Ethnicity Per Block Group

CARLISLE BOROUGH								
RCAP Block Groups				ECAP Block Groups				
Tract	Block Group	% LMI	% Racial Minority	Tract	Block Group	% LMI	% Ethnic Minority	
0120	420410120005	57.2%	38.1%	0120	420410120002	56.1%	7.18%	
0121	420410121001	52.4%	21.3%	0121	420410121001	52.4%	10.33%	
0121	420410121002	61.4%	18.0%	0122	420410122001	68.5%	7.96%	
0122	420410122001	68.5%	44.8%	0123	420410123001	89.1%	5.37%	
0122	420410122002	82.8%	23.7%	0124	420410124002	57.3%	5.65%	
0123	420410123001	89.1%	49.6%					
0124	420410124002	57.3%	14.9%					

Source: 2018-2022 ACS 5-Year Estimates by Block Group

Table 28: LMI Block Group and Minorities

CARLISLE BOROUGH					
Census Tract	Carlisle Borough Block Group	% LMI Persons	#LMI Persons	#Minority	%Minority <sup>1</sup>
120	420410120001	48.7%	645	350	28.5%
120	420410120002	56.1%	460	58	7.3%
120	420410120003	83.5%	480	41	6.1%
120	420410120004	32.3%	370	116	9.8%
120	420410120005	57.2%	455	194	25.1%
121	420410121001	52.4%	610	242	21.0%
121	420410121002	61.4%	715	138	13.3%
122	420410122001	68.5%	695	541	40.6%
122	420410122002	82.8%	625	159	16.7%
123	420410123001	89.1%	780	300	31.6%
123	420410123002	46.7%	320	256	16.2%
124	420410124001	16.5%	285	143	6.5%
124	420410124002	57.3%	1435	318	11.3%
124	420410124003	29.5%	285	185	11.4%
124	420410124004	11.8%	100	52	6.3%

Source: 2018-2022 ACS 5-Year Estimates by Block Group

<sup>1</sup> “racially diverse” is defined as a block group with twice the diversity of the County average, which in Cumberland County’s case is 11%, we have established that the minority block groups reflect 22% diversity and above.

## 2. Cumberland County

In Cumberland County, there are 13 block groups that qualify as an RCAP, plus seven in the Borough of Carlisle. Six block groups across the County are ECAPs, plus five are in Carlisle. See attached mapping.

Table 29: LMI Block Groups Having 22%

CUMBERLAND COUNTY								
RCAP Block Groups (13)				ECAP Block Groups (6)				
Tract	Block Group	% LMI	% Racial Minority	Tract	Block Group	% LMI	% Ethnic Minority	
0102	420410102032	51.2%	28.1%	0102	420410102032	51.2%	10.9%	
0103	420410103003	54.2%	17.1%	0103	420410103001	51.9%	13.8%	
0105	420410105003	56.9%	13.0%	0106	420410106003	61.8%	9.3%	
0106	420410106003	61.8%	12.7%	0106	420410106005	58.8%	4.5%	
0106	420410106005	58.8%	14.4%	0108	420410108002	70.5%	13.6%	
0108	420410108003	74.4%	19.1%	0129	420410129001	67.6%	4.9%	
0110	420410110021	57.0%	13.1%					
0110	420410110022	58.7%	19.0%					
0116	420410116012	60.2%	25.4%					
0131	420410131021	90.4%	17.7%					
0131	420410131022	78.3%	11.4%					
0132	420410132002	72.3%	17.8%					
0132	420410132004	91.1%	25.6%					

Source: 2018-2022 ACS 5-Year Estimates by Block Group

The following County Census Block Groups are both LMI and have high concentrations of racial minority groups include:

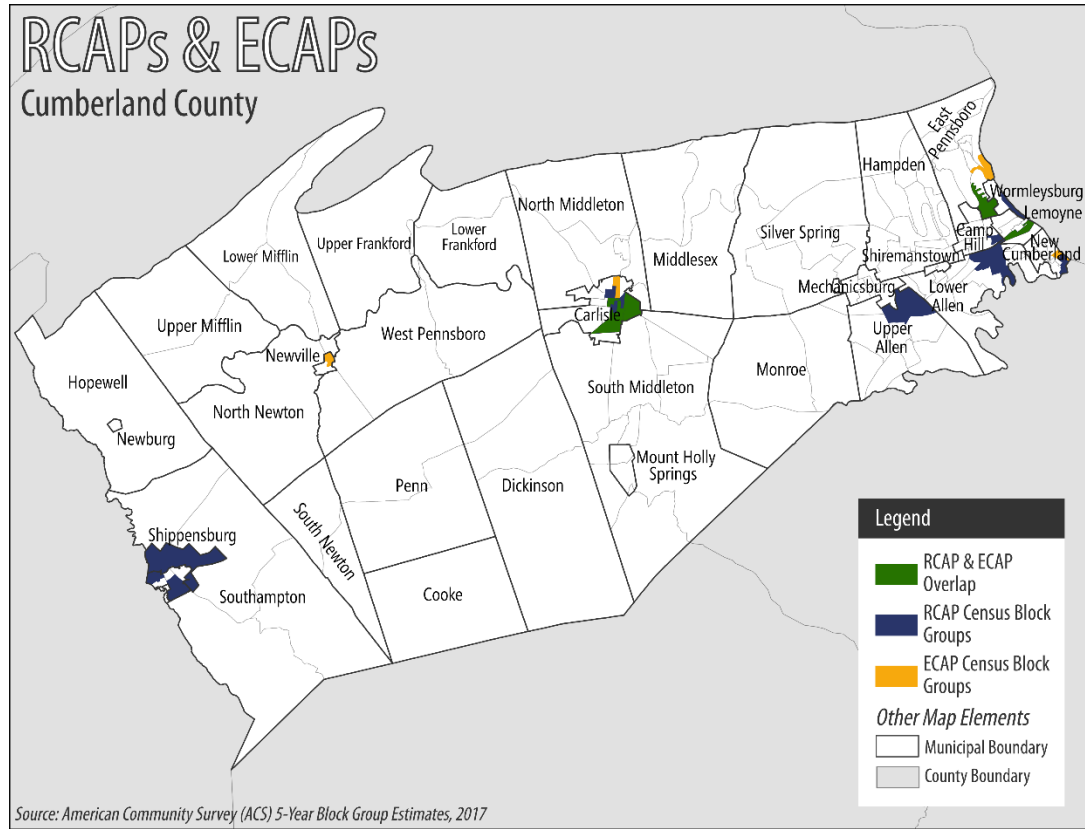
Table 30: LMI Block Groups with High Minority Concentration

CUMBERLAND COUNTY					
Census Tract	Block Group	% LMI Persons	#LMI Persons	#Minority	%Minority <sup>1</sup>
0102	420410102032	51.2%	520	375	28.1%
0103	420410105003	54.2%	580	175	17.1%
0105	420410105003	56.9%	370	92	13.0%
0106	420410106003	61.8%	420	123	12.7%
0106	420410106005	58.8%	520	134	14.4%
0108	420410108003	74.4%	320	117	19.1%
0110	420410110021	57.0%	650	162	13.1%
0100	420410110022	58.7%	691	205	19%
0116	420410116012	60.2%	1530	808	25.4%
0131	420410131021	90.4%	945	523	17.7%
0131	420410131022	78.3%	1675	245	11.4%
0132	420410132002	72.3%	745	172	17.8%
0132	420410132004	91.1%	665	156	25.6



Source: 2018-2022 ACS 5-Year Estimates by Block Group  
<sup>1</sup> “racially diverse” is defined as a block group with twice the diversity of the County average, which in Cumberland County’s case is 11%, we have established that the minority block groups reflect 22% diversity and above.

Figure 4: RCAPS and ECAPS in Cumberland County



## F. INCOME AND WORKFORCE

Household income is one of several factors used to determine a household’s eligibility for a home mortgage loan or a rental lease. Median household income (MHI) in Cumberland County is \$82,849 which is higher than the statewide median of \$73,824 and higher than the national median of \$77,540 in 2022. The MHI for Carlisle Borough has barely increased from \$59,550 to \$59,742 according to the 2018-2022 ACS. Carlisle’s MHI continues to be much lower than that of the County.

As shown in Table 33, there is substantial variation in income by race. Asians have the highest MHI in both Carlisle and Cumberland County. Black and American Indian households have the lowest MHIs, earning less than half of the MHI for Asian households. Hispanic households have increased by 25% over the last 10 years is one of the fastest growing groups in Cumberland County. However, Hispanic MHI is nearly half that of the small Asian population.

### Median Income Limits in Cumberland County

Low Moderate Income (LMI) households refers to households whose incomes do not exceed 80 percent of the area median family income (AMI), as established by HUD, with adjustments for smaller or larger families. HUD utilizes three income levels to define LMI households:

- Extremely low income: Households earning 30 percent or less than the AMI (subject to specified adjustments for areas with unusually high or low incomes)
- Very low income: Households earning 50 percent or less than the AMI (subject to specified adjustments for areas with unusually high or low incomes)
- Low and moderate income: Households earning 80 percent or less than the AMI (subject to adjustments for areas with unusually high or low incomes or housing costs)

Household poverty is strongly related to limited housing choice. The federal poverty level in 2020 was defined as an annual income of \$26,200 for a family of four, or \$12,760 for an individual. The overall poverty rate in Cumberland County in 2020 was 7.0%. Today the poverty level is \$67,080 for a family of four.

Table 31: 2022 HUD Median Income Limits

2022 HUD MEDIAN INCOME LIMITS – 80% OF HUD MEDIAN HOUSEHOLD INCOME FOR CUMBERLAND COUNTY*							
	1 Person	2 People	3 People	4 People	5 People	6 People	7 People
Cumberland County	\$52,850	\$60,400	\$67,950	\$75,450	\$81,500	\$87,550	\$93,600

*Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2022 data*

\*CHAS data is organized by metropolitan area. Cumberland County is part of the Harrisburg-Carlisle, PA Metropolitan Statistical Area (MSA), so all information presented here applies to all of the Harrisburg-Carlisle MSA.

Black households, which have the second lowest MHI, also experience the highest poverty rate. Conversely, White households have a high MHI and the second lowest rate of poverty.

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

Figure 5: Low- to Moderate-Income in Cumberland County

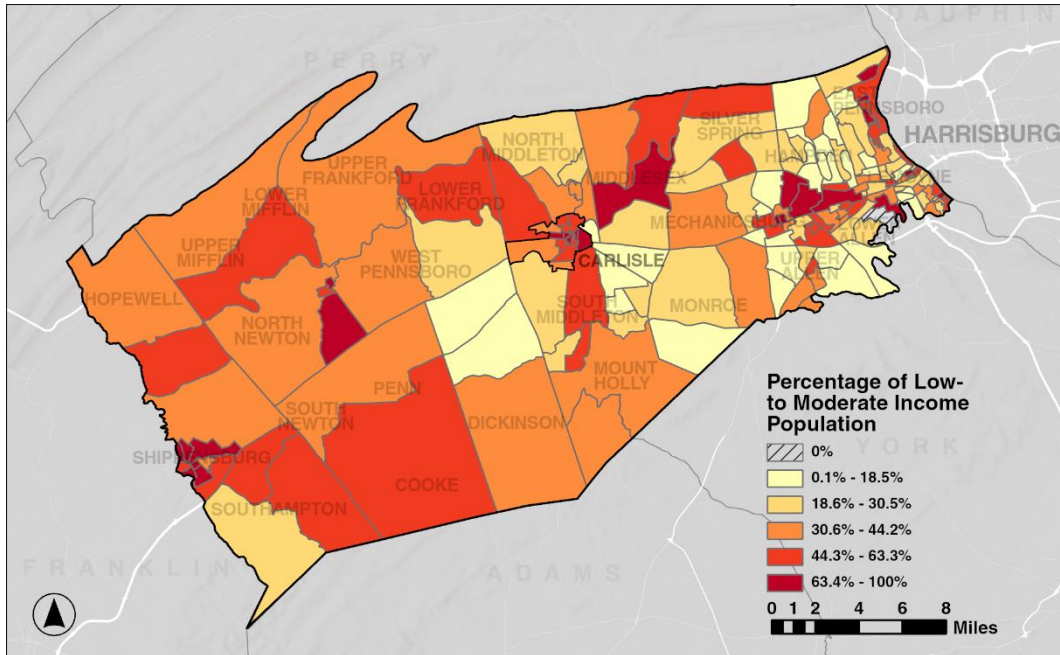
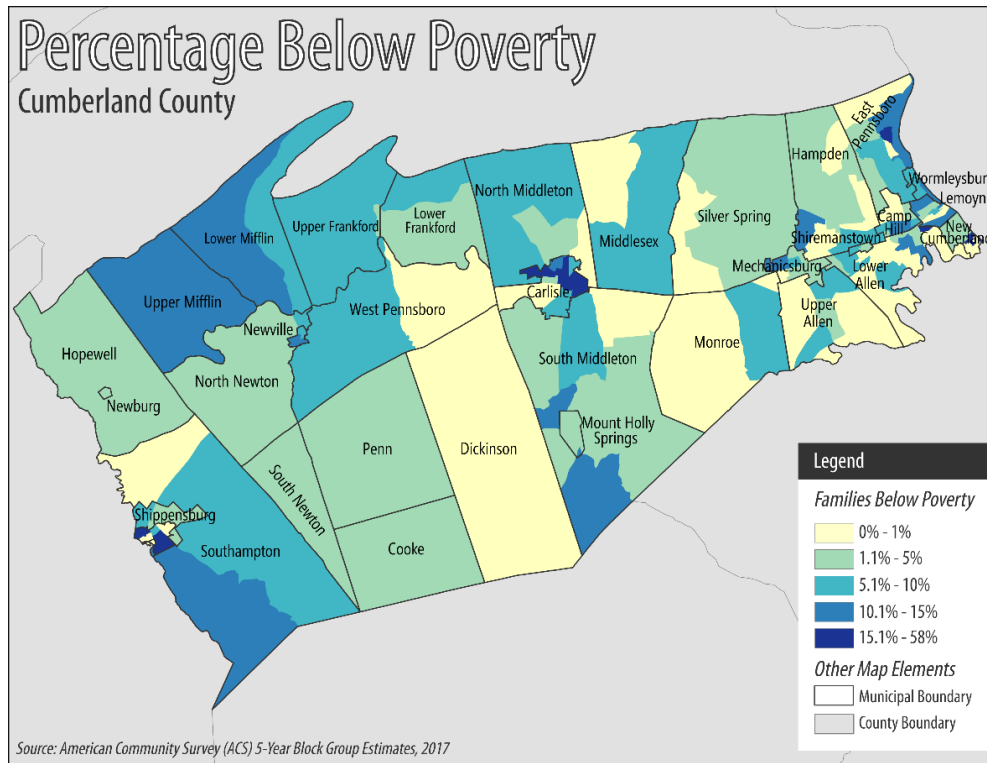


Table 32: Cumberland And Carlisle Poverty Rate/Race

	Carlisle Borough		Cumberland County	
	Median Household Income	Poverty Rate (%)	Median Household Income	Poverty Rate (%)
All households	\$55,756	18.9	\$82,849	6.3
White	\$60,672	11.3	\$83,085	6.3
Black	\$34,282	61.7	\$48,542	30.7
Asian	\$36,333	5.1	\$114,804	5.5
Some other race	*	32.7	\$60,625	18.3
Two or more races	\$46,808	56.6	\$92,571	15.8
Hispanic*	\$58,192	50.6	\$64,946	25.5

Source: 2018-2022 ACS- 5 Year Estimates

Figure 6: Percentage of Families Below Poverty in Cumberland County



In Cumberland County, full-time male employees made 1.36 times more than female employees. The largest demographic living in poverty is females aged 18-24, followed by males aged 18-24 and then females aged 25-34.

Table 33: Average Salary Per Gender

CARLISLE BOROUGH	CUMBERLAND COUNTY
Average Male Salary: \$55,042	Average Male Salary: \$68,296
Average Female Salary: \$48,829	Average Female Salary: \$56,896
<i>Source: 2018-2022 ACS 5-Year Estimates</i>	

The American Community Survey (ACS) provides detailed employment data by gender and race, indicating differences in employment rates among groups. According to 2022 estimates for Cumberland County, women experience slightly lower unemployment rates than men. White and Asian residents are much less likely to experience unemployment than Blacks and those that are two or more races and those with disabilities. These trends are generally the same in Carlisle Borough, though with higher percentages overall. The notable differences between the County and the Borough is the higher unemployment rate for those with disabilities and those that are two or more races.

In 2022, the highest paid race/ethnicity of Carlisle Borough workers were White. These workers were paid 1.25 times more than Black or African American workers, who made the second highest salary of any race/ethnicity.

Table 34: Median Household Income Per Race

MEDIAN HOUSEHOLD INCOME	
CALISLE BOROUGH: \$55,756	CUMBERLAND COUNTY: \$82,849
White: \$60,672	White: \$83,085
Black or African American: \$34,282	Black or African American: \$48,542
Asian: \$36,333	Asian: \$114,804
<i>Source: 2018-2022 ACS- 5 Year Estimates</i>	

**Workforce**

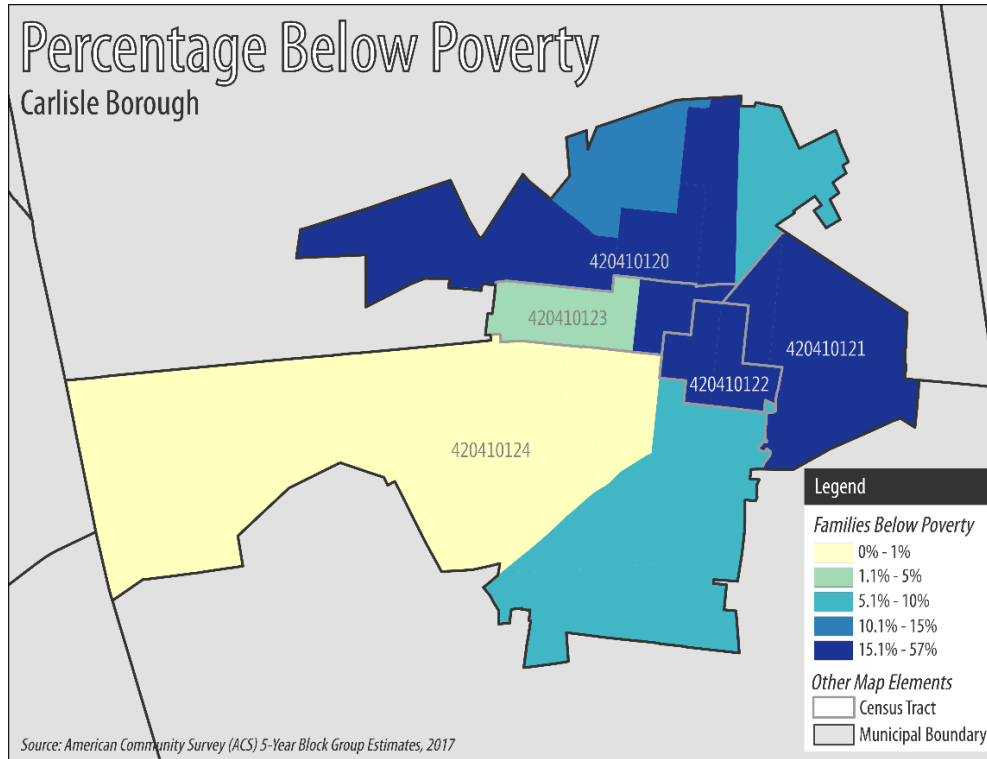
While unemployment is low, wages are not necessarily high. The health care industry employs the largest share of County workers, followed by retail trade and educational services. Median earnings for these industries, however, are the 14th, 18th, and 11th, respectively, out of 20. The industries with the five highest median earnings (Utilities; professional, scientific, and technical services; Public administration; Management; and Finance and insurance) employ less than 26% combined of the County’s total workforce.

In the Borough of Carlisle, the largest field was educational services, in which 30% of workers were employed, followed by health care and retail. Less than 14% of Carlisle workers were in the industries with the highest earnings.

Table 35: Workforce by Industry

Industry	CUMBERLAND COUNTY			CARLISLE		
	Total	Share	Median Earnings	Total	Share	Median Earnings
Civilian employed population 16 years and over	131,777	100%	\$39,819	10,529	100%	\$28,080
Agriculture, forestry, fishing, hunting, mining	1,274	1.0%	\$31,908	78	0.7%	-*
Construction	6,685	5.1%	\$41,849	134	1.3%	\$37,548
Manufacturing	10,083	7.7%	\$46,736	848	8.1%	\$45,431
Wholesale Trade	3,564	2.7%	\$46,606	246	2.3%	\$30,865
Retail Trade	15,501	11.8%	\$23,043	1,225	11.6%	\$22,955
Transportation, Warehousing, Utilities	10,182	7.7%	\$43,679	691	6.6%	\$41,496
Information	1,672	1.3%	\$39,679	103	1.0%	\$22,750
Finance and Insurance, Real Estate, Rental, Leasing	9,139	6.9%	\$51,645	665	6.3%	\$78,942
Professional, Scientific, Management, Administrative, Waste Management	16,416	12.5%	\$50,104	1,217	11.6%	\$23,894
Educational Services, Health Care, Social Assistance	31,209	23.7%	\$35,967	3,155	30.0%	\$26,359
Arts, Entertainment, Recreation, Accommodation, Food Services	10,377	7.9%	\$11,989	1,205	11.4%	\$11,791
Public Administration	10,363	7.9%	\$62,388	475	4.5%	\$59,511
Other Services	5,312	4.0%	\$27,769	487	4.6%	\$26,417
<i>Source: 2018-2022 ACS 5-Year Estimates</i>						
*A '-' entry indicates that there are too few sample observations to compute a median.						

Figure 7: Percentage of Families Below Poverty in Carlisle Borough



## G. LANGUAGE ACCESS

Persons with LEP are defined by the federal government as persons who have a limited ability to read, write, speak, or understand English. In Carlisle Borough 96% of the people speak English proficiently and 97% of the people in Cumberland County speak English “very well” in 2022. HUD issued its guidelines on how to address the needs of persons with LEP in January 2007. HUD uses the prevalence of persons with LEP to identify the potential for impediments to fair housing choice due to their inability to comprehend English. Persons with LEP may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. To assist these individuals, it is important that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent and establishes policies to eliminate barriers. It is also incumbent upon HUD entitlement communities to determine the need for language assistance and comply with Title VI of the Civil Rights Act of 1964.

In Cumberland County, 7,074 qualified as LEP in 2023. The greatest majority LEP speak Spanish. This group exceeds the HUD “safe harbor” minimum of 1,000 LEP persons or 5%. In order to determine whether the translation of vital documents is required, the County must conduct the four-factor analysis. The term “vital document” refers generally to any publication that is needed to gain access to the benefits of a program or service. The four-factor analysis requires entitlements such as the Urban County to evaluate the need for translation and/or other accommodations based on four factors:

- The number or proportion of persons with LEP to be served or likely to be encountered by the program
- The frequency with which persons with LEP come into contact with the program

- The nature and importance of the program, activity or services provided by the program, and
- Resources available to the grantee vs. costs

In 2024/2025 CCHRA held public meetings, housing events, and other stakeholder and focus group meetings , along with a community survey and determined nearly all meeting attendees and public housing residents speak English very well.

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

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

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

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

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

CCHRA considers translation on a case-by-case basis, evaluating the frequency of languages encountered and the context of circumstances surrounding the request. The County, historically, has relied on its Boroughs to provide affordable housing of all sizes, types and price ranges. Carlisle Borough’s access to public funding that encourage and create new housing opportunities is limited, however, more available than in other Borough’s in the County. Revitalization of Carlisle Borough’s residential housing stock as well as other older boroughs in the County is the greatest need with regards to providing more affordable housing options. Land use policies in these municipalities should be flexible from a fair housing perspective.



# Chapter 4: Lending Practices

A key aspect of fair housing choice is equal access to credit for the purchase or improvement of a home, particularly considering the recent tightening of lending/credit markets. This chapter reviews the lending practices of financial institutions and the access to financing for all households, particularly minority households and those with lower incomes. Lending patterns in lower- and moderate-income neighborhoods and areas of minority concentration are also examined. However, publicly available data on lending does not contain detailed information to make conclusive statements of discrimination but can only point out potential areas of concerns. Furthermore, except for outreach and education efforts, a local jurisdiction's ability to influence lending practices is limited. Such practices are largely governed by national policies and regulations.

## A. BACKGROUND OVERALL LENDING PATTERNS

Lending practices in the private sector may impact a household's access to housing. A key aspect of fair housing choice is equal access to credit for the purchase of a home. In the past, financial institutions did not always employ fair lending practices. Credit market distortions and other activities such as redlining prevented some groups from equal access to credit. This section reviews the lending practices of financial institutions and the access to financing from all households, particularly minority households and those of very low and low incomes.

### 1. Community Reinvestment Act

The passage of the Community Reinvestment Act (CRA) in 1977 was designed to improve access to credit for all members of the community. The Community Reinvestment Act (CRA) is intended to encourage regulated financial institutions to help meet the credit needs of entire communities, including very low- and low-income persons and neighborhoods. The CRA was enacted by Congress in 1977 (12 U.S.C. 2901) and is implemented by Regulation BB (12 CFR 228). The CRA includes a reporting requirement that discloses an institution's lending activity by area and type of lending. Institutions are rated based on several factors. Those that have a poor rating may be required to improve community lending practices as a condition of regulatory agency approval for regulated activities such as branch openings, acquisitions, and mergers. The CRA has undergone several legislative changes since 1977 and was substantially revised in 2005.

### 2. Financial Stability Act

The Financial Stability Act of 2009 established the Making Home Affordable Program, which assists eligible homeowners who can no longer afford their home with mortgage loan modifications and other options, including short sale or deed-in-lieu of foreclosure. The program is targeted toward homeowners facing foreclosure and homeowners who are unemployed or "underwater" (i.e., homeowners who owe more on their mortgage than their home is worth).

### 3. Helping Families Save Their Homes Act

The Helping Families Save Their Homes Act was passed by Congress in May 2009 and expands the Making Home Affordable Program. This Act includes provisions to make mortgage assistance and foreclosure prevention services more accessible to homeowners and increases protections for renters living in foreclosed homes. It also establishes the right of a homeowner to know who owns their

mortgage and provides over two billion dollars in funds to address homelessness. Under this bill, tenants also have the right to stay in their homes after foreclosure for 90 days or through the term of their lease.

#### **4. Fraud Enforcement and Recovery Act**

The Fraud Enforcement and Recovery Act (FERA) enhances the criminal enforcement of federal fraud laws by strengthening the capacity of federal prosecutors and regulators to hold accountable those who have committed fraud. FERA amends the definition of a financial institution to include private mortgage brokers and non-bank lenders that are not directly regulated or insured by the federal government, making them liable under federal bank fraud criminal statutes. The law also makes it illegal to make a materially false statement or to willfully overvalue a property in order to manipulate the mortgage lending business.

#### **5. Conventional Versus Government-Backed Financing**

Mortgages are divided into two main types, conventional and government-backed loans. Conventional financing is market-rate-priced loans provided by private lending institutions such as banks, mortgage brokers, and credit unions. To assist households who may have difficulty obtaining home mortgage financing in the private market, several government agencies offer loan products that have below-market interest rates and/or are insured (or guaranteed) by the agencies.

Sources of government-backed financing include the Federal Housing Administration (FHA-insured), the Department of Veterans Affairs (VA-guaranteed), and the Farm Service Agency or Rural Housing Service (FSA/RHS). These types of loans are offered to the consumer through private lending institutions or directly from the federal agency. These products often make the difference between qualifying and not qualifying for a mortgage.

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

Under the terms of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, any commercial lending institution that makes five or more home mortgage loans annually must report all residential loan activity to the Federal Reserve Bank under the terms of the Home Mortgage Disclosure Act (HMDA). The HMDA was enacted by Congress in 1975. It is implemented by the Federal Reserve Board's Regulation C. The HMDA requires the reporting of mortgage lending data that can be used:

To determine whether financial institutions are serving the housing needs of their communities; or to inform public officials who may be distributing public-sector investments to attract private investment; or to identify possible discriminatory lending patterns:

- a. The HMDA regulations require most institutions involved in lending to comply and report information on loans denied, withdrawn, or incomplete by race, sex, and income of the applicant.
- b. The information from the HMDA statements assists in determining whether financial institutions are serving the housing needs of their communities. The data also help to identify possible

discriminatory lending practices and patterns. The data focus on the number of homeowner mortgage applications received by lenders for home purchases, refinancing, and improvements.

## B. OVERALL LENDING PATTERNS

### 1. Data and Methodology

The availability of financing affects a person's ability to purchase or improve a home. Under the HMDA, lending institutions are required to disclose information on the disposition of loan applications by the income, gender, and race of the applicants. This applies to all loan applications for home purchases, improvements and refinancing.

HMDA data are submitted by lending institutions to the FFIEC. Certain data is available to the public via the FFIEC site either in raw data format or as pre-set printed reports. The analyses of HMDA data presented in this AI were conducted using Lending Patterns™. LendingPatterns is a web-based data exploration tool that analyzes lending records to produce reports on various aspects of mortgage lending. It analyzes HMDA data to assess market share, approval rates, denial rates, low/moderate income lending, and high-cost lending, among other aspects.

In Cumberland County in 2022, 11,428 households applied for conventional home loans. Conventional loans were the most popular form of loan applied for when compared to FHA, FSA/RHS, and VA guaranteed loans. However, the conventional loan denials ranked the highest at almost 15%. The highest majority of loan applications were for the purchase of multi-family dwellings. The following provides descriptions of home improvement and refinancing loans and a lenders perspective on risk:

- a. **Home Improvement Loans** - Historically, home improvement loan applications have a higher rate of denial when compared to home purchase loans. Part of the reason is that an applicant's debt-to-income ratio may exceed underwriting guidelines when the first mortgage is considered with consumer credit balances. Another reason is that many lenders use the home improvement category to report both second mortgages and equity-based lines of credit, even if the applicant's intent is to do something other than improve the home (e.g., pay for a wedding or college). Loans that will not be used to improve the home are viewed less favorably since the owner is divesting in the property by withdrawing accumulated wealth. From a lender's point of view, the reduction in owner's equity represents a higher risk.
- b. **Refinancing** - Homebuyers will often refinance existing home loans for a number of reasons. Refinancing can allow homebuyers to take advantage of better interest rates, consolidate multiple debts into one loan, reduce monthly payments, alter risk (i.e. by switching from variable rate to fixed rate loans), or free up cash and capital.

### 2. Lending Patterns by Race/Ethnicity and Income

The data included for this analysis is for 2022 and constitutes all types of applications received by lenders by families: home purchase, refinancing, or home improvement mortgage applications for one-to four-family dwellings and manufactured housing units across the entire County. The information provided is for the primary applicant only; co-applicants were not included in the analysis. In addition, where information was not provided or is categorized as not applicable, no analysis has been conducted due to the lack of information.

The large majority of applicants are requesting loans for home purchase. A large percentage of loans are from applicants that are White (68%) and there was a significant increase in loans from applicants that are Asian.

Table 36: 2022 Cumberland County Cumulative Mortgage Data

	TOTAL APPLICATIONS		ORIGINATED		APPROVED		DENIED		WITHDRAWN/ INCOMPLETE	
	#	%	#	%	#	%	#	%	#	%
<b>Loan Purpose</b>										
Home purchase	5,829	43.8%	3,757	64.5%	91	1.56%	481	8.25%	567	9.73%
Home improvement	2,002	15.1%	1,301	64.9%	52	2.6%	448	22.4%	157	7.84%
Refinancing	2,129	16.0%	1,329	62.4%	58	2.72%	332	15.6%	228	10.7%
Total	13,296		6,387		201		1,261		952	
<b>Loan Type</b>										
Conventional	11,428	85.6%	7,192	62.9%	264	2.31%	1,727	15.1%	1,135	9.9%
FHA-insured	985	7.41%	441	44.7%	15	1.52%	140	14.2%	152	15.4%
USDA	55	0.41%	27	49.0%	0	0.0%	3	5.50%	1	1.82%
VA-guaranteed	828	6.23%	394	47.6%	4	0.48%	91	10.9%	173	20.9%
Total	13,296		8,054		283		1,961		1,461	
<b>Property Type</b>										
One to four-family unit	667	2.3%	210	1.1%	69	5.7%	301	6.8%	87	2.1%
Manufactured housing unit	120	0.4%	88	0.5%	10	0.8%	15	0.3%	7	0.2%
Multi-family Dwelling	28,252	97.3%	18,914	98.4%	1,135	93.5%	4,135	92.9%	4068	97.7%
Total	29,039		19,212		1,214		4,451		4,162	
<b>Applicant</b>										
Native American	42	0.3%	45	0.2%	5	0.4%	31	0.7%	15	0.4%
Asian	1,295	9.74%	902	4.7%	48	4.0%	137	3.1%	204	4.9%
Black or African American	255	1.9%	289	1.5%	21	1.7%	119	2.7%	88	2.1%
Hawaiian or Other Pacific Islander	13	0.1%	27	0.1%	3	0.2%	9	0.2%	12	0.3%

White	8,874	66.7%	16,164	84.1%	1,017	83.8%	3,567	80.1%	3314	79.6%
No information	2,618	19.7%	1,489	7.8%	92	7.6%	563	12.6%	512	12.3%
Not applicable	0	1.3%	296	1.5%	28	2.3%	25	0.6%	17	0.4%
Hispanic or Latino*	463	1.6%	270	1.4%	20	1.6%	87	2.0%	86	2.1%
Total	13,296		19,212		1,214		4,451		4,162	

*Source: 2022 Consumer Financial Protection Bureau Mortgage Data (HMDA)*  
*\*Hispanic or Latino note included in Total*

### C. MAJOR LENDERS

Table 38 summarizes the top ten lenders by loan application submittal in Carlisle/Harrisburg MSA in 2017 and the number of loan application submittals. There were 399 total lenders doing residential loan business in this region. Residents applied most frequently to Members 1st Federal Credit Union. However, the top three lenders having the greatest financial loan commitments were: JP Morgan Chase Bank; Wells Fargo Bank and Bank of America.

*Table 37: Top Lenders – Cumberland County 2017*

<b>TOP LENDERS – CUMBERLAND COUNTY 2017</b>	
Banks	Applications
Members 1 <sup>st</sup> Federal Credit Union	1,905
Quicken Loans, Inc.	1,001
Wells Fargo Bank, National Association	900
PSECU	674
Home Point Financial Group	657
PNC Bank, National Association	445
GMH Mortgage Services, LLC	439
Orrstown Bank	431
Residential Mortgage Services	424
Mid Penn Bank	371

*Source: www.lendingpatterns.com, 2017*

# Chapter 5: Public Sector Policies

Impediments to fair housing choice can take many forms. Some policies, practices, and procedures may appear neutral on their face but adversely affect the provision of fair housing choice. An important element of this AI is an examination of public policies in Cumberland County and Carlisle Borough to determine opportunities for reducing obstacles to fair housing and furthering the expansion of fair housing choice.

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

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

In FY 2024, the County received \$1,254,163 in CDBG funds and \$497,075 in HOME funds. The County typically divides its CDBG allocation among economic development, the rehabilitation of owner-occupied housing, public services, physical infrastructure, public facilities, code enforcement, historic preservation, and blight removal. The funds support activities located throughout the County, benefiting both site-specific public facilities and infrastructure activities, as well as public services and economic development activities assist persons countywide. The County applies its HOME funds to a combination of activities that have included home ownership assistance, operational support for community housing developers, and rental construction. In recent years, the County has not included pure fair housing activities, such as paired testing, education, or outreach in its CDBG budget.

The Borough received a FY 2024 CDBG allocation of \$341,710 which was divided among activities similar to those carried out by the County, including public facility improvements, public services, owner-occupied housing rehabilitation, economic development, and code enforcement.

## A. COUNTY PROGRAMS

A community's comprehensive plan is its vision for the future, describing land use, housing, commercial areas, transportation, natural resources, community facilities, and other conditions 10 or more years into the future. Cumberland County adopted an updated Comprehensive Plan in 2017 and has been working towards the adoption of an updated Comprehensive Plan in 2024. Particularly relevant to the AI, the land use element of the comprehensive plan defines the location, type, and character of future development; the housing element expresses the preferred density and intensity of residential neighborhoods. The land use and housing elements of the comprehensive plan, taken together with the remaining components, define the type of place that a community wishes to become.

### 1. Cumberland County

Cumberland County's Comprehensive Plan serves to inform County decision making and assist local governments in preparing their own, more detailed local plans in accordance with their own goals

and land use policies. It does not preempt the authorities of municipalities, but exists to establish a vision and expand and strengthen the capacities of local governments to make informed decisions that advance the prosperity and livability of the region. The Pennsylvania Municipalities Planning code leaves ultimate authority for local land-use decisions with municipalities, which limits the County's ability to impact settlement patterns.

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

*Mission: The Cumberland County Planning Department's mission is to partner with our urban, suburban, and rural communities to implement plans that promote economic development, provide more housing and transportation choices, and protect clean air, land, and water.*

The Planning Commission Department Program Overview, related to the mission statement, can be found on the following website: <https://www.ccpa.net/DocumentCenter/View/16666/ccpd-overview-web?bidId=>

The current Comprehensive Plan for Cumberland County was adopted by the Commission in 2017 as an update from the 2009 plan and other updates completed in 2011 and 2015. An updated Comprehensive Plan is preparing for adoption in 2024. The comprehensive plan was developed through an extensive public engagement process that involved multiple public forums, meetings, and surveys targeting elected officials, municipal staff, local and County planning commissions, school districts, chambers of commerce, non-profit organizations, and the public at-large. The results of this outreach process heavily drove the formation and prioritization of the comprehensive plan's overarching goals and priorities. There are eight principles of the plan including:

- Preserve the best first.
- Grow in, not out.
- **Housing for all.**
- Plan for people and places.
- Expand transportation choices.
- Adapt and stay safe.
- Open for business.
- Engage to improve.

Housing is a top priority. The Plan's Housing Goal is to provide a sufficient supply of mixed housing types within the financial reach of all County residents. The housing plan noted:

- Cumberland County has the fastest growing population in Pennsylvania. The County is estimated to need 15,788 new dwelling units between 2015 and 2040 to accommodate projected population growth.
- Based on past trends, Cumberland County has provided a sufficient number of overall units to house the population, while maintaining a vacancy rate that is suitable to housing demand.
- Over 33% of the County's housing stock was built prior to 1960. This older housing stock is generally concentrated in Carlisle, Mechanicsburg, and New Cumberland Boroughs. Without regular maintenance, these houses can quickly become substandard.

- The housing stock in Cumberland County consists primarily of single-family, owner-occupied units with three bedrooms or more. Nearly 30% of the housing stock is renter-occupied. The need for more affordable housing, and in particular rental housing, is strong in the County.
- The County’s multi-family housing is concentrated in limited geographic areas, namely in older boroughs, which can limit housing choice and affordability.
- There is an under supply of small units in the County (two or fewer bedrooms). As average household size continues to decline, this issue will become more significant.
- Median housing value and median rent has increased while median household income has remained stagnant when adjusted for inflation. The increase in costs paired with a fall in real income means that it has become comparatively more difficult to afford housing in Cumberland County.
- 46% of Cumberland County renters are currently unable to afford the two-bedroom fair market rent of \$1,012 per month. Smaller, more affordable rental options are needed in the County.
- Vacancy rate for owner-occupied housing is relatively low. This may produce a tight market for owner-occupied homes and increase prices.
- Carlisle Borough should, however, proactively evaluate how it could apply its CDBG funds to the aim of broadening the array of housing options available to its lowest-income renters and homebuyers, particularly low-income members of protected classes.

The County’s planning goals for housing include:

1. Provide a variety of housing unit types. Specifically, promote plans and regulations that provide for all types of residential uses including multi-family and manufactured home units. The plan points out that one-and two-bedroom units are needed in areas where employment and proper infrastructure are.
2. Provide adequate housing for all income levels. Specifically:
  - Support the CCHRA programs for affordable housing.
    - a. HOME eligible projects
    - b. Rental units that permit Housing Choice Vouchers
  - Support removing procedural, regulatory, and perceived barriers to fair and affordable housing.
    - a. Convene homebuilding industry stakeholders, realtors and municipalities to investigate ways to collaboratively improve opportunities for affordable and workforce housing in Cumberland County.
    - b. Provide appropriate housing for special needs populations.
    - c. Promote plans and regulations that address housing for special needs populations.
3. Encourage preservation and rehabilitation of existing housing stock.
  - a. Encourage municipal adoption of property maintenance codes and regulations.
  - b. Support the Blighted Property Reinvestment Program

All public engagement activities, including the Housing Summit held in September 2024, indicated that local zoning regulations should be reviewed and amended to be more consistent with land development issues encountered during planning and engineering process. Issues include:

- Minimum lot size requirements are too large
- Coverage requirements are too strict
- Setback requirements



- Parking requirements are too demanding
- Height requirements do not allow three or more stories
- Recreation fees are too high for affordable housing projects
- Maximum units per building can be too restrictive
- Landscaping requirements are too excessive
- Cannot accommodate persons with disabilities

## 2. Borough of Carlisle

The most current Comprehensive Plan for Borough of Carlisle was adopted in 2002 and experienced a targeted update in 2019. Like the County’s plan, it is not in itself regulatory, but instead provides direction to establish overall policies for the development and preservation of Carlisle over the next ten years. Although 20 years have passed since its adoption, many of the recommendations are relevant. Applicable goals and recommendations of the plan are activities that further fair housing choice. For example, one is to “further enhance the diversity of Carlisle’s population, uniting persons of varying ages, incomes, and racial and ethnic backgrounds.” Another, to “promote increased use of public transit, bicycling, walking and carpooling,” would benefit members of the protected classes who are less likely to be able to afford private vehicles.

However, there are many instances of recommendations in the plan that are problematic that could be associated with impeding fair housing choice. While not exactly equivalent to impeding fair housing choice, the discouragement of dense, renter-occupied housing options disproportionately impacts members of the protected classes. The plan establishes a goal to:

“assist in providing housing for persons with special needs throughout the County,”

This goal was followed by the language:

“care is needed to make sure that Carlisle is not overburdened by more than its fair share of the region’s needs for subsidized housing and human services. While these services are important, some types of specialized housing can create difficulties and unusually large expenses for the police department and the school system, and nuisances for the surrounding neighborhood.”

This language, especially the use of the legal term “nuisance,” could be viewed as derogatory toward members of the protected classes, who often require the benefit of subsidized housing. There are also a number of places where language in the plan specifically targets middle- or upper-income households to the obvious exclusion of low-income households or is prejudiced against low income households outright. The plan continues and states:

“To maintain its economic health, the Borough needs to continually work to attract and retain middle-income households in new construction and existing homes. A single blighted property can severely discourage new investment on an entire block and can cause responsible residents to move out.”

“Care is needed to avoid placing very low-income households in subsidized home-ownership. In too many cases, these households do not have the funds to pay for repairs that are periodically needed in an older home. If they have no equity in the home, they may be tempted to walk away from the mortgage. As a result, a property can stand vacant for months until foreclosure occurs and the property is resold. During this time, the property can deteriorate and/or be vandalized.”

In 2016, Carlisle Borough and its partners prepared the Carlisle Urban Redevelopment Plan (The Plan). After nearly 100 years of operation, three of Carlisle Borough's largest industrial facilities closed during the period from 2008 to 2010. All of the closures occurred in the Borough's northwest neighborhood and their shuttering presented a major economic challenge to a concentrated urban neighborhood within the Borough. While their closings have created short term hardship, the nearly 65 acres of vacant property left in their wake, create a substantial urban redevelopment opportunity for the future.

With the closing of the manufacturing plants, hundreds of jobs were gone, and the Carlisle community was faced with a cluster of contaminated brownfields that were impacting nearby neighborhoods and key economic assets. The three key brownfields sites include the 48-acre International Automotive Components (IAC/Masland) factory, the 12-acre Carlisle Tire & Wheel property, and the three-acre 759 Hamilton Street Site (former Tyco Electronics plant). EPA's Brownfields Area-Wide Planning program funds were used to create The Plan, its recommendations, and implementation steps. There were strategies for key areas of Masland Site, 759 Hamilton Street, Carlisle Tire and Wheel Site, and Lincoln Street area. A Site Reuse Plan was created, and the Borough and its partners are beginning its redevelopment plans as funding and investors surface. Findings of a market analysis demand included:

- Office: 11,000 square feet (sf) of local services office such as financial services, medical, professional services, and real estate.
- Residential: 280-350 new residential dwelling units by 2018
  - 200-250 Active adult dwellings
  - 80-100 Mid-rise condominiums<sup>1</sup>
  - Potentially apartments, townhouses and village-style single-family homes if developed in a quality mixed-use walkable setting.
- Retail: 119,000 sf of new retail including:
  - 25,600 sf grocery store
  - 16,000 sf Drug Store
  - 12,900 sf Wholesale
  - 14,800 sf Electronics & appliances

In 2023, a zoning ordinance amendment was passed by Borough Council which rezoned the area to allow for Urban Mixed Use development.

<sup>1</sup>An absorption of 30-35 mid-rise units per year over the next five years is possible, at an average price point of approximately \$180,000 including amenities such as: six to nine rooms; 1st floor retail or services; both passenger and freight elevators; a variety of units including those with and without balconies; walkable site linkages to Main Street or convenient neighborhood shopping; and immediate access to public transportation.

## **B. COUNTY CDBG PROGRAM PROJECT PROPOSAL AND SELECTION**

The Cumberland County Redevelopment Authority's Community Development Division (CCHRA CDD) administers the County's CDBG and HOME programs and also administers Carlisle's CDBG program on behalf of the Borough. Both Cumberland County and Carlisle allocate formula grant funds on a competitive basis. In Carlisle, the window for funding applications typically opens in January, with applications due at the end of February. CCHRA staff evaluates the eligibility of projects and their ability to address priorities identified in the Consolidated Plan and makes recommendations to Borough Council in April so that a final program budget can be submitted to HUD in May.

The County's CDBG funds may be used in any municipality within Cumberland County with the exception of Carlisle. Its HOME funds may be used anywhere within the County. The annual funding request round typically opens in July, with CDBG and HOME applications due at the end of August. CCHRA staff makes

recommendations to the Board of Commissioners in September to facilitate submission of a final program budget to HUD by mid-November. The County typically receives its annual program allocation within three-five months of passage of the federal budget.

The County uses a single application for both CDBG and HOME projects. This application can be found on CCHRA's website. <https://cchra.com/program/individual/community-development-block-grants>

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

Applications for property acquisition and new construction projects additionally require due diligence and site control (or plans for the same), but do not impose any specific priorities or scoring criteria for any particular geography or type of development.

### **C. FAIR HOUSING PROGRAM OUTREACH**

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

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

Cumberland County requires recipients of grant funds supporting more than five units to complete an Affirmative Fair Housing Marketing Plan (AFHMP) in the form of a HUD-developed template (as per 24 CFR 200.615). The document requires grantees to advertise the availability of housing opportunities at least 90 days prior to initial or renewed occupancy for new construction and substantial rehabilitation projects. Grantees must identify the demographic groups least likely to apply for the housing without special outreach efforts (by race/ethnicity as well as persons with disabilities, families with children or "other") and submit proposed marketing activities and community contacts for County review.

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

The County's adoption of this particular form has the effect of requiring a serious diligence effort among its grantees, as the form is thorough with regard to fair housing expectations for marketing HOME-subsidized units.

Affirmative fair housing marketing and planning should be part of all new construction, substantial rehabilitation, and existing project marketing and advertising activities.

## D. BUILDING AND PLANNING PRACTICES

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

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

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

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

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

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

### 1. Benchmarking

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

- a. Ordinance defines "family" inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit.
- b. Ordinance defines "group home" or similarly named land use comparatively to single family dwelling units.
- c. Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use/conditional use permit or public hearing.
- d. Ordinance regulates the siting of group homes as single-family dwelling units without any additional regulatory provisions.
- e. Ordinance has a "Reasonable Accommodation" provision or allows for persons with disabilities to request reasonable accommodation/modification to regulatory provisions.

- f. Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right.
- g. Ordinance does not distinguish between “affordable housing/multi-family housing” (i.e., financed with public funds) and “multi-family housing” (i.e., financed without any public funds).
- h. Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing, or permanent supportive housing facilities exclusively to non-residential zoning districts.
- i. Ordinance permits manufactured and modular housing on single lots like single family dwelling units.
- j. Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less.
- k. Ordinance does not include exterior standards for all single-family dwelling units regardless of size, location, or zoning district.

Each criterion was assigned one of two values. A score of “1” means that the impediment was not present in the ordinance or that the positive measure was in place. A score of “2” means that impediment was present or that the positive measure was not. The final benchmark score is a simple average of the individual criteria. More specifically:

## **2. Zoning Review Benchmark Criteria**

1.00 - 1.24 Ordinance is at low risk relative to discriminatory provisions for housing and members of the protected classes.

1.25 - 1.49 Ordinance is at moderate risk relative to discriminatory provisions for housing and members of the protected classes.

1.50 - 2.00 Ordinance is at high risk relative to discriminatory provisions for housing and members of the protected classes.

## **3. Results**

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

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

Most ordinances ranked as posing a moderate to high risk for discriminatory provisions. The most common affirmative language consisted of reasonable allowances for multi-family densities and low minimum lot sizes that would provide an array of affordable housing development or infill options. No ordinances had design guidelines for dwelling units that would have the effect of making development less feasible for assisted units. The most common problems were restricting the siting of group homes, in some cases literally with buffer requirements, and limiting the number of unrelated people who may live together. Few ordinances included a “reasonable accommodation” provision for variances for persons with disabilities.

The highest score of the group (i.e. the most problematic ordinance) was Silver Spring Township, at 1.50. Although this ordinance has aspects that are known to promote fair housing, such as a permissive minimum lot size in R1 (or low density), it is lacking other constructive measures, such as unrestricted siting of group home and manufactured homes. It also has an inadequate definition of “family” of all the ordinances reviewed, allowing only “a father, mother, grandfather, grandmother or single parent and their children” to live together.

The lowest score (i.e. the ordinance that most promotes fair housing choice) was in Lemoyne Borough Township, at 1.06. The only missing element of this ordinance from a fair housing perspective was a reasonable accommodation provision for persons with disabilities.

**Camp Hill Borough**

With a score of 1.25, Camp Hill’s ordinance falls into the “low risk” range for discriminatory provisions. The definition of “Family” limits family households up to four persons who are not related to each other by blood, marriage, legal guardianship, licensed or court-appointed foster care, or legal adoption except persons possessing a handicap, who reside in one dwelling unit and live and cook together as a single housekeeping unit. The Borough permits units as small as 500 sf/unit and permits residential conversions up to three units per dwelling. However, the Borough only permits four units per acre for multi-family dwellings in all districts with the exception of the DT and CN zoning districts that permit up to 12 units per acre.

**Carlisle Borough**

With a score of 1.43, Carlisle’s ordinance falls into the “moderate risk” range for discriminatory provisions. Carlisle only permits up to four persons related by blood, foster relationship, marriage or adoption, living together in a single dwelling unit and maintaining and functioning a common household. The ordinance requires that group homes for up to six people with disabilities locate according to a 900-foot buffer of other such facilities, which given the Borough’s built-out status, could effectively zone this use out of areas where it is affordable to develop.

Additionally, the ordinance specifies that group home activity “shall not be oriented to ... treatment for current alcohol or drug addiction,” which amounts to discrimination according to the Americans with

COMMUNITY	SCORE
Camp Hill Borough	1.25
Carlisle Borough	1.43
Dickinson Township	1.20
East Pennsboro Township	1.18
Hampden Township	1.45
Lemoyne Borough	1.06
Mechanicsburg Borough <sup>1</sup>	1.30
Monroe Township	1.35
New Cumberland Borough	1.48
Shippensburg Borough	1.36
Silver Spring Township	1.50
South Middleton Township	1.45
<sup>1</sup> Mechanicsburg Borough has an adopted Historic District that guides exterior redevelopment projects.	

Disabilities Act, which covers persons recovering from substance abuse. In an inconsistency with the PA Municipalities Planning Code, the Borough allows mobile and manufactured homes only as a special exception in R3, not as a use permitted by right in any residential area. On the other hand, the ordinance includes provisions that would advance housing choice, such as a reasonable accommodation policy. In 2018, Carlisle Borough approved a text amendment to their Urban Mixed Use zone to accommodate a zoning request made by PIRHL Developers for a LIHTC project.

### **East Pennsboro Township**

East Pennsboro's zoning ordinance scored relatively low on the benchmarking tool at 1.18, meaning that it does not contain many elements that pose high risks of causing impediments to fair housing choice. Its definition of family and group home is broad and inclusive, it allows reasonably small lot sizes in residential districts and it expressly allows manufactured homes to exist as single-family dwelling units. However, it requires that group homes obtain approval from the Board of Commissioners and provide evidence that the home "will be conducted in a manner that will not be detrimental to neighboring property owners."

### **Hampden Township**

Hampden Township's zoning ordinance qualified as a moderate risk on the benchmarking tool with a score of 1.45. Among the sample of ordinances reviewed, it was the most consistent with fair housing standards, offering a liberal definition of a "family" that would include group homes and other non-traditional households to settle throughout the community, the encouragement of residential density in planned residential developments, the absence of design standards that would drive up development costs and explicit allowance for mobile homes in single family residential districts. This ordinance does not define "Group Home". A developer of group homes would have to use refer to regulations specified for either a Boarding House or Personal Care Home. A Personal Care Home does not include persons recovering from addiction and does not mention persons with disabilities.

### **Lemoyne Borough**

Lemoyne's zoning ordinance qualified as a low risk on the benchmarking tool with a score of 1.06. The zoning ordinance was updated and adopted in 2012. Its "family" definition is open and inclusive and would include group homes for people with disabilities, though the ordinance does not specifically call out this use. The Urban Residential district is relatively large and allows multi-family structures up to six units by right. Permanent mobile homes may locate as single-family dwelling units upon issuance of a permit.

### **Mechanicsburg Borough**

Mechanicsburg's zoning ordinance scored 1.30 on the benchmarking tool, squarely in the "low risk" range. The risks are related primarily to restrictions on family and group homes. The "Family" definition imposes a restriction on the number of unrelated persons living together. Group Care Facility (Group Home) sets living parameters between 9-15 residents that may exist as single-family dwelling units, but group homes for six to eight residents are considered to be a conditional use requiring a 1,000-foot buffer and a "detailed statement of intent" that describes the "nature of the anticipated occupants." Group home operators face a burden of proof in convincing officials that the home satisfies "a demonstrative need and shall be conducted in a responsible manner without detriment to the surrounding properties and the neighborhood." This provision is antithetical to the notion of mainstreaming people with disabilities into community life.

### **Monroe Township**

Monroe Township's zoning ordinance scored 1.35 on the benchmarking tool, also in the "moderate risk" range. Monroe adopted an updated ordinance in 1998, as amended. Its definition of "family" allows up to six unrelated, and its definition of "group care facility" which includes the term "group home" notes minimum and maximum number of residents and is subject to the Supplemental Regulations and Conditional Use requirements. The governing body could also set additional parameters on this use. Multi-family dwellings must go through a Special Exception process. However, in the Neighborhood Commercial (NC) district multi-family dwellings are permitted by right at a minimum lot size of 10,000 sf., and at a density of eight units per acre. The Village Zone does not permit multi-family units and group quarters uses are only permitted by special exception, along with building heights capping at two stories. Group Homes are permitted by right in most zones however, if residing in a single-family home, the lot must be a minimum of three acres. Setting limits on lot size severely limits the feasibility of the reuse on an existing building or dwelling.

### **New Cumberland Borough**

With a score of 1.48, New Cumberland Borough's ordinance borders high risk for discriminatory provisions. The ordinance does not allow more than three unrelated people to live together. While there is an exception for group homes of up to six unrelated persons, this use is defined separately in the ordinance and not permitted by right in any residential district – only by exception in a commercial district conditioned on a 500-foot buffer. However, other provisions would promote housing choice, such as the permitting of apartment buildings by right in R2, which comprises a relatively large portion of the land use map, very permissive minimum lot sizes of 5,000 sf in R1 and R2 and treatment of modular homes a single family detached dwellings throughout the Borough.

### **Shippensburg Borough**

Shippensburg Borough's zoning ordinance scored 1.36 on the benchmarking tool, squarely within the "moderate risk" category. The Borough limits a "family" to three unrelated persons. Group homes are permitted by right in the R-3 and R-4 districts. Lot size is somewhat restrictive because coverage requirements is 40-50% district depending. Minimum lot size requirements for a group home is adequate and furthers fair housing choices. Shippensburg Borough is home to Shippensburg University. Family size as per the zoning ordinance, may have a lot to do with the unrelated college students living together during their tenure at school. The Borough should review its ordinances against Fair Housing needs and try to find a solution that works best for the college students and residents with disabilities.

### **Silver Spring Township**

Silver Spring's zoning ordinance fell into the "moderate to high risk" range with a score of 1.50. While its limitation of family to three unrelated members would discourage non-traditional household formation, such as people living together for economic reasons, it specifically excepts "any number of unrelated persons who reside within a licensed group home." The ordinance states that group homes will be treated as single-family dwellings. The risk in Silver Spring is related more to limitations on land available and zoned for affordable housing types. For instance, multi-family housing is permitted by right in the high-density residential district (which comprises a small expanse of land), but only up to five dwelling units per acre. In a land use study completed in 2014, the amount of land designated as high density residential was minimal and consisted of only infill opportunities. Requirements for a multi-family development are two-acre tracts of land with coverage requirements of 60%, lot width of 200 feet, and 50 and 60 foot setback requirements. These requirements may limit affordable housing development.

### **South Middleton Township**

South Middleton Township's zoning ordinance also ranks as moderate risk among those reviewed according to the benchmarking tool with a score of 1.45. No more than four unrelated persons can live



together in the same dwelling unit. Group Homes do not specify a minimum or maximum number of residents. Multi-family dwelling units and Group Homes are not treated the same as single family dwellings. They are both required to go through a Conditional Use planning process and the minimum lot area for multi-family dwellings is two acres. Article XVI provides Supplemental Regulations over group homes including a distance from other group homes of 2,000 feet and public water and sewer. South Middleton Township does give density bonuses for utilizing lands intended for Transfer of Development Rights permitting 14 units per acre.

Safe Harbour, Inc. recently complete construction of 52, two-bedroom housing rental units on five acres in South Middleton Township, Cumberland County. Planning for the project required the development team to create a zoning amendment in order to make the development feasible. Each unit will include a kitchen and bathroom facilities and tenants will have income at or below 50% of the area median income. The project was financed through local, state and federal funding sources, including cash, loans, grants, and tax credits.

## E. HOUSING

Housing--particularly affordable housing--has been a primary concern in Cumberland County. All public engagement and outreach activities centered on how to create a strategic path to implement housing needs, primarily permanent affordable housing in preferred places, in Cumberland County.

The Borough and County will continue to use CDBG funds to increase affordable housing opportunities, especially through the rehabilitation of owner-occupied units. In the past, the Borough has successfully sought federal rental rehabilitation funds. While CCHRA does not administer a rental rehabilitation program, the need exists for one. In the Borough, the number of homes that have one housing problem are largely (40%) rental homes and given that over 48% of the rental units in the Borough were constructed before 1950 (compared to only 28% in Cumberland County), the need is great for housing rehabilitation (CoStar Data 2018).

CCHRA owns and manages 208 apartments and townhouses, 194 of which are in Carlisle. This type of affordable housing is not enough. The units are at three sites, two in Carlisle Borough and one in Mt. Holly Springs Borough. The units in Carlisle include 12 efficiencies, 57 one-bedroom apartments, 66 two-bedroom apartments, 62 three-bedroom apartments, and 8 four-bedroom apartments. Out of the 194 units in Carlisle, 50 are elderly units, and the remaining 149 are family units. There are 319 elderly units in Cumberland County and 209 units in Carlisle Borough (CCHRA 2024). Of the total units, 59 are designed specifically for elderly residents.

Other rent restricted or affordable units in the Borough and Carlisle area are:

- Hanover Street Senior Apartments is a 5-story affordable senior living residential property that offers 9 one-bedroom units located right in Carlisle's downtown on Hanover Street.
- The Townhomes at Factory Square is a 52 unit multi-family community that offers two- and three-bedroom units and is rent restricted. Unit cost are between \$686 and \$879 depending on the size of the unit. These units are located just outside the Borough.
- Dawn Ridge is a 58 unit multi-family community that offers two- to four-bedroom units and is rent restricted. Must be income qualified. These units are located off S. Spring Garden Street.
- Elwood Gardens is an older two-story apartment community containing 120 units located in Carlisle. These apartments are rent subsidized one- and two-bedroom units.

The large and growing waiting list indicates that the housing needs for persons with disabilities, in particular mental health, and those with extremely low-incomes, are currently unmet. Since 2015, the

Housing Choice Vouchers leased grew from 1,239 to 1,285 in 2024. The housing rehabilitation program and homebuyer program assists in fostering and maintaining affordable housing in the County and Carlisle Borough. CCHRA promotes new affordable housing opportunities associated with CDBG and HOME funding.

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

As noted in Chapter 3: Community Profile, the housing stock in Carlisle Borough consists primarily of single-family units containing three or more bedrooms. Unlike the rest of the County, the number of rental units continues to increase in the Borough as well as the monthly rent costs. The number of apartments renting for less than \$500 decreased significantly over the last 7 years. With 32% of Carlisle households making less than \$42,150 which is significantly lower than the median household income of \$55,756. This research tells us that the number of cost burden households in the County and Borough will continue to rise. This information coupled with a very low vacancy rate, housing demand is also an issue.

Community engagement activities pointed to several key actions needed to bring low- and moderate-income families above poverty-level. Major actions included:

- Increase wages.
- Increase working hours.
- Establish more workforce training programs.
- Increase opportunities for higher education/vocational-technical trade schools.

The County and Borough supports the development of a life and work skills program funded by several nonprofit entities in the County (Tri-County Occupational Industrial Corporation and the South-Central Workforce Investment Board (SCPa Works)). These entities have created programs that integrate education, training programs, and community partners with the needs of local industry and the regional economy.

## **F. PUBLIC TRANSIT**

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

The Cumberland-Dauphin-Harrisburg Transit Authority, more commonly known as Capital Area Transit (CAT), was formed in 1973 to provide local bus service to the residents of the Harrisburg area. The following are current CAT routes:

- Route 81 and 82 provides public transit lines that stop at Park & Ride lots in Shippensburg/Newville/Carlisle/Harrisburg.
- Route A – New Cumberland route that does directly into downtown Harrisburg.
- Route C – Carlisle Local and Commuter Express

- Route CY – Carlisle Pike Warehouse line that goes from Chewy Warehouse, Fry Communications in Mechanicsburg and WEG Warehouse to Downtown Harrisburg
- Shippensburg Raider Regional Transit Blue and Red Route. This route services Shippensburg residents and college students.

The Cumberland County Transportation Department (CCTD) offers a shared ride service throughout Cumberland County and limited service to surrounding counties with available resources. CCTD provides service Monday-Friday 8am-4:30pm, provided that notification is given for a ride prior to 12 PM the previous day. Residents of Cumberland County must register prior to transportation. Fares are mileage-based, with seniors eligible for a significant discount.

In general, the transit within Cumberland County caters to metro-Harrisburg and the next two largest population centers, Carlisle, and Shippensburg. Traveling to or from anywhere else in the County on public transit is difficult, expensive, or both. This has the potential to limit fair housing choice to those wishing to live outside of these areas but who do not have access to a private vehicle. The current CCTD website requires an update in order to take online ride registration. The website is currently out of date and registration is not possible.

The Cumberland County Library System provides senior citizen transportation for persons 65 years of age or older to critical places including banks, grocery stores, employment, post offices, senior centers, hospital/nursing homes, and immediate family members. Proof of age forms are required and applications for routine rides require up to two business days to complete and process. This service is supported by the PA State Lottery and the Department of Transportation and Cumberland County area Agency on Aging.

## **G. ANNUAL ACTION PLAN/CONSOLIDATED PLAN**

CCHRA is the lead agency for the preparation of the Five-Year Strategic Plan and administration of the CDBG program for both Carlisle Borough and Cumberland County’s CDBG and HOME grant programs.

The purpose of the Consolidated Plan is to:

- To provide decent housing by preserving the affordable housing stock, increasing the availability of affordable housing, reducing discriminatory barriers, increasing the supply of supportive housing for those with special needs, and transitioning homeless persons and families into housing.
- To provide a suitable living environment through safer, more livable neighborhoods, greater integration of low- and moderate- income residents throughout the Borough, increased housing opportunities, and reinvestment in deteriorating neighborhoods.
- To expand economic opportunities through more jobs paying family-sustaining wages, provide greater homeownership opportunities, development activities that promote long-term community viability, and the empowerment of low- and moderate- income persons to achieve self-sufficiency.

CDBG funding for the Borough typically opens in January and applications are due at the end of February each year. Recommendations are made to Carlisle Borough Council in March/April, with submittal of a final program budget to HUD by mid-May. CCHRA’s Community Development Division administers the program on behalf of the Borough.

CDBG goals for Borough and County include:

- Increase affordable housing opportunities.
- Remediate and reduce blight conditions.

- Provide vital public services.
- Enhance economic development opportunities.

The County allocates its spending among housing programs, social services, economic development, job training, and facility improvements to provide safe, decent, and affordable housing, increase economic opportunities, and enhance the general quality of life for its residents. As in past years, the County focused its CDBG and HOME funded activities in the Census Block Groups with the highest concentrations of poverty and with the greatest deterioration off activities and housing stock. The number of persons served was comparable to previous years.

The County gave \$132,889 from its Affordable Housing Trust Fund for the County's Down Payment and Closing Cost Assistance Program. This ongoing program provides up to \$5,000 of assistance to first-time homebuyer in the County. The County continued to encourage and support, through both the Housing Authority and a Non-Profit organization, self-sufficiency programs designed to assist low-income public housing tenants in becoming upwardly mobile. The County promotes homeownership by supporting a Homebuyer Workshop operated and managed by the Cumberland County Redevelopment Authority.

From its economic development revolving loan fund, the County awarded one loan to small businesses. As a condition of receiving the loan, the borrowers are required to create jobs to be made available to LMI individuals. The number of jobs to be created on this loan is one. Though borrowers have two years to create the jobs, the County frequently sees job creation activity much sooner, which benefits the local economy.

## **H. REGIONAL COLLABORATION**

Many issues, such as homelessness, affordable housing, jobs-housing balance, and access to transportation are issues that require the collaboration of communities throughout the region. In recent years, the County's municipalities have undertaken multiple initiatives that address housing-related issues including: first-time homebuyers programs, rental rehabilitation, and land development approvals for affordable housing. Other regional collaboration include the completion of Cumberland County and Carlisle Borough Analysis of Impediments to Fair Housing Choice, Continuum of Care, Coordinated Entry System of Eastern PA, Employment Skills Center Workforce Development training Program, United Way of the Capital Region's Workforce Development Community Pilot Program, SCPa (South Central PA - formerly South Central Workforce Investment Area), Safe Harbour & New Hope Ministries, and County-wide Emergency Solutions Grants. Continuing these planning efforts and implementation would bridge the gap of disparities among communities. A majority of the Action Steps noted in Table 44 require regional collaboration. The Public Outreach process for the AI is based upon positive community-wide and agency support and participation. Cumberland County and CCHRA have created a solid foundation to work with others to create a path that initiates and completes the Plan's action steps.

## **I. CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)**

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

Cumberland County became an “Urban County” in 2005, which meant the County became an entitlement community under the CDBG regulations. As an entitlement community, the County receives annual CDBG grants directly from HUD. Prior to 2005, the County received CDBG funds from the state. The County also qualified as a “Participating Jurisdiction” under the HOME program and has received HOME grants annually since 2005. The County prepared its third Five Year Consolidated Plan in 2015 that identified priority housing and community development needs and projected a plan to address those needs over the five-year period of 2015 – 2019, inclusive. Prior to each year of the five-year period, recipients write an Annual Action Plan to implement the Consolidated Plan during that year.

### 1. Cumberland County - 2022

FY 2022 CAPER reported on CDBG and HOME Program funds and expenditures and goals satisfied. For program year 2022, the County received a CDBG grant of \$1,251,178, and a HOME grant of \$595,520. The County projected \$638,858.96 Program Income (PI) for the year. The 2020 Annual Plan established activities for the year of 2022 (July 1, 2022 – June 30, 2023). The County received a CDBG-CV grant in two phases totaling \$1,947,384 to assist with coronavirus. In 2022, the County expended \$2,262,594.11 bringing the balance into compliance. At least **70%** of funds expended during the year, net of planning and administration expenditures must benefit primarily low-income and moderate-income persons. The County disbursed \$1,447,305.89 or 98.59% for activities benefitting LMI individuals in 2022. The County disbursed \$226,787.59 or 18.13% for Public Services activities in 2022 and expended \$111,917.26 or **5.92%** for planning and administration activities. HOME funds obligated in 2022 was \$171,611.33. Project work and programs initiated and or accomplished in 2022 include:

- **Housing:**
  - **Owner-Occupied Housing Rehabilitation:** A total of \$180,687 was expended to assist six households.
- **Code Enforcement:** The County conducted 2,790 inspections and re-inspections designed to identify and eliminate deteriorating housing and blighting influences in the Borough of Shippensburg, Shippensburg Township, and Lemoyne Borough. The County expended \$103,011.17 CDBG funds on Code Enforcement during the year.
- **Economic Development/Shopsteading:** A total of \$400,000 was expended for the acquisition and soft costs of four businesses.
- **Façade Improvement:** There were no façade improvements.
- **Public Services:** The County disbursed \$226,878.59 in 2022. The County continued to support the operational costs associated with James Wilson Emergency Shelter at Safe Harbour affording people the ability to access the services provided by Safe Harbour. PY 2022 funds were used for YWCA’ Growing Opportunities at Grandview Court, a community partners for change coordinator, enhanced police patrols, Hope Station, and Salvation Army.
- **Public Facilities:** The County used funds for several vital public facility projects in PY 2022 including the sewer replacement for St. Paul Church, new HVAC and other improvements for Medard’s House, ADA improvements in Borough of Lemoyne, Enola outreach center improvements for New Hope Ministries, improvements to Shippensburg Township sports courts, ADA accessibility to CCHRA headquarters, removal of barriers in New Cumberland, installation of LED crosswalks in Shippensburg Borough, and ADA improvements for Newburg Borough.

### 2. Carlisle Borough – 2022

FY 2022 CAPER reported on CDBG and HOME Program funds and expenditures and goals satisfied. For program year 2022, Carlisle received a CDBG grant of \$358,323.00, and received no HOME grant funds. Planning and administrative funds obligated was \$73,664.60 or 15.2%. The Borough obligated \$48,334

for Public services projects and programs. 99% of the funds benefit low- and moderate- income persons. Project work and programs initiated and or accomplished in 2022 include:

- **Housing Rehabilitation:**
  - **Owner-Occupied Housing Rehabilitation:** A total of \$35,784.15 was expended to assist four households.
- **Sidewalk Improvements:** No funds were expended for sidewalks in 2022.
- **Code Enforcement:** The Borough expended \$68,729.30 in CDBG funds on Code Enforcement during the year.
- **Carlisle Streetview Program:** No new grants were issued in 2022.
- **Economic Development/Shopsteading:** Two businesses were assisted, 360 Dance Fitters Company and Eclipse Gaming Café, with a total of \$85,000 loan in exchange for creating Full-Time Equivalent jobs to LMI individuals.
- **Public Services:** The Borough spent \$48,334.21 through continued support with Hope Station Community Service Program/Utility Payments and Employment Skill Center-Workforce Development Training Program.
- **Public Facilities:** The Borough funded \$175,639.35 on public facilities projects: N. Hanover Corridor Improvements, Hope Station Rehabilitation, LeTort Park Lighting, N. Pitt St. Stormwater Project, and Fairground at Linear Park.

In 2022 the CDBG and HOME expenditures for Carlisle Borough and Cumberland County were:

*Table 39: Total CDBG & Home Expenditures 2022*

CATEGORIES	CARLISLE BOROUGH	CUMBERLAND COUNTY
Public Housing/Housing Rehab	\$35,784.15	\$180,687.76
Code Enforcement	\$68,729.30	\$103,011.17
Public Facilities	\$175,639.35	\$862,912.01
Public Services	\$48,334.21	\$226,878.59
Economic Development	\$85,000.00	\$400,000.00
Planning & Administration	\$73,664.60	\$489,104.58
	\$488,229.43	\$2,262,594.11

The charts below graphically capture how the expenditures, noted in Table 40, are categorized. Beyond program administration of the two HUD programs, the County spends the majority of its funds on Housing Rehabilitation and public facilities improvements project work. Carlisle Borough uses its funds for codes enforcement, public facilities improvements and housing rehabilitation project work.

Figure 8: Carlisle Borough CDBG & HOME Expenditure Categories

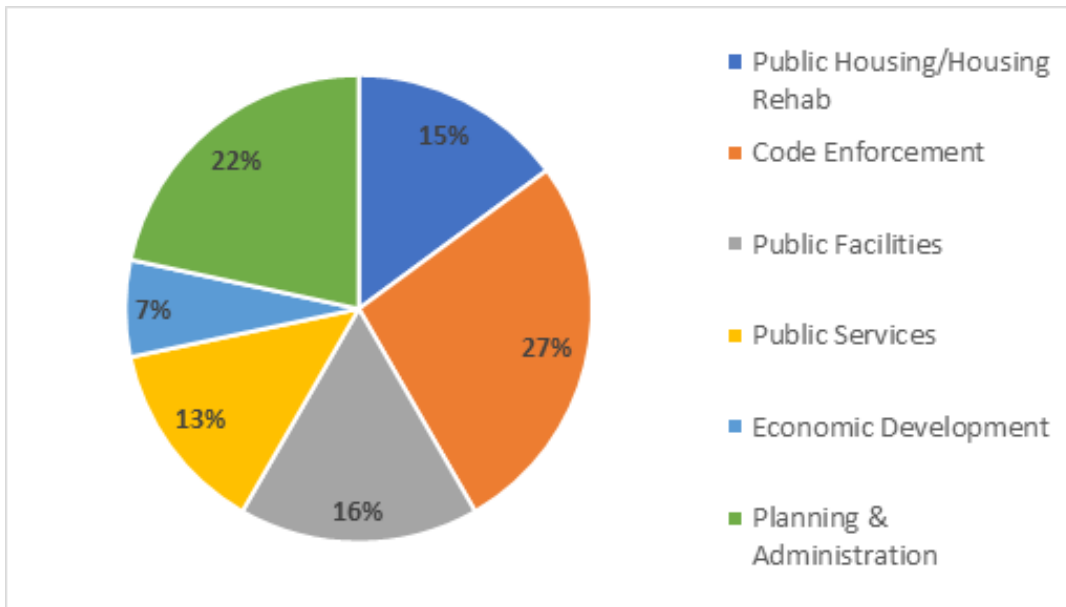
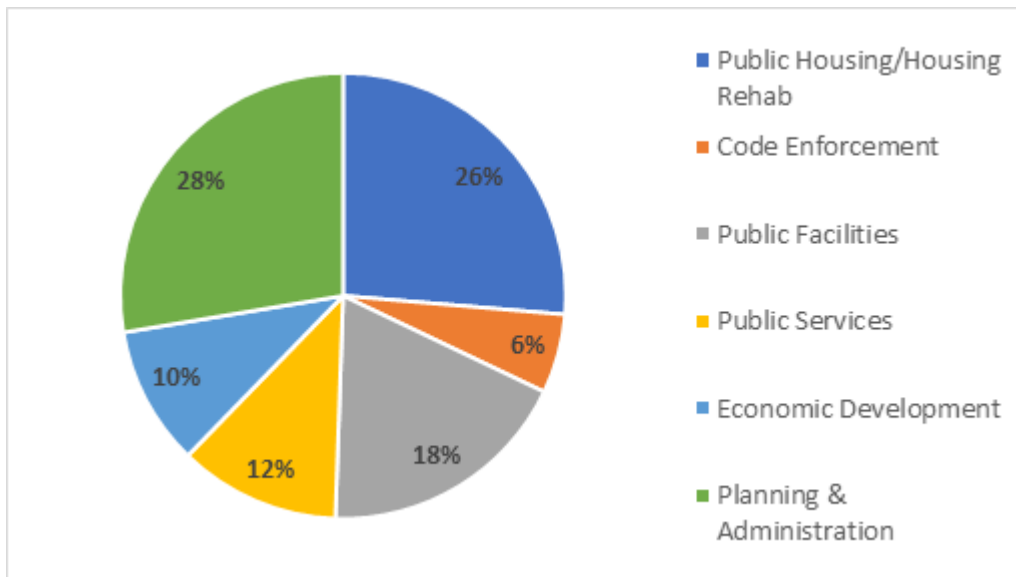


Figure 9: Cumberland County CDBG & HOME Expenditure Categories



## Chapter 6: Fair Housing Profile

This chapter provides an overview of fair housing practices, fair housing services available to residents, and the nature and extent of fair housing complaints received by fair housing organizations. Fair housing services encompass the investigation and resolution of housing discrimination complaints, discrimination auditing/testing, and education and outreach, including the dissemination of fair housing

information. Tenant/landlord counseling services are usually offered by fair housing service providers but are not considered fair housing services.

## **A. FAIR HOUSING PRACTICES IN THE HOMEOWNERSHIP MARKET**

Americans have the right to own a home in the neighborhood of one's choice. Not all Americans, however, have always enjoyed equal access to homeownership due to credit market distortions, “redlining,” steering, and predatory lending practices.

### **1. The Homeownership Process**

The following discussions describe the process of homebuying and likely situations when a person/household may encounter housing discrimination. However, much of this process occurs in the private housing market over which local jurisdictions have little control or authority to regulate.

The recourse lies in the ability of the contracted fair housing service providers in monitoring these activities, identifying the perpetrators, and taking appropriate reconciliation or legal actions.

### **Advertising**

The first thing a potential buyer is likely to do when they consider buying a home is search advertisements either in magazines, newspapers, or the Internet to get a feel for what the market offers. Advertisements cannot include discriminatory references such as the use of words describing:

- Current or potential residents
- Neighbors or the neighborhood in racial or ethnic terms
- Adults preferred (except for senior or active adult living)
- Perfect for empty nesters
- Conveniently located by a Catholic Church
- Ideal for married couples without kids

In August 2023, approximately, 467 homes were listed for sale on Realtor.com in Cumberland County. A random sample of 60 listings were reviewed throughout the County with no findings or references to something other than the physical description of the available home and amenities and services.

While real estate advertising can be published in other languages, by law an English version of the ad must also be published. Monitoring this requirement is difficult, if not impossible. Even if an agent does not intend to discriminate in an ad, it would still be considered a violation to suggest to a reader whether a particular group is preferred. Previous litigation has set precedence for violations in advertisements that hold publishers, newspapers, multiple listing services, real estate agents, and brokers accountable for discriminatory ads.

Initially, buyers must find a lender that will qualify them for a loan. This part of the process entails an application, credit check, ability to repay, amount eligible for, choosing the type and terms of the loan, etc. Applicants are requested to provide a lot of sensitive information including their gender, ethnicity, income level, age, and familial status. Most of this information is used for reporting purposes required of lenders by the CRA and the HMDA. The previous section of this AI provides a detailed analysis of HMDA data noted in Chapter 4.

### **Appraisals**

Banks order appraisal reports to determine whether a property is worth the amount of the loan they will be giving. Generally speaking, appraisals are based on the comparable sales of properties within the



neighborhood of the property being appraised. Other factors are taken into consideration, such as the age of the structure, any improvements made, location, general economic influences, etc.

### **Real Estate Agents**

Real estate professionals may act as agents of discrimination. Some unintentionally, or possibly intentionally, may steer a potential buyer to particular neighborhoods by encouraging the buyer to look into certain areas; others may choose not to show the buyer all choices available. Agents may also discriminate by whom they agree to represent, whom they turn away, and the comments they make about their clients.

The Pennsylvania Association of REALTORS® (PAR) is included language on many standard forms disclosing fair housing laws to those involved. In April each year, PAR hosts fair housing trainings/seminars to educate members on the provisions and liabilities of fair housing laws, and the Equal Opportunity Housing Symbol is also printed on all PAR forms, documents and website as a reminder.

### **Covenants, Conditions, and Restrictions (CC&Rs)**

Covenants, Conditions, and Restrictions (CC&Rs) are restrictive promises that involve voluntary agreements, run with the land they are associated with, and are listed in a recorded Declaration of Restrictions. The Statute of Frauds (Civil Code Section 1624) requires them to be in writing because they involve real property. They must also be recorded in the County where the property is located in order to bind future owners. Owners of parcels may agree amongst themselves as to the restrictions on use but, in order to be enforceable, they must be reasonable.

Information about local properties with regards to CC&Rs for all subdivisions can be found at the Cumberland County Courthouse in Carlisle, PA. Persons looking to find detailed information about a property in PA can obtain information from the Recorder of Deeds at the Courthouse or can utilize the services of a professional title search company. Information that can be found include: The Fair Housing Council of the Capital Region and the PHRC are excellent resources of information for a wide range of issues related to compliance with fair housing law. Realtors, brokers and agents are advised, under the Pennsylvania Human Relations Act, neither you or your designee may:

- Steer or otherwise direct a property seeker's attention to a particular neighborhood based on the race, color, religion, national origin, ancestry, sex, disability, age, familial status or use of a support animal or because the user is a handler or trainer of support animals.
- Volunteer information to or invite questions from property seekers concerning the race, color, religion, national origin, ancestry, sex, disability, age, familial status or use of a support animal because of the blindness, deafness or physical disability of the user or because the user is a handler or trainer of support animals.
- Answer questions from or initiate a discussion with persons who are selling, renting or otherwise making housing or commercial property available concerning the race, color, religion, national origin, ancestry, sex, disability, age, familial status or use of a support animal because the user is a handler or trainer of support animals of prospective buyers, applicants or others seeking housing.
- Engage in certain practices which attempt to induce the sale or discourage the purchase or lease of housing accommodations or commercial property by making direct or indirect reference to the present or future composition of the neighborhood in which the facility is located with

respect to race, color, religion, sex, ancestry, national origin, disability, age, familial status or a support animal dependency.

- Engage in any course of action which could be construed as reluctant or delayed service having the effect of withholding or making unavailable housing accommodations or commercial property to persons because of their race, color, religion, national origin, ancestry, sex, disability, age, familial status or use of a support animal.

CC&Rs are void if they are unlawful, impossible to perform or are in restraint on alienation (a clause that prohibits someone from selling or transferring his/her property). However, older subdivisions and condominium/ townhome developments may contain illegal clauses which are enforced by the homeowners associations.

### **Homeowners Insurance**

Without insurance, banks and other financial institutions lend less. For example, if a company excludes older homes from coverage, lower income and minority households who can only afford to buy in older neighborhoods may be disproportionately affected. Another example includes private mortgage insurance (PMI). PMI obtained by applicants from CRA protected neighborhoods is known to reduce lender risk. Redlining of lower income and minority neighborhoods can occur if otherwise qualified applicants are denied or encouraged to obtain PMI.

## **2. National Association of REALTORS® (NAR)**

The NAR has developed a Fair Housing Program to provide resources and guidance to REALTORS® in ensuring equal professional services for all people. The term REALTOR® identifies a licensed professional in real estate who is a member of the NAR; however, not all licensed real estate brokers and salespersons are members of the NAR.

### **Code of Ethics**

Article 10 of the NAR Code of Ethics provides that “REALTORS® shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, or national origin. REALTORS® shall not be a party to any plan or agreement to discriminate. against any person or persons on the basis of race, color, religion, sex, handicap, familial status, or national origin.”

Additionally, Standard of Practice Article 10-1 states that “REALTORS® shall not volunteer information regarding the racial, religious or ethnic composition of any neighborhood and shall not engage in any activity which may result in panic selling. REALTORS® shall not print, display or circulate any statement or advertisement with respect to the selling or renting of a property that indicates any preference, limitations or discrimination based on race, color, religion, sex, handicap, familial status, or national origin.”

NAR has created a diversity certification, “At Home with Diversity: One America” to be granted to licensed real estate professionals who meet eligibility requirements and complete the NAR “At Home with Diversity” course. The certification will signal to customers that the real estate professional has been trained on working with diversity in today’s real estate markets. The coursework provides valuable business planning tools to assist real estate professionals in reaching out and marketing to a diverse housing market. The NAR course focuses on diversity awareness, building cross-cultural skills and developing a business diversity plan.

### **3. Pennsylvania – Department of State - Real Estate Commission**

The Pennsylvania Department of State Real Estate Commission grants and renews licenses for real estate brokers and salespersons, builder-owner salespersons and rental referral agents. As noted earlier, not all licensed brokers and salespersons are members of the National or Pennsylvania Association of REALTORS®.

The Commission has adopted education requirements that include courses in ethics and in fair housing. To renew a real estate license, each licensee is required to complete 14 hours of continuing education as per Section 35.382(b) of the state regulations. Continuing education that is used to reactivate a license cannot be used to renew the license during the same renewal period. An additional 14 hours of continuing education is required prior to renewal. Mandated education includes: seven hours in each of General Module education; seven hours of Commercial Module courses; and seven hours of Residential Module education. Courses include: licensing, leases, zoning, land development, home inspections, consumer protection, agreements of sale, environmental issues, property management, tenant fit out, letters of intent, title reports, closing costs, ethics, trust fund, and fair housing. The fair housing course contains information that will enable an agent to identify and avoid discriminatory practices when providing real estate services to clients.

Those seeking a Real Estate license must complete continuing education courses related to consumer protection. Such education addresses consumer services, consumer protection, disciplinary actions involving licenses that provide consumer services, and legal and ethical duties of licensees when working with consumers.

### **4. Pennsylvania Association of REALTORS® (PAR)**

The PAR is a trade association of 34,000 realtors statewide. As members of organized real estate, realtors also subscribe to a strict code of ethics as noted above. PAR governance spans over 10 districts within the State of Pennsylvania. Cumberland County is in District 6. The top features PAR offers its members include:

- a. Property search
- b. Property details
- c. Property pricing
- d. Neighborhood information
- e. School information
- f. Market Trend Maps
- g. Customized reports
- h. RPR Mobile app to view on and off market properties, leases, valuations, tax and mortgage, distressed data and more

PAR is led by elected, volunteer officers and holds monthly meetings including one annual meeting to discuss its general membership, sessions on fair housing issues, trending issues such as short-term rentals, board reorganization, and committee reports and discussions. Current outreach efforts in the Pennsylvania include building eco-friendly energy saving features in homes, homes improvements for successful home sales, and living in underserved communities.

## **B. FAIR HOUSING PRACTICES IN THE RENTAL HOUSING MARKET**

### **1. Rental Process**

The following information reviews local advertisements for potentially discriminatory language.

Rental advertisements should not include discriminatory references. A random sample of 50 rental from just over 400 available apartments listings in 2024 were reviewed. Roughly 12% of advertisements were found to contain potentially discriminatory language. The only problematic language involved “no pets” policies. Persons with disabilities are one of the protected classes, and apartments must allow “service animals” and “companion animals,” under certain conditions. Service animals are animals that are individually trained to perform tasks for people with disabilities such as guiding people who are blind, alerting people who are deaf, pulling wheelchairs, alerting and protecting a person who is having a seizure or performing other special tasks. Service animals are working animals, not pets. Companion animals, also referred to as assistive or therapeutic animals, can assist individuals with disabilities in their daily living and, as with service animals, help disabled persons overcome the limitations of their disabilities and the barriers in their environment. HB 2049: Service Animal Integrity Act has accomplished the following:

- a. Reduce the number of fraudulent requests for accommodations of service or assistance animals in multi-family housing.
- b. Help those who are disabled and truly in need of such accommodations.
- c. Provide clear, minimum standards for documentation required to substantiate a need for an assistance or service animal accommodation.
- d. Provide penalties for intentionally misrepresenting such a need.

Persons with disabilities have the right to ask their housing provider to make a reasonable accommodation in a “no pets” policy in order to allow for the use of a companion or service animal.

However, in the case of rental ads that specifically state, “no pets,” some disabled persons may not be aware of their right to ask for an exception to this rule. A “no pets” policy could, therefore, be interpreted as potentially discriminatory.

There were not ads that included potentially discriminatory language based on household size or who will reside in the rental together. Rental advertising companies such as apartmentguide.com or apartments.com, that post apartment availability seem to be well aware of fair housing policies and do not mention family size, ethnicity, race, age, gender and or children within the online advertisements.

### **Responding to Ads**

A 2011 study conducted nationally, comprehensive audit-style experiments via email correspondence were used to test for racial discrimination in the rental housing market. This study was particularly unique because it tested for two variables—discrimination based on race and social class. By responding to online rental listings using names associated with a particular racial/ethnic group and varying message content grammatically to indicate differing levels of education and/or income (i.e. social class), researchers found that, overall, blacks continued to experience statistically significant levels of discrimination in the rental housing market. This discrimination was even more pronounced when the housing inquiry was made to look like it originated from a black individual of a lower social class.

Differential treatment of those responding to advertisements is a growing fair housing concern. While there were no ads that directly denied Housing Choice Vouchers, this a growing problem noted in a recent pilot study commissioned by HUD. In an article published by “Market Watch” entitled “Landlord discrimination is making affordable housing crunch worse”, August 2018. Prepared by Urban Institute’s Metropolitan Housing and Communities Policy Center. In this article, landlords will choose not to show up for showings if they know a voucher maybe involved in the rental agreement. And or tenants cannot find a suitable apartment in a preferred area because the landlord will not follow up or show available units. As the researchers wrote, “The study’s findings show that landlords are not passive actors in the

HCV program. They have incredible power in deciding if voucher holders can use housing benefits and, ultimately, where voucher holders can live. The denial rates for voucher holders were so high, in fact, that the researchers found they could not accurately assess the role of race or ethnicity in landlord decision-making.” In Philadelphia, of all the voucher tests completed there was a 68% denial rate and in low-poverty areas the denial rate was 83%. The article goes on to say, “There may be some hope, however. Denial rates in metros like Fort Worth and Los Angeles were many times higher than those in Newark and Washington, D.C., where there are local legal protections against discrimination on the basis of voucher use, suggesting that such laws do have an impact and could be expanded.” It should also be noted that there is no national law prohibiting landlords from refusing to rent to tenants with approved vouchers.

Viewing the unit is the most obvious place where the potential renters may encounter discrimination because landlords or managers may discriminate based on race or disability, or judge on appearance whether a potential renter is reliable or may violate any of the rules.

In a follow up to the study discussed above, researchers developed an experiment to test for subtle discrimination. Subtle discrimination is defined as unequal treatment between groups that occurs but is difficult to quantify and may not always be identifiable through common measures such as price differences. Researchers found that, in general, landlords replied faster and with longer messages to inquiries made from White names. The study also found that landlords were more likely to use descriptive language, extend invitations to view a unit, invite further correspondence, use polite language, and make a formal greeting when replying to e-mail inquiries from a White home seeker.

### **Credit/Income Check**

Landlords may ask potential renters to provide credit references, lists of previous addresses and landlords, and employment history/salary. The criteria for tenant selection, if any, are typically not known to those seeking to rent. Many landlords often use credit history as an excuse when trying to exclude certain groups. Legislation provides for applicants to receive a copy of the report used to evaluate applications.

The study on subtle discrimination mentioned earlier found no statistically significant evidence of discrimination in using language related to fees, asking for employment or rental history, or requesting background information.

### **The Lease**

Typically, the lease or rental agreement is a standard form completed for all units within the same building. However, the enforcement of the rules contained in the lease or agreement may not be standard for all tenants. A landlord may choose to strictly enforce the rules for certain tenants based on arbitrary factors, such as race, presence of children, or disability.

Lease-related language barriers can impede fair housing choice if landlords and tenants do not speak the same language. In Pennsylvania, there are no policies in place for applicants and tenants to negotiate lease terms primarily in a second language such as Spanish. In California, if a language barrier exists, the landlord must give the tenant a written translation of the proposed lease or rental agreement in the language used in the negotiation before the tenant signs it. This rule applies to lease terms of one month or longer and whether the negotiations are oral or in writing.

### **Security Deposit**

A security deposit is typically required. To deter “less-than-desirable” tenants, a landlord may ask for a security deposit higher than for others. Tenants may also face discriminatory treatment when vacating the units. The landlord may choose to return a smaller portion of the security deposit to some tenants, claiming excessive wear and tear. A landlord may also require that persons with disabilities pay an additional pet rent for their service animals, a monthly surcharge for pets, or a deposit, which is also a discriminatory act. In a recent article in “Market Watch” March 2018, many Americans cannot manage to pay a required apartment down payment deposit. High deposit fees have become a major barrier to affordable housing. In Great Falls Montana, this city is creating viable solutions to this problem by providing low interest loans with minimal monthly payments for a three-year repayment term.

### **During the Tenancy**

During tenancy, the most common forms of discrimination a tenant may face are based on familial status, race, national origin, sex, or disability. Usually this type of discrimination appears in the form of varying enforcement of rules, overly strict rules for children, excessive occupancy standards, refusal to make a reasonable accommodation for handicapped access, refusal to make necessary repairs, eviction notices, illegal entry, rent increases, or harassment. These actions may be used as a way to force undesirable tenants to move on their own without the landlord having to make an eviction.

### **2. Pennsylvania Apartment Association**

The Pennsylvania Apartment Association offers the program “Click and Lease Program” a comprehensive program geared towards creating legally compliant lease documents that are compliant with the Fair Housing Act. The Association also offers a 12-Credential Program for the following credentials:

- National Apartment Leasing Professional
- Certified Apartment Manager
- Certificate for Apartment Maintenance Technicians
- Certified Apartment Portfolio Supervisors
- Certified Apartment Supplier
- Independent Rental Owner Professional

Course work differs for each professional credential program. Information about the programs can be found at: <https://www.paa-central.com/credential-program-overview.html>

### **3. The National Association of Residential Property Managers**

The National Association of Residential Property Managers (NARPM) promotes a high standard of property management business ethics, professionalism and fair housing practices within the residential property management field. NARPM is an association of real estate professionals who are experienced in managing single-family and small residential properties. Members of the association adhere to a strict Code of Ethics to meet the needs of the community, which include the following duties:

- Protect the public from fraud, misrepresentation, and unethical practices of property managers.
- Adhere to the Federal Fair Housing statutes.
- Protect the fiduciary relationship of the client.
- Treat all tenants professionally and ethically.
- Manage the property in accordance with the safety and habitability standards of the community.
- Hold all funds received in compliance with state law with full disclosure to the client.

NARPM offers three designations to qualified property managers and property management firms:

1. Residential Management Professional, RMP ®
2. Master Property Manager, MPM ®
3. Certified Residential Management Company, CRMC ®

Various educational courses are offered as part of attaining these designations including the following fair housing and landlord/tenant law courses:

- Ethics (required for all members every four years)
- Habitability Standards and Maintenance
- Marketing
- Tenancy
- ADA Fair Housing
- Lead-Based Paint Law

#### **4. Pennsylvania Manufactured Housing Association**

The Pennsylvania Manufactured Housing Association (PMHA) is a nonprofit organization created in 1949 for the exclusive purpose of promoting and protecting the interests of owners, operators, builders and or developers of manufactured home communities in Pennsylvania. PMHA assists its members in the operations of successful manufactured home communities in today's complex business and regulatory environment. PMHA has over 1,000 member and has administrative offices located in New Cumberland Pennsylvania.

PMHA offers a manager accreditation program as well as numerous continuing education opportunities. The MHEI – ACM Program educates the land-lease community operators on issues unique to their career. The ACM® designation distinguishes community managers who have experience managing manufactured home communities, have successfully completed the ACM program of education and have committed to upholding the ACM code of ethics. The ACM designation provides the opportunity for community managers to identify themselves as committed professionals. PMHA holds an annual conference as well as monthly District meetings. The closest district meetings are held in Harrisburg.

## **C. FAIR HOUSING SERVICES**

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

Fair housing services include the investigation and resolution of housing discrimination complaints, discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars.

Landlord/tenant counseling is another fair housing service that involves informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection legislations as well as mediating disputes between tenants and landlords.

The number of complaints reported may under-represent the actual occurrence of housing discrimination in any given community, as persons may not file complaints because they are not aware of how or where to file a complaint. Discriminatory practices can be subtle and may not be detected by someone who does not have the benefit of comparing his treatment with that of another home seeker. Potential fair housing act violations are vastly underreported. The most common reasons include individuals who:

- Are afraid of being homeless.
- Feel a sense of helplessness or feel powerless to handle the situation.
- Don't know who to call.
- Feel no one will believe them.
- Are focused on obtaining housing not filing a time-consuming complaint.

Other times, persons may be aware that they are being discriminated against, but they may not be aware that the discrimination is against the law and that there are legal remedies to address the discrimination. Also, households may be more interested in achieving their first priority of finding decent housing and may prefer to avoid going through the process of filing a complaint and following through with it. According to the Urban Institute, 83% of those who experience housing discrimination do not report it because they feel nothing will be done. Therefore, education, information, and referral regarding fair housing issues remain critical to equip persons with the ability to reduce impediments. A pilot study conducted in 2018 over landlord acceptance of housing choice vouchers revealed that finding housing with is extremely difficult. On average for every 40 ads reviewed there was only one potentially eligible unit identified. Many landlords refuse to accept vouchers. Denial rates were the highest in Fort Worth at 78%, Los Angeles 76% and Philadelphia at 67%. Rates in Newark and Washington DC were the lowest in the country. Policy changes could encourage landlord participation. The following policy recommendations of the study included:

- Pursue legal protections for voucher holders.
- Encourage landlord participation and recruit landlords, particularly in low poverty neighborhoods.
- Set more competitive rents and improve program management.
- Expand search time and provide housing search assistance.
- Host landlord focus groups to help shed light on their perceptions of the voucher program and voucher holders.

Cumberland County and Carlisle Borough utilize the services of PHRC as its fair housing service provider. The number of fair housing cases have not increased since the 2020 AI and are satisfied with services. PHRC and MidPenn Legal Services handles all fair housing complaints. These organizations do not perform fair housing testing/audits but can provide recommendations on existing companies that provide testing services.

#### **1. U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

The FHEO at HUD receives complaints from persons regarding alleged violations of the federal Fair Housing Act. In 2022, FHEO and its state partners including the PHRC conducted thousands of investigations under various statutes, obtaining settlements and other outcomes that provided significant relief for victims of discrimination and the public interest. In the U.S. there were 11,741 completed investigations. In FY 2022, HUD continued its aggressive enforcement of the Fair Housing Act, obtaining relief for victims of discrimination in a wide range of cases. As in recent years, complaints involving disability discrimination represented the single largest category of complaint filings at 57% of total complaints filed with HUD. Two-thirds of disability complaints alleged a housing provider's refusal to make a reasonable accommodation in rules, policies, and procedures needed by a person with a disability. Race complaints comprised 20.9% of complaints (and discrimination based on color was alleged in 2.3% of all complaints). Discrimination on the basis of sex, including complaints alleging sexual harassment, accounted for 9.4% of complaints. National origin, religion, and familial status complaints accounted for 10.1%, 2.8%, and 10.6% of complaints, respectively. HUD reported monetary relief of \$8.6M for victims of discrimination (FHEO 2022 Annual Report).



HUD maintains a record of all housing discrimination complaints for jurisdictions, including Cumberland County. According to the HUD website, any person who feels their housing rights have been violated may submit a complaint to HUD via phone, mail or the Internet. These grievances can be filed on the basis of race, color, national origin, sex, disability, religion, familial status and retaliation. HUD refers complaints in PA to Region III FHEO (Fair Housing Equal Opportunity), which has 30 days to address the complaint. As a substantially equivalent agency, DFEH's findings are usually accepted by HUD. Thereafter, HUD tracks the complaint and its issues and outcomes as a "dually filed" complaint. PHRC reports the major impediments to Fair Housing Act compliance includes but is not limited to lack of transportation, sustainable economic development, lack of affordable housing, gentrification, use of credit scores and criminal background requirements. Cases that are administratively closed, are usually due to complaint withdrawal before or after resolution, judicial dismissal or the complainant's refusal to cooperate. Caution should be used when interpreting complaints that are administratively closed. This resolution does not always mean that housing discrimination has not occurred. In the case of a complainant withdrawing a complaint, an uncooperative complainant, or a complainant who cannot be located, it is possible that the complainant changed her mind, decided against the trouble of following through with the complainant, chose to seek other housing without delay, or some other reasons. This happens with over 20% of all discrimination complaint cases filed.

Fair housing complaints originated in localities across the County, with the greatest occurrence in Carlisle, Mechanicsburg and Camp Hill. Employment was easily the most common basis for complaint, cited in 43 cases. The National Fair Housing Alliance coordinates efforts to expand the Fair Housing Act to prosecute those who commit housing-related hate activities. The number one location where hate crimes occur is in or near a home. The Fair Housing Act provides a way to counter hate escalation. It is unlawful to coerce, threaten, intimidate, or interfere with a person engaging in an activity protected under the Fair Housing Act. It is also unlawful for someone to injure, intimidate, or interfere with any person in the exercise or enjoyment of his or her fair housing rights.

## **2. PENNSYLVANIA HUMAN RELATIONS COMMISSION**

The Pennsylvania Human Rights Commission, or PHRC, enforces state laws that prohibit discrimination particularly the Pennsylvania Human Relations Act, which covers discrimination in employment, housing, commercial property, education and public accommodations. PHRC educates the public in order to prevent discrimination and foster equal opportunity; and to address incidents of bias that may lead to tension between racial, ethnic and other groups.

PHRC's role in fair housing is to investigate all allegations for housing discrimination. Once PHRC has determined there has been a violation of the Human Relations Act and the Fair Housing Act, as an adjudicatory agency they hold a conciliation conference and a public hearing when necessary. A conciliation conference is a chance for the parties to agree on settlement terms and also provides PHRC the opportunity to address public interest. If the parties do not agree to a settlement, the case moves to the public hearing process. The case is heard before a panel of our Commissioners or before our hearings Examiner. The Examiner or panel of Commissioners, hear the case again and make a determination based upon the evidence presented. If they agree there was a violation of our Act, they can assess actual and emotional damages as well as a civil penalty against the guilty party. From PHRC's perception, impediments to Fair Housing Act compliance includes, but is not limited to, lack of transportation, poor economic development, lack of affordable housing, gentrification, use of credit scores and criminal background requirements.

PHRC's Strategic Plan 2014-2017 (not updated) included the following goals:

- **Goal 1:** To ensure responsive, timely resolution of discrimination complaints.

- **Goal 2:** To promote equal opportunity and prevent unlawful discrimination by providing relevant training, reliable information and targeted outreach.
- **Goal 3:** To ensure effective and efficient agency operations by optimizing resources.

PHRC successfully handled and closed 1,348 discrimination cases within the planning horizon of their Strategic Plan (2014-2018). In 2018 there were 48 complaints in Cumberland County, two education, 43 employment, two housing and two public accommodation cases. PHRC reported the following about the Fair Housing Policies and Actions taken over the last five years. Cumberland County and the Borough of Carlisle both report progress in fair housing initiatives annually in the CAPER. In 2017, PHRC reported the following about discrimination cases filed:

- Most cases are filed by persons between 49 and 69 of age
- Most cases are filed by persons with Hispanic and Latino ancestry
- Most cases are filed by persons of the African American, Caucasian, and Black race
- The wide majority of cases are filed by females
- Most cases are filed by persons whom are of Islamic religion
- Most cases are filed by persons from Mexico, Haiti, India, Jamaica, or Puerto Rico national origin
- Most familial status cases filed include families having guardianship rights for child or young adults
- Most disability cases are filed by individuals with three main health conditions:
  1. Mental disorders, post-traumatic stress anxiety, attention deficit disorder, bi-polar, and depression
  2. Physical diseases including cancer, diabetes, and arthritis
  3. Physical disorders including shoulder impairments, back pain, heart, hearing and vision impairments, and problems

<b>REMEDIES THAT COULD BE AVAILABLE FOR MOST HOUSING CASES INCLUDE:</b>		
<b>Lease/ Rent or Sale of property</b>	<b>Eviction Stopped</b>	<b>Reasonable Accommodations</b>
<b>Modifications Made to Housing Units</b>	<b>Money for pain and embarrassment</b>	<b>Changes to Housing Agreements</b>
<b>Policy Changes</b>	<b>Posting of Fair Housing Notices</b>	<b>Training for Respondent</b>
<b>Reimbursement or forgiveness of fees</b>	<b>Civil Penalties</b>	<b>Out of pocket expenses</b>
<i>Source: PHRC Annual Report, 2017</i>		

The County’s efforts to affirmatively further fair housing, as reported in its CAPER documents, center on addressing these seven issues.

- a. Housing affordability continues to be a problem, and members of the protected classes are disproportionately affected.
- b. Subsidized housing and affordable market rentals are geographically concentrated in particular areas of the County.

- c. Local units of government that participate in the Urban County’s entitlement grant programs may not unequivocally understand their responsibility to affirmatively further fair housing choice.
- d. Some of the policy documents used by CCHRA in the administration of housing programs could be improved from a fair housing perspective.
- e. The relatively sparsely developed townships in the eastern portion of the County are isolated from transit service due to the financial undesirability of extending routes to such areas.
- f. Evidence demonstrates that some discrimination is present in the sale and rental of housing across Cumberland County, especially on the basis of disability.
- g. Mortgage lending data suggests that racial minorities are more likely to experience mortgage application denial or high-cost lending than White applicants.

CCHRA publishes a notice in the local newspaper to inform county residents of Fair Housing requirements and to provide contact information for those who feel they have been denied housing unfairly. CCHRA continues to fund the Local Housing Options Team coordinator with CDBG funds. CCHRA also runs a housing counseling workshop (and works with local banks) to assist protected classes with securing loans.

CCHRA provides training to all rental housing staff on Fair Housing and those staff must sign a code of conduct form after the training that is a condition of employment. Housing Choice Voucher staff also review locations of high poverty concentration with potential recipients during intake and encourage them to seek housing outside those neighborhoods. CCHRA and Cumberland County staff are actively monitoring municipal ordinances and providing technical assistance as necessary to prevent and eliminate discriminatory barriers.

All applicants that receive funding from CCHRA are required to make a “good faith effort” in carrying out Affirmative Marketing requirements. As previously stated, effectiveness of the plan is not measured in specific goals or quotas, but in the effort of the recipients of subrecipients. Effort made can be displayed in a few different ways:

- a. **Advertising** - Keep records for a minimum of five years. These records can include any advertising done for Affirmative Fair Housing initiatives surrounding projects. This advertising must have proof of publication or being placed in locations that would be viewed by those vulnerable groups identified above.
- b. **Marketing** - Keep records for a minimum of five years. Marketing records can include efforts where communication with any religious or other organization representing those persons least likely to apply.
- c. **Developing a brochure or handout** - This brochure or handout would describe those facilities or services provided by your program or project. These facilities or services should be in close proximity to the group targeted and should include items such as transportation, schools, hospitals, and recreational activities.
- d. **Training** - Trainings done by staff and for staff should be written down, signed off on by participating staff and maintained for five years. These trainings should include indication that sales/rental staff has read and understood the Fair Housing Act and the purpose of the AFHMP Plan. These trainings should be done at a minimum, annually.

### 3. LOCAL FAIR HOUSING INFRASTRUCTURE

Local lenders, realtors, the Capital Region Fair Housing Council, and CCHRA have joined forces in a coalition to identify the needs of LMI homebuyers, educate homebuyers in all facets of homeownership through a homebuyer workshop, and coordinate the implementation of special programs available

through the coalition's member agencies. CCHRA, on behalf of the County, participates in a forum intended to identify and eliminate predatory lenders that prey upon low-income homeowners.

The County has for many years promoted affordable housing by supporting non-profit developers with CDBG and HOME grants and by providing down payment and closing cost assistance to homebuyers. The Borough supports homeownership for LMI residents through funding of both direct-sale programs and lease-to-purchase programs for those that need time to cure credit problems or to save sufficient funds for purchase of a home. CCHRA staff participate in the local Fair Housing Council, direct first-time homebuyer classes and distribute fair housing information where possible. CCHRA annually identifies potential development projects that will deconcentrate housing for members of the protected classes, which in recent years have included multi-unit facilities for seniors, people with cognitive disabilities and the chronically homeless in locations outside of low- and moderate-income census tracts. County CDBG funds continue to fund the Local Housing Options Team coordinator, who assists residents to locate rental housing. In concert with local banks, CCHRA runs a housing counseling workshop to assist members of the protected classes in securing loans.

In recent years, CCHRA published fair housing information on its website, produced, and distributed a new fair housing pamphlet and reminded the County Planning Commission about the need to review municipal codes for impediments to fair housing. Additionally, CCHRA publishes a notice in the newspaper to inform residents of their fair housing rights and the recourse available in case they have been unfairly denied housing.

With regard to zoning, CCHRA worked with Carlisle Borough in 2012 to revise residential districts to include a new Village district that incorporates more diverse housing types, with the effect of broadening uses in some areas of the Borough that had been traditionally dominated by large-lot single-family housing. CCHRA and Cumberland County Planning Department supports a proposed affordable housing development in South Middleton Township which will require a zoning amendment. Safe Harbour in concert with Integrated Development Partners are spearheading a 52 unit affordable housing development. Eligible income requirements are 50% of the area median income. Finally, the County and the Borough coordinated the production of this document with the undertaking of their Five-Year Consolidated Plans to ensure that recommendations are grounded firmly in fair housing principles.

Cumberland County and Carlisle Borough have not adopted local human rights/relations ordinances; therefore, prohibitions against discrimination at the federal and state levels apply. In many jurisdictions across Pennsylvania, locally adopted provisions expand the number and type of protected classes, extending protection on the basis of sexual orientation, gender identity, marital status or other characteristics. Such ordinances usually also establish a local system for enforcement by creating a commission that receives, reviews, investigates and resolves discrimination complaints. Human rights/relations commissions commonly undertake proactive outreach activities such as commissioning paired discrimination testing – which can help determine which problems might exist in a given community and how to address them – or education and outreach that broaden awareness of housing rights and responsibilities. This topic is a priority for attendees who participated in the public engagement activities of the AI and Consolidated Planning process. The Public Policies section of the AI zoning ordinance details in 14 municipalities in the region. Each of which have shortcomings as its related to furthering fair housing choices.

In the absence of such infrastructure, much of the fair housing work in Cumberland County is carried out by agencies such as the Fair Housing Council of the Capital Region, which has existed for more than 45 years with the mission to eliminate housing discrimination by providing housing counseling, an information help line, homeownership workshops, landlord/tenant counseling, credit/debit and budget

counseling, HUD Housing counseling, and other seminars and training and publications. The Council plays a vital role in negotiating special lending programs at below market interest rates for low- and moderate-income persons. The Council, a HUD-certified counseling agency, has graduated more than 10,000 people from its homebuyers workshops offered across its service area. In 2024, there were First Time Homebuyer's Workshops locally funded by local and regional banks in the immediate area. Since its existence, the Council has had over 14,000 homebuyer workshop graduates.

#### **4. PENNSYLVANIA LEGAL SERVICES**

A national resource for fair housing in Cumberland County and Carlisle Borough is MidPenn Legal Services. MidPenn is a nonprofit, public interest law firm that provides free civil legal services to low-income residents and survivors of domestic violence and sexual assault in 18 counties in Central Pennsylvania.

MidPenn provides several key discrimination legal services programs to income eligible residents including:

- Legal Intervention for Victims and Empowerment (LIVE) offers legal representation to survivors of domestic and sexual violence in protection orders, family law, housing and expungement.
- Employment Law Project assist individuals in overcoming barriers to employment, obtaining unemployment compensation, preserving their existing jobs, and clearing up criminal records.

MidPenn has a Carlisle office that serves Cumberland County residents. Legal staff spent over 100,000 hours on cases and assisted nearly 21,100 residents in the service area (MidPenn Annual Report, Fiscal Year 2022-2023).

MidPenn provides a wide range housing protection including: foreclosure and eviction defense, housing discrimination, substandard housing, lockout and utility shut-offs by landlords, and rent deposit refunds. MidPenn provides a range of services to support fair housing and civil rights for populations facing housing discrimination. MidPenn's work includes investigating violations of state and federal fair housing laws, filing administrative complaints and engaging in affirmative litigation, land use and housing element advocacy, and conducting education, outreach, workshops, and training. MidPenn also works with state and local fair housing agencies, local governments, and other non-profits and community-based organizations to remedy discrimination in public and private housing markets and to reduce the incidence of practices that perpetuate segregation.

#### **Legal Services for Seniors**

Nearly 2.9 million Pennsylvanians are 60 and older; almost 25% of its population. The Senior Law Center exists to protect the legal rights and interests of older Pennsylvania citizens. They provide community-based neighborhood legal services, advocacy for long-term systemic solutions, professional training, advice and information and referral services, community outreach and education and direct legal services and representation. Founded in 1978, Senior Law Center is a nonprofit public interest law organization serving over 5,000 older Pennsylvanians, age 60 or older, conducts outreach events throughout the Commonwealth, and holds educational programs at community and senior centers. Senior Law Center runs five offices in the Philadelphia area.

## **D. BIAS & HATE CRIMES**

In Pennsylvania, a hate crime is defined as a criminal act motivated by ill will or hatred towards a victim's race, color, religion or national origin. In Pennsylvania, hate crimes are termed ethnic intimidation and the offense is set forth in the crimes code, Title 18, Section 2710. When certain criminal offenses are committed with the motive of hate, the crime of ethnic intimidation can also be

charged. Generally, the types of offenses to which ethnic intimidation can be added are called underlying offenses. These underlying offenses involve danger or harm to you and/or your property.

The Pennsylvania State Police and local police departments charge and investigate criminal offenses that involve ethnic intimidation. PHRC records as often as possible Bias and Hate Crimes in Pennsylvania.

PHRC does not investigate hate crimes or criminal offenses. PHRC does track incidents reported in order to inform the PA Interagency Task Force on Community Activities and Relations (Task Force). The Task Force is a group made up of state agencies who work to prevent and respond to civil tension and violence arising from conflicts between ethnic or cultural groups and when there are public expressions of bias or hate. The primary function of the group is to quickly and appropriately address civil tension when conflicts occur, and to promote positive community relations among various groups in order to prevent tension. PHRC can also assist you in determining if an act of hate also violates the PA Human Relations Act (PHRA). To obtain this assistance, contact the PHRC regional office near you.

Hate crime statistics in 2022 reveal:

*Table 40: Cumberland County Hate Crime Statistics, 2022*

<b>CASES</b>	<b>ASSAULTS</b>	<b>SEX RELATED OFFENCES</b>	<b>DESTRUCTION OF PROPERTY</b>
<b>Cumberland County Hate crimes</b>			
Offenses	1505	79	2135
Solved	1065	26	1366
<b>Carlisle Borough</b>			
Offenses	165	10	318
Solved	115	2	143
<i>Source: Pennsylvania Uniform Crime Reporting System, PCCD, Focus Report</i>			

# Chapter 7: Fair Housing Progress

Two previous AI reports have been developed among the collaborating entities. These include:

- Cumberland County Carlisle Borough 2015 AI
- Cumberland County Carlisle Borough 2019 AI
- Dauphin County Affirmatively Furthering Fair Housing (AFFH)

This section reviews the progress these communities have made in addressing the impediments identified in their previous AI and AFFH. This section reviews the progress these communities have made in addressing impediments identified in their previous AIs.

Table 41: Summary of Accomplishments

ACCOMPLISHMENTS		
Cumberland County and Carlisle Borough		
Impediment	Action	Specific Accomplishments
Housing affordability	Allocate resources to broaden availability of housing options.	-County CDBG funds continue to fund the Local Housing Options Team coordinator, who assists residents to locate rental housing. -Safe Harbour, Inc. and CCHRA completed a 52-unit affordability housing project in South Middleton Township. Future tenants must meet income requirements (at or below 50% AMI). -The 2024, Cumberland County Comprehensive Plan update provides a detailed housing section that supports providing adequate affordable housing options. The Plan also supports CCHRA programs that increase affordable home ownership and rental.
Deconcentrate subsidized housing and affordable market rentals	Create housing opportunities in areas not characterized as low-income.	-In 2018, a low-income tax credit housing project added 52 units in a new redevelopment area of the Borough.
	Monitor local zoning changes that decrease housing discrimination.	-In 2012, PHRC & CCHRA assisted Carlisle Borough with zoning amendments that incorporate diverse housing types, to broaden housing types and sizes. -In 2023, Carlisle Borough approved a zoning amendment to accommodate mixed use development.
	Promote available fair housing training and education.	-CCHRA’s Compliance Specialist focuses on implementing fair housing activities and programs.
	Require CDBG/HOME subrecipients to certify they will affirmatively	-CCHRA’s annual CDBG application supports fair housing and requires housing projects attain equal opportunity goals.

	further fair housing.	
Review transportation alternatives to rural and suburban townships.	Collaborate future transit routes with CAT.	-In 2019, CAT integrated new bus route programming that enables customers to view "in real time" the location and timing at bus stops. At the same time a new route was added for employment areas located off Route 15 servicing Upper and Lower Allen Townships. Also, service has been extended from Harrisburg to Shippensburg utilizing I-81. This route contains several park and ride options in Newville, Carlisle, and Mechanicsburg.
	Identify medium and high-density areas that would benefit from transit.	-The 2017, the Cumberland County Comprehensive Plan recommended the preparation of a Transit Development Plan that designs transit routes linking people and housing to places of employment.
Update Carlisle Borough's Comprehensive Plan.	Review the current plan for discriminatory fair housing language	-In 2018, a new Comprehensive Plan was prepared. A housing plan recommends maintaining medium and high-density lot sizes to accommodate affordability.
Create an awareness that discrimination against populations with disability is an issue.	Retain a fair housing advocacy agency to monitor discriminatory actions.	-Borough of Carlisle ensures that the Equal Opportunity poster is prominently displayed in all publicly supported rental facilities as well as the courthouse and other County and Borough facilities. -Authority staff administering the voucher program review locations of high poverty concentration with potential recipients and encourage them to seek housing outside of such neighborhoods. Since the last AI, CCHRA has given preference for those with disabilities.
	Promote education and outreach to landlords, tenants and homebuyer rights.	-CCHRA annually publishes a notice in the newspaper to inform residents of their fair housing rights and the recourse available in case they have been unfairly denied housing. -CCHRA trains all rental housing staff on fair housing, and staff members must sign a code of conduct following the training as a condition of employment. -CCHRA and Mid Penn Legal services provide several landlord/tenant education programs annually.
Uncover issues related to mortgage lender discrimination.	Provide and promote housing counseling for credit repair to ensure members of protected classes have access to decent affordability housing.	-In concert with local banks, CCHRA runs a housing counseling workshop to assist members of the protected classes in securing loans. -CCHRA offers a First Time Homebuyer Program, and homebuyer counseling classes.
<b>Dauphin County</b>		



Lack of focus of fair housing by Dauphin County officials	Provide fair housing education and outreach.	-Dauphin County expanded and increased its funding for its First-Time Home Buyers program. -Tri-County Housing Development Corporation began administering a lease to buy rental program for homeowners.
Outdated municipal zoning ordinances.	Review and amend ordinances to further fair housing.	-Seven municipal zoning ordinances were amended.
Lack of accessible, affordable housing options for persons with disabilities.	Create housing alternatives.	-Provide CDBG funding to create a local Housing options Team Coordinator position. -Dauphin County Housing Authority utilized the Section 811 program to build 12 ADA compliance rental units.
A shortage of affordable housing disparately affects housing choice.	Undertake housing projects that attract mixed income families.	-Dauphin County Redevelopment Authority created a mixed income rental housing project for low- and moderate-income households.

# Chapter 8: Fair Housing Action Plan

## A. DATA COLLECTION AND ENGAGEMENT CONCLUSIONS

Cumberland County, according to data provided in the previous chapters, has several key issues:

- Housing affordability
- Housing availability
- Rising rent and mortgage costs

Median home values, in the last ten years have increased 51% and rents have increased 41%. Increases in median rents have occurred for two reasons 1) current demand for more rental units and 2) households were having difficulties when qualifying for a mortgage.

The inventory of affordable rental units has significantly decreased and at the same time, rental rates continue to increase. The continued high price of both owner-occupied and rental housing reduces the ability of low-income households to find affordable housing. The overall number of apartments renting for less than \$700 decreased 43% in Cumberland County 44.8% in Carlisle Borough since 2010. Even more significant the number of apartments renting for less than \$1,000 in the Borough has decreased by 56%. Additionally, median contract rents have increased by 42% for a two-bedroom apartment.

Both Cumberland and Carlisle have updated their Comprehensive Plans and many local municipalities and area-wide social services participated in the Consolidated Planning process. Carlisle Borough approved more flexible residential requirements zoning amendments. Most Cumberland County municipalities have amended their zoning ordinances to include less restrictive definitions of “Family” and contain zoning districts that permit multi-story, high density residential development.

Preserving affordable housing is an ongoing challenge of the Borough and the County. Rehabilitation of existing vacant units combined with developing new affordable housing units, particularly rental housing for families, is both a short term and long-term goal of the County.

## B. SETTING FAIR HOUSING PRIORITIES AND GOALS

Following the period of public engagement conducted for the Fair Housing Assessment, program partners held meetings to analyze and interpret community comments alongside of HUD and local data in order to create regional fair housing goals. Goals have been set specific to the issues that must be addressed. Regional program partners worked with CCHRA and Carlisle Borough to help construct fair housing goals and priorities for Cumberland County, Carlisle Borough, and other jurisdictions in the County.

HUD provides a list of potential contributing factors in each section, accompanied by descriptions of those potential factors. CCHRA utilized the HUD-provided list of potential fair housing contributing factors, along with the explanation of each factor, to determine whether any factor listed creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues.

Other factors were included if they create, contribute to, perpetuate, or increase the severity of one or more fair housing issues. In addition to the analysis using HUD-provided data, local data, and local knowledge in each section of the AI, the community participation process may be of assistance to

program participants in helping to identify and prioritize the contributing factors that should be the focus of the AI. As part of the engagement process housing and social service participants:

- Identified fair housing issues and significant contributing factors
- Prioritized contributing factors, giving highest priority to those factors that limit or deny fair housing choice or access to opportunity or negatively impact fair housing or civil rights compliance
- Justified the prioritization of contributing factors; and
- Set priorities and goals to address the identified contributing factors and related fair housing issues (HUD, 2022)

### C. CONTRIBUTING FACTORS TO FAIR HOUSING ISSUES

CCHRA and Borough staff identified and prioritized the following contributing factors to fair housing issues as “medium” or “high” based on community engagement, HUD and local data. After identifying and prioritizing fair housing issues and contributing factors, program partners collaborated to determine common factors across the region.

Table 42: Contributing Factors to Fair Housing Issues

Cumberland County & Carlisle Borough Contributing Factors To Fair Housing Issues				
Fair Housing Issues	Contributing Factors This information represents the priorities identified by the County and Borough through the engagement process combined with HUD and local data	Priorities		
		Low	Medium	High
<b>Disparities in Access to Opportunity: Public Housing</b>	• Community opposition to expand new public housing		Medium	
	• Occupancy codes and zoning restrict integrated housing approaches		Medium	
	• Limitations on site selection (size & affordability)			High
	• Impediments to mobility		Medium	
<b>Disparities in Access to Opportunity: Employment</b>	• Location of affordable housing to employment centers/areas			High
	• Adequate public investment in specific neighborhoods including service and amenities			High
	• Poor acceptance of individuals with criminal backgrounds		Medium	
	• Poor acceptance of individuals with permanent disabilities	Low	Medium	
	• Lack of strong and consistent private industry partnerships for workforce training and hiring		Medium	
<b>Disparities in Access to Opportunity: Transportation</b>	• Access to jobs			High
	• Access to workforce training/ career education			High

<b>Disparities in Access to Opportunity: Education</b>	• Family relocation adjustment issues with school and students			
	• Cost of higher education			
	• Lack of private company and community college incentives			
<b>Disparities in Access to Opportunity: Environment</b>	• Lack of personal resources for critical home repairs			
	• Lack of funding to address neighborhood blight			
<b>Disparities in Access to Opportunity: Low-Income Neighborhoods Access to Services</b>	• Lending discrimination			
	• Private housing discrimination			
	• Lack of access to neighborhoods that are close to employment			
	• Impediments to mobility			
	• Lack of resources and staff to further fair housing choices			
	• Prevailing wage rates hinder affordable housing construction			
	• Lack of qualified building contractor companies focused on affordability			
<b>Disparities in Access to Opportunity: Segregated racially or ethnically concentrated areas</b>	• Community opposition towards new affordable housing projects			
	• Discriminatory housing policies in local zoning codes			
	• Existing and planned neighborhoods do not integrate low-, moderate-, and high-income families			
	• Existing and planned affordable neighborhoods lack in housing variety (type, size and style)			
	• Community opposition towards housing for people with physical and mental disabilities			
	• Lack of local incentives for larger housing redevelopment projects			
	• LMI populations cannot afford technology			
	• Private housing entities discriminate			
	• Lack of private landlord reinvestment and community engagement			
	• Landlord discrimination of rental subsidies/vouchers and diversity			
<b>Disproportionate Housing Needs</b>	• Lack of homeownership financing programs for LMI households			
	• Deteriorated properties in older Boroughs			
	• Lack of private investment or interest			
<b>Disability and Access</b>	• Income discrimination			
	• Access to transportation			

	<ul style="list-style-type: none"> <li>• Low volume of accessible housing</li> </ul>			
	<ul style="list-style-type: none"> <li>• Access or location of public housing is not convenient</li> </ul>			
	<ul style="list-style-type: none"> <li>• Landlords do not accept persons with disabilities</li> </ul>			
<b>Financing for Homeownership</b>	<ul style="list-style-type: none"> <li>• Lack of local or regional incentive programs to create paths for homeownership</li> </ul>			
	<ul style="list-style-type: none"> <li>• Lack of land trust models for homeownership</li> </ul>			
	<ul style="list-style-type: none"> <li>• Lack of engagement opportunities with Habitat For Humanity</li> </ul>			
<b>State and Federal Policy</b>	<ul style="list-style-type: none"> <li>• Overabundance of bureaucracy to obtain and spend funds for housing priorities</li> </ul>			
	<ul style="list-style-type: none"> <li>• State building codes increase affordable housing development costs</li> </ul>			
	<ul style="list-style-type: none"> <li>• State and federal grant funding programs do not make smaller housing projects viable</li> </ul>			
	<ul style="list-style-type: none"> <li>• MS4 stormwater management requirements</li> </ul>			

## D. PRIORITY GOALS AND ACTIONS

The highest priority Contributing Factors to Fair Housing based on community engagement activities and data analysis include:

- Limitations on site selection for new public housing.
- Access or location to public housing is not convenient.
- Location of affordable housing to employment centers
- Adequate public investment in specific neighborhoods including service and amenities
- Access to jobs
- Access to workforce training/career education
- Lack of funding to address neighborhood blight
- Low-income neighborhoods access services issues:
  - Limited access to employment
  - Impediments to mobility
  - Lack of resources and staff to further fair housing choices
  - Prevailing wage rates hinder affordable housing construction
- Issues related to segregated racially or ethnically concentrated areas are:
  - Community opposition towards new affordable housing projects, discriminatory housing policies in local zoning codes, existing and planned neighborhoods do not integrate low-, moderate- and high-income families or provide a housing variety (type, size and style).
  - Landlords discrimination of rental subsidies/vouchers and diversity
- Lack of homeownership financing programs for LMI households
- Deteriorated properties in older Boroughs
- Low volume of accessible housing units
- Lack of local or regional incentive programs to create paths for homeownership.

- Overabundance of bureaucracy to obtain and spend funds for housing priorities.
- MS4 stormwater management requirements

The following goals and action steps were developed as a result of specific data capture, partner agency consultation, existing programs and policies, community engagement, outreach activities and issue prioritization. Through the AI process, the following Ten goals have been developed with associated action steps as shown in Table 44:

- Goal 1: Reduce homelessness for members of protected classes.
- Goal 2: Increase affordable housing opportunities.
- Goal 3: Create innovative construction models for affordable housing.
- Goal 4: Create public awareness of fair housing laws and affordable housing advocacy.
- Goal 5: Create local and regional policy changes that benefit LMI households.
- Goal 6: Address state and federal conditions placed on funding.
- Goal 7: Increase homeownership.
- Goal 8: Improve housing opportunities for individuals with disabilities.
- Goal 9: Train and employ all work-age individuals.
- Goal 10: Improve quality of life in LMI areas

Table 44 specifically describes and lays out the top issues, priority goals and action steps that will further fair housing. Several high priority action steps have been highlighted to provide clearer direction for CCHRA, its staff and partnering agencies.

*Table 43: Goals and Action Steps to Further Fair Housing*

<b>GOALS AND ACTION STEPS TO FURTHER FAIR HOUSING</b>		
<b>Top Issue</b>	<b>Goals</b>	<b>Action Steps</b>
<b>Homelessness</b>		
<b>Goal 1</b>	<b><i>Reduce homelessness for members of protected classes.</i></b>	<ol style="list-style-type: none"> <li>1. Prepare regional homeless strategies that includes the roles and responsibilities of local social services, the County, aging and senior facilities, and municipalities with larger LMI areas. The strategy should also include priority short and long term goals, objections and strategies for implementation.               <ol style="list-style-type: none"> <li>a. Provide annual resources to assist in implementing the Homeless Strategy.</li> </ol> </li> <li>2. Increase financing resources to service providers for targeted emergency and transitional housing.</li> <li>3. Increase case manager staffing at existing service providers to citizens needing affordable housing and homeless individuals and families.</li> <li>4. Provide education and training for landlords and property management groups about affordable housing needs, community involvement, and property reinvestment.</li> <li>5. Enhance communications/resource sharing between service agencies to improve existing homeless service programs and actions.</li> </ol>
<b>Affordable Housing</b>	<b>Goals</b>	<b>Action Steps</b>

<p><b>Goal 2</b></p>	<p><i><b>Increase affordable housing opportunities.</b></i></p>	<ol style="list-style-type: none"> <li>1. Update Carlisle Borough’s Comprehensive Plan to achieve consistency with fair housing standards.</li> <li>2. Create a subsidy program for available market rate dwellings. This affordable rate would be subsidized by the County or a designated entity.</li> <li>3. <b>Reduce local and regional barriers associated with new public housing projects by:</b> <ol style="list-style-type: none"> <li>a. <b>Reduce restrictions for higher density residential uses and create flexible dimensional requirements in Townships.</b></li> <li>b. <b>Govern public housing development the same as market rate housing development proposals.</b></li> </ol> </li> <li>4. Increase the supply of affordable housing by creating redevelopment incentive programs in targeted areas for future owner-occupied and rental occupied housing projects. <ol style="list-style-type: none"> <li>a. Encourage County action on Act 152-2016 to use deed recording fees for blighted property demolition. (Dauphin County has generated over \$600,000).</li> </ol> </li> <li>5. <b>Create a development collaboration between CCHRA/CAEDC/REC. Improve local infrastructure at redevelopment sites.</b></li> <li>6. Cumberland County should consider a balanced approach when allocating CDBG funding as it relates to the ways in which to increase affordable housing. <ol style="list-style-type: none"> <li>a. Projects including added workforce training and education, transportation to work, financial assistance for daycare, rehabilitation of renter-occupied units, and new construction.</li> </ol> </li> <li>7. <b>Partner with PA Housing Affordability Fund program for rental assistance to increase affordable housing opportunities.</b></li> <li>8. <b>Engage private property owners.</b> <ol style="list-style-type: none"> <li>a. <b>Work to promote the work of LHOT who is working with the Capital Area Rental Property Owners Association to help engage, educate, and incent new landlords to participate in the voucher program.</b></li> <li>b. Consider the development of an incentive program where landlords of affordable units are paid to hold the unit until a tenant can be placed in the unit (approximately one to three months).</li> <li>c. Initiate an annual landlord training program that can be provided in key areas of the</li> </ol> </li> </ol>
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		<p>County. Particularly Shippensburg, Mechanicsburg, Carlisle, and West Shore area communities.</p> <p>9. Take advantage of tax incentive programs including LERTA.</p> <p>10. <b>Create local tax incentive program for affordable housing developers and or property owners.</b></p>
<b>Goal 3</b>	<b><i>Create innovative construction models for affordable housing.</i></b>	<p>1. Start carpentry, mechanical, plumbing, and electrical training at a younger age.</p> <p>2. Create programs that involve local skilled trades companies.</p> <p>3. Explore more ways to work with Habitat for Humanity. Promote the training opportunities with Habitat service workers. Such training also includes basic family budgeting, and timely rent payments, etc.</p> <p>4. <b>Create a flexible business model for new development to include a percentage of the units be available for homeownership and rental. The business model could incorporate financial options for homeownership.</b></p> <p>a. <b>Incorporate CCHRA’s processes for housing development that include: home ownership education, budgeting, and home maintenance education and skills.</b></p>
<b>Advocacy</b>	<b>Goals</b>	<b>Action Steps</b>
<b>Goal 4</b>	<b><i>Create public awareness of fair housing laws and affordable housing advocacy.</i></b>	<p>1. CCHRA and Cumberland County should develop a municipal outreach program about the positive impacts of affordable housing in their communities.</p> <p>a. <b>Change local attitudes about affordable housing. Begin educational programs that promote the positives of mixed income neighborhoods.</b></p> <p>2. <b>The County is encouraged to affirmatively further fair housing by adopting an official affirmative marketing policy that monitors housing developer compliance over time.</b></p> <p>3. <b>Assign County or CCHRA staff to annually review apartment rental advertisements released by private housing companies. A County representative could complete an annual site visit to review tenant listings and advertisement records particularly for housing agencies that receive CDBG and HOME funds.</b> If discrimination has occurred, County policies may refer all matters to PHRC and/or HUD.</p> <p>4. Encourage social services to advocates of affordable housing by becoming more aware of discriminatory</p>



<b>Policy</b>	<b>Goals</b>	<b>Action Steps</b>
<b>Goal 5</b>	<b><i>Create local and regional policy changes that benefit LMI households.</i></b>	<p>local land use laws and to attend meetings where there are pending affordable housing projects.</p> <ol style="list-style-type: none"> <li>1. The Cumberland County Planning Department (CCPD) should collaborate with Carlisle Borough and CCHRA to create fair housing policies that encourage non-discriminatory municipal zoning and land use practices and policies. <ol style="list-style-type: none"> <li>a. Create a model ordinance for local municipalities.</li> <li>b. <b>Identify priority areas for new housing and or housing rehab where employment opportunities exist.</b></li> <li>c. Reduce minimum unit and lot size, parking, impervious, and or building coverage requirements.</li> <li>d. Create density bonus options</li> <li>e. Prepare a flexible definition for <i>Family</i></li> <li>f. <b>Create policies for housing development plans that encourages an integrated approach to development. Such policies could prioritize accessibility and permit a variety of living situations.</b></li> </ol> </li> <li>2. Local municipalities should reduce single family dwelling conversions in areas where disinvestment has occurred.</li> <li>3. <b>CCPD and CCHRA together should advocate and support the importance of integrated housing approaches to priority municipalities where a majority of families work.</b></li> <li>4. <b>As part of its CDBG or HOME project selection process, the County would provide funds those municipalities who permit integrated housing opportunities.</b></li> <li>5. Understand the specific redevelopment obstacles related to construction on the local and County level that can be changed.</li> <li>6. Update Carlisle Borough’s Comprehensive Plan to achieve consistency with fair housing standards.</li> </ol>
<b>Goal 6</b>	<b><i>Address state and federal conditions placed on housing development.</i></b>	<ol style="list-style-type: none"> <li>1. Establish a committee in partnership with the Central Pennsylvania Planning Association to review and provide impactful change to state and federal affordable housing policies.</li> <li>2. <b>Create ways to minimize the strings attached to funding by working with state and federal agencies that make policy changes.</b></li> <li>3. <b>Create change in HUD policies to fund both market rate and affordable rate integrated housing projects.</b></li> </ol>

		<p>a. <b>Advocate to reduce or eliminate prevailing wage rates requirements for new housing or housing rehab projects.</b></p> <p>4. Work with PHFA to change its debt program so that it becomes a more useful and widely used tool.</p> <p>5. <b>Advocate for reduced MS4 stormwater management requirements related to affordable housing development projects.</b></p>
<b>Homeownership</b>	<b>Goals</b>	<b>Action Steps</b>
<b>Goal 7</b>	<b>Increase home ownership.</b>	<p>1. Explore the use of land trust agencies where a homeowner would own the building but not the land therefore reducing the overall housing costs.</p> <p>2. Advocate for local mortgage lending institutions to better serve minorities and LMI households.</p> <p>a. Create gap financing programs and resources for LMI families who would like to become homeowners.</p> <p>3. <b>Seek out new resources and provide additional programs for LMI homebuyers.</b></p> <p>4. <b>Welcome first-time homebuyers by establishing more municipal First-Time Home Buyer Programs throughout the County.</b></p> <p>5. <b>Retain existing homeowners by creating housing reinvestment programs and resources for property owners throughout the County.</b></p> <p>6. Strategically target investment to proactively prevent or reduce blight. Deploy the use of the “Bubble Property” methodology.</p>
<b>Accessibility</b>	<b>Goals</b>	<b>Action Steps</b>
<b>Goal 8</b>	<b>Improve housing opportunities for individuals with disabilities.</b>	<p>1. Complete research on regional scale to see where employee/employer transportation and ridesharing opportunities lie in the County.</p> <p>2. <b>Improve public and private sector transportation opportunities and services for employees. Employers can help subsidize local transit programs.</b></p>
<b>Employment/Work force Training</b>	<b>Goals</b>	<b>Action Steps</b>
<b>Goal 9</b>	<b>Train and employ all work-age individuals.</b>	<p>1. Improve housing quality and accessibility through workforce training initiatives with trades industry.</p> <p>2. <b>Improve education and provide skills training for healthcare and warehousing jobs</b></p> <p>a. Create partnerships with organizations such as Partnerships for Better Health, the builders association, HACC, Junior Achievement, local school districts, and local vocational technical schools.</p>

		<ul style="list-style-type: none"> <li>b. Mimic workforce development programs similar to “Road to Success” in Montgomery County.</li> <li>c. Increase training opportunities that target “Second Chance” individuals.</li> </ul> <p>3. Increase the number of qualified buildings/contractors in the County</p>
<i>Quality of Life</i>	<i>Goals</i>	<i>Action Steps</i>
<b>Goal 10</b>	<i>Improve quality of life in LMI areas.</i>	<ol style="list-style-type: none"> <li>1. <b>Increase public investment to improve neighborhoods through streetscape amenities, safety and greening initiatives and through codes enforcement efforts with property owners.</b></li> <li>2. <b>Establish guidelines for municipal rental property inspection programs as a way to combat issues of blight and deterioration in rental housing.</b> <ul style="list-style-type: none"> <li>a. Local programs could be multi-municipal with shared costs.</li> <li>b. Enforces routine rental inspection that encourage landlords make financial decisions to either reinvest or to sell.</li> </ul> </li> <li>3. <b>Establish a County-wide funding programs for fixing property code violations for LMI households.</b> Specifically, the Borough of Carlisle provides revolving loan funds for code violation and rehabilitation properties.</li> <li>4. Improve access to technology. Technology improvements are needed in downtown Carlisle as a shift from a manufacturing economy to a service economy is happening.</li> </ol>

# Appendix A – Federal Fair Housing Laws

- *Title VI of the Civil Rights Act of 1964 (Title VI)*: Title VI is intended to protect the rights of individuals regardless of race, color, or national origin in programs and activities that receive federal funding or financial assistance.<sup>3</sup>
- *Title VIII of the Civil Rights Act of 1968 (Fair Housing Act)*: The Fair Housing Act (adopted in 1968 and amended in 1988) prohibits housing discrimination against any of the following seven protected classes: Race, Color, Religion, Sex, National Origin, Familial Status, and Disability<sup>3,4</sup>
  - As amended in 1988, the Fair Housing Act added “familial status” and “disability” as protected classes and increased HUD’s authority to establish mandatory enforcement measures to ensure compliance with federal law.<sup>5</sup>
- *Section 504 of the Rehabilitation Act of 1973 (Section 504)*: Section 504 established guidelines that prohibit individuals with disabilities from being denied access to housing under programs and activities that receive federal funding or financial assistance.<sup>6</sup>
- *Section 109 of Title I of the Housing and Community Development Act of 1974 (Section 109)*: Section 109 prohibits housing discrimination based on race, color, national origin, sex, or religion under programs and activities that receive federal funding or financial assistance.<sup>7</sup>
- *Title II of the Americans with Disabilities Act of 1990 (Title II)*: Title II prohibits discrimination based on disability under programs, services, and activities provided by public entities. HUD is responsible for enforcement of Title II when it is associated with public housing, housing assistance, and housing referrals administered by state and local jurisdictions.<sup>8</sup>
- *Architectural Barriers Act of 1968 (Architectural Barriers Act)*: The Architectural Barriers Act mandates that buildings and facilities that received federal funding assistance after September 1969 be accessible to and functional for handicapped individuals.<sup>9</sup>
- *Age Discrimination Act of 1975 (Age Discrimination Act)*: The Age Discrimination Act prohibits programs or activities that receive federal funding from discriminating against individuals on the basis of age, unless such discrimination is authorized by federal, state or local laws.<sup>10</sup>
- *Title IX of the Education Amendments Act of 1972 (Title IX)*: Title IX prohibits educational programs or activities that receive federal funding or financial assistance from discriminating against individuals on the basis of sex.<sup>11</sup>
- In addition to federal fair housing laws that guarantee equal access to housing, a number of presidential executive orders were also issued to minimize discrimination and barriers to obtaining housing.

In 1988, disability and familial status (the presence or anticipated presence of children under 18 in a household) were added (further codified in the Americans with Disabilities Act of 1990).<sup>[5]</sup> In certain circumstances, the law allows limited exceptions for discrimination based on sex, religion, or familial status.

In 2017, a federal judge ruled that sexual orientation and gender identity are protected classes under the Fair Housing Act. As of May 2018, there is an additional pending effort to amend the Fair Housing Act to make this explicit (HR 1447).

# Appendix B – Public Outreach

See enclosed documentation coming soon.

# Appendix C – Adoption

See enclosed documentation coming soon.