

Analysis of Impediments
to
Fair Housing Choice

City of Reading
2019 – 2023

Introduction

The City of Reading is an entitlement community and receives federal Community Development Block Grant (CDBG), Home Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) Program funds from the U.S. Department of Housing and Urban Development (HUD). As a result, the City is charged with the responsibility of conducting CDBG, HOME, ESG, and any other federal programs in compliance with the federal Fair Housing Act. The responsibility of compliance with the federal Fair Housing Act extends to nonprofit organizations and other entities that receive federal funds through the City.

Furthermore, all communities that receive money from HUD must certify that they will “affirmatively further fair housing.” One method to achieve this requirement is for a community to conduct an Analysis of Impediments to Fair Housing (AIFH).

The completion of a fair housing analysis and identification of fair housing impediments is the first phase in fair housing planning. The elected governmental body is expected to review and approve the analysis and use it for direction, leadership, and resources for future fair housing planning. The AIFH serves as a baseline for progress against which implementation efforts will be judged. The AIFH involves:

- The evaluation of population, household, income, and housing characteristics by protected classes in the City of Reading.
- The evaluation of public and private sector policies that impact fair housing choice.
- The identification of blatant or de facto impediments to fair housing choice, where any may exist.
- Recommendations for specific strategies to overcome the effects of any identified impediments.

The City of Reading has completed this AIFH to correspond with the years of the City’s new Consolidated Plan which are 2019-2023. The intent of the AIFH is to identify and devise actions which may impact any impediments to fair housing choice that citizens currently living in or seeking to live in the City may face. The AI to fair housing choice is a review of a jurisdiction’s laws, regulations and administrative policies, procedures, and practices affecting the location, availability, and accessibility to housing, as well as an assessment of conditions, both public and private, affecting fair housing choice.

In addition to the Housing and Community Development Act of 1974, the Civil Rights Act of 1968 also directs HUD’s review of fair housing practices. An amendment to Title VIII of the Civil Rights Act was passed in 1988. The Amendment, known as the Fair Housing Act of 1988, expanded the scope of coverage of the law to include families with children and handicapped persons as protected classes. Enforcement powers for HUD, including a monetary penalty for discrimination, were also added.

Methodology

The City conducted the AIFH using the following sources: (1) the most recently available demographic data regarding population, household, income, and employment at the census tract and municipal levels; (2) public policies which affect the location and development of housing; (3) lending institution financial data from the Home Mortgage Disclosure Act (HUMDA); (4) community engagement; and (5) agencies that provide housing and housing-related services to members of protected classes.

The primary source of data for this report is Census 2010. In some instances, more recent data is used. Throughout this analysis, comparisons are made between white/ethnic majority residents and racial/ethnic minority residents. In the City of Reading, racial/ethnic minority residents include African Americans, American Indians/Alaskan Natives, Asians/Pacific Islanders, persons of some other race alone, persons of two or more races, and Hispanics. Except African American and Hispanic residents, the number of persons within each of these racial/ethnic minority groups is too small for the Census Bureau to provide data at the municipality level or census tract level. As a result, most comparisons of the trends and conditions are provided only for white residents, black residents, and Hispanic residents.

Community engagement activities began on August 28, 2017 as a partnered approach with the County of Berks, with outreach to local and regional stakeholders. In-person meetings or calls were scheduled to discuss key items and to obtain information which could provide insight to the AI. Stakeholder meetings were held on September 14, 2017 at the County Agricultural Center. More than 25 agencies were invited to attend the meetings with others being contacted by phone for interviews. Those agencies that could not attend were later contacted by phone. These agencies, organizations, and public entities often act as a conduit between the public and local government. While they are not the equivalent of obtaining information directly from the public, they are critical in providing information for underserved groups as well as those who do not wish to engage in a public outreach process. They are also useful partners in dispensing information and helping to spread the word regarding announcements or public notifications. Three meeting/intake sessions with key stakeholders were attempted. Staff contacted the remaining stakeholders and those who could not attend the sessions by phone. The following stakeholders were represented at the sessions:

Stakeholder Meeting #1 – Berks Community Action Program (BCAP), Hispanic Center of Reading & Berks County, American Red Cross, Habitat for Humanity of Berks County, YMCA of Reading & Berks County, Abilities in Motion, Salvation Army, Berks Area Regional Transportation Authority, and Our City-Reading, Inc.

Stakeholder Meeting #2 – Greater Reading Economic Partnership, Berks County Workforce Development Board, Real Estate Investors Association, Reading-Berks Association of Realtors, Berks Coalition to End Homelessness, Rural Opportunities Inc., and Neighborhood Housing Services of Berks County.

Stakeholder Meeting #3 – Co-County Wellness Services, Safe Berks, Council on Chemical Abuse, Hope Rescue Mission, Catholic Social Services, Berks County Area Agency on Aging, Berks County Housing Authority, Threshold Rehabilitation Services of Berks, Family Promise of Berks County, and the Children’s Home of Reading.

Stakeholder Meeting #4 – Hogar-Crea, Mary’s Shelter, Prospectus Berco, the Junior League of Reading, Opportunity House, Career Link, Community Prevention Partnerships, Centre Park Historic District, College Heights Community Council, Northeast Community Spring Board Coalition, Outlet Area Neighborhood Group, Penn’s Common Neighborhood Group, and Berks County MH/DD.

Fair Housing Choice

Equal and free access to residential housing (housing choice) is fundamental to meeting essential needs and pursuing personal, educational, employment, or other goals. Because housing choice is so critical, fair housing is a goal that government, public officials, and private citizens must achieve if equality of opportunity is to become a reality.

Fair housing choice is defined as the "ability of persons, regardless of Race, Color, Religion, Sex, National Origin, Familial Status, Disability, or of similar income levels to have available to them the same housing choices." This analysis encompasses the following six areas:

- The sale or rental of dwellings (public and private)
- The provision of housing brokerage services
- The provision of financing assistance for dwellings
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority or ethnic concentration, and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by the U.S. Department of Housing and Urban Development (HUD) regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

Federal Fair Housing Act

The Federal Fair Housing Act covers most housing. In some circumstances, the Act exempts owner-occupied buildings with no more than four units, single-family housing sold or rented

without the use of a broker, and housing operated by organizations and private clubs that limit occupancy to members.

What is Prohibited?

1. In the Sale and Rental of Housing

No one may take any of the following actions based on Race, Color, National Origin, Religion, Sex, Familial Status, or Disability:

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different terms, conditions, or privileges for the sale or rental of a dwelling
- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale, or rental
- For profit, persuade owners to sell or rent (blockbusting) or
- Deny anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing.

2. In Mortgage Lending

No one may take any of the following actions based on Race, Color, National Origin, Religion, Sex, Familial Status, or Disability:

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

3. Other Prohibitions

It is illegal for anyone to:

- Threaten, coerce, intimidate, or interfere with anyone exercising a fair housing right or assisting others who exercise that right
- Advertise or make any statement that indicates a limitation or preference based on Race, Color, National Origin, Religion, Sex, Familial Status, or Disability. This prohibition against discriminatory advertising applies to

single-family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

Additional Protections for the Disabled

If someone has a physical or mental disability (which can include hearing, mobility, and visual impairments, chronic alcoholism, chronic mental illness, AIDS, and mental retardation) that substantially limits one or more major life activities, or has a record of such a disability, or is regarded as having such a disability, a landlord may not:

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

A "reasonable accommodation" is a change, exception, or adjustment to a rule, policy, practice, or service that may be necessary for a person with a disability to fully enjoy their apartment or house. Common accommodations include providing a mobility-impaired person with an accessible parking space, allowing a tenant to have a service animal, or the installation of a ramp for wheelchair access.

Requirements for New Buildings

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

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

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

Housing Opportunities for Families

Unless a building or community qualifies as housing for older persons, it may not discriminate based on familial status. That is, it may not discriminate against families in which one or more

children under the age 18 live with:

- A parent
- A person who has legal custody of the child or children or
- The designee of the parent or legal custodian, with the parent or custodian's written permission.

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

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

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

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

The Pennsylvania Human Relations Act (PHRA)

The Pennsylvania Human Relations Act, as amended, prohibits housing discrimination based on Race, Color, Familial Status, Religion, Ancestry, Disability, Age, Sex, National Origin, and the use of guide or support animals because of a disability.

The PHRA is enforced by the Pennsylvania Human Relations Commission (PHRC).

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

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

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

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

- Discriminatory real estate practices, including refusal to sell or lease housing accommodations to members of the protected classes
- Discrimination in the terms and conditions of real estate transactions
- Discrimination in the lending of money to acquire, construct, rehabilitate, repair, or maintain housing
- Discrimination in the refusal to make reasonable accommodation
- Advertising or marketing real estate in a way that makes members of the protected classes feel unwelcome or not solicited
- Making an inquiry concerning Race, Color, Familial Status, Age, Religion, Ancestry, Sex, National Origin, or Disability

Census Data

HUD defines areas of racial or ethnic concentration as geographical areas where the percentage of minorities or ethnic persons is 10 percentage points higher than the City's percentage, and, while there may exist areas of minority or ethnic concentration, other characteristics must also be present before a potential impediment to fair housing can be identified. For example, if high rates of poverty and low-moderate income persons are also found within an area of minority concentration, there *may* exist a potential impediment to fair housing choice.

Background Data

Total Population

The City of Reading, located in eastern Pennsylvania, has experienced a consistent increase in population beginning in 1990. In 2017, American Community Survey (ACS) data reported a total population of 88,300. The 2010 census data reported that the total population was 88,082. This represents an increase of 218 people in 7 years.

Protected Classes

Persons by Race and Ethnic Origin

The racial make-up of the City of Reading has continued to undergo a significant shift with the number of racial minority residents, which initially began increasing in 1990. Between 1990 and 2000, the number of racial minority residents more than doubled from 16,740 to 44,178. American Community Survey (ACS) data reveal that these trends have continued. In 2017, the City's racial minority population was estimated at 67,818 residents which was equivalent to 76.8% of the total population.

The minority population is diversifying and increasing. In 2017, ACS reported that blacks represented 12.1% of the population.

**Figure 1
Population Trends - 2000 to 2010**

	2000	2010	% Change 2000 - 2010
Pennsylvania	12,281,054	12,702,379	3.80%
Berks County	373,638	411,442	9%
Reading city	81,207	88,082	7.80%

In the previous analysis of impediments, persons of “some other Race alone” were the largest minority group in the City of Reading. However, according to the most recent census data, this is no longer true. Racial/ethnic minorities make up 78.5% of the population with the largest group now being Hispanics (66.5%).

The second largest group is those persons of “two or more races”. This group now comprises 18.9% of the population.

Between the years of 2000 through 2010 Blacks have remained the 3rd largest minority group behind Hispanics. In 2010 Blacks made up 13.2% of the city population.

**Figure 2
Trend in Population by Race & Ethnic Origin 2000-2010**

	2000		2007		2010		% Change 2000 – 2010
Total Population	81,207	100.0%	80,951	100.0%	87,994	100%	100.0%
White Population	48,059	59.2%	45,794	56.6%	42,617	48.4%	-11.3%
Non-White Population	33,148	40.8%	35,157	43.4%	45,377	51.6%	36.8%
Black	9,947	12.2%	10,565	13.1%	11,624	13.2%	16.9%
American Indian/Alaskan Native	356	0.4%	128	0.0%	794	0.9%	1.2%
Asian/Pacific Islander	1,328	1.6%	1,532	2.0%	1,111	1.3%	-16.3%
Some other Race Alone	18,125	22.3%	20,337	25.1%	26,538	30.2%	46.4%
Two or more Races	3,392	4.2%	2,595	3.2%	5,398	6.1%	59.1%
Hispanic	30,302	37.3%	40,690	50.3%	51,230	58.2%	69.1%

Although progress has been made in terms of decreasing disproportions with minority representation in the County most specifically through the increase of Hispanic residents, the

majority of racial and ethnic minorities continue to reside in the City.

Figure 3 demonstrates that the populations in the County of Berks and the City of Reading, are majority white.

**Figure 3
Population by Race and Ethnic Origin**

	Total	White	Non-White	Hispanic
Berks County	421,164	86.90%	13.10%	22.50%
Reading city	88,375	53.5%	46.5%	66.50%

The minority population of Berks County continues to be heavily concentrated in the City of Reading, which is the largest city in the County. The disparity between the percentage of minorities living in the boroughs and townships and the percentage residing in the City of Reading may suggest that housing options are limited for ethnic and or racial minorities outside of the City due to several factors which may include economics.

**Figure 4
Population by Race and Ethnic Origin – 2010**

	Total	White alone	All Minorities	Hispanic	Black	American Indian / Alaskan Native	Asian Alone	Hawaiian / Pacific Islander	Some other Race Alone	Two or More Races
Berks County	411,442	342,148	69,294	67,355	20,143	1,285	5,385	128	32,101	10,252
Reading City	88,082	42,617	45,465	51,230	11,624	794	1,039	72	26,538	5,398
Reading as a % of the County	22%	12%	66%	76%	58%	62%	19%	56%	83%	53%

As the chart demonstrates the City of Reading continues to have the largest concentration of minorities and Hispanics. Whites make up 48.4% of city of Reading’s population, blacks make up 13.2% and Hispanics make up 58.1% of the population.

Upon evaluating the previous numbers since 1990 the data reveals that although ethnic and racial minorities have moved into the boroughs and townships of the County the majority remains in the City, suggesting a persisting pattern of concentration of ethnic minorities. Minorities only represent 17% of the County’s population.

Figure 5
Change in Population by Race and Ethnic Origin-2010

	White	All	Hispanic	Black	American Indian / Alaskan Native	Asian	Some other Race Alone	
Berks County	37,804	12,688	25,116	30,998	6,365	674	1,600	11,784
Reading city	6,875	-5,892	12,317	20,928	1,677	438	-257	8,413

HUD defines an area of racial or ethnic concentration as an area with a population of racial or ethnic minority residents of 10 percentage points or higher than the City’s overall percentage. Concern over the situation of areas of concentrations of racial/ethnic minority residents generally arise when the same geographic areas are also noted to contain a disproportionately higher rate of low-income persons, lower homeownership rates and higher rates of unemployed or underemployed persons, among other issues.

Figure 6
Areas of Concentration of Minority and Hispanic Residents, City of Reading – 2010

	Total Population	All Minorities	Hispanic	Black	Some other Race Alone
Berks County	411,442	12%	10%	4%	5%
Reading city	88,082	41%	37%	12%	22%
CT 1	5,346	38.9%	61.1%	13.8%	31.4%
CT 2	3,970	38.4%	57.7%	17.3%	30.7%
CT 3	2,172	35.3%	49.6%	13.5%	27.2%
CT 4	3,936	40.4%	57.3%	13.5%	32.1%
CT 5	3,554	35.7%	52.6%	8.6%	28.4%
CT 6	3,261	15%	18.1%	9.9%	6.6%
CT 7	4,196	38%	59.1%	10.1%	29.0%
CT 8	4,405	49.1%	68.3%	9.3%	39.6%
CT 9	2,696	36.7%	49.5%	18.0%	28.9%
CT 10	3,248	43.8%	68.7%	19.3%	33.9%
CT 11	4,184	43.9%	70.2%	17.6%	35.9%

CT 12	1,741	44%	67.3%	25.6%	36.0%
CT 13	2,970	36.1%	68.2%	17.7%	29.2%
CT 14	4,494	50%	74.8%	9.6%	40.0%
CT 15	3,730	45.9%	68.0%	10.7%	34.6%
CT 16	2,670	39.5%	58.9%	10.1%	28.6%
CT 17	3,224	52.9%	77.6%	6.5%	42.9%
CT 18	2,874	28.8%	38.3%	13.5%	20.6%
CT 19	2,539	35.8%	56.3%	16.7%	28.9%
CT 20	4,181	29.4%	44.2%	13.5%	22.0%
CT 21	2,783	39.3%	59.9%	15.3%	32.3%
CT 22	2,026	46.7%	75.3%	15.6%	39.6%
CT 23	2,186	47%	69.3%	12.5%	40.0%
CT 25	3,201	41.9%	69.8%	17.6%	33.7%
CT 26	3,330	40.8%	68.7%	13.5%	31.4%
CT 27	2,071	16.7%	22.4%	7.0%	12.0%
CT 29	3,094	15.3%	20.9%	7.6%	9.8%

Source: U.S. Census Bureau, Census 2010,

Ancestry

There were 19% foreign born persons living in the City of Reading between 2010 – 2012. Of that number 31% were naturalized U.S. citizens, and 93% entered the County before the year 2010, 8% entered the County in 2010 or later.

Between 2010- 2012 81% of people living in the City were native residents of the United States. More than half (52%) remained living in the state in which they were born.

**Figure 7
Foreign-Born Population by Municipality – 2008-2012**

	Total Population	Foreign-Born Residents						Total Foreign-Born Residents	
		Native-Born Residents		Naturalized Citizens		Not Citizens		#	%
		#	%	#	%	#	%		
Pennsylvania	12,281,054	11,772,763	95.9%	257,339	2.1%	250,952	2.0%	508,291	4.1%
Berks County	373,638	357,606	95.7%	7,116	1.9%	8,916	2.4%	16,032	4.3%

Reading city	81,201	72,685	89.5%	2,607	3.2%	5,909	7.3%	8,516	10.5%
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Source: U.S. Census Bureau: American Community Survey 5-Year Estimates 2008- 2012 (B05002)

Family Households and Female-Headed Households

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

In the boroughs and townships of Berks County, there were 103,312 family households in 2012. Of the 151,291 total households, 18,978 were female-headed households. Female-headed households increased by 1.4% from 2007 to 2012. The number of male headed households showed an increase as well. In 2007, male households were at 4.9% but increased to 5.4% by 2012.

Figure 8
Trends in Household Types – 2000 to 2012

	2000		2007		2012	
	#	%	#	%	#	%
Total Households	141,570	100.0%	149,410	100.0%	151,291	100%
Family Households	98,463	69.6%	104,612	70.0%	103,312	68.3%
Married Couple Households	78,517	55.5%	80,661	54.0%	76,132	50.3%
With children	33,370	23.6%	35,026	23.4%	28,503	18.8%
Without children	45,147	31.9%	45,635	30.5%	47,629	31.5%
Female-Headed Households	14,038	9.9%	16,609	11.1%	18,978	12.5%
With children	8,218	5.8%	12,201	8.2%	11,159	7.4%
Without children	5,820	4.1%	4,408	3.0%	7,819	5.2%
Male-Headed Households	5,908	4.2%	7,342	4.9%	8,202	5.4%
With children	3,273	2.3%	4,039	2.7%	4,353	2.9%
Without children	2,635	1.9%	3,303	2.2%	3,849	2.5%
Non-Family and 1-person Households	43,107	30.4%	44,798	30.0%	47,979	31.7%
Average Household Size	2.55	--	2.61	--	2.65	--

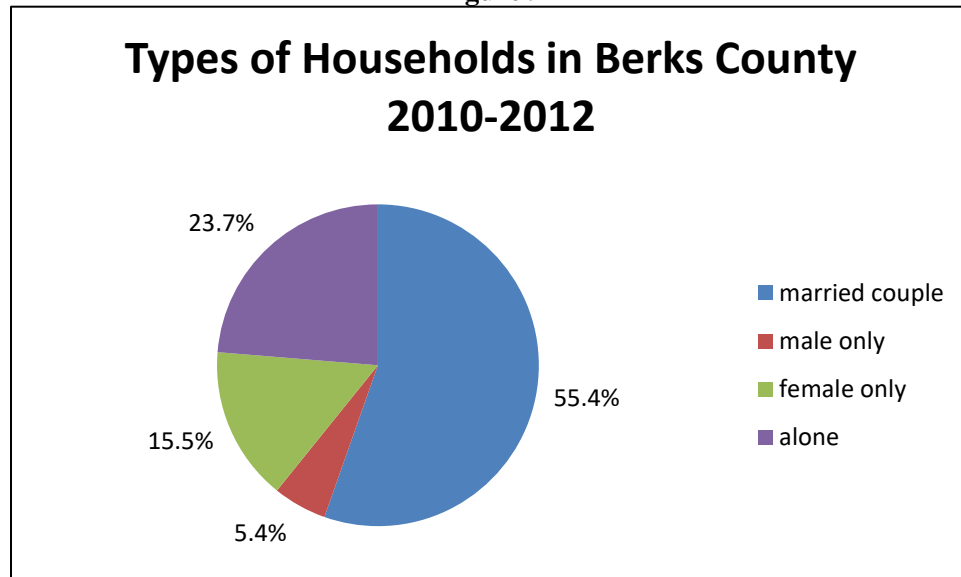
Sources: U.S. Census Bureau and American Community Survey 1 year estimates 2012 (DP-02)

As Figure 8 demonstrates family households decreased from 2007 to 2012 by 1.7%. Married households decreased by 3.7% and married households without children experienced the largest decrease from 23.4% in 2007 to 18.8% in 2012 (which is a 4.6% decrease).

The data contained in Figure 9 is for the Townships and Boroughs in the County of Berks. The figure demonstrates that married couples make up the highest percentage of households across all categories.

Female headed households, Hispanic households are at 31.3%, followed by some other Race alone (31%) then Black households at 19.6% followed by White households at (11.2%).

Figure 9



Source: U.S. Census Bureau, Census 1year estimate 2012

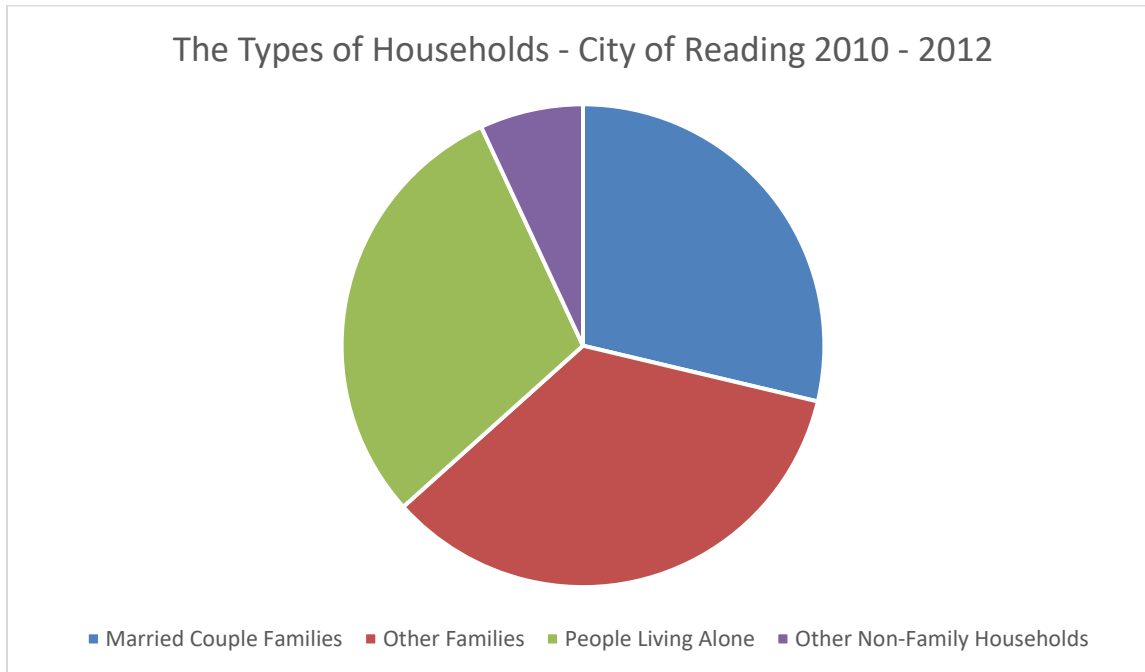
In 2010- 2012 there were 31,000 households in the City of Reading, with the average household size of 2.8 people.

Families account for 63% of city households which includes married couples (29%) and other families (35%). 19% are female headed households with no husband present but children are in the home. Non-family households made up 37% of all city households. Some of the nonfamily households were people living alone however some households were comprised of non- related people living together.

Additionally. 43% of all city households had one or more people under the age of 18 and 21% had one or more people over the age of 65 years.

Figure 10

Source: U.S. Census Bureau



Disability Status

The Census Bureau reports disability status for non-institutionalized disabled persons age 5 and over. As defined by the Census Bureau, a disability is a long-lasting physical, mental, or emotional condition. This condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

Discrimination based on physical, mental, or emotional handicap, provided “reasonable accommodation” can be made, is prohibited under the Fair Housing Act. Reasonable accommodation may include changes to address the needs of disabled persons and may include adaptive structural changes as well as administrative changes, provided these changes can reasonably be made.

Berks County had 405,986 non-institutionalized persons age 5 years and older between the years of 2008 through 2012. Of these, 52,021 or 13% had at least one disability.

The City of Reading was one of the twenty-six municipalities that had rates that were the same or higher than the rate of disabled persons than the County overall.

Figure 11
Persons with Disabilities – 2008 – 2012

	Civilian Non-institutionalized Population 5 years and older	With one or more disabilities	Percent
Berks County	405,986	52,021	13%
Reading city	87,523	16,452	19%

Source: U.S. Census Bureau, Census 2008 - 2012

Income Data

Median Household Income

In 2012, the median household income (MHI) in the City of Reading was \$26,777 compared to the MHI of \$55,170 for the County of Berks residents.

As shown in Figure 12, Black, some other Race alone, and Hispanic households generally have lower incomes than White households. In the lowest income category (under \$24,999) these three groups had the highest percentages (52%, 54%, and 49% respectively). The category where incomes are similar for all races noted in the chart is between \$25,000 and \$49,999. As the chart demonstrates, Whites were at 25%, Blacks at 27%, some other Race alone 24%, and Hispanics 26%.

In 2011, the City of Reading was named as having the largest share of residents living in poverty in all U.S. cities with a population of 65,000 or more. A total of 41.3% of city residents and 13.7% of county residents were considered impoverished. In 2013 that number decreased slightly to 40.5% in the City but rose to 14.6% in the County.

Figure 12
Household Income by Race and Ethnicity – 2012

	White	Black	Some Other Race	Hispanic
Number of Households		7,698	5,810	19,083
% Households by Income				
\$0 to \$24,999	20%	52%	54%	49%
\$25,000 to \$49,999	25%	27%	24%	26%
\$50,000 to \$74,999	20%	13%	15%	11%
\$75,000 and higher	35%	8%	7%	14%

*Native Hawaiian/Pacific Islanders and American Indians/Alaskan Natives were not included due to small populations

Source: U.S. Census Bureau, Census 2012

In the higher income categories, the percentage drops significantly for Blacks, Hispanics, and some other race alone. Whites account for 35% of persons with incomes at \$75,000 or above

whereas Blacks, some other race alone and Hispanics do not together total 35% (Blacks 8%, some other Race 7%, and Hispanics 14%).

The differences in incomes across racial/ethnic groups could be part of the explanation for the un-intentional ethnic minority concentration patterns observed in Berks County. Since such large shares of minority and Hispanic households have lower incomes, they may not be able to afford to live in many areas of the County outside of the City of Reading where more whites can afford to live.

Low-and Moderate-Income Persons

Figure 13 outlines the percentage of low and moderate income (LMI) persons in the County by census block group. This information is calculated by HUD to determine area eligibility for the Community Development Block Grant (CDBG) Program. Persons deemed low-moderate income have incomes at or below 80% of the area median income level. HUD’s formula for calculating low-and moderate-income persons includes persons residing in households and excludes persons residing in group quarters.¹

Based on the 2000 census data, HUD determined that there were 144,399 low-and moderate-income persons in Berks County, equivalent to 40% of the population for which this rate is calculated.

The City of Reading contains 54,109 (37%) of the County’s LMI population, and 68% of the population in Reading for which this rate is calculated is low and moderate income. By block group, there are some areas in the County where the concentration of LMI persons is even higher. Except block groups with small populations, (less than 300 persons per block group), most block groups with the highest concentrations of LMI persons reside in the City of Reading. In the City of Reading, there is a correlation between census tracts with concentrations of minorities and those with high concentrations of LMI persons and a correlation between census tracts with concentrations of Hispanics and those with high concentrations of LMI persons.

**Figure 13
Low-Moderate Income Block Group Areas – 2000**

tract	blkgrp	lowmod	lowmoduniv	lowmod_pct
000100	1	1,480	1,490	99.33%
000100	2	1,080	1,200	90.00%
000100	3	550	625	88.00%
000100	4	475	475	100.00%

¹ The group quarter population includes persons under formally authorized supervised care or custody such as correctional institutions, nursing homes, and juvenile institutions. The group quarter population also includes non-institutionalized persons living in group quarters such as college dormitories, military quarters, and group homes.

000100	5	935	1,040	89.90%
000200	1	1,140	1,665	68.47%
000200	2	340	530	64.15%
000200	3	1,570	1,980	79.29%
000300	1	550	935	58.82%
000300	2	465	930	50.00%
000400	1	1,385	1,735	79.83%
000400	2	635	970	65.46%
000400	3	875	1,040	84.13%
000500	1	680	1,150	59.13%
000500	2	790	1,385	57.04%
000500	3	705	1,160	60.78%
000600	1	330	595	55.46%
000600	2	660	1,835	35.97%
000700	1	710	1,150	61.74%
000700	2	545	1,385	39.35%
000700	3	785	1,075	73.02%
000800	1	1,070	1,820	58.79%
000800	2	1,425	1,575	90.48%
000800	3	615	920	66.85%
000900	1	1,295	2,085	62.11%
000900	2	495	670	73.88%
001000	1	1,140	1,470	77.55%

001000	2	1,115	1,605	69.47%
001100	1	1,635	1,915	85.38%
001100	2	580	690	84.06%
001100	3	1,750	1,905	91.86%
001200	1	560	585	95.73%
001200	2	545	725	75.17%
001300	1	810	955	84.82%
001300	2	530	720	73.61%
001300	3	325	355	91.55%
001400	1	890	1,030	86.41%
001400	2	750	1,165	64.38%
001400	3	850	1,020	83.33%
001400	4	1,135	1,185	95.78%
001500	1	1,375	1,635	84.10%
001500	2	1,315	1,585	82.97%
001500	3	655	870	75.29%
001600	1	1,135	1,420	79.93%
001600	2	835	1,520	54.93%
001700	1	1,710	2,205	77.55%
001700	2	945	985	95.94%
001800	1	730	1,485	49.16%
001800	2	1,180	1,720	68.60%
001900	1	875	935	93.58%

001900	2	1,085	1,315	82.51%
002000	1	800	1,200	66.67%
002000	2	1,265	1,615	78.33%
002000	3	945	1,440	65.63%
002100	1	495	970	51.03%
002100	2	1,035	1,135	91.19%
002100	3	720	890	80.90%
002200	1	610	785	77.71%
002200	2	1,055	1,220	86.48%
002300	1	835	945	88.36%
002300	2	655	1,010	64.85%
002500	1	425	540	78.70%
002500	2	1,320	2,045	64.55%
002500	3	520	795	65.41%
002600	1	445	745	59.73%
002600	2	2,205	2,415	91.30%
002700	1	225	610	36.89%
002700	2	615	1,280	48.05%
002900	1	1,095	2,195	49.89%
		61,305	84,255	72.76%

Source: U.S. Dept. of Housing & Urban Development

Employment Data

Civilian Labor Force

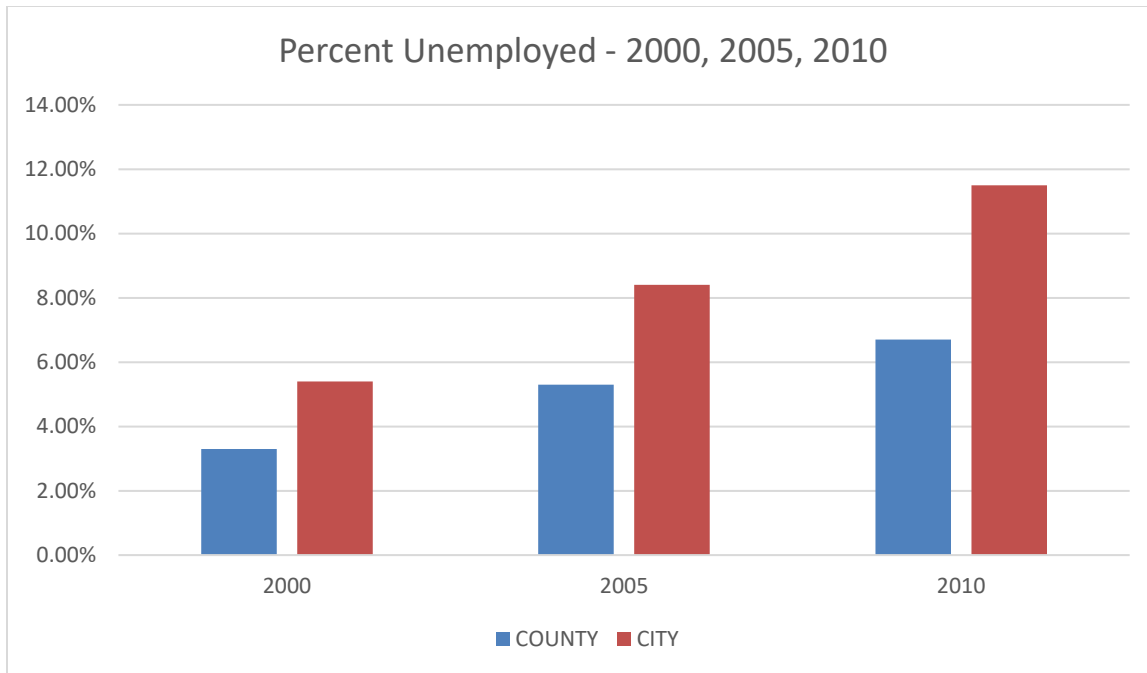
In 2000, the unemployment for Berks County was 6.7% and for the City 11.5%. In 2018, that rate dropped to 5.1% for the County and dropped to 11.4% for the City. The County's rate was slightly

higher than the unemployment rate for the State's rate at 4.9% and slightly higher than the national rate of 3.5%. Unemployment rates were lowest among Whites in the City, County, and the State. The highest unemployment was experienced by Blacks, where it was nearly triple the unemployment rate among Whites. Unemployment rates of whites, Hispanics, and persons of some other race alone, in the County, closely resembled those of the State. The rate of Black unemployment was 3% higher than that of the State for the County, and 7.9% higher than that of the State for the City.

Figure 14

ACS 2010

Civilian Labor Force 2012



Housing Data

Cost of Housing

The median housing value in Berks County increased 35% between 1990 and 2012, when adjusted for inflation. This was in stark contrast to the median gross rent, which increased only slightly since 1990, when adjusted for inflation. During the same period, median household income, adjusted for inflation, remained relatively constant.

Berks County lost a substantial number of affordable rental units since 2000. Between 2000 and 2012, the number of affordable rental units renting for less than \$500 per month *decreased* by 7,020 and the number of those renting for between \$500 and \$749 per month also decreased. At the same time, the number of units with higher rents between \$750 and \$999 more than doubled

and those with rents higher than \$1,000 per month more than tripled.

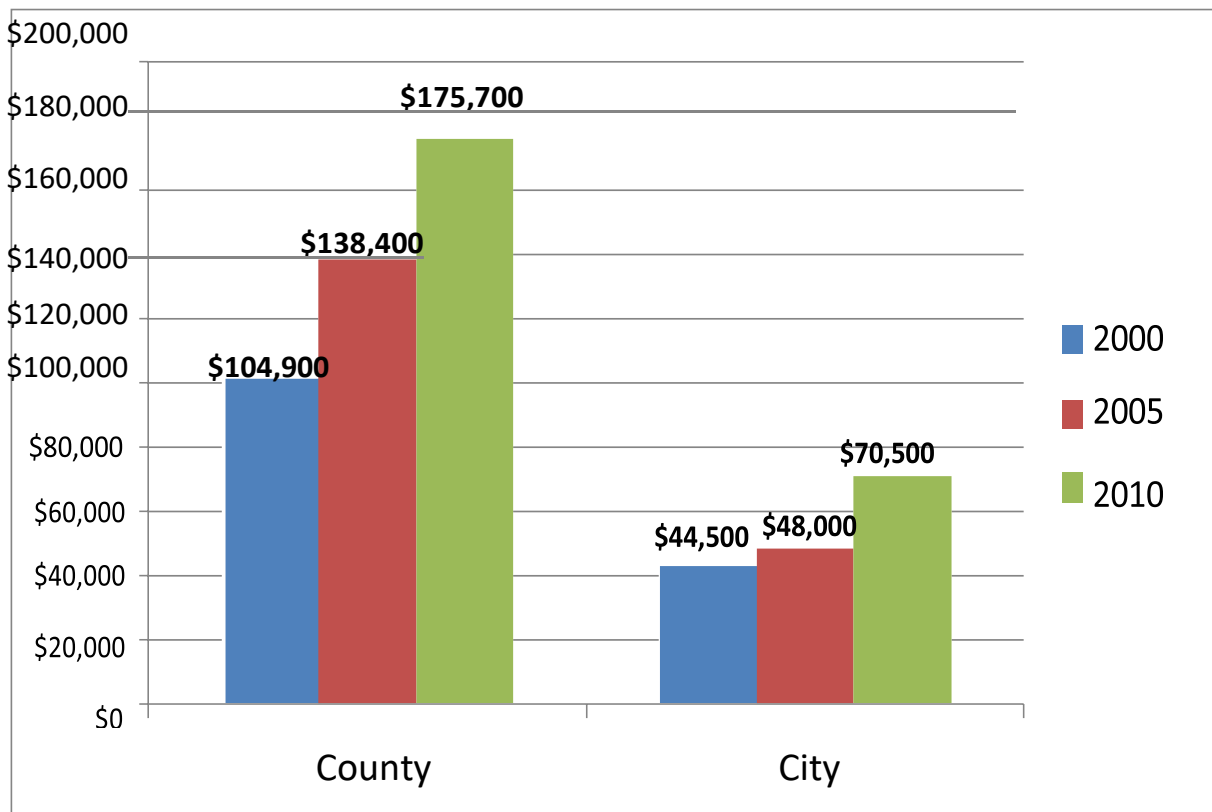
Lack of affordable housing does constrain housing choice. Residents may be limited to a smaller selection of neighborhoods or municipalities because of a lack of affordable housing in those areas. Residents must take into consideration such things as access to transportation (bus routes and cabs)

Berks County lost a substantial number of affordable rental units since 2000. Between 2000 and 2007, the number of affordable rental units renting for less than \$500 per month *decreased* by 7,020 and the number of those renting for between \$500 and \$749 per month also decreased. At the same time, the number of units with higher rents between \$750 and \$999 more than doubled and those with rents higher than \$1,000 per month more than tripled.

ACS 2010

Figure 15

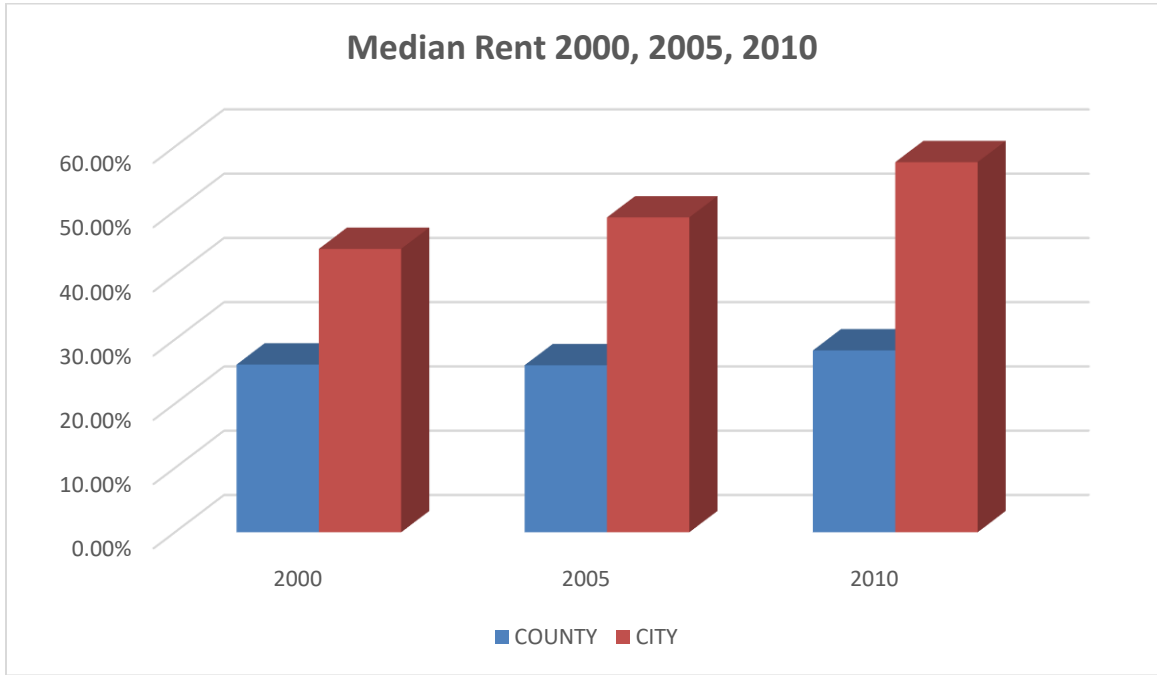
Median House Value, 2000, 2005, 2010



Owner-occupied units

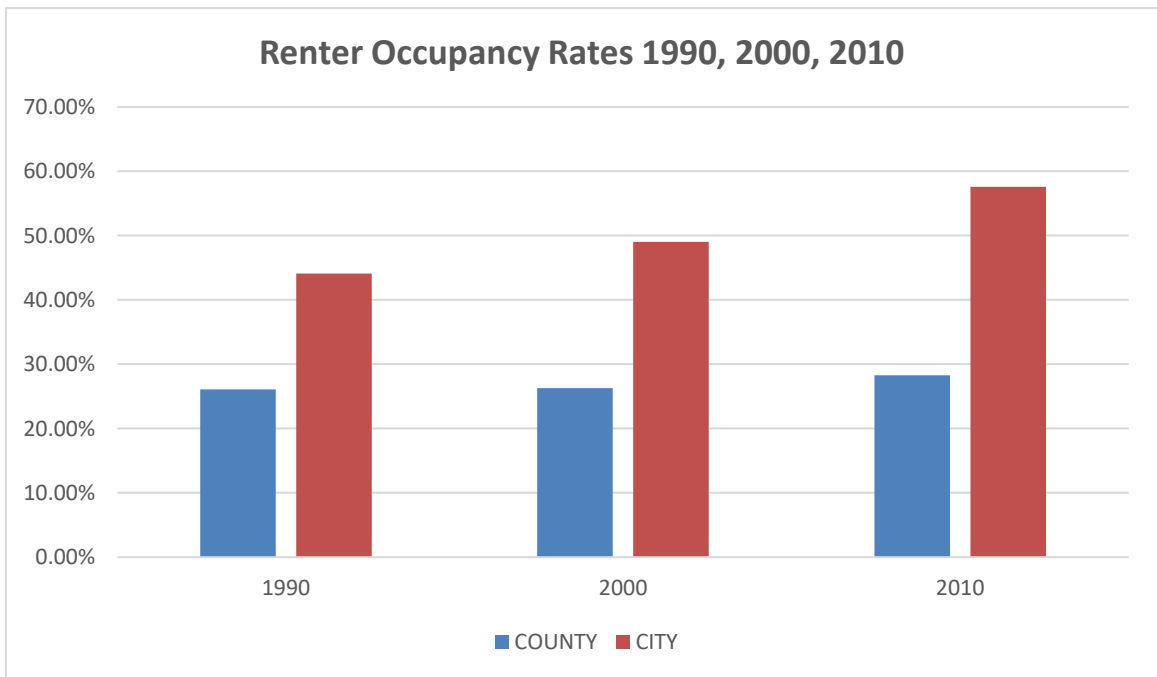
ACS 2010

Figure 16



CENSUS 2010

Figure 17



Home Ownership

The overall home ownership rate in Berks County was 71.17% in 2015. Of the total 104,693 homeowners, 99,371 (95%) were white households. Racial and ethnic minority homeowners numbered only 5,322, comprising 5% of all homeowners even though they constitute 11.8% of the population.

Households headed by blacks, Hispanics, and persons of some other race alone own their homes at a much lower rate than white households. Among all housing units occupied by white householders, 77% were owner-occupied. For blacks, the rate was only 43%, and only 34% of some other race households and 37% of Hispanic households are homeowners.

In the City of Reading, 64% of homeowners are white. Blacks, Hispanics, and persons of some other race, and as groups, do not comprise more than 3% of the homeowners in any municipality in Berks County. As previously explained, the City of Reading also contains the highest percentage of minority and Hispanic residents.

Figure 18
Home Ownership by Race/Ethnicity of Household

	Owner Occupied Units	Percent Owner-Occupied Units			
		White	Black	Some Other Race	Hispanics
Pennsylvania	3,491,722				1%
Berks County	110,653	92.4%	2.5%	3%	2%
Reading city	12,703	64%	11%	19%	6%

Source: U.S. Census Bureau, Census 2010, Summary File 3 (H14)

Cost-Burdened Households

Affordable housing is defined as paying no more than 30% of gross household income for monthly housing expenses including mortgage, utilities, insurance, and taxes, or rent and utilities, regardless of income level. It should be noted that some households may choose to pay more than 30% of their income for housing. However, when households spend more than 30% of their income on housing, it is considered excessive and these households are classified as cost burdened.

When households pay higher proportions of their income for housing, they may be forced to sacrifice other basic needs, such as food, clothing, and health care. Additionally, cost-burdened households may have trouble maintaining their dwelling. Cost-burden is a concern among lower-income households, who have fewer housing choices overall.

Figure 19
Cost Burdened Households

Income Category by Housing Problem	RENTERS					OWNERS				
	Elderly	Small Families	Large Families	All Others	Total	Elderly	Small Families	Large Families	All Others	Total
Extremely Low Income (0-<30% of MFI)	2,514	2,534	809	2,584	8,441	3,766	988	395	916	6,065
% with Any Housing Problem	63.8	77.3	88.3	66.9	71.2	76	79.8	91.1	80.3	78.2
% Cost Burdened	62.6	73.4	74.7	65	67.7	75.3	77.8	86.1	78.8	77
% Extremely Cost Burdened	43.7	55.4	48.8	50.7	49.9	42.1	67.3	70.9	62	51.1
Very Low Income (30-<50% of MFI)	2,321	1,913	594	1,750	6,578	5,604	1,642	745	928	8,919
% with Any Housing Problem	61.7	65.5	78.1	66	65.4	35.6	71.4	72.5	68.2	48.6
% Cost Burdened	60	59	52	63.4	59.9	34.7	70.9	65.1	67.8	47.3
% Extremely Cost Burdened	18.2	7.3	5.7	13.1	12.6	12.2	39	22.8	42.6	21.2
Low Income (50-<80% of MFI)	1,955	2,954	859	2,894	8,662	8,147	5,628	1,738	2,242	17,755
% with Any Housing Problem	39.6	21.8	41.8	20.9	27.5	15.6	44	48.8	52.5	32.5
% Cost Burdened	38.4	15.4	9.8	16.7	20.5	15.3	43	39.3	52.3	31.1
% Extremely Cost Burdened	4.9	1	0.5	1.2	1.9	4.5	10.4	6	17.3	8.1
Middle Income (80% of MFI & above)	1,477	5,520	773	5,405	13,175	11,968	44,884	7,129	7,959	71,940
% with Any Housing Problem	12.3	5.5	26.3	3.3	6.6	7	8.8	14.8	16.8	10
% Cost Burdened	10.7	1.2	1	1.7	2.4	6.7	8.4	9	15.8	9
% Extremely Cost Burdened	4.7	0.2	0.5	0	0.6	0.7	0.3	0.3	1.5	0.8
Total	8,267	12,921	3,035	12,633	36,856	29,485	53,142	10,007	12,045	104,679

Source: State of the Cities Data System: HUD CHAS Table 1C

The following chart illustrates the degree of cost-burden among households by income group, tenure (renters versus owners), and race/ethnicity. Using the same data source, it is possible to analyze the degree to which white, black, and Hispanic households are cost-burdened relative to each other in Berks County. (The data for households of some other race alone was not available, and the data for all other racial and ethnic minorities was not analyzed due to small populations.)²

Figure 20
Comparison of Cost Burdened Households by Race/Ethnicity

		Extremely Low Income (0%-<30% of MFI)	With any housing Problem	Very Low Income (30%-<50% of MFI)	With any housing Problem	Low Income (50%-<80% of MFI)	With any housing Problem
RENTER HOUSEHOLDS	White						
	Elderly	2,135	66%	2,190	61%	1,855	41%
	Family	1,040	78%	1,255	67%	2,645	24%
	Other	1,595	69%	1,370	69%	2,390	20%
	Total	4,770	70%	4,815	65%	6,890	27%
	Black						
	Elderly	115	65%	85	71%	40	25%

² HUD CHAS data tables provide information on the percent of households by race “with housing problems” but do not distinguish between the three types of housing problems surveyed: overcrowded, lacking complete plumbing/kitchen facilities and cost burden. However, in all data tables, cost burden is (by far) the housing problem that impacts more households than the other two physical deficient characteristics combined.

	Family	355	79%	260	64%	270	30%
	Other	255	75%	125	64%	105	43%
	Total	725	75%	470	65%	415	33%
	Hispanic						
	Elderly	240	48%	70	71%	39	10%
	Family	1,790	81%	945	71%	815	34%
	Other	625	56%	225	51%	345	19%
	Total	2,655	72%	1,240	68%	1,199	29%
OWNER HOUSEHOLDS							
	White						
	Elderly	3,605	76%	5,450	35%	8,040	15%
	Family	950	83%	1,700	73%	6,205	45%
	Other	785	82%	840	67%	2,090	53%
	Total	5,340	78%	7,990	46%	16,335	32%
	Black						
	Elderly	80	81%	30	67%	45	56%
	Family	70	79%	120	54%	245	41%
	Other	40	75%	20	100%	50	40%
	Total	190	79%	170	62%	340	43%
	Hispanic						
	Elderly	65	69%	80	56%	30	0%
	Family	345	86%	495	76%	750	43%
Other	70	64%	60	75%	75	33%	
Total	480	80%	635	73%	855	40%	

Source: HUD's State of the Cities Data System, 2000

The populations of black and Hispanic households are much smaller than those of white households, and this can skew the data. Regardless of the income level, total black and Hispanic households experienced higher degrees of cost burden than white households in all but one case. Beyond this, however, no conclusive pattern emerges from the data evidencing a correlation between race/ethnicity, cost burden, income level, and/or household type.

Public Housing

The Berks County Housing Authority owns and manages all public housing units in the County outside of the City of Reading and the administrator of Housing Choice Vouchers (HCV) (formerly known as Section 8) for privately owned, government-subsidized housing outside of Reading. Currently there are 488 vouchers being used.

As of 2019 there were 777 families on the waiting list for public housing. 78 families are on the waiting list for the HCV program. Demographic information is not collected for persons on the waiting list.

Public housing outside the City of Reading, is located within 19 different Boroughs. A total of 1,256 units are available outside of the City of Reading. The City contains almost 2 ½ times that amount in units (3,170 or 72% of all units). The limited distribution of public housing severely restricts location choice outside of the City and provides few geographical choices for extremely and very low-income persons and households.

Public and Assisted Housing

The table below provides a listing of the public and assisted housing units located in the City. The income level is shown by using four abbreviations: 1) EL for Extremely Low Income (0% to 30% of median income); 2) L for Low Income (31% to 50% of median income); 3) M for Moderate Income (51% to 80% of median income); 4) OI for Other Income (81% and above median income). The type of family served is shown by using three abbreviations: 1) E for elderly; 2) S for small family; and 3) L for large family.

Figure 21

Inventory of Public & Assisted Housing Units City of Reading

Project	Location	# Units	Income Level	Type	Eff.	1B	2B	3B	4B+	Special Needs
Glenside Homes	Reading	400	L	S & L	0	112	208	72	8	20
Episcopal House	Reading	140	M	E	82	58	0	0	0	3
Sixth Ward	Reading	10	M	S & L	0	0	4	4	2	0

Penn's Common Court	Reading	46	M	E	0	37	9	0	0	3
Market Square	Reading	38	M	E	0	38	0	0	0	3
The Lincoln Residences	Reading	52	M	E	0	52	0	0	0	11
River Oak Apts.	Reading	15	M	S & L	0	12	0	3	0	3
Hampden House Apts.	Reading	144	M	S&L	0	56	80	8	0	0
Century Hall Apts.	Reading	15	L	S	0	3	12	0	0	1
Oakshire	Reading	90	L	E	0	45	45	0	0	8
Goggleworks	Reading	12	L	E	0	12	0	0	0	0
TOTAL		3135			598	1375	788	283	90	144

Public Transit

Households without a vehicle, typically low to moderate income households, are at a disadvantage in accessing jobs and services. This is even more true in rural areas. Access to public transportation is critical to these households. Without access to transportation, potential employment can be at risk. Not having access to employment can also put their housing needs at risk. In Berks County approximately 1.7% of people aged 16 years and older utilize public transportation, and 9% of city residents utilize public transportation. These percentages exclude utilizing taxi cabs. 58% of city workers drove to work alone between 2010- 2012. 20% of those workers carpooled.

In Berks County, the Berks Area Regional Transportation Authority (BARTA) provides transportation to city/county residents. BARTA provides extensive routes and schedules for those that choose to utilize public transportation to get to work.

BARTA provides the following:

- 21 fixed routes with regular schedules to destinations such as Fairgrounds Square Mall, Albright College, Reading Hospital, Berkshire Mall, and local area employers.

- The BARTA Special Services Division provides door to door transportation. This program requires an application prior to use. Service is available between the hours of 5:00 a.m. and 10:30 p.m., Monday through Friday. There are other requirements associated with this program as well as a fee.
- 37 para-transit vehicles in the Special Services Division

BARTA's participation and willingness to work with area businesses and assess community needs has been essential for the Berks County area. Barta established a route to Cabela's in 2003 (which was ranked #39 in 2012 for Berks County top 50 employers). This same route also services a large manufacturer (Ashley Furniture) as well.

In 2007, BARTA created a special route to transport city workers to East Penn Manufacturing, which was named the top employer in 2012.

Private Sector Housing

Real Estate Practices

Berks County and the City of Reading are served by the Reading-Berks Association of Realtors Inc., and the Real Estate Investors Association of Berks County (REIA Berks)

All incoming association members are required to attend New Member Orientation and Induction training which includes National Association of Realtors (NAR) Code of Ethics training as well as Fair Housing training. Generally, classes are provided based on the influx of membership applications.

The Association prepares and distributes a quarterly electronic newsletter and maintains a webpage with pertinent information. A minimum of four (4) membership meetings are held per year however more meetings may occur if needed.

Five (5) of the Association's 13 Board of Director members are female; and eight (8) are male. According to the Association they do not keep records of Racial or Ethnic makeup of the board or its membership.

Information about the agency and structure of REIA was also requested however they did not respond to our request. Their website provides information on the group and its board and officers. The officers consist of three (3) men and one (1) woman. There are an additional 5 men listed as board members.

The website also reports that meetings are held each month, and guest speakers are a part of each meeting. The membership is also provided with a reference library and a monthly newsletter.

Newspaper Advertising

Weekly monitoring of the Sunday edition of the *Reading Eagle-Times* during the year is conducted by the City of Reading Human Relations Commission (RHRC). The reviews consistently revealed no advertising that was in violation of Fair Housing principals.

Under Federal Law, no advertising with respect to the sale or rental of a dwelling may indicate any preference, limitation, or discrimination because of Race, Color Religion, Sex, National Origin, Familial Status, or disability.

Public Sector

The analysis of impediments is a review of impediments to fair housing choice in the public and private sector. Impediments to fair housing choice are any actions, omissions, or decisions taken because of Race, Color, Religion, Sex, Disability, Familial Status, or National Origin that restricts housing choices or the availability of housing choices, or any actions, omissions, or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of Race, Color, Religion, Sex, Disability, Familial Status, or National Origin. Policies, practices, or procedures that appear neutral on their face but which operate to deny or adversely affect the provision of housing to persons of a particular race, Color, Religion, Sex, Disability, Familial Status, or National Origin may constitute such impediments.

An important element of the analysis includes an examination of public policy in terms of its impact on housing choice. From a budgetary standpoint, housing choice can be affected by the allocation of staff and financial resources to housing related programs and initiatives. The decline in federal funding opportunities for affordable housing for lower income households has shifted much of the challenge of affordable housing production to state, county, and local government decision makers.

From a regulatory standpoint, local government measures to control land use (such as zoning regulations) define the range and density of housing resources that can be introduced in a community. Housing quality standards are enforced through the local building code and inspection procedures.

A community's sensitivity to housing issues is often determined by people in positions of public leadership. The perception of housing needs and the intensity of a community's commitment to housing related goals and objectives are often measured by board members, directorships and the extent to which these individuals relate within an organized framework of agencies, groups, and individuals involved in housing matters. The expansion of housing choice requires a team effort and public leadership and commitment is a prerequisite to strategic action.

The section below was adopted from the previous Analysis primarily because the public policies in the City of Reading have not substantially changed.

The sampling of the zoning ordinances of the 73 municipalities (15% selected among the Boroughs and Townships across the County who had zoning) were reviewed in the previous analysis and those same Boroughs were reviewed as part of this analysis. The zoning ordinance for the City of Reading was also selected. Appendix A includes summaries of the zoning ordinances reviewed for this analysis.

Municipal zoning ordinances in Berks County and the City of Reading were reviewed to identify zoning that may potentially impede housing choice. The analysis was based on topics raised in HUD's Fair Housing Guide, which include:

- The opportunity to develop various housing types (including apartments and housing at various densities)
- The opportunity to develop alternative designs (such as cluster developments and planned residential developments)
- The treatment of mobile or modular homes, and if they are treated as stick-built single-family dwellings
- 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.

In each municipal zoning ordinance reviewed, the following eight zoning elements were analyzed for impediments to fair housing choice.

Regulations of Group Homes for Persons with Disabilities

Group homes are residential uses that do not adversely impact a community. Efforts should be made to ensure group homes can be easily accommodated throughout the community under the same standards as any other residential use. Of concern, are those that serve members of the protected classes, such as the disabled. Because a group home for the disabled serves to provide a non-institutional experience for its occupants, imposing conditions are contrary to the purpose of a group home. More importantly, the restrictions, unless executed against all residential uses in the zoning district, are an impediment to the siting of group homes and are in violation of the Fair Housing Act.

Several of the zoning ordinances reviewed for this analysis were found to be in violation of the Fair Housing Act as they relate to the provision of group homes. The following observations were noted during the reviews:

- In seven of the ordinances, group home is neither mentioned nor regulated.
- In only one ordinance, group homes are permitted wherever single-family detached homes are permitted.
- Four of the ordinances placed exceptionally restrictive conditions on the siting of group homes in their municipalities. These included:
 - Dispersal requirements ranging from 750-1,000 linear feet from another similar facility within the municipality.
 - The need for the building to appear as if it is traditional single-family home.

- Extra off-street parking requirements for residents and staff ranging from one space per employee to one space for each employee and resident.
- Limiting the maximum number of residents from three to ten.

Federal Entitlement Programs

Community Development Block Grant (CDBG) Program

The CDBG entitlement funds from HUD are used for a variety of public services, planning, street improvements, clearance, rehabilitation, code enforcement, and economic development initiatives. The CDBG program serves to benefit primarily low- and moderate-income persons in agreement with the statutory requirements.

In FY2018 the City's activities benefitted 28,697 people of which 19,468 were White, 3,244 Black and 4,895 other multi-races. Of that total 16,511 identified themselves as Hispanic.

HOME Program

The HOME entitlement program funds are used for a variety of housing initiatives including Community Housing Development Organization (CHDO) operation expenses, homebuyer programs, and housing rehabilitation activities. The HOME Program also serves low-and moderate-income persons.

During 2018, the City rehabilitated 2 units which benefitted 7 people, comprised of 3 White and 4 Other Multi-Racial. Of that number, 4 were Hispanic. The City's Homeownership Program benefitted 20 people, comprised of 7 White, 6 Black, and 7 Other Multi-Racial. Of that number, 19 were Hispanic. The City's TBRA Program funded rental and security deposit assistance that benefitted 28 people, comprised of 22 White and 6 Black. Of that number, 14 were Hispanic.

Emergency Solutions Grant (ESG) Program

The Emergency Solutions Grant program provides homeless persons with basic shelter and essential supportive services. It can assist with the operational costs of the shelter facility and for the administration of the grant. ESG funds also can be used to provide short-term homeless prevention assistance to persons at imminent risk of losing their own housing due to eviction, foreclosure, or utility shutoffs. The City of Reading reports that the ESG program assisted 691 people.

Evaluation of Current Fair Housing Legal Status

This section provides a review of the 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 Department of Justice or private plaintiffs in addition to the identification of other fair housing concerns or problems.

A lack of filed complaints does not necessarily indicate a lack of a problem. Some persons may not file complaints because they are not aware of how to go about filing a complaint or where to go to file a complaint. Discriminatory practices can be subtle and may not be detected by someone

who does not have the benefit of comparing one's treatment with that of another home seeker. Other times, persons may be aware that they are being discriminated against, but they may not be aware that the discrimination is against the law and that there are legal remedies to address the discrimination. Finally, households may be more interested in prioritizing finding decent housing and may prefer to avoid going through the process of filing a complaint and following through with it. Therefore, education, information, and referral regarding fair housing issues remain critical to equip persons with the ability to reduce impediments.

Existence of Fair Housing Complaints

Pennsylvania Human Relations Commission (PHRC)

Previously a request was made by the Berks County Office of Community Development to PHRC for a list of the number and nature of fair housing complaints filed in Berks County since 2000. The list was not received and therefore not included in the previous analysis.

HUD provided information regarding all the cases filed in Berks County between January 2010 and December 2013. Thirteen (13) cases were identified as being resolved by PHRC. HUD did not provide any data for years 2013-2018.

City of Reading Human Relations Commission

The RHRC has continued to process and investigate cases of discrimination filed within our jurisdiction. Between 2013 and 2018 the RHRC investigated and resolved 49 allegations of housing discrimination.

Allegations of discrimination can be filed identifying several different protected classes. Of all cases filed with the RHRC, 16 were filed under the basis of National Origin. The next most frequent protected class is Sex (8) then Race (5).

The RHRC had 2 findings of probable cause during this timeframe.

City of Reading

The City of Reading updated its Disorderly Conduct Code (DCR) in 2014. This ordinance provides a resource for landlords and neighbors of disorderly tenants to utilize if someone is disturbing the peace or violent and/or criminal activity is occurring. The Ordinance required a landlord to evict a tenant that received two (2) DCR's within a one-year period.

HUD notified the City of the potential disparate impact this ordinance could have on families with children, domestic violence victims, and the disabled.

The City has since amended the ordinance and put several steps in place before an eviction can occur. The DCR is reviewed by an "Officer of the Day" before the DCR is mailed to the tenant. The tenant is also given the opportunity to appeal the DCR.

Action and Recommendations

The City of Reading has identified the following impediments, along with the goals and strategies to address the impediments.

Impediment 1: Lack of Fair Housing Education and Outreach

There is a continuing need to educate residents of the community concerning their rights and responsibilities under the Fair Housing Act and to raise awareness that all residents have a right under federal law to fair housing choice.

Goal: Improve the public's knowledge and awareness of the Federal Fair Housing Act and related laws, regulations, and requirements to affirmatively further fair housing in the City.

Strategies: To meet this goal, the following activities should be undertaken:

1-A: Promote fair housing awareness through the media, seminars, and training to provide educational opportunities for all persons to learn more about their rights under the Fair Housing Act and Americans With Disabilities Act.

1-B: Make available and distribute literature and informational material concerning fair housing issues, an individual's housing rights, and landlord responsibilities to affirmatively further fair housing.

1-C: Educate and promote that all residents have a right to choices about where to live.

Impediment 2: Need for Affordable Housing

The median value and cost to purchase and maintain a single-family home in the City that is decent, safe, and sound is \$70,704, which limits the choice of housing for lower income households. About 51% of homeowners and 78% of renters are cost overburdened by more than 30% of their monthly household income.

Goal: Promote the conservation of the existing housing stock and development of additional housing units for low/moderate income households through new construction and rehabilitation.

Strategies: To meet this goal, the following activities will be undertaken:

2-A: Continue to support and encourage plans from both private developers and non-profit housing providers to develop additional affordable housing through rehabilitation or new construction.

2-B: Continue to support and provide financing for the rehabilitation of the existing housing stock to become decent, safe, and sound housing that will remain affordable to low/moderate income households.

Impediment 3: Need for Accessible Housing Units

As an older built-up environment, there is a lack of accessible housing units and developable sites, since a large proportion of the City's housing units were built over 50 years ago and do not have accessibility features.

Goal: Increase the number of accessible housing units through rehabilitation or new construction to be occupied by persons with disabilities.

Strategies: To meet this goal, the following activities should be undertaken:

3-A: Promote programs to increase the amount of accessible housing through the rehabilitation of existing owner-occupied housing by making accessible improvements.

3-B: Encourage the development of accessible housing through new construction of units designed to be occupied by persons with disabilities.

3-C: Promote programs to assist elderly homeowners to make accessibility improvements to their properties, so they may remain in their homes.

Impediment 4: Lack of Financial Resources

Both the federal and state governments continue to provide insufficient funding to address housing needs.

Goal: Increase federal and state funding for housing, which will then allow communities to better achieve housing goals.

Strategies: To meet this goal, the following activities should be undertaken:

4-A: Work with national and state organizations to increase the funding for housing.

4-B: Encourage and support non-profit housing agencies to apply for funding from federal, state, and foundation resources to promote and develop affordable housing projects.

4-C: The City of Reading should promote, sponsor, and partner with private developers to build affordable housing using federal, state, and local funding sources.

Impediment 5: Economic Issues Affecting Housing Choice

There is a lack of economic opportunities in the City, which prevents low-income households from improving their income and ability to have a choice in housing locations and creates a fair housing concern.

Goal: The local economy needs to improve, creating new jobs or better job opportunities, which in turn will increase household income, and thus allow for greater choice in housing locations.

Strategies: To meet this goal, the following should be undertaken:

5-A: Strengthen partnerships and develop incentive programs that will enhance the City's business base, expand its tax base, and create a more sustainable economy.

5-B: Support and enhance workforce development and skills training that result in a "livable" wage and increased job opportunities.

5-C: Work with the Greater Reading Chamber Alliance to promote and encourage economic development with local commercial and industrial firms to expand their operations and increase job opportunities.

Impediment 6: Public Policy

Municipal zoning may need additional definitions and provisions concerning Fair Housing.

Goal: To have municipal zoning ordinances affirmatively further fair housing or not restrict housing choice.

Strategies: To meet this goal, the following activities should be undertaken:

6-A: Continue to have the City of Reading and Berks County Planning Commissions review new ordinances or amendments to zoning ordinances for provisions that would eliminate restrictions to fair housing choice.

6-B: Encourage the City of Reading and Berks County Planning Commissions to develop and promote zoning language that would increase housing choice.

6-C: Encourage the City of Reading and Berks County Planning Commissions to include "Accessibility" and "Visitability" in zoning ordinances.