

# Analysis of Impediments to Fair Housing Choice



**The Urban County of Bucks County  
and Bensalem Township**

**March 2014**



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## I. INTRODUCTION

### A. The Analysis of Impediments

The Housing and Community Development Act of 1974, as amended, requires that any jurisdiction receiving Community Development Block Grant (CDBG) or HOME program funds affirmatively furthers fair housing. Bucks County and Bensalem Township have jointly prepared this Analysis of Impediments to Fair Housing Choice (AI) to satisfy requirements of the Act.

#### ***The Entitlement Areas***

The Urban County of Bucks County, as designated by the U.S. Department of Housing and Urban Development (HUD), consists of Bucks County exclusive of Bensalem and Bristol townships, which are separate HUD entitlement jurisdictions. The Urban County receives CDBG, HOME, and ESG funds from HUD; Bensalem Township receives CDBG funding from HUD and is a member of the County's HOME Consortium. Bristol Township receives CDBG money from HUD and HOME funding through the Commonwealth of Pennsylvania and was not a party to the preparation of this AI.

#### ***Lead Agency***

Bucks County (through its Department of Community and Business Development) is the lead agency responsible for the preparation and implementation of the AI.

#### ***Purpose***

This AI serves as the basis for fair housing planning and assisting in the building of public support for fair housing efforts for both the Bucks County entitlement area and Bensalem Township. The document was approved by both governmental entities and will be used to provide direction and leadership, guide the allocation of resources, and serve as a "point-in-time" baseline against which the implementation of fair housing initiatives will be judged and recorded.

#### ***Organization of the Document***

The rest of this section outlines the requirements and obligations of the Fair Housing Act of 1968 (as amended and supplemented), the Pennsylvania Human Rights Act, along with other pertinent legislation. Afterwards, the document provides a demographic overview of both jurisdictions, a fair housing profile, an evaluation of policies, and an assessment of Fair Housing policy, programs and activities. The document ends with an outline of conclusions, potential impediments, and activities to address the same.

#### ***Comments***

Comments on any facet of the document should be addressed to:

Bucks County Department of Community & Business Development  
Neshaminy Manor Center  
1260 Almshouse Road  
Doylestown, PA 18901  
Phone: 215-345-3840  
Fax: 215-345-3865  
E-mail: [business@co.bucks.pa.us](mailto:business@co.bucks.pa.us)



## **B. Analysis of Impediments to Fair Housing Choice**

The AI is a review of a jurisdiction's laws, regulations, and administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing, as well as an assessment of conditions, both public and private, affecting fair housing choice.

### ***Definition of Impediments***

HUD defines an impediment to fair housing choice as any action, omission, or decision that restricts, or has the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin.

### ***Covered Areas***

The AI must encompass the following five areas related to fair housing choice:

- The sale or rental of dwellings (public and private)
- 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 concentration
- 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 (i.e., the CDBG program regulations) and/or 24 CFR Part 92 (i.e., the HOME program regulations).

### ***Responsibilities***

Federal entitlement communities have specific fair housing planning responsibilities. These include:

- 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 the jurisdictions' initiatives to affirmatively further fair housing

HUD interprets these three certifying elements to include:

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

## C. The Federal Fair Housing Act

The following summarizes the Fair Housing Act exemptions and prohibitions:

### ***Exemptions***

The federal Fair Housing Act exempts owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a broker, or housing operated by organizations and private clubs that limit occupancy to members. Housing for older persons is exempt from the prohibition against familial status discrimination if:

- The 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 percent of the occupied units, and adheres to a policy that demonstrates the intent to house persons who are 55 or older

### ***Prohibitions***

The Fair Housing Act outlines a number of specific prohibitions, as follows:

#### ➤ *Sale and Rental of Housing*

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

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

#### ➤ *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 is 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 with legal custody of a child under age 18.

#### ➤ *Mortgage Lending*

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

- Refuse to make a mortgage loan
- Refuse to provide information regarding loans



- Impose different terms or conditions on a loan
- Discriminate in appraising property
- Refuse to purchase a loan
- Set different terms or conditions for purchasing a loan.

➤ Other Prohibitions

It is illegal for anyone to:

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

**D. Pennsylvania Human Relations Act**

The Pennsylvania Human Relations Act, as amended, prohibits housing discrimination based on race, color, sex, religion, national origin, ancestry, handicap or disability, guide dogs, support animals, age (40 and above), pregnancy, familial status (families with children under age 18), use of a guide or support animal due to blindness, deafness or physical disability, or the disability of an individual with whom the person is known to have a relationship or association. While this State law appears to protect additional classes of people, it primarily expands on the classes protected under federal law. The primary difference in the protected classes between the federal law and the Pennsylvania law is the lowering of the age to 40 for the older persons class. Consequently, persons residing in Pennsylvania have only slightly more protection under state law than under federal law in the area of housing discrimination. The following chart lists the protected classes under federal and state laws related to fair housing in Pennsylvania.

**Table 1 Protection for Members of the Protected Classes in Pennsylvania**

Protected Class	Federal Fair Housing Act	Pennsylvania Human Relations Act
Race	•	•
Color	•	•
National Origin	•	•
Religion	•	•
Sex	•	•
Familial Status (families with children under age 18)	•	•
Handicap/Disability Status	•	•
Ancestry		•
Age (40 and older)		•
Use of Guide/Support Animal		•
Pregnancy		•
Association/Relationship with an Individual with a Disability		•

Section 6 of the Act establishes the Pennsylvania Human Relations Commission (PHRC) with the following duties and responsibilities (Section 5):

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

The Act describes unlawful acts of discrimination and sets forth the procedure for aggrieved parties to file complaints, along with the process for investigating and processing complaints. Specific 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 lending 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

## **E. Comparison of Accessibility Standards**

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

### ***Fair Housing Act***

If someone has a physical or mental disability (including hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex or 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 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

### ***Americans with Disabilities Act (ADA)***

The ADA standards came about as a result of the American with Disabilities Act of 1990. The ADA is intended to ensure the accessibility to public places and commercial facilities by individuals with disabilities. The ADA requirements are to be applied during the design, construction, and alteration of such buildings and facilities to the extent required by regulations issued by federal



agencies, including the Department of Justice. A complete description of the guidelines can be found at <http://www.ada.gov/stdspdf.htm>.

### ***Uniform Federal Accessibility Standards (UFAS)***

UFAS accessibility standards are required for facility accessibility by physically handicapped persons for federal and federally-funded facilities. These standards are to be applied during the design, construction, and alteration of buildings and facilities to the extent required by the Architectural Barriers Act of 1968, as amended. A complete description of the guidelines can be found at <http://www.access-board.gov/ufas/ufas-html/ufas.htm>.

### ***Visitability Standards***

The term “visitability” refers to single-family housing designed in such a way that it can be lived in or visited by people with disabilities. A house is visitable when it meets three basic requirements:

- At least one no-step entrance
- Doors and hallways wide enough to navigate a wheelchair through
- A bathroom on the first floor big enough to accommodate the use of a wheelchair and a closed door

### ***Universal Design***

Universal design calls for products and environments to be usable by all people, to the greatest extent possible, without adaptation or specialized design. Seven principles guide Universal Design. These include:

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

## **F. Methodology**

A comprehensive approach was used to prepare this AI. The following sources were employed:

- The most recently available demographic data regarding population, household, housing, income, and employment
- The most recent five-year Consolidated Plan for each unit of government
- The 2004 Analysis of Impediments to Fair Housing Choice for Bucks County
- The 2003 Analysis of Impediments to Fair Housing Choice for Bensalem Township
- Fair housing complaints filed with HUD and the PA Human Relations Commission since 2007
- The 2011 *Bucks County Comprehensive Plan* and the 2002 Bensalem Township Comprehensive Plan

- Municipal zoning ordinances
- Administrative policies concerning housing and community development
- Financial lending institution data from the Home Mortgage Disclosure Act (HMDA) database
- Real estate advertisements from the *Bucks County Courier Times*
- Previous Consolidated Annual Performance and Evaluation Reports (CAPER) for each unit of government
- 2010 residential segregation data available from Census Scope
- The 2009 Testing Audit from the Fair Housing Council of Suburban Philadelphia
- Interviews and focus group sessions conducted with agencies and organizations that provide housing and housing related services to members of the protected classes.

### ***Use of Census Data***

Two major sources of data were used for this report. U.S. Census Bureau data from the decennial census and annual American Community Surveys were supplemented with estimates obtained from DemographicsNow. The Census Bureau's annual American Community Survey (ACS) data is available only for geographic units with a population of 20,000 or more. As a result, ACS data is generally not available for smaller geographic units within a municipality such as Census Tracts or Block Groups.

Census data products are based on the collection, tabulation, editing, and handling of questionnaires. Hence, errors in the data are possible. In addition to errors occurring during data collection, much of the census data is based on Summary File 3 (SF3) sample data rather than Summary File 1 (SF1). Therefore, each individual data set is subject to sampling and non-sampling errors, which may cause slight discrepancies in the reporting of similar type of data. Nonetheless, any such discrepancies do not negate the usefulness of the Census data.

### ***Agency Consultation***

The preparation of the AI involved a consultation process with local public agencies, nonprofit organizations, and other interested entities. A series of written questionnaires were mailed to many of the participants and detailed lists of issues were developed for the focus group sessions and interviews. From October 2009 through early 2010, a series of focus group sessions and individual interviews were also conducted to identify current fair housing issues impacting the various agencies and organizations. Comments received through these meetings and interviews are incorporated throughout the AI, where appropriate. A list of the stakeholders identified and invited to the focus group sessions and interviews is included in the Attachments section.

## **G. The Relationship between Fair Housing and Affordable Housing**

This document goes beyond an analysis of the adequacy of affordable housing in Bucks County and Bensalem Township. This AI defines the relative presence of members of the protected classes within the context of factors that influence the ability of the protected classes to achieve equal access to decent, quality and affordable housing and related services in both entitlement jurisdictions.



## II. DEMOGRAPHIC INFORMATION

### A. Demographic Profile

#### Population Trends

In the past five decades, Bucks County has grown from a primarily rural setting with 308,567 residents in 1960 to a more diverse community of 625,249 residents by 2010. Its growth has significantly outpaced that of Pennsylvania as a whole. In recent years, however, the rate of growth in Bucks County has slowed considerably.

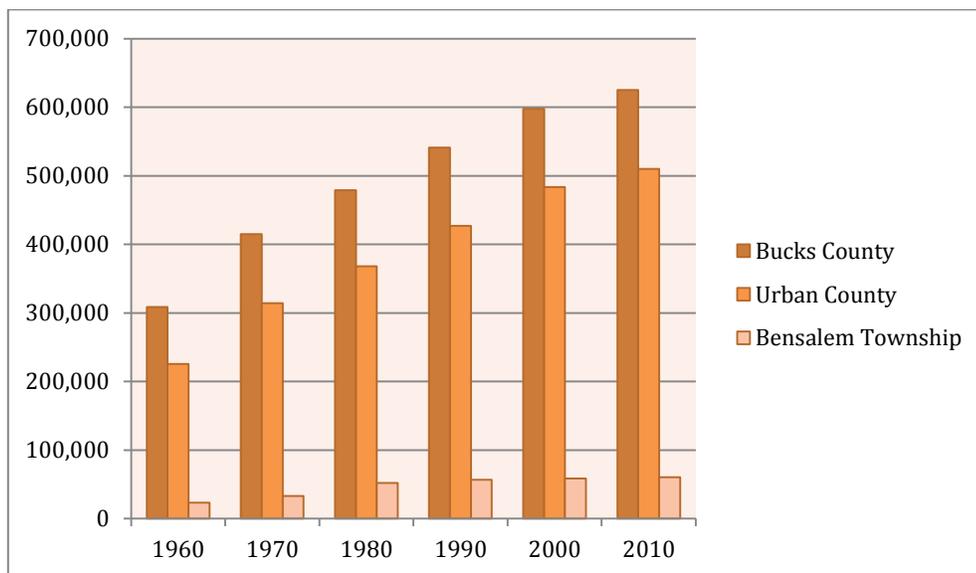
The area that makes up the Urban County (Bucks County exclusive of Bensalem and Bristol townships) has followed a similar pattern. Likewise, the HUD entitlement community of Bensalem Township has more than doubled its population, growing from 23,478 residents in 1960 to 60,427 in 2010.

**Table 2 Population Trends, 1960-2010**

	1960	1970	1980	1990	2000	2010	% Change 1960-2010
Bucks County	308,567	415,056	479,211	541,174	597,635	625,249	102.6%
Urban County*	225,791	314,520	368,110	427,257	483,680	510,240	126.0%
Bensalem Township	23,478	33,038	52,368	56,788	58,434	60,427	157.4%
Pennsylvania	11,319,366	11,793,909	11,855,687	11,881,643	12,281,054	12,702,379	12.2%

\* Bucks County exclusive of Bensalem Township and Bristol Township  
 Source: U.S. Census Bureau

**Figure 1 Population Trends, 1960-2010**





Minority population growth has been steadily increasing at a fast pace for both entitlement areas. Between 1990 and 2010, the number of minority residents more than doubled in the Urban County area and in Bensalem Township.

**Table 3 Population by Race and Ethnicity, 1990-2010**

Period/Area	Total Population	White	Black	Asian	Other Races	Hispanic
<b>1990</b>						
Bucks County	541,174	514,459	15,053	8,110	3,552	8,534
Urban County*	427,257	412,069	7,570	5,218	2,400	6,052
Bensalem Township	56,788	50,432	3,880	1,907	569	1,157
<b>2000</b>						
Bucks County	597,635	552,734	18,454	14,295	12,152	13,820
Urban County*	483,680	456,473	9,717	9,196	8,294	9,176
Bensalem Township	58,434	48,443	4,047	3,890	2,054	2,505
<b>2010</b>						
Bucks County	625,249	566,557	26,633	27,501	4,558	24,612
Urban County*	510,240	474,215	15,240	18,899	1,886	16,256
Bensalem Township	60,427	46,896	5,040	6,706	1,785	4,697

\*Bucks County exclusive of Bensalem Township and Bristol Township

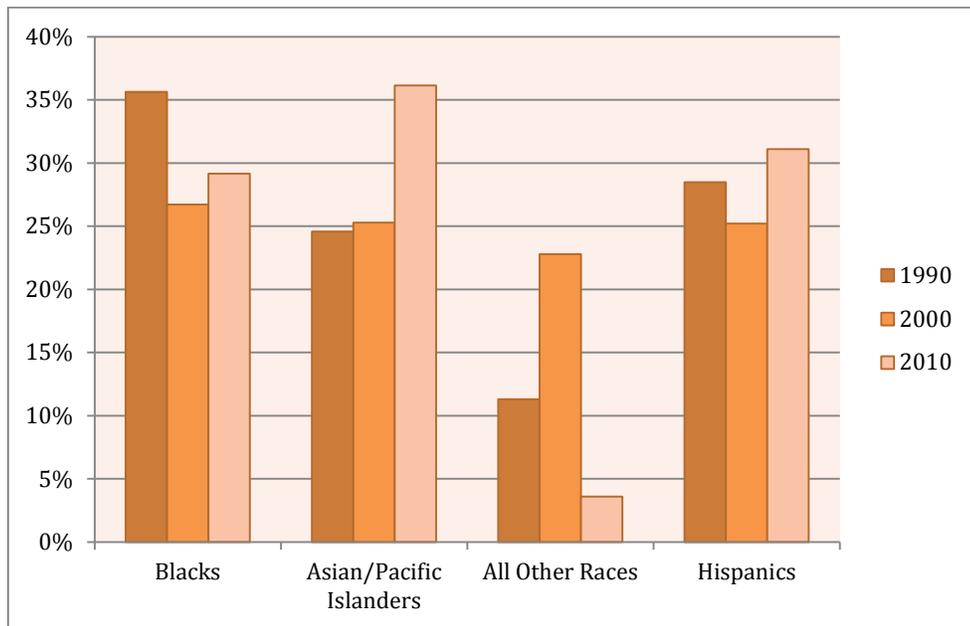
Source: U.S. Census Bureau

One factor to note is the increased diversity among minorities. Whereas in 1990 African American/Black residents accounted for 35.6 percent of all minorities in the Urban County, their share of the total minority population declined to 29.2 percent by 2010. Similarly, while in 1990 African Americans/Blacks represented 51.6 percent of the minority population in Bensalem, their share declined to 27.6 percent by 2010.

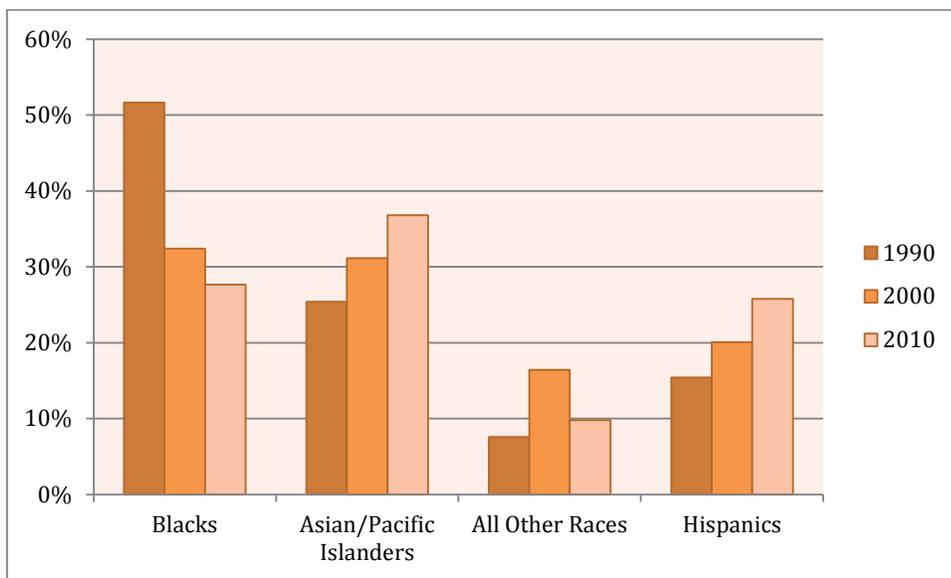
Conversely, the number of Asian/Pacific Islander residents has increased significantly both in actual numbers and as a segment of the minority population. In 1990, Asian/Pacific Islanders represented 24.6 percent of the minority population in the Urban County. Their share rose to 36.1 percent by 2010. The pattern in Bensalem was nearly identical, with Asians increasing from 25.4 percent of all minorities in 1990 to 36.8 percent by 2010.

Hispanics are the other major minority group. During the same period, this group more than doubled its number, increasing from 6,052 (1.6 percent) to 16,256 (3.2 percent). In Bensalem, Hispanics more than quadrupled in number from 1,157 to 4,697, increasing their share of the total population from 2 percent to 7.8 percent.

**Figure 2 Racial/Ethnic Minority Characteristics in the Urban County, 1990-2010**



**Figure 3 Racial/Ethnic Minority Characteristics in Bensalem Township, 1990-2010**





### Areas of Racial and Ethnic Minority Concentration

HUD regulations found at 24 CFR 91.210(a) require a jurisdiction to identify and describe any areas with concentrations of racial/ethnic minorities and/or low income families.

#### Urban County Areas of Minority Concentration

For purposes of the AI, an area of minority concentration was deemed as one that encompassed a minority population exceeding the total percentage of that group for the Urban County, by 10 percent or more. The Census Tracts for both the Urban County and Bensalem Township were reviewed and the following results obtained, based on 2010 data:

➤ African Americans/Blacks

In the Urban County, African American/Black residents accounted for 3 percent of the population.<sup>1</sup> Six Census Tracts (one each in Bristol Borough and Middletown, Warminster and Falls townships and two in Morrisville Borough) had a percentage of population of 13 percent or more.

➤ Asians

Asian residents represented 3.7 percent of the total Urban County population. No Census Tracts in the Urban County had an Asian population concentration equal to or greater than 13.7 percent, although one tract in Middletown Township had a concentration of 13.6 percent.

➤ Hispanics

Hispanic residents represented 3.2 percent of the total County population. Three Census Tracts (two in Bristol Borough and one in Warminster Township) had a Hispanic population of 13.2 percent or more.

**Table 4 Census Tracts with Concentrations of Minority Populations in the Urban County, 2010**

Municipality	Census Tract	Total Population	Race and Ethnicity			
			White	Black	Asian	Hispanic
Bristol Borough	1006	3,737	84.4%	11.1%	0.8%	<b>14.2%</b>
Bristol Borough	1007	3,309	74.9%	<b>19.8%</b>	1.1%	<b>17.6%</b>
Middletown Township	1008.11	4,547	71.4%	<b>14.7%</b>	13.6%	5.9%
Warminster Township	1016.05	4,130	64.8%	<b>13.9%</b>	4.6%	<b>32.8%</b>
Morrisville Borough	1057.02	3,143	83.3%	<b>13.0%</b>	2.4%	8.6%
Morrisville Borough	1057.04	6,210	75.2%	<b>19.8%</b>	2.4%	9.9%
Falls Township	1058.01	6,346	74.8%	<b>15.9%</b>	9.1%	5.3%
<b>Bucks County (Urban County):</b>		<b>510,240</b>	<b>92.9%</b>	<b>3.0%</b>	<b>3.7%</b>	<b>3.2%</b>

Source: US Census Bureau, Census 2010

<sup>1</sup> The areas of minority concentration were determined using Census 2010 data at the census tract level.

For the most part, the areas of African American/Black concentration in the Urban County seem to be separate from the areas of concentration of Asians and Hispanics (i.e., there is little overlap between the geographic areas and the racial or ethnic groups). The exceptions are Census Tracts 1008.11 and 1016.05 in Middletown and Warminster townships, respectively. Both have concentrations of Black and Hispanic residents.

For the remainder of this report, the analysis is limited to Whites, African Americans/Blacks, and Hispanics and Asians. The other groups are simply too decentralized throughout the county, without any areas of sufficient concentration, making their numbers too small to analyze.

**Bensalem Township Areas of Minority Concentration**

A standard of 10 percent above the community-wide percentage was also used to analyze minority concentrations in Bensalem Township. The results, also based on 2010 data, are as follows:

- African Americans  
In Bensalem Township, African Americans/Blacks accounted for 8.3 percent of the total population. No Census Tract had a concentration of 18.3 percent or greater.
  
- Asians  
Asian residents accounted for 11.1 percent of the Township’s population. No Census Tract had a concentration of 21.1 percent or greater, although one tract (1002.09) had an Asian population of 21 percent.
  
- Hispanics  
Hispanics made up 7.8 percent of the population in Bensalem Township. Census Tract 1002.08 had a Hispanic population in excess of 21 percent.

**Table 5 Areas of Racial and Ethnic Concentration in Bensalem Township, 2010**

Census Tract	Total Population	Race and Ethnicity			
		White	Black	Asian	Hispanic
1001.02	2,720	86.7%	4.5%	7.6%	4.1%
1001.03	2,402	84.4%	10.3%	3.5%	6.2%
1001.04	4,498	62.6%	11.4%	18.6%	16.9%
1001.05	3,297	95.6%	1.8%	2.4%	4.0%
1002.01	4,422	76.3%	17.5%	5.4%	3.5%
1002.06	4,838	78.6%	7.3%	13.5%	5.4%
1002.07	4,246	77.2%	11.9%	10.3%	4.2%
1002.08	6,429	65.9%	9.6%	13.3%	<b>21.0%</b>
1002.09	9,452	63.3%	10.5%	21.0%	10.0%
1002.1	7,408	84.7%	5.2%	9.8%	3.7%
1002.11	6,710	89.5%	5.1%	5.0%	3.9%
1002.12	4,005	89.4%	3.3%	6.9%	2.8%
<b>Bensalem Total</b>	<b>60,427</b>	<b>77.6%</b>	<b>8.3%</b>	<b>11.1%</b>	<b>7.8%</b>

Source: US Census Bureau, Census 2010



It is within these impacted areas that other demographic characteristics—such as income and housing—will be analyzed.

### **Residential Segregation**

Residential segregation is a measure of the degree of separation of racial or ethnic groups living in a neighborhood or community. Typically, the pattern of residential segregation involves the existence of predominantly homogenous, White suburban communities and lower income minority inner-city neighborhoods. A potential impediment to fair housing is created where either latent factors, such as attitudes, or overt factors, such as real estate practices, limit the range of housing opportunities for minorities. A lack of racial or ethnic integration in a community can also produce a number of other potential problems, such as, higher rates of poverty, diminished employment prospects, lower educational attainment, along with increased infant and adult mortality rates.

### **Index of Dissimilarity**

An Index of Dissimilarity allows for comparisons between subpopulations, indicating how much one group is spatially separated from another within a community. The Index produced results on a scale from 0-to-100. A score of “0” corresponds to perfect integration and a score of “100” represents total segregation.<sup>2</sup> The index is typically interpreted as the percentage of the minority population that would have to move in order for a community or neighborhood to achieve full integration. A dissimilarity index of less than 30 indicates a low degree of segregation, while values between 30 and 60 indicate moderate segregation, and values above 60 indicate high segregation.

### **Bucks County (Urban County)**

The dissimilarity index for Whites/Blacks in the Urban County was 38.3 in 2010. This is indicative of a moderate level of segregation. The data indicate that in order to achieve full integration among White persons and Black persons in the County, 38.3 percent of Black residents would have to move to a different location within Bucks County. Additional dissimilarity indices in the chart below show the result of the Dissimilarity Index analysis for other minority groups. The White/Asian index was calculated at 27.3 percent, the White/Hispanic index at 28.4, and the White/multi-race index at 42.7 percent. Since the populations for some other minority racial groups indices are less than 1,000 persons, the indices are not listed individually and they cannot be reliably interpreted.

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<sup>2</sup> The index of dissimilarity is a commonly used demographic tool for measuring inequality. For a given geographic area, the index is equal to  $1/2 \sum ABS [(b/B)-(a/A)]$ , where b is the subgroup population of a census tract, B is the total subgroup population in a city, a is the majority population of a census tract, and A is the total majority population in the city. ABS refers to the absolute value of the calculation that follows.

**Table 6 Urban County Dissimilarity Indices (DI), 2010**

	DI with White Population	Population	% of Total Population
White	-	474,215	92.9%
Black	38.3	16,299	3.0%
Asian	27.3	5,586	3.7%
Other Race	42.7	17,561	1.4%
Hispanic*	28.4	16,256	3.2%
TOTAL	-	510,240	100.0%

\* Hispanic ethnicity is counted independently of race.  
 Source: U.S. Census Bureau, Census 2010

**Bensalem Township**

The dissimilarity index for Whites/Blacks in Bensalem Township was 26.1 percent in 2010. That figure indicates a relatively low level of segregation for the two groups, within the municipality. The data indicate that in order to achieve full integration among White persons and Black persons in the Township, 26.1 percent of Black residents would have to move to a different location within Bensalem Township.

The Index of Dissimilarity for the other minority groups was higher: 28.1 percent for Whites and Asians and 37.3 percent for Whites and Hispanics. These numbers indicate that Asians are slightly less segregated than Blacks, while Hispanics are more segregated. Indices for the other groups cannot be as reliably interpreted since their individual populations in many cases are less than 1,000.

**Table 7 Bensalem Township Dissimilarity Index Rankings, 2010**

	DI with White Population	Population	Percent of Total Population
White	-	46,896	77.6%
Black	26.1	5,040	8.3%
Asian	28.1	6,706	11.1%
Some Other Race	35.8	2,851	4.7%
Hispanic*	37.3	4,697	7.8%
TOTAL	-	60,427	100.0%

\*Hispanic ethnicity is counted independent of race.  
 Source: U.S. Census Bureau, Census 2010

To place the dissimilarity indices for both the Urban County and the Township in context, the following chart lists the dissimilarity indices for similar counties in eastern Pennsylvania. Compared to other suburban counties in the region, Bucks County in its entirety is in the middle range for segregation of Black and Asian population, and in the lower range for segregation involving the Hispanic population. Bensalem Township’s segregation indices are lower across the board, compared to those for suburban counties within the region.



**Table 8 Pennsylvania County Dissimilarity Index (DI) Rankings, 2010**

County	White Population	Black Population	*Hispanic Population	Asian Population	Total	DI White/Black	DI White/Hispanic	DI White/Asian
Berks	342,148	20,143	67,355	5,382	411,442	48.2	68.7	33.0
Bucks	557,647	22,376	26,782	24,008	625,249	48.3	34.8	34.5
Chester	426,707	30,623	32,503	19,296	498,886	47.2	48.8	37.5
Delaware	558,979	110,260	26,537	26,277	558,979	69.9	41.1	37.0
Lehigh	276,286	21,440	65,615	10,247	349,497	49.9	60.5	34.0
Montgomery	649,021	69,351	34,233	51,565	799,874	48.6	39.2	33.7
Northampton	256,895	14,986	31,179	7,203	297,735	44.5	49.1	38.2
Philadelphia	626,221	661,839	187,611	96,405	1,526,006	74.0	62.1	47.0

\*Hispanic ethnicity is counted independently of race.

Sources: CensusScope; University of Michigan Population Studies Center's Racial Residential Segregation Measurement project; U.S. Census (DP-1)

**Race/Ethnicity and Income**

Household income is one of several factors used to determine a household's eligibility for a home mortgage loan.

**Median Income**

Median income for Whites and Asians in Bucks County is higher than for African American/Blacks and Hispanics. The median household income for African American/Black households was \$42,005, equivalent to 56 percent of the median income for White households and only 46 percent that of Asian households. Hispanic households seem to fare slightly better than with a median income of \$51,104, or 67 percent of the median income for White households and 56 percent that of Asian households.

Income levels in Bensalem Township are lower overall, but the income trends seem to be similar to the County's. Asians have the highest median income at \$82,554 followed by Whites at \$58,625.

**Table 9 Median Household Income and Poverty Rates by Race/Ethnicity, 2010**

	Median Household Income	Poverty Rate
<b>Bucks County</b>	<b>\$74,828</b>	<b>4.9%</b>
Whites	\$75,942	4.4%
Blacks	\$42,005	18.2%
Asians	\$91,272	3.1%
Hispanics	\$51,104	14.1%
<b>Bensalem Township</b>	<b>\$59,668</b>	<b>6.4%</b>
Whites	\$58,625	6.1%
Blacks	\$40,655	18.5%
Asians	\$82,554	1.1%
Hispanics	\$47,542	5.5%

Source: U.S. Census Bureau, 2010 American Community Survey (B19013, B19013A, B19013B, B19013D, B19013I & B17001, B17001A, B17001B, B17001D, B17001I)

**Poverty**

Higher poverty rates were commensurate with lower household income levels. The poverty rate among African Americans/Blacks was more than four times the rate for Whites in Bucks County. Poverty also seems higher among Hispanics and lowest among Asians.

In Bensalem Township, Blacks and Hispanics appear slightly poorer than their counterparts in the rest of the County. Poverty also seems higher in the Township, with African Americans/Blacks more likely to be living in poverty than Blacks living elsewhere in Bucks County.

**Income Distribution**

A review of household income distribution also shows disparities. Black households seem significantly more likely to fall into the lower income brackets than their White counterparts, as illustrated in Table 10. In the Urban County, only 12.3 percent of White households earned less than \$25,000 compared to 23.4 percent of African American/Black households. At the opposite end of the spectrum, more than half of all White households earned more than \$75,000 compared to only 21.8 percent of Black households.

In Bensalem Township, 15.5 percent of the White households earned less than \$25,000 compared to 31.1 percent of African Americans. At the upper end of the spectrum, 38.2 percent of White households earned \$75,000 or more while only 23.5 percent of African American households fell into that category of household earnings.

**Table 10 Household Income Distribution by Race, 2010**

	Total	\$0 to \$24,999	\$25,000 to \$49,999	\$50,000 to \$74,999	\$75,000 and higher
<b>All Households</b>					
Bucks County	228,447	12.9%	19.3%	17.9%	50.0%
Urban County*	185,193	12.2%	17.7%	16.7%	53.4%
Bensalem Township	23,008	15.9%	25.1%	20.2%	38.9%
<b>White Households</b>					
Bucks County	210,556	12.6%	18.8%	17.9%	50.7%
Urban County*	191,363	12.3%	18.1%	17.6%	52.0%
Bensalem Township	19,193	15.5%	25.6%	20.7%	38.2%
<b>Black Households</b>					
Bucks County	7,586	25.2%	35.1%	17.5%	22.2%
Urban County*	5,823	23.4%	36.9%	17.9%	21.8%
Bensalem Township	1,763	31.1%	29.2%	16.2%	23.5%

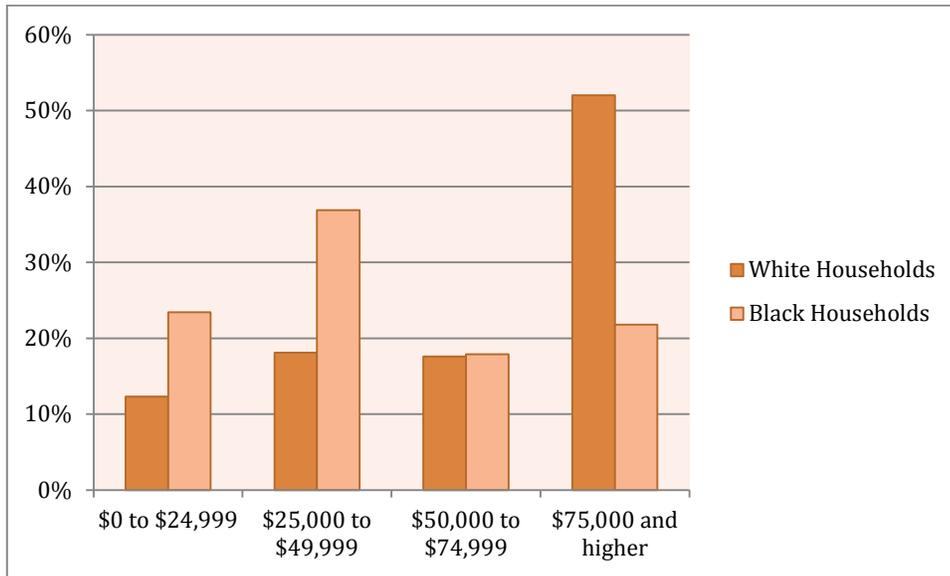
\* Bucks County exclusive of Bensalem Township and Bristol Township

Note: The sample sizes of Asians and Hispanics were too small and not provided in the Census data.

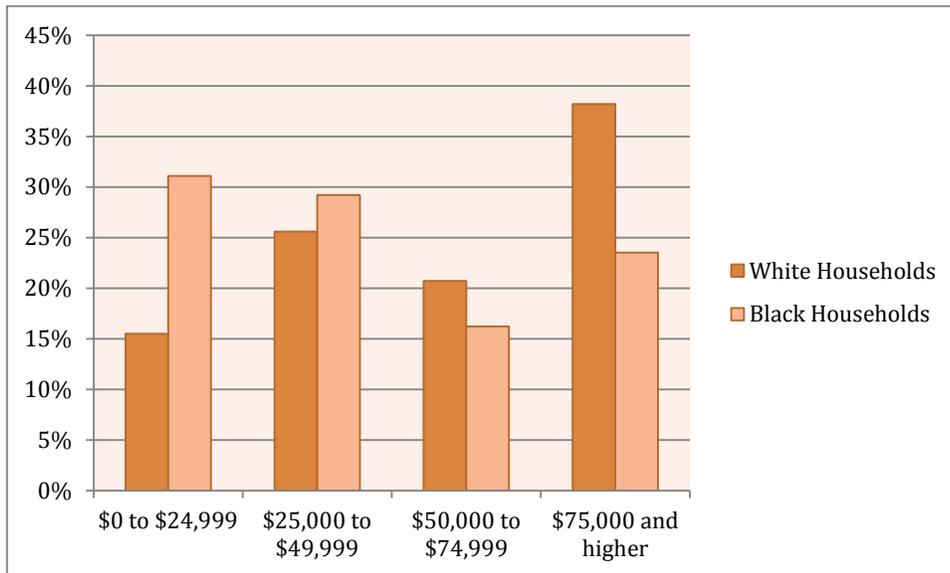
Source: U.S. Census Bureau, 2008-2010 American Community Survey (C19001, B19001A, B19001B, B19001D, B19001I).



**Figure 4 Household Income Distribution by Race in the Urban County, 2010**



**Figure 5 Household Income Distribution by Race in Bensalem Township, 2010**



**Concentrations of LMI Persons**

The CDBG Program includes a statutory requirement that 70 percent of the funds invested benefit low and moderate income (LMI) persons. As a result, HUD provides the percentage of LMI persons in each census block group for entitlements such as the Urban County and Bensalem Township.

HUD data reveals that there are 76 census block groups in the Urban County where at least 39.06 percent of residents meet the criterion for LMI status.<sup>3</sup> Of these, 10 block groups are located in identified areas of minority concentration in Bristol Borough, Falls Township, Morrisville Borough and Warminster Township, as listed in Table 11.

**Table 11 Areas of LMI Persons and Minority Concentration in the Urban County**

Municipality	Census Tract	Block Group	Low/Moderate Income Persons		
			#	Universe	%
Bristol Borough	1007.00	1	584	947	61.7%
	1007.00	3	662	1,014	65.3%
	1007.00	4	386	713	54.1%
Falls Township	1058.01	1	788	1,697	46.4%
Morrisville Borough	1057.04	2	748	1,521	49.2%
	1057.04	3	1,220	2,109	57.8%
	1057.04	4	960	1,896	50.6%
Warminster Township	1016.05	1	239	532	44.9%
	1016.05	2	1,426	2,318	61.5%
	1016.05	3	1,069	1,335	80.1%

Source: U.S. Department of Housing & Urban Development, 2009

In Bensalem Township, there are 10 census block groups where at least 47.5 percent of residents (for whom this rate is determined) meet the criterion for LMI status.<sup>4</sup> Of these, three block groups are located within identified areas of minority concentration and are listed in Table 12.

**Table 12 Areas of LMI Persons and Minority Concentration in Bensalem Township**

Census Tract	Block Group	Low/Moderate Income Persons		
		#	Universe	%
1002.08	2	884	1,688	52.4%
1002.08	3	587	1,117	52.6%
1002.08	4	1,293	1,681	76.9%

Source: U.S. Department of Housing & Urban Development, 2009

**Disability and Income**

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 that can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

<sup>3</sup> The 39.06 percent threshold is determined by HUD and represents the upper quartile of census block groups having the highest concentration of low and moderate income persons in the Urban County.

<sup>4</sup> The 47.5 percent threshold is determined by HUD and represents the upper quartile of census block groups having the highest concentration of low and moderate income persons in Bensalem Township.



### **Fair Housing Requirements**

The Fair Housing Act prohibits discrimination based on physical, mental or emotional handicap, provided “reasonable accommodation” can be made. Reasonable accommodation may include changes to address the needs of disabled persons, including adaptive structural (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal). In the Urban County, 8.1 percent of the population 5 years and older reported at least one disability in 2010; in Bensalem, the rate was higher, at 12.6 percent.<sup>5</sup>

### **Income Discrepancies**

According to the National Organization on Disabilities, a significant income gap exists for persons with disabilities, given their lower rate of employment. In the Urban County, among all persons with a disability in 2005-2007, 7.5 percent were living below the poverty line, as compared to 3.2 percent for those without a disability. In Bensalem Township, among all persons with a disability, 19 percent were living in poverty compared to 5.8 percent of persons without a disability.<sup>6</sup>

### **Familial Status and Income**

The Census Bureau divides households into family and non-family households. Family households are married couple 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.

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

In the Urban County, the proportion of female-headed households has increased from 7.4 percent in 1990 to 8.4 percent in 2010, and female-headed households with children have increased from 3.4 percent to 4.3 percent. By comparison, married couple family households with children have declined from 33 percent to 26.7 percent. There was a slight increase in the rate of male-headed households with children, from 1 percent to 1.3 percent.

In Bensalem Township, the trends were very similar with female-headed households increasing slightly from 9.4 percent to 10 percent. Female-headed households with children decreased from 5.4 percent to 4.9. The decline in married-family households with children was sharper than in the Urban County, declining from 30.6 percent to 19.3 percent. The percentage of male-headed households with children increased from 1.1 percent to 1.9 percent.

Female-headed households with children often experience difficulty in obtaining housing. In Bucks County in 2010, female-headed households with children accounted for 21.7 percent of all families living below the level of poverty, compared to only 4.5 percent of all families living above the level of poverty. In Bensalem Township, this group accounted for 34.2 percent of all

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<sup>5</sup> U.S. Census Bureau, 2010 American Community Survey (S1810)

<sup>6</sup> U.S. Census Bureau, 2005-2007 American Community Survey

families living below the level of poverty, compared to only 5.1 percent of all families living above the level of poverty.<sup>7</sup>

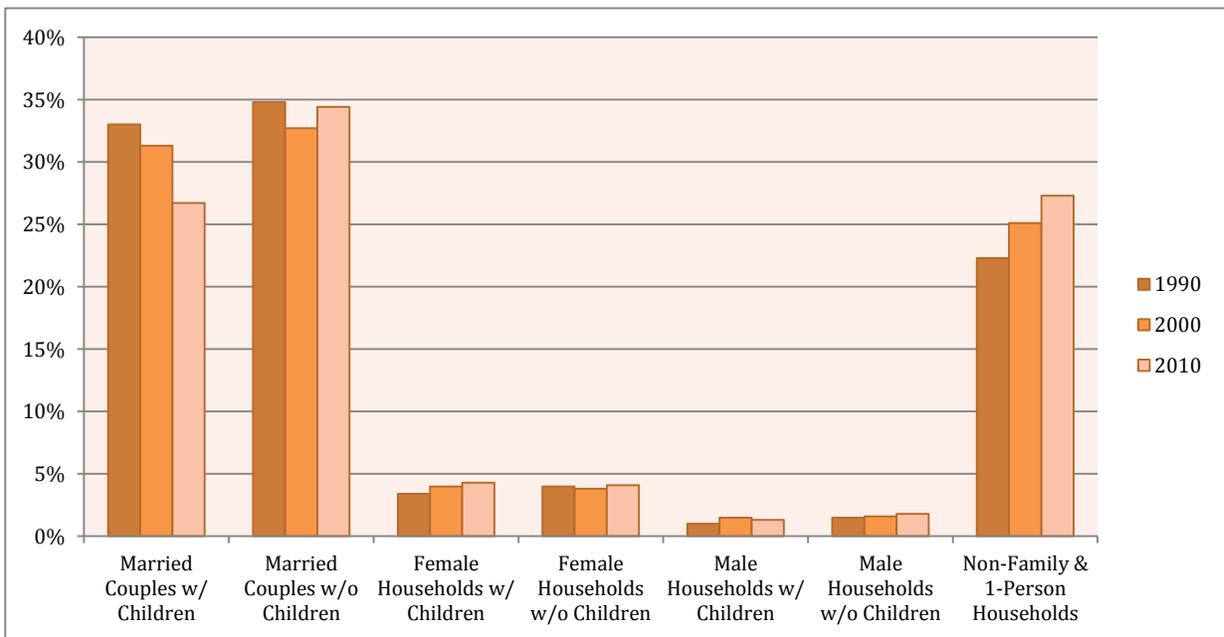
**Table 13 Households by Type and Presence of Children, 1990-2010**

	Total Households	Family Households										Non-family and 1-person Households
		% of Total	Married-couple families		Female-headed Households			Male-headed Households				
			% of Total	With Children	Without Children	% of Total	With Children	Without Children	% of Total	With Children	Without Children	
<b>1990</b>												
Bucks County	190,312	77.1%	66.3%	32.5%	33.7%	8.0%	3.8%	4.2%	2.8%	1.1%	1.7%	22.9%
Urban County*	150,274	77.7%	67.8%	33.0%	34.8%	7.4%	3.4%	4.0%	2.5%	1.0%	1.5%	22.3%
Bensalem Township	20,796	71.0%	58.5%	30.6%	27.8%	9.4%	5.3%	4.1%	3.1%	1.0%	2.1%	29.0%
<b>2000</b>												
Bucks County	218,773	74.0%	62.1%	30.0%	32.1%	8.6%	4.3%	4.2%	3.3%	1.6%	1.7%	26.0%
Urban County*	176,395	74.9%	64.0%	31.3%	32.7%	7.8%	4.0%	3.8%	3.1%	1.5%	1.6%	25.1%
Bensalem Township	22,635	66.9%	52.6%	24.4%	28.2%	10.7%	5.3%	5.4%	3.5%	1.7%	1.8%	33.1%
<b>2010</b>												
Bucks County	229,552	72.0%	59.4%	25.4%	34.0%	8.9%	4.5%	4.4%	3.7%	1.5%	2.2%	28.0%
Urban County*	185,582	72.7%	61.2%	26.7%	34.4%	8.4%	4.3%	4.1%	3.2%	1.3%	1.8%	27.3%
Bensalem Township	23,409	67.7%	52.0%	19.3%	32.8%	10.0%	4.9%	5.1%	5.7%	1.9%	3.8%	32.3%

\*Bucks County exclusive of Bensalem Township and Bristol Township

Source: U.S. Census Bureau, Census 1990 (STF-3, P019); Census 2000 (SF-3, P10); 2008 American Community Survey (B11001, B11003)

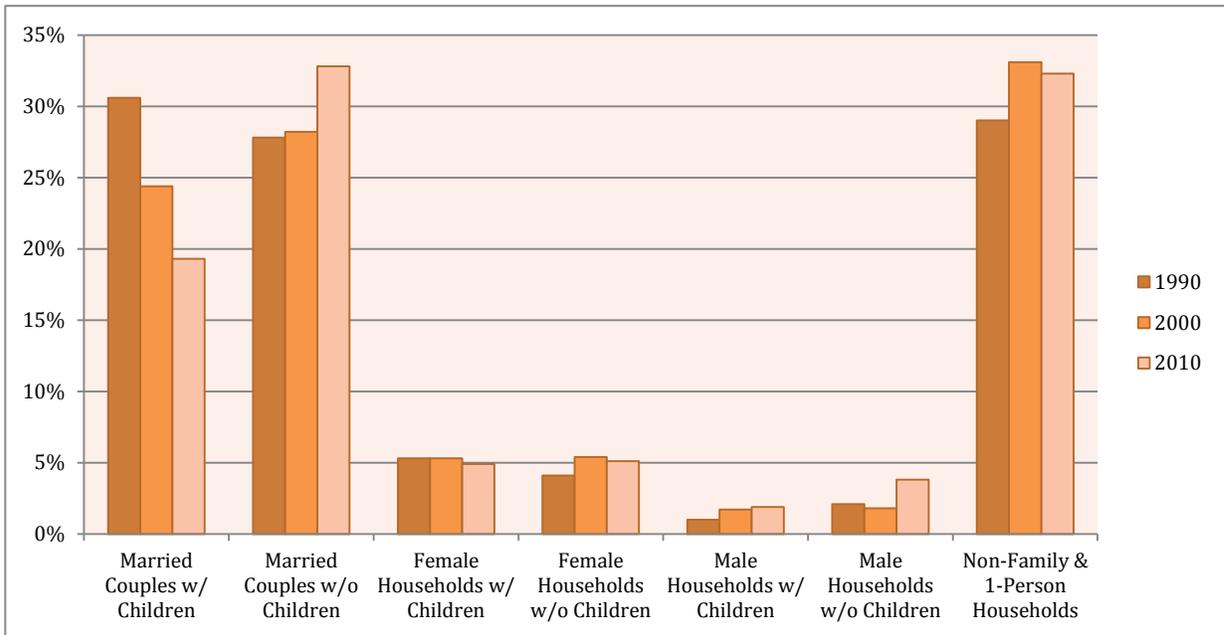
**Figure 6 Households by Type and Presence of Children in the Urban County, 1990-2010**



<sup>7</sup> U.S. Census Bureau, American Community Survey 2008-10 (DP03)



Figure 7 Households by Type and Presence of Children in Bensalem Township, 1990-2010



### Ancestry

It is illegal to refuse the right to housing based on place of birth or ancestry. 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.<sup>8</sup>

Census data on native and foreign-born populations revealed that 8.1 percent of Urban County residents and 15.9 percent of Township residents in 2010 were foreign-born or born outside of the U.S. in Puerto Rico or on U.S. island areas.<sup>9</sup>

### Poverty Level

Among families with children with foreign-born parents residing in the Urban County, 18.9 percent were living under 200 percent of the poverty level compared to 11.7 percent who were living above. In Bensalem Township, 19.7 percent were living under 200 percent of the poverty level compared to 28.2 percent who were living above this level.<sup>10</sup>

### Limited English Proficiency

Persons with limited English proficiency (LEP) are defined as persons who have a limited ability to read, write, speak or understand English. To determine whether translation of vital documents is required, the number of LEP persons in a single language group who are likely to qualify for and be served by the Urban County’s programs must be identified. In Bucks County,

<sup>8</sup> See the *Federal Register* for January 22, 2007, “Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons.

<sup>9</sup> U.S. Census Bureau, 2008-2010 American Community Survey Three-Year Estimates (C05002)

<sup>10</sup> U.S. Census Bureau, 2008-2010 American Community Survey Three-Year Estimates (C05010)

the five languages with the highest number of persons who speak English less than “very well” are Spanish, Russian, Gujarati (spoken by persons native to the [Indian](#) state of [Gujarat](#)), Chinese and Korean.

**Table 14 Language Spoken at Home by Ability to Speak English in Bucks County, 2010**

Language Group	Number of LEP Persons (% of total population)	% of Total Population
Spanish	7,503	1.27%
Russian	3,177	0.5%
Gujarati	1,543	0.26%
Chinese	1,333	0.226%
Korean	1,125	0.191%

Source: U.S. Census Bureau, 2008-2010 American Community Survey Three-Year Estimates (B16001)

Bucks County, Census data revealed there are potentially five languages with significant numbers of native speakers who also speak English less than “very well.” The languages include Spanish, Russian, Gujarati, Chinese and Korean. For each of these five languages, the number of LEP persons exceeds 1,000.

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.<sup>11</sup> 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 the following:

- 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
- Resources available to the grantee and costs.

### **Protected Class Status and Unemployment**

Unemployment in Bucks County in 2010 was 7.2 percent, which was lower than Pennsylvania’s rate of 8.3 percent, as indicated on the following table. In the whole of Bucks County among racial and ethnic minorities, unemployment was higher among Blacks (8.9 percent) and Hispanics (6.2 percent), but lower among Asians (4.8 percent). Higher unemployment, whether temporary or permanent, will mean less disposable income for housing expenses.

<sup>11</sup> The four-factor analysis is detailed in the *Federal Register* dated January 22, 2007.



Unemployment rates tend to be higher in Bensalem Township than in the Urban County, particularly among males. The overall unemployment rate in the township was 7.9 percent in 2010.

**Table 15 Civilian Labor Force, 2010**

Civilian Labor Force	Pennsylvania		Bucks County		Urban County*		Bensalem Township	
	Total	%	Total	%	Total	%	Total	%
<b>Total CLF</b>	<b>6,168,903</b>	<b>100%</b>	<b>327,130</b>	<b>100%</b>	<b>265,166</b>	<b>100%</b>	<b>32,880</b>	<b>100%</b>
Employed	5,657,793	91.7%	303,694	92.8%	246,737	93.1%	30,295	92.1%
Unemployed	511,110	8.3%	23,436	7.2%	18,429	6.9%	2,585	7.9%
<b>Male CLF</b>	<b>3,205,521</b>	<b>100.0%</b>	<b>172,647</b>	<b>100.0%</b>	<b>139,923</b>	<b>100.0%</b>	<b>17,244</b>	<b>100.0%</b>
Employed	2,917,466	91.0%	159,327	92.3%	129,898	92.8%	15,779	91.5%
Unemployed	288,055	9.0%	13,320	7.7%	10,025	7.2%	1,465	8.5%
<b>Female CLF</b>	<b>2,963,382</b>	<b>100.0%</b>	<b>154,483</b>	<b>100.0%</b>	<b>125,243</b>	<b>100.0%</b>	<b>15,636</b>	<b>100.0%</b>
Employed	2,740,327	92.5%	144,367	93.5%	116,839	93.3%	14,516	92.8%
Unemployed	223,055	7.5%	10,116	6.5%	8,404	6.7%	1,120	7.2%
<b>White CLF</b>	<b>5,235,429</b>	<b>100%</b>	<b>297,934</b>	<b>100%</b>	<b>246,613</b>	<b>100%</b>	<b>26,393</b>	<b>100%</b>
Employed	4,855,749	92.7%	276,639	92.9%	229,648	93.1%	24,335	92.2%
Unemployed	379,680	7.3%	21,295	7.1%	16,965	6.9%	2,058	7.8%
<b>Asian CLF</b>	<b>172,483</b>	<b>100%</b>	<b>12,539</b>	<b>100%</b>	<b>8,244</b>	<b>100%</b>	<b>3,355</b>	<b>100%</b>
Employed	160,465	93.0%	11,940	95.2%	7,942	96.3%	3,125	93.1%
Unemployed	12,018	7.0%	599	4.8%	302	3.7%	230	6.9%

\* Bucks County exclusive of Bensalem Township and Bristol Township

Note: The sample sizes of Blacks and Hispanics in Bensalem and Bristol Townships were too small and not provided in the Census data. Therefore, the unemployment rates for minorities in the Urban County could not be calculated.

Source: U.S. Census Bureau, 2008-2010 American Community Survey (C23001, C23002A, C23002B, C23002D, C23002I)

## B. Housing Market

### *Housing Inventory*

Between 1990 and 2009 the Urban County housing stock increased by more than 26 percent, from 157,153 to 198,302 units. New residential development in 13 municipalities accounted for some 80 percent of the net increase in housing units, as detailed in Table 16.

Table 16 Trends in Housing Inventory, 1990-2009

Census Tract	1990		2000		2009		Change 1990-2009	
	#	% of Total Housing Units	#	% of Total Housing Units	#	% of Total Housing Units	#	% of Total Housing Units
<b>Bucks County</b>	<b>199,934</b>	<b>100.0%</b>	<b>225,497</b>	<b>100.0%</b>	<b>242,496</b>	<b>100.0%</b>	<b>42,562</b>	<b>21.3%</b>
<b>Urban County*</b>	<b>157,153</b>	<b>78.6%</b>	<b>181,476</b>	<b>80.5%</b>	<b>198,302</b>	<b>81.8%</b>	<b>41,149</b>	<b>26.2%</b>
Bedminster township	1,731	0.9%	1,868	0.8%	2,314	1.0%	583	33.7%
<b>Bensalem township</b>	<b>22,711</b>	<b>11.4%</b>	<b>23,535</b>	<b>10.4%</b>	<b>23,953</b>	<b>9.9%</b>	<b>1,242</b>	<b>5.5%</b>
Bridgeton township	574	0.3%	612	0.3%	612	0.3%	38	6.6%
Bristol borough	4,137	2.1%	4,207	1.9%	4,180	1.7%	43	1.0%
Bristol township	20,070	10.0%	20,486	9.1%	20,241	8.3%	171	0.9%
Buckingham township	3,283	1.6%	5,861	2.6%	8,377	3.5%	5,094	155.2%
Chalfont borough	1,144	0.6%	1,404	0.6%	1,459	0.6%	315	27.5%
Doylestown borough	4,099	2.1%	4,055	1.8%	4,081	1.7%	-18	-0.4%
Doylestown township	4,857	2.4%	6,200	2.7%	6,617	2.7%	1,760	36.2%
Dublin borough	840	0.4%	869	0.4%	895	0.4%	55	6.5%
Durham township	485	0.2%	524	0.2%	541	0.2%	56	11.5%
East Rockhill township	1,359	0.7%	1,883	0.8%	1,983	0.8%	624	45.9%
Falls township	13,320	6.7%	13,528	6.0%	13,315	5.5%	-5	0.0%
Haycock township	791	0.4%	841	0.4%	887	0.4%	96	12.1%
Hilltown township	3,659	1.8%	4,370	1.9%	5,687	2.3%	2,028	55.4%
Hulmeville borough	333	0.2%	356	0.2%	350	0.1%	17	5.1%
Ivyland borough	171	0.1%	199	0.1%	284	0.1%	113	66.1%
Langhorne borough	301	0.2%	333	0.1%	392	0.2%	91	30.2%
Langhorne Manor borough	545	0.3%	649	0.3%	625	0.3%	80	14.7%
Lower Makefield township	8,868	4.4%	11,931	5.3%	12,702	5.2%	3,834	43.2%
Lower Southampton township	7,264	3.6%	7,333	3.3%	7,407	3.1%	143	2.0%
Middletown township	14,942	7.5%	15,716	7.0%	16,829	6.9%	1,887	12.6%
Milford township	2,525	1.3%	3,161	1.4%	3,397	1.4%	872	34.5%
Morrisville borough	4,186	2.1%	4,313	1.9%	4,224	1.7%	38	0.9%
New Britain borough	828	0.4%	930	0.4%	967	0.4%	139	16.8%
New Britain township	3,285	1.6%	3,969	1.8%	4,257	1.8%	972	29.6%
New Hope borough	1,007	0.5%	1,251	0.6%	1,246	0.5%	239	23.7%
Newtown borough	1,101	0.6%	936	0.4%	1,055	0.4%	-46	-4.2%
Newtown township	5,332	2.7%	6,848	3.0%	7,218	3.0%	1,886	35.4%
Nockamixon township	1,259	0.6%	1,411	0.6%	1,457	0.6%	198	15.7%
Northampton township	11,484	5.7%	13,138	5.8%	13,700	5.6%	2,216	19.3%
Penndel borough	992	0.5%	927	0.4%	894	0.4%	-98	-9.9%
Perkasie borough	3,089	1.5%	3,378	1.5%	3,396	1.4%	307	9.9%
Plumstead township	2,296	1.1%	4,103	1.8%	5,020	2.1%	2,724	118.6%
Quakertown borough	3,597	1.8%	3,606	1.6%	3,685	1.5%	88	2.4%
Richland township	3,371	1.7%	3,902	1.7%	4,963	2.0%	1,592	47.2%
Richlandtown borough	379	0.2%	451	0.2%	457	0.2%	78	20.6%
Riegelsville borough	404	0.2%	403	0.2%	390	0.2%	-14	-3.5%
Sellersville borough	1,704	0.9%	1,827	0.8%	1,865	0.8%	161	9.4%
Silverdale borough	309	0.2%	329	0.1%	346	0.1%	37	12.0%
Solebury township	2,503	1.3%	3,207	1.4%	4,003	1.7%	1,500	59.9%
Springfield township	1,940	1.0%	1,972	0.9%	2,518	1.0%	578	29.8%
Telford borough	761	0.4%	1,015	0.5%	1,031	0.4%	270	35.5%
Tinicum township	1,709	0.9%	1,834	0.8%	1,918	0.8%	209	12.2%
Trumbauersville borough	293	0.1%	382	0.2%	405	0.2%	112	38.2%
Tullytown borough	861	0.4%	819	0.4%	987	0.4%	126	14.6%
Upper Makefield township	2,023	1.0%	2,598	1.2%	2,971	1.2%	948	46.9%
Upper Southampton township	5,918	3.0%	6,123	2.7%	6,021	2.5%	103	1.7%
Warminster township	11,228	5.6%	11,644	5.2%	13,057	5.4%	1,829	16.3%
Warrington township	4,458	2.2%	6,314	2.8%	8,197	3.4%	3,739	83.9%
Warwick township	1,981	1.0%	4,050	1.8%	4,925	2.0%	2,944	148.6%
West Rockhill township	1,684	0.8%	1,701	0.8%	1,872	0.8%	188	11.2%
Wrightstown township	865	0.4%	986	0.4%	1,066	0.4%	201	23.2%
Yardley borough	1,078	0.5%	1,209	0.5%	1,257	0.5%	179	16.6%

\*Bucks County exclusive of Bensalem Township and Bristol Township

Source: DemographicsNow



In Bensalem Township, the total housing stock increased 5.5 percent, from 22,711 to 23,953 units. In five census tracts, the net increase exceeded 100 units during this period. The charts that follow illustrate the net change in housing inventory from 1990 to 2009 in the two jurisdictions.

**Table 17 Trends in Total Housing Inventory in Bensalem Township, 1990-2009**

Census Tract	1990		2000		2009		Change 1990-2009	
	#	% of Total Housing Units	#	% of Total Housing Units	#	% of Total Housing Units	#	% of Total Housing Units
<b>Bensalem Township</b>	<b>22,711</b>	<b>100.0%</b>	<b>23,535</b>	<b>100.0%</b>	<b>23,953</b>	<b>100.0%</b>	<b>1,242</b>	<b>5.5%</b>
1001.02	1,380	6.1%	1,391	5.9%	1,528	6.4%	148	10.7%
1001.03	1,024	4.5%	1,085	4.6%	1,119	4.7%	95	9.3%
1001.04	1,791	7.9%	1,810	7.7%	1,586	6.6%	-205	-11.4%
1001.05	1,225	5.4%	1,239	5.3%	1,220	5.1%	-5	-0.4%
1002.01	1,670	7.4%	1,707	7.3%	1,712	7.1%	42	2.5%
1002.06	1,857	8.2%	1,818	7.7%	1,648	6.9%	-209	-11.3%
1002.07	1,167	5.1%	1,507	6.4%	1,690	7.1%	523	44.8%
1002.08	2,604	11.5%	2,648	11.3%	2,718	11.3%	114	4.4%
1002.09	3,359	14.8%	3,463	14.7%	3,691	15.4%	332	9.9%
1002.10	2,520	11.1%	2,563	10.9%	2,613	10.9%	93	3.7%
1002.11	2,782	12.2%	2,867	12.2%	3,015	12.6%	233	8.4%
1002.12	1,332	5.9%	1,437	6.1%	1,413	5.9%	81	6.1%

Source: DemographicsNow

### **Types of Housing Units**

In 2010, the Census reported 185,582 occupied housing units in the Urban County. Of these, 150,345 were owner-occupied and 35,392 were renter-occupied, as noted in Table 18. In Bucks County, there are many owner-occupied condominium units located within multi-family structures, as well as owner-occupied townhouse and rowhouse units classified as single-family housing in the Census. For this reason, analyzing the tenure of housing (owner versus renter) by the type of housing unit may provide a clearer profile of the most affordable segment of the housing inventory: rental housing. For example, 5,123 units of the owner-occupied housing stock in the Urban County consisted of multi-family units, equivalent to 3.4 percent of the owner-occupied inventory. By comparison, there were far more multi-family units within the rental housing stock. Of the 35,392 renter-occupied units, 24,639 consisted of multi-family units, equivalent to 69.7 percent of the rental housing stock. About two-thirds of these units were located in 11 of the Urban County's 52 municipalities.

**Table 18 Housing Units in Structures in the Urban County, 2010**

Municipality	Owner-Occupied				Renter-Occupied				% Renter-Occupied Multi-family Units <sup>3</sup>
	Total	Single-family <sup>1</sup>	Multi-family <sup>2</sup>	% Multi-family	Total	Single-family <sup>1</sup>	Multi-family <sup>2</sup>	% Multi-family	
Bucks County	180,092	170,280	5,567	3.1%	49,460	13,380	35,572	71.9%	15.5%
<b>Urban County*</b>	<b>150,345</b>	<b>141,662</b>	<b>5,123</b>	<b>3.4%</b>	<b>35,237</b>	<b>12,033</b>	<b>24,571</b>	<b>69.7%</b>	<b>13.9%</b>
Bedminster Township	1,930	1,917	13	0.7%	331	244	64	19.3%	2.8%
<b>Bensalem Township</b>	<b>14,364</b>	<b>13,419</b>	<b>281</b>	<b>2.0%</b>	<b>9,045</b>	<b>1,057</b>	<b>7,914</b>	<b>87.5%</b>	<b>33.8%</b>
Bridgeton Township	492	449	4	0.8%	73	31	26	35.6%	4.6%
Bristol Borough	2,522	2,430	92	3.6%	1,611	290	1,321	82.0%	32.0%
Bristol Township	15,383	15,205	163	1.1%	5,178	1,552	3,087	59.6%	15.0%
Buckingham Township	6,319	6,065	48	0.8%	415	342	36	8.7%	0.5%
Chalfont Borough	1,318	1,225	93	7.1%	108	25	83	76.9%	5.8%
Doylestown Borough	2,105	2,004	101	4.8%	1,998	428	1,570	78.6%	38.3%
Doylestown Township	4,763	4,543	105	2.2%	930	341	589	63.3%	10.3%
Dublin Borough	369	332	37	10.0%	541	60	481	88.9%	52.9%
Durham Township	429	424	0	0.0%	36	32	4	11.1%	0.9%
East Rockhill Township	1,650	1,633	5	0.3%	313	431	153	48.9%	7.8%
Falls Township	9,923	8,653	10	0.1%	3,217	483	2,684	83.4%	20.4%
Haycock Township	766	739	0	0.0%	95	70	61	64.2%	7.1%
Hilltown Township	4,189	4,021	53	1.3%	986	530	424	43.0%	8.2%
Hulmeville Borough	273	270	3	1.1%	74	33	41	55.4%	11.8%
Ivyland Borough	245	145	0	0.0%	21	13	10	47.6%	3.8%
Langhorne Borough	369	280	26	7.0%	156	26	130	83.3%	24.8%
Langhorne Manor Borough	269	355	13	4.8%	26	11	15	57.7%	5.1%
Lower Makefield Township	10,408	9,887	506	4.9%	1,270	419	851	67.0%	7.3%
Lower Southampton Township	5,855	5,577	42	0.7%	1,334	218	1,089	81.6%	15.1%
Middletown Township	11,643	11,462	173	1.5%	3,853	643	3,170	82.3%	20.5%
Milford Township	3,071	2,866	90	2.9%	888	145	147	16.6%	3.7%
Morrisville Borough	2,256	2,169	87	3.9%	1,527	297	1,230	80.6%	32.5%
New Britain Borough	884	798	86	9.7%	116	80	36	31.0%	3.6%
New Britain Township	3,425	3,273	152	4.4%	453	264	179	39.5%	4.6%
New Hope Borough	818	719	99	12.1%	434	119	305	70.3%	24.4%
Newtown Borough	636	622	14	2.2%	258	108	150	58.1%	16.8%
Newtown Township	6,407	5,999	399	6.2%	773	342	431	55.8%	6.0%
Nockamixon Township	1,185	1,143	42	3.5%	161	140	21	13.0%	1.6%
Northampton Township	12,583	12,160	423	3.4%	1,003	446	557	55.5%	4.1%
Pennel Borough	480	459	21	4.4%	389	79	370	95.1%	42.6%
Perkasie Borough	2,280	2,253	27	1.2%	1,013	183	830	81.9%	25.2%
Plumstead Township	3,516	3,208	308	8.8%	539	297	179	33.2%	4.4%
Quakertown Borough	2,108	2,049	59	2.8%	1,356	259	1,097	80.9%	31.7%
Richland Township	4,226	3,322	904	21.4%	381	178	152	39.9%	3.3%
Richlandtown Borough	421	403	18	4.3%	117	60	37	31.6%	6.9%
Riegelsville Borough	240	236	4	1.7%	73	39	34	46.6%	10.9%
Sellersville Borough	1,120	1,034	86	7.7%	499	158	341	68.3%	21.1%
Silverdale Borough	234	234	0	0.0%	60	33	27	45.0%	9.2%
Solebury Township	3,218	3,112	106	3.3%	228	166	62	27.2%	0.1%
Springfield Township	1,769	1,696	73	4.1%	123	110	13	10.6%	0.7%
Telford Borough	569	490	79	13.9%	4,233	41	382	9.0%	8.0%
Tinicum Township	1,445	1,412	33	2.3%	246	161	75	30.5%	4.4%
Trumbauersville Borough	283	276	7	2.5%	62	37	25	40.3%	7.2%
Tullytown Borough	473	456	17	3.6%	232	85	70	30.2%	9.9%
Upper Makefield Township	5,292	2,570	13	0.2%	207	207	0	0.0%	0.0%
Upper Southampton Township	5,069	4,689	373	7.4%	811	125	686	84.6%	11.7%
Warminster Township	8,845	1,869	976	11.0%	3,603	1,364	2,239	62.1%	18.0%
Warrington Township	6,523	6,248	275	4.2%	1,168	270	898	76.9%	11.7%
Warwick Township	4,625	4,452	173	3.7%	163	401	104	63.8%	2.2%
West Rockhill Township	1,465	1,329	136	9.3%	623	230	384	61.6%	18.4%
Wrightstown Township	931	931	0	0.0%	71	62	9	12.7%	0.9%

\*Bucks County exclusive of Bensalem and Bristol townships

<sup>1</sup> Includes detached and attached units.

<sup>2</sup> Includes structures with 2 or more units.

<sup>3</sup> As a percent of all occupied units.

Source: U.S. Census Bureau, 2010 American Community Survey (B25032)



In 24 of the 52 Urban County municipalities, renter-occupied multi-family units represented less than 10 percent of the total occupied housing inventory in 2010. For example, in Bedminster Township, a semi-rural community in upper Bucks County, of the 2,261 occupied housing units, only 64 were renter-occupied multi-family units, equivalent to 2.8 percent of the Township’s occupied housing stock. Please refer to Table 18.

In Bensalem Township, there were 23,409 occupied housing units in 2010. Of these, 13,364 were owner-occupied and 9,045 were renter-occupied, as noted in Table 19. Only 2 percent of the owner-occupied housing stock included multi-family units, compared to 87.5 percent of the rental housing inventory. Nearly three-fourths of these units were located in six of the Township’s 12 census tracts. Two areas of minority concentration, tracts 1001.04 and 1002.08, accounted for 2,430 of the multi-family rental units, equivalent to 30.7 percent of all such units in the Township.

In three of the Township’s 12 census tracts, renter-occupied multi-family units represented less than 10 percent of the occupied housing inventory in 2010. In Census Tract 1002.10, there were only single family rental units; no multi-family rental units were counted in the housing inventory.

**Table 19 Housing Units in Structures in Bensalem Township, 2010**

Municipality	Owner-Occupied				Renter-Occupied				% Renter-Occupied Multi-family Units <sup>3</sup>
	Total	Single-family <sup>1</sup>	Multi-family <sup>2</sup>	% Multi-family	Total	Single-family <sup>1</sup>	Multi-family <sup>2</sup>	% Multi-family	
<b>Bensalem Township</b>	<b>14,364</b>	<b>13,419</b>	<b>281</b>	<b>2.0%</b>	<b>9,045</b>	<b>1,057</b>	<b>7,914</b>	<b>87.5%</b>	<b>33.8%</b>
1001.02	415	405	10	2.4%	840	32	808	96.2%	64.4%
1001.03	570	514	56	9.8%	439	70	369	84.1%	338.5%
1001.04	611	611	0	0.0%	1219	0	1,219	100.0%	66.6%
1001.05	982	982	0	0.0%	260	61	199	76.5%	16.0%
1002.01	1,376	1,376		0.0%	229	192	37	16.2%	2.3%
1002.06	1,103	1,063	40	3.6%	725	86	639	88.1%	35.0%
1002.07	841	841	0	0.0%	921	12	909	98.7%	51.6%
1002.08	1,188	1,188	0	0.0%	1346	135	1,211	90.0%	47.8%
1002.09	1,678	1,646	32	1.9%	2128	191	1,937	91.0%	50.9%
1002.10	2,631	2,500	114	4.3%	59	59	0	0.0%	0.0%
1002.11	1,630	1,601	29	1.8%	726	154	572	78.8%	24.3%
1002.12	1,339	1,339	0	0.0%	153	95	58	37.9%	3.9%

<sup>1</sup> Includes detached and attached units and mobile homes.

<sup>2</sup> Includes structures with 2 or more units.

<sup>3</sup> As a percent of all occupied units.

Source: U.S. Census Bureau, 2006-2010 American Community Survey (B25032)

### ***Protected Class Status and Homeownership***

The value in home ownership lies in the accumulation of wealth as the owner's share of equity increases with the property's value. Paying a monthly mortgage instead of rent is an investment in an asset that is likely to appreciate. According to one study, "a family that puts 5 percent down to buy a house will earn a 100 percent return on the investment every time the house appreciates 5 percent."<sup>12</sup>

The countywide homeownership rate of 77.1 percent in 2010 was well above the statewide rate of 69.6 percent. In the Urban County, Whites had a home ownership rate of 81 percent. African American/Blacks had the lowest rate of home ownership, at 40 percent, while the rate for Hispanics was 50 percent, and for Asians, 77 percent.

Among the municipalities in the Urban County, minority home ownership varied widely, as illustrated in Table 20. Several townships and boroughs with fewer than 50 minority households reported home ownership rates of 100 percent.

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<sup>12</sup> Kathleen C. Engel and Patricia A. McCoy, "From Credit Denial to Predatory Lending: The Challenge of Sustaining Minority Homeownership," in *Segregation: The Rising Costs for America*, edited by James H. Carr and Nandinee K. Kutty (New York: Routledge 2008) p. 82.



**Table 20 Homeownership by Race/Ethnicity, 2010**

Municipality	White		Black		Asian		Hispanic	
	#	%	#	%	#	%	#	%
<b>Bucks County</b>	<b>170,902</b>	<b>80%</b>	<b>3,171</b>	<b>40%</b>	<b>4,755</b>	<b>69%</b>	<b>3,236</b>	<b>46%</b>
<b>Urban County*</b>	<b>145,494</b>	<b>81%</b>	<b>1,751</b>	<b>40%</b>	<b>3,590</b>	<b>77%</b>	<b>2,324</b>	<b>50%</b>
Bedminster Township	1,985	85%	9	60%	33	97%	27	66%
<b>Bensalem Township</b>	<b>12,021</b>	<b>63%</b>	<b>578</b>	<b>33%</b>	<b>927</b>	<b>52%</b>	<b>351</b>	<b>25%</b>
Bridgeton Township	439	78%	2	100%	1	100%	5	71%
Bristol Borough	1,980	59%	114	39%	0	0%	181	43%
Bristol Township	14,737	53%	842	43%	238	54%	561	55%
Buckingham Township	6,156	92%	62	91%	174	97%	98	80%
Chalfont Borough	1,199	85%	13	81%	33	94%	16	80%
Doylestown Borough	1,922	51%	10	3%	23	40%	23	38%
Doylestown Township	5,056	82%	32	63%	49	80%	68	74%
Dublin Borough	409	49%	1	9%	9	47%	11	20%
Durham Township	402	89%	1	100%	3	100%	4	67%
East Rockhill Township	1,696	86%	11	85%	7	88%	15	71%
Falls Township	9,402	78%	158	19%	213	50%	185	43%
Haycock Township	775	88%	5	71%	2	100%	3	75%
Hilltown Township	4,141	81%	54	52%	101	81%	55	50%
Hulmeville Borough	270	75%	2	67%	7	100%	2	33%
Ivyland Borough	259	86%	0	--	20	91%	4	67%
Langhorne Borough	339	56%	21	66%	5	71%	1	17%
Langhorne Manor Borough	261	98%	5	71%	1	100%	2	50%
Lower Makefield Township	9,592	89%	179	71%	534	88%	162	73%
Lower Southampton Township	5,619	82%	35	31%	88	70%	73	54%
Middletown Township	12,080	79%	156	29%	285	52%	192	52%
Milford Township	3,075	90%	31	76%	36	97%	33	92%
Morrisville Borough	2,038	70%	158	31%	29	51%	109	40%
New Britain Borough	794	87%	6	75%	6	100%	11	92%
New Britain Township	3,488	88%	48	80%	94	90%	55	87%
New Hope Borough	709	59%	4	21%	11	65%	11	21%
Newtown Borough	634	67%	2	40%	4	57%	9	60%
Newtown Township	5,861	87%	64	74%	382	88%	84	74%
Nockamixon Township	1,103	82%	2	50%	1	50%	9	53%
Northampton Township	12,268	92%	65	84%	376	96%	124	89%
Penndel Borough	471	60%	5	6%	2	12%	7	21%
Perkasie Borough	2,266	71%	11	46%	15	63%	25	45%
Plumstead Township	3,548	86%	19	68%	49	83%	81	56%
Quakertown Borough	2,050	60%	25	35%	27	45%	41	31%
Richland Township	4,020	88%	42	75%	88	91%	83	75%
Richlandtown Borough	311	69%	4	100%	0	0%	3	30%
Riegelsville Borough	267	73%	0	--	1	100%	4	80%
Sellersville Borough	1,196	72%	3	14%	6	46%	15	38%
Silverdale Borough	253	81%	2	67%	0	--	0	0%
Solebury Township	2,985	90%	28	88%	73	100%	48	77%
Springfield Township	1,708	86%	8	89%	4	67%	14	70%
Telford Borough	490	50%	3	30%	23	79%	19	44%
Tinicum Township	1,289	80%	5	71%	3	75%	11	42%
Trumbauersville Borough	258	73%	0	0%	1	50%	4	57%
Tullytown Borough	469	65%	6	26%	1	17%	6	50%
Upper Makefield Township	2,703	95%	26	90%	60	97%	49	92%
Upper Southampton Township	4,878	85%	19	51%	57	84%	40	69%
Warminster Township	8,839	74%	95	28%	121	61%	122	19%
Warrington Township	6,367	86%	100	54%	327	85%	77	33%
Warwick Township	4,590	95%	55	90%	142	96%	67	97%
West Rockhill Township	1,533	73%	9	56%	17	94%	15	79%
Wrightstown Township	893	90%	10	91%	22	92%	7	64%
Yardley Borough	755	71%	26	68%	13	62%	14	58%

\*Bucks County exclusive of Bensalem Township and Bristol Township

Note: Cells for tracts in which no member of a racial or ethnic group live are left blank to differentiate them from tracts in which only renters live.

Source: U.S. Census Bureau, Census 2010 (SF3-H11, H12)

In Bensalem Township, among Whites, the home ownership rate was 63.3 percent, which was significantly less than the Urban County (81.2 percent) and the whole of Bucks County (79.4 percent). Approximately one-half of all Blacks (50.1 percent) owned their homes, and about than one-quarter of all Hispanics (25.3 percent) were home owners. Asians had a homeownership rate similar to Blacks (49.8 percent).

**Table 21 Homeownership by Race/Ethnicity in Bensalem Township, 2010**

Census Tract	White		Black		Asian		Hispanic	
	#	%	#	%	#	%	#	%
<b>Bensalem Township</b>	<b>12,021</b>	<b>63.3%</b>	<b>575</b>	<b>50.1%</b>	<b>920</b>	<b>49.8%</b>	<b>351</b>	<b>25.3%</b>
1001.02	415	37.3%	0	100.0%	0	0.0%	11	25.6%
1001.03	531	63.8%	27	65.8%	0	0.0%	15	28.3%
1001.04	529	41.2%	0	100.0%	82	29.3%	17	7.7%
1001.05	942	78.4%	0	0.0%	0	0.0%	19	65.5%
1002.01	1,079	84.4%	257	10.1%	27	100.0%	33	80.5%
1002.06	950	63.9%	45	77.2%	108	78.8%	27	34.2%
1002.07	665	45.1%	25	81.6%	98	100.0%	27	45.8%
1002.08	1,063	57.2%	47	86.1%	32	13.9%	42	11.0%
1002.09	1,342	40.7%	58	85.6%	240	48.9%	37	13.1%
1002.10	2,269	97.5%	101	0.0%	172	100.0%	61	82.4%
1002.11	1510	70.4%	15	63.4%	105	74.5%	32	34.8%
1002.12	1251	89.1%	0	0.0%	56	100.0%	30	90.9%

Note: Cells for tracts in which no member of a racial or ethnic group live are left blank to differentiate them from tracts in which only renters live.

Source: U.S. Census Bureau, ACS 2006-2010 (B25003H) & Census2010QT-H1

**Protected Classes and Larger Households**

A larger household, whether or not children are present, can raise fair housing concerns. If there are policies or programs that restrict the number of persons that can live together in a single housing unit, and members of the protected classes need more bedrooms to accommodate their larger household, there is a fair housing concern because the restriction on the size of the unit will have a negative impact on members of the protected classes. Across Bucks County, minorities were much more likely than Whites to live in families with three or more persons. Among individual minority groups, Asians and Hispanics had the highest rates of larger family households.

**Table 22 Families with Three or More Persons, 2010**

Race	Percent of Families with Three or More Persons		
	Bucks County	Urban County*	Bensalem Township
White	58.6%	84.0%	56.7%
Black	67.7%	66.0%	64.9%
Asian	75.1%	67.6%	77.0%
Some Other Race Alone	81.5%	60.4%	86.0%
Two or More Races	71.0%	64.0%	66.7%
Hispanic	76.8%	65.0%	80.8%

\*Bucks County exclusive of Bensalem and Bristol townships

Source: U.S. Census Bureau, Census 2010 (P28)



In the Urban County, 3 percent of the rental housing stock contained three or more bedrooms in 2010, compared to 85.4 percent of the owner housing stock. In Bensalem Township, where rental units comprise 38.6 percent of the housing inventory, only 9.4 percent of the rental housing stock contained three or more bedrooms, compared to 85.7 percent of the owner housing stock.

**Table 23 Housing Units by Number of Bedrooms, 2010**

Size of Housing Units	Renter-Occupied Housing Stock		Owner-Occupied Housing Stock	
	Number of Units	% Total Units	Number of Units	% Total Units
<b>Urban County*</b>				
0-1 bedroom	13,258	38.1%	2,206	1.4%
2 bedrooms	13,646	39.2%	18,866	12.3%
<b>3 or more bedrooms</b>	<b>7,883</b>	<b>22.7%</b>	<b>132,298</b>	<b>86.3%</b>
Total	34,787	100.0%	153,370	100.0%
<b>Bensalem Township</b>				
0-1 bedroom	4,150	45.9%	160	1.1%
2 bedrooms	4,045	44.7%	1,900	13.2%
<b>3 or more bedrooms</b>	<b>850</b>	<b>9.4%</b>	<b>12,304</b>	<b>85.7%</b>
Total	9,045	100.0%	14,364	100.0%

\*Bucks County exclusive of Bensalem and Bristol townships

Source: U.S. Census Bureau, 2008-2010 American Community Survey (B25042)

The need for larger affordable housing units has been recognized by the Urban County. In 2007 the Urban County eliminated the \$30,000 maximum subsidy per unit limitation. Currently, each project must justify the need for the subsidy requested. For single-family units, the subsidy has ranged from \$45,000 to \$80,000 per unit. For group homes, the County's per unit subsidy has reached as high as \$113,000 under the new guidelines.

A review of the waiting lists and current tenant characteristics of Bucks County Housing Authority also reveal a need for three-bedroom housing units. Only 48 of the 648 units (7 percent) of public housing contain three or more bedrooms. Of the 114 family applicants on the waiting list for larger bedroom units, 93 are requesting three-bedroom units. Within the Section 8 Program, a total of 302 of the 3,233 Section 8 rental units (9.3 percent) contain three or more bedrooms with an additional 199 applicants on the waiting list for similarly sized larger housing units.

**Cost of Housing**

Increasing housing costs per se are not a direct form of housing discrimination. However, a lack of affordable housing does constrain housing choice. Residents may be limited to a smaller selection of neighborhoods or communities because of a lack of affordable housing in those areas.

Real household income in Bucks County decreased 0.4 percent between 1990 and 2010. This rate was outpaced by the surge in median housing value of 32.8 percent. By comparison, median gross rent fell about 3.4 percent. In Bensalem Township, real household income decreased at a greater rate (10.9 percent) while median housing value grew by more than 33 percent. Similar to

the County trend, median gross rent fell by 8 percent in the Township, although there were steep absolute losses in numbers of units in the lowest rent categories, as discussed in the next section.

**Table 24 Trends in Median Housing Value, Rent and Income, 1990-2010**

	Median Housing Value (in 2010 \$)	Median Gross Rent (in 2010 \$)	Median Household Income (in 2010 \$)
<b>1990</b>			
Bucks County	\$241,348	\$1,049	\$75,264
Bensalem Township	\$201,933	\$1,082	\$66,827
<b>2000</b>			
Bucks County	\$210,909	\$951	\$77,187
Bensalem Township	\$169,942	\$972	\$64,277
<b>2010</b>			
Bucks County	\$320,500	\$1,013	\$74,941
Bensalem Township	\$269,300	\$995	\$59,567
<b>% Change 1990-2010</b>			
Bucks County	32.8%	-3.4%	-0.4%
Bensalem Township	33.4%	-8.0%	-10.9%

Sources: U.S. Census Bureau, Census 1990 (STF3-H061A, H043A, P080A), Census 2000 (SF3-H76, H63, P53), 2008-2010 American Community Survey (B25077, B25064, B19013)

**Rental Housing**

Ideally, if household income increased at a faster rate than median gross rents, it should have been easier for households to find affordable rental housing units. In reality, both the Urban County and Bensalem Township have lost substantial numbers of affordable rental units since 2000. Between 2000 and 2010, the number of affordable rental units renting for less than \$500/month decreased more than 50 percent in the Urban County and more than 75 percent in the Township. In Bensalem, there were only 914 rental units leasing for less than \$700/month compared to almost 3,800 units in 2000. By comparison, the number of higher-rent units (\$1,000/month or more) increased more than 146 percent in the Urban County and more than doubled in the Township during the same period.

**Table 25 Loss of Affordable Rental Housing Units, 2000-2010**

Units Renting for:	2000	2010	Change 2000-2010	
			#	%
<b>Urban County*</b>				
Less than \$500	4,792	2,316	-2,476	-51.7%
\$500 to \$699	9,026	3,137	-5,889	-65.2%
\$700 to \$999	11,948	9,703	-2,245	-18.8%
\$1,000 or more	7,391	18,251	10,860	146.9%
<b>Bensalem Township</b>				
Less than \$500	1,372	332	-1,040	-75.8%
\$500 to \$699	2,408	582	-1,826	-75.8%
\$700 to \$999	4,322	3,524	-798	-18.5%
\$1,000 or more	1,180	4,260	3,080	261.0%

\* Bucks County exclusive of Bensalem Township and Bristol Township Sources: U.S. Census Bureau, Census 2000 (SF3, H62), 2010 American Community Survey (B25063)



A monthly rent of \$500 is considered affordable (i.e., paying no more than 30 percent of gross income on housing costs) for a household earning at least \$20,000. According to 2005-2009 ACS data, there were 16,840 households earning less than \$20,000 in the Urban County, equivalent to 9.2 percent of the total households. However, there was a 51.7 percent decline in the number of units renting at less than \$500 in the Urban County.

In Bensalem Township, there were 3,558 households earning less than \$20,000, equivalent to 15.5 percent of the total households. Within the Township, only 332 units rented for less than \$500/month. Here, too, the demand for rental housing in this price range is very high.

Monthly Supplemental Security Income (SSI) payments for an individual as of 2012 were \$698 in Bucks County and throughout Pennsylvania. If SSI represents an individual renter's sole source of income for a single individual, the maximum rent affordable (30 percent of income) would be \$209. The 2012 HUD Fair Market Rent (FMR) for a one-bedroom unit was \$899. Consequently, the individual would likely need housing assistance in the form of housing voucher, or have other living arrangements, such as living with relatives or friends.

**Sales Housing**

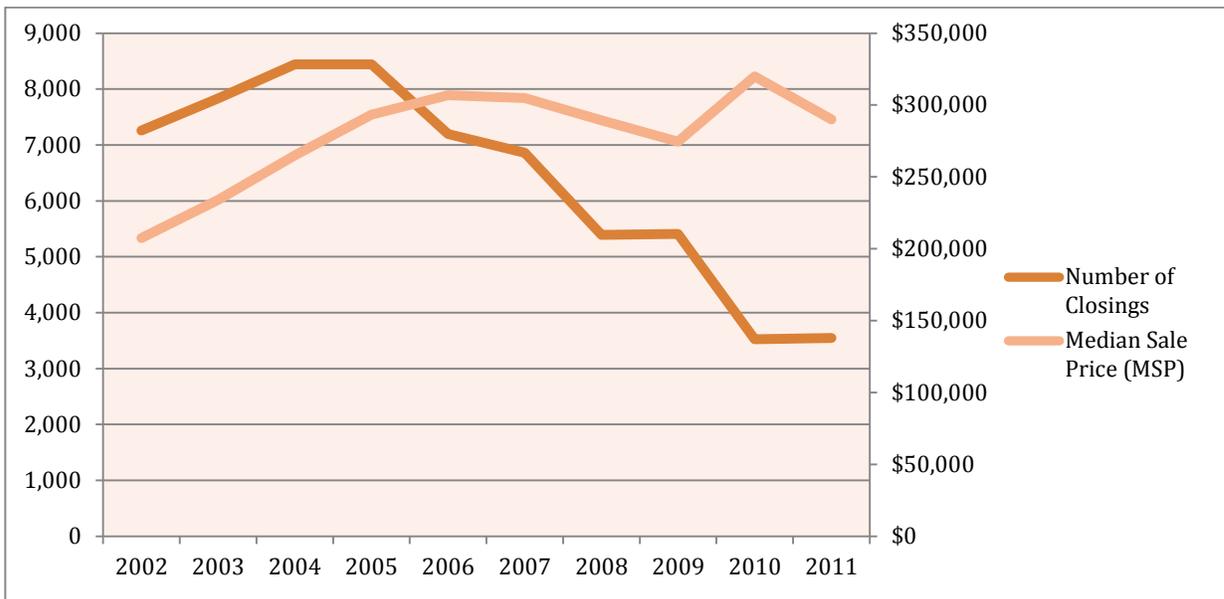
The sales market in Bucks County has roughly followed national trends, with growth in the number of sales between 2002 and 2004, followed by a decline beginning in 2006 and accelerating over the course of the next five years. At the peak of market volume in 2004, a total of 8,445 single family units were sold. Between 2004 and 2011, the number of closings decreased 58 percent, to 3,546.

**Table 26 Bucks County Housing Market Trends, 2002-2011**

	<b>Number of Closings</b>	<b>Median Sale Price (MSP)</b>	<b>MSP as % of Listed Price</b>
2002	7,261	\$207,367	97.9%
2003	7,832	\$234,133	97.6%
2004	8,445	\$264,989	97.5%
2005	8,441	\$293,401	97.3%
2006	7,195	\$306,927	95.9%
2007	6,860	\$304,957	95.2%
2008	5,390	\$289,420	93.6%
2009	5,411	\$274,562	92.5%
2010	3,524	\$320,000	92.2%
2011	3,546	\$290,000	90.7%
Total	71,098		

Source: TREND Multiple Listing Service

During the period of growth in sales volume to 2004, median sales prices increased from \$207,367 in 2002 to \$264,989 in 2004. Prices continued to rise, to a peak of \$306,927 in 2006, while sales volume began to decline after 2004, falling to 3,524 in 2010 before edging up the next year. From 2001 through 2011, the sales volume dropped by 51.1 percent, compared to a 39.8 percent gain in the median price, which is indicative of continuing affordability and/or mortgage finance issues that would disproportionately affect prospective low-to-moderate-income homebuyers, including those from protected classes.

**Figure 8 Bucks County Housing Market Trends, 2002-2011**

### ***Protected Class Status and Housing Problems***

Lower income households of all types experience high rates of housing problems.<sup>13</sup> Overall, nearly three-fourths of all lower income renter household types in the Urban County and nearly 80 percent in Bensalem Township experienced one or more housing problems. The corresponding ratios for lower-income homeowners were 64.7 percent in the Urban County and 59.4 percent in Bensalem. Tables 27 and 28 detail rates of housing problems for renters and homeowners in the Urban County and Bensalem Township, respectively, by household race and ethnicity. Generally, lower-income members of protected classes—racial and ethnic minorities and people with disabilities—who own their homes had higher rates of housing problems than other types of lower income homeowners, but such a trend is not quite as clear-cut among renters. Rates of housing problems among lower income renters tended to be somewhat higher in Bensalem than in the Urban County, while the reverse was true among lower income homeowners.

<sup>13</sup> HUD defines housing problems as (1) cost burden of 30 percent or more (i.e. paying more than 30 percent of gross income on monthly housing expenses), and/or (2) lacking complete kitchen or plumbing facilities, and/or (3) overcrowding of more than 1.01 persons per room.



**Table 27 Lower Income Households with Housing Problems in the Urban County, 2007**

Households 0-80% of MFI		
	Total	% with a Housing Problem
<b>Renters</b>		
White Non-Hispanic	15,425	72.5%
Black Non-Hispanic	1,645	84.8%
Asian	320	79.7%
Hispanic	1,210	60.3%
Total	18,600	73.0%
<b>Owners</b>		
White Non-Hispanic	33,840	64.0%
Black Non-Hispanic	300	96.7%
Asian	185	89.2%
Hispanic	765	77.1%
Total	35,090	64.7%

Source: 2005-2007 HUD Comprehensive Housing Affordability Strategy data

**Table 28 Lower Income Households with Housing Problems in Bensalem Township, 2007**

Households 0-80% of MFI		
	Total	% with a Housing Problem
<b>Renters</b>		
White Non-Hispanic	3,265	81.6%
Black Non-Hispanic	840	83.9%
Asian	125	52.0%
Hispanic	405	65.4%
Total	4,635	79.8%
<b>Owners</b>		
White Non-Hispanic	3,270	56.6%
Black Non-Hispanic	135	66.7%
Asian	245	65.3%
Hispanic	165	100.0%
Total	3,815	59.4%

Source: 2005-2007 HUD Comprehensive Housing Affordability Strategy data

Rates of housing problems among lower income renters in the Urban County ranged from a high of 84.8 percent among Black households to a low of 60.3 percent for Hispanic households. The corresponding figures in Bensalem ranged from a high of 83.9 percent for Black households, to a low of 52 percent for Asian households.

Rates of housing problems among lower income homeowners in the Urban County ranged from a high of 96.7 percent for Black households to a low of 64 percent for White households. In Bensalem, rates of housing problems among lower income homeowners ranged from a high of

100 percent among Hispanic households, the highest figure for any group of lower income households, to a low of 56.6 percent among White households.

Table 29 and 30 detail rates of housing problems among lower income elderly households and those with a member who is disabled, both renters and homeowners, in the Urban County and in Bensalem Township. Both groups also registered high rates of housing problems.

**Table 29 Lower Income Elderly and Disabled Households with Housing Problems in the Urban County, 2007**

	Total	Elderly Households 0-80% of MFI with a Problem	%	Total	Disabled 0-80% of MFI with a Problem	%
Renters	2,945	2,275	77.2%	3,625	2,645	73.0%
Owners	10,555	5,750	54.5%	4,670	2,715	58.1%

Source: 2005-2007 HUD Comprehensive Housing Affordability Strategy data

**Table 30 Lower Income Elderly and Disabled Households with Housing Problems in Bensalem Township, 2007**

	Total	Elderly Households 0-80% of MFI with a Problem	%	Total	Disabled 0-80% of MFI with a Problem	%
Renters	865	640	74.0%	1,185	1,055	89.0%
Owners	1,245	740	59.4%	520	300	57.7%

Source: 2005-2007 HUD Comprehensive Housing Affordability Strategy data

Lower income disabled renter households had the highest rate of housing problems of any lower income renter household type in the Urban County, at 89.4 percent. Disabled renter households recorded the highest overall rate of housing problems among lower income renters in Bensalem, at 89 percent. The rates of housing problems for lower income elderly renter households in the Urban County and in Bensalem, at 77.2 percent and 74 percent respectively, were similar to the overall rates in the two areas.

Conversely, lower income elderly homeowner households had the lowest rate of housing problems in the Urban County, at 54.5 percent. Rates for elderly and disabled homeowner households were similarly relatively low across the board in the Urban County and in Bensalem Township. Lower income households with at least one disabled member had the highest rate of problems among all types of lower income renter households in Bensalem, at 89 percent, while the rate of housing problems among lower income elderly homeowners in the Township, at 57.7 percent, nearly mirrored that for the Urban County.

These findings suggest the need to continue funding and marketing of the countywide program to rehabilitate owner-occupied housing, funded through the HOME program and the County's



Housing Trust Fund, and operated by the Bucks County Redevelopment Authority. Affirmative marketing efforts should target households and neighborhoods where rehabilitation needs are apparent, and include outreach to members of protected classes and disability-adaptive improvements. The Section 8 voucher program and rental assistance through the HOME program should be continued to help cost-burdened lower income households. It is unlikely that either program can be expanded at the present time. Methods of promoting housing code enforcement and of assisting rehabilitation of housing occupied by lower income households should also be explored.

### III. EVALUATION OF CURRENT FAIR HOUSING PROFILE

This section provides a review of the past and current fair housing planning initiatives, and the existence of fair housing complaints or compliance reviews where a charge of a finding of discrimination has been made. The 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.

Citizens of Bucks County receive fair housing services from a variety of organizations, including but not limited to the Pennsylvania Human Relations Commission, the Fair Housing Council of Suburban Philadelphia, the Bucks County Human Relations Council, and Legal Aid of Southeastern Pennsylvania. These groups sponsor community events to promote education, training and outreach; investigate and process fair housing complaints; and work to promote a mutual understanding of diversity among residents.

#### A. Fair Housing Complaints

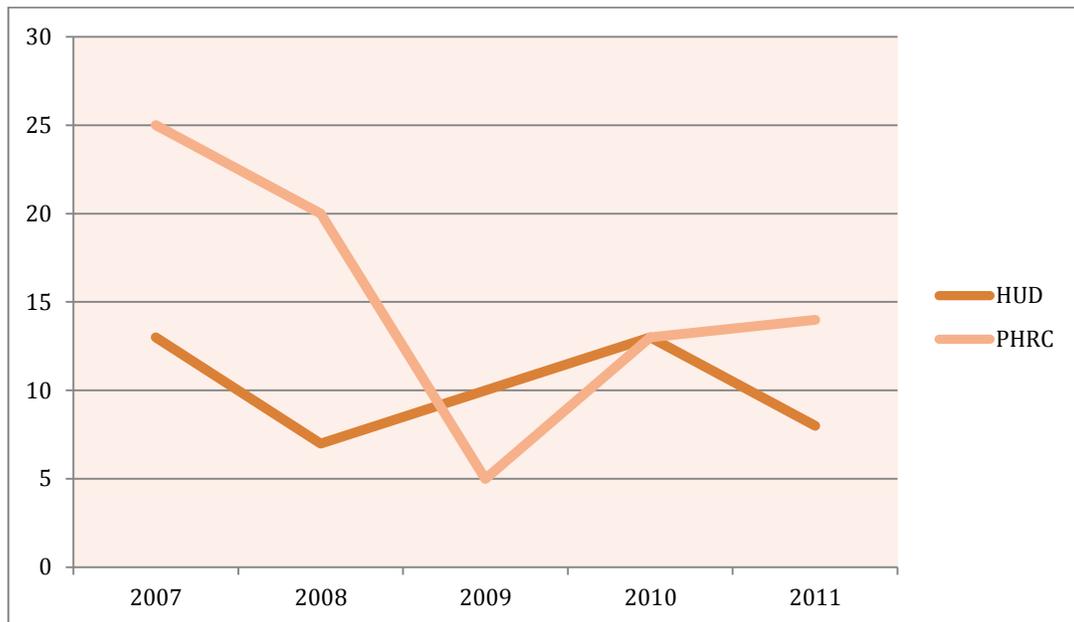
A lack of filed complaints does not necessarily indicate a lack of a problem. Some persons may not file complaints because they are not aware of how to or where to file a complaint. Others may not be aware that the discrimination is against the law and that there are legal remedies to address the discrimination. Some others 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.

#### *U.S. Department of Housing and Urban Development*

The Office of Fair Housing and Equal Opportunity (FHEO) at HUD receives complaints from persons regarding alleged violations of the federal Fair Housing Act. Fair housing complaints originating in Bucks County were obtained and analyzed for the period of January 2007 through December 2011. In total, 51 complaints originating in Bucks County were filed with HUD, for an average of about 10 per year. The volume of HUD cases was heaviest in 2007 and again in 2010, with 10 cases filed in each of the two years. Of the total, 8 complaints were filed in Bensalem Township, the most of any listed municipality in the County. Other places where multiple complaints originated were often the more populous and urbanized communities of Lower and Central Bucks, including Levittown, Bristol, Doylestown, Langhorne and Warminster. (The community names do not necessarily correspond to municipalities, as in the case of Levittown and Langhorne, which are postal designations that may apply to different municipalities, nor are boroughs distinguished from townships that have the same name in the HUD filings.)



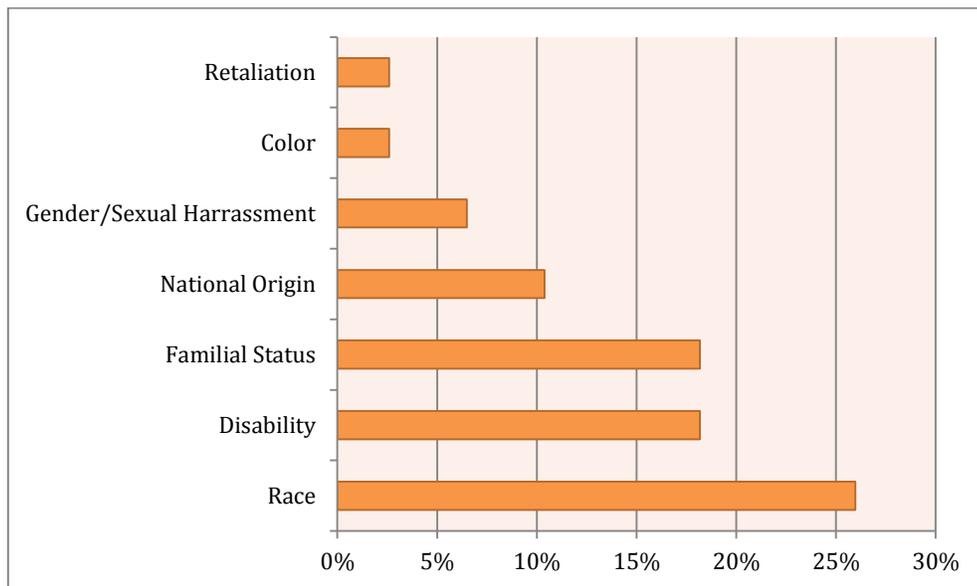
**Figure 9 Housing Complaints Filed with HUD and PHRC in Bucks County, 2007-2011**



Source: HUD

Race was the most common basis for complaint, followed by disability and familial status. Many HUD complaints were filed on multiple bases; as a result, the following chart reflects the percentage of all complaints that involved each basis.

**Figure 10 HUD Complaints by Basis of Discrimination in Bucks County, 2007-2011**



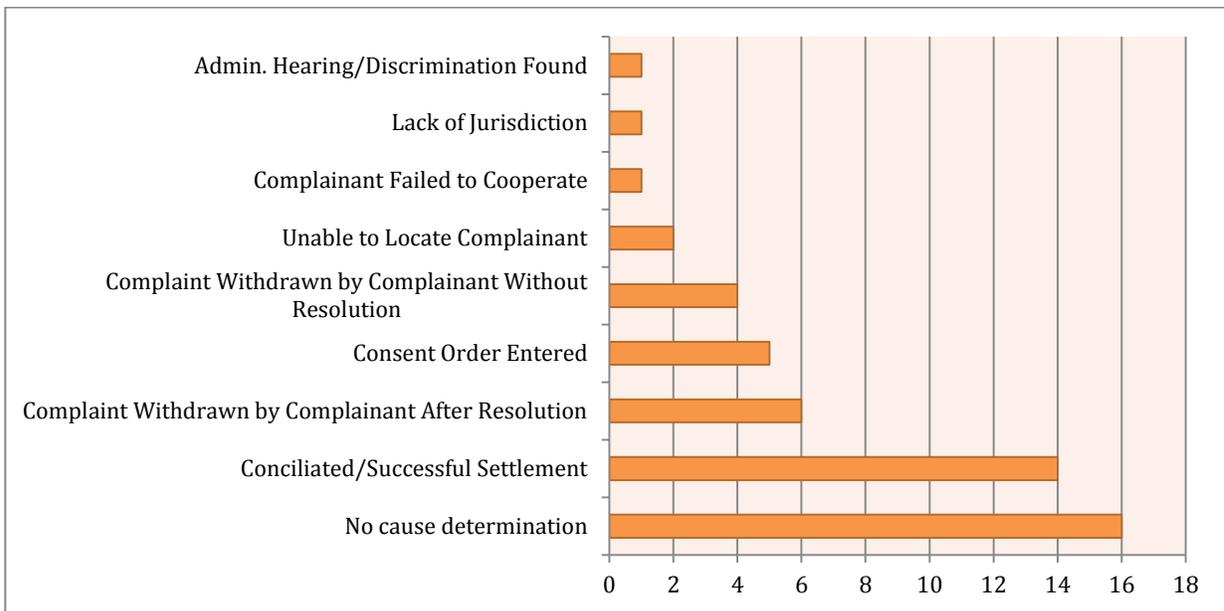
Source: HUD

Of the 51 complaints filed with HUD, 50 have been closed since June 2007, 14 (27 percent) of which were conciliated with a successful settlement. Of these, five each (10 percent) involved

race and national origin, while three (6 percent) involved disability. The complaints settled through conciliation arose from various issues, with the majority citing refusal of rental or discriminatory rental terms, conditions, privileges, services and facilities. These cases involved the following (multiple complaint bases are noted, where cited):

- Refusal to rent (7)
- Discriminatory terms, conditions, privileges, or services and facilities (6)
- Refusal to make or permit reasonable accommodation (4)
- Discriminatory advertising (4)
- Discriminatory refusal to negotiate for rental housing (1)
- Denial of making housing available (1)
- Failure to permit reasonable modification (1).

**Figure 11 Resolution of HUD Complaints in Bucks County, 2007-2011**



Source: HUD

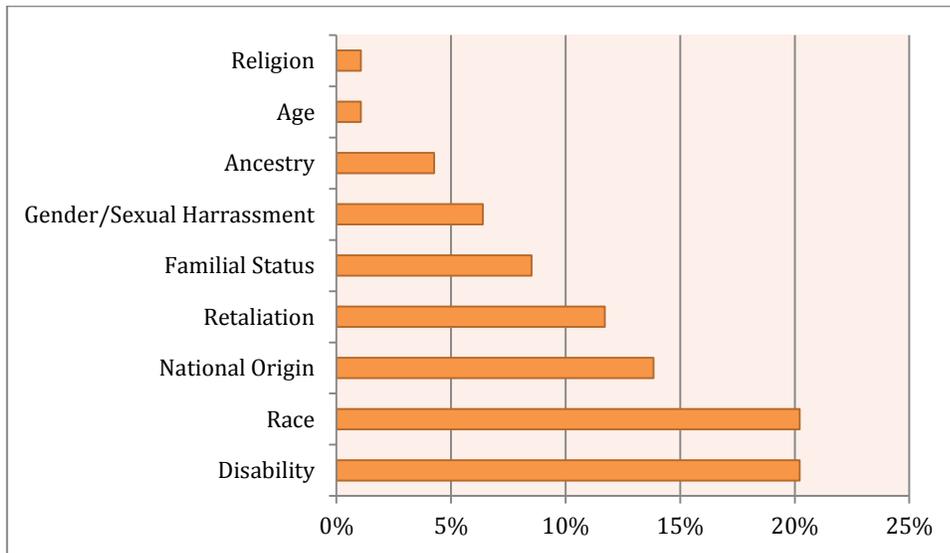
Of the 51 complaints filed, 16 (31 percent) were found to be without probable cause. This occurs when the preponderance of evidence obtained during the course of the investigation is insufficient to substantiate the charge of discrimination. Another 18 cases (28 percent) were administratively closed, most often due to complaint withdrawal before or after resolution or issuance of a consent 37 order.

### ***Pennsylvania Human Relations Commission***

The Pennsylvania Human Relations Commission (PHRC) provided data on housing complaints originating in Bucks County between January 2007 and December 2011. During these five years, there were 82 filings, equivalent to an average of about 16 cases per year. Complaints to PHRC were not categorized by municipality. The bases for complaint are summarized in Figure 12.



**Figure 12 PHRC Complaints by Basis of Discrimination in Bucks County, 2007-2011**

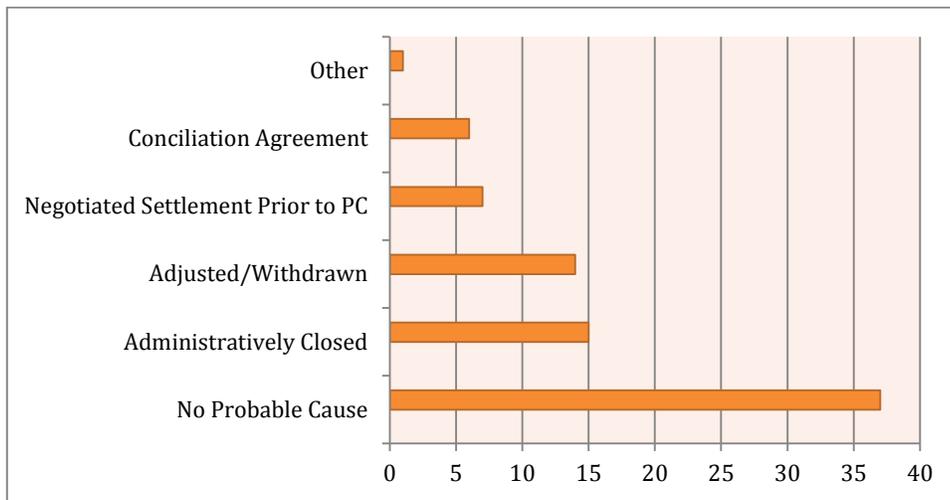


Source: PHRC

This breakdown of the bases for discrimination is partially consistent with the five-year analysis of HUD complaints, of which 40 percent involved race, 22 percent involved disability, and 15 percent involved familial status. Lower proportions of Bucks County complaints filed with the PHRC involved race (23 percent) or familial status (10 percent), compared to those filed with HUD, although the PHRC database did not cite multiple complaint bases. The PHRC share of complaints based on retaliation (13 percent) was higher than HUD's. The share of complaints based on disability was similar for both agencies. Overall, far more fair housing complaints were filed with PHRC (82) than with HUD (51).

Of the 94 complaints filed with PHRC, 80 were closed. In 37 of the closed cases (46 percent) lack of probable cause was found. Of the remainder 15 cases (19 percent) were administratively closed; 7 cases resulted in a negotiated settlement prior to a finding of probable cause; 14 cases were adjusted and withdrawn; and 6 cases were resolved through conciliation agreements.

**Figure 13 Resolution of PHRC Complaints in Bucks County, 2007-2011**



Source: PHRC

Of the 13 cases that ended in conciliation agreements or negotiated settlements, 6 involved race; 4 involved familial status; 2 involved a disability; and 1 involved national origin. Overall, 11 of these 13 cases alleged discrimination in terms, conditions and/or privileges relating to rental, while 2 alleged harassment by a neighbor.

***Fair Housing Council of Suburban Philadelphia***

The Council reported that a total of 44 housing discrimination complaints were filed from Bucks County in 2009. However, the Council did not have the resources to provide a summary of the complaints by basis for discrimination. It is highly probable that a number of the complaints filed with the Council were referred to HUD and PHRC.

**B. Patterns and Trends in Fair Housing Complaints**

Race continues to be the primary basis of discriminatory complaints at all levels followed by disability, and then familial status, which may be expected to disproportionately affect lower-income households with children in general, and single-parent households headed by women in particular.

***Testing***

Bucks County, through its Department of Community and Business Development, is a partner with the Fair Housing Council of Suburban Philadelphia. The Council is a Qualified Fair Housing Enforcement Organization as designated by HUD. As such, it provides fair housing education, conducts real estate testing and files housing discrimination complaints. In 2009, the Council released its most recent testing audit for the Philadelphia region.

Between January 2006 and December 2008, the Council completed 237 tests in the counties of Bucks, Chester, Delaware, Montgomery and the City of Philadelphia. The tests were designed to explore discriminatory practices in real estate transactions based on race, disability and familial status. Of the 237 total tests conducted, 31 were conducted in Bucks County. Although testing



results were not available by county, the following summary statements were included in the 2009 audit:

- The highest rates of discrimination were recorded in Delaware County (42 percent) and Montgomery County (36 percent). Bucks County had a rate of 32 percent.
- Of the 92 tests conducted for racial discrimination, 29 percent showed preferential treatment for white testers.
- Of the 27 tests conducted for familial discrimination, 19 percent showed preferential treatment for families without children.
- 15 new construction sites were tested for compliance with accessibility design and construction standards. One-third was found non-compliant; however, the audit did recognize that the sample was rather small and additional testing was warranted.
- 30 apartment complexes and condominiums were tested to determine compliance with reasonable accommodation requests. In 27 percent of the tests, agents stated they would refuse to grant specific modification requests at the tenants' expense.

**C. Existence of Fair Housing Discrimination Suit**

There is no pending fair housing discrimination suit involving Bucks County or Bensalem Township.

**D. Determination of Unlawful Segregation**

There is no pending unlawful segregation order involving Bucks County or Bensalem Township.

## IV. EVALUATION OF PUBLIC AND PRIVATE SECTOR POLICIES

The analysis of impediments is a review of barriers to fair housing choice in the public and private sector.

### A. Public Sector

An important element of the analysis includes an examination of public policy in terms of its impact on housing choice. This section evaluates the public policies in Bucks County and Bensalem Township to determine opportunities for furthering the expansion of fair housing choice.

#### ***Federal Entitlement Programs***

From a budgetary standpoint, housing choice can be affected by the allocation of staff and financial resources to housing related programs and initiatives. Disruptions in the private tax credit equity markets and 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.

The Community Development Block Grant and HOME programs are the two primary HUD entitlement funds through which eligible communities can create new affordable housing opportunities in non-impacted areas.

#### **CDBG Program**

Each year, the Urban County and the Township determine separately how their entitlement funds will be invested in their respective communities. Typically, this involves a local application, review and selection process with proposed activities that meet statutory and regulatory eligibility guidelines selected for funding. The methodology by which these processes are undertaken in each jurisdiction is demonstrative of the degree to which the processes are transparent, community-driven and reflective of fair housing considerations.

##### ➤ Urban County – CDBG Program

CDBG funds are used to carry out rehabilitation activities of rental housing units and facilities providing services to persons with special needs. The CDBG program serves to benefit primarily low and moderate income persons in accordance with the statutory requirements of the program.

Annually, the Urban County solicits applications for CDBG program. Applications are provided to previous sub-recipients and any entity that requests one, and workshops are held at various locations at different times to accommodate interested applicants from across the County. Written guidelines and an application form are provided to all potential applicants. The Community Development Advisory Board reviews and recommends CDBG applications for funding. This board consists of 27 members appointed as follows:

- Four members appointed by the Bucks County Association of Townships of the Second Class



- One member designated by each of the Boards of Supervisors of Falls, Middletown and Warminster Townships
- Five members appointed by the Bucks County Boroughs Association
- Twelve members are appointed as citizen-at-large representatives, including lower-income persons, beneficiaries of CDBG assistance, minorities, and such other groups as may be needed to meet HUD citizen participation requirements
- The three County Commissioners are appointed as *ex-officio* members.

By-laws govern both the appointment and internal actions of the CDBG Advisory Board, which meets three times annually with specific agendas. The June meeting includes the review of the Urban County's CAPER and the application and guidelines packet. The October meeting involves the review of applications received (from nonprofit organizations as well as municipal governments) and the results of site visits conducted by both Board members and staff on the applications submitted. The November meeting involves the review of all application information and the establishment of funding recommendations for consideration of the County Commissioners, who have final approval authority.

The Urban County has two categories of funding for its CDBG funds. All municipalities are categorized as either a Formula Municipality or a Pool Municipality. Sixty percent of the annual CDBG allocation is made available to these two categories of municipalities. Of this amount, 80 percent is dedicated to the Formula Municipalities, which have individual allocations based on population, poverty and overcrowded housing conditions. These municipalities have been allowed to apply anytime within a three-year cycle for their funding allocation. The remaining 20 percent have been used for the projects of Pool Municipalities, which contain no LMI block groups. Awards to Pool Communities and nonprofits is made on a competitive basis.

To reach funding decisions, the Social Services Committee of the board makes recommendations on any new public services requests, with ongoing projects considered by the full board with a floor vote. A separate Pool Communities Committee makes recommendations on the competitive applications submitted by municipalities.

The CDBG Application Instructions and Application Evaluation Form require that a copy of a municipality's anti-discrimination policy be submitted with the request for funds.

➤ *Bensalem Township*

CDBG funding allocation decisions are overseen by the Township's Office of Community Development. According to its FY 2010 Annual Plan, the system for establishing the priority for the selection of these projects is predicated upon the following criteria:

- Meeting the statutory requirements of the CDBG Program
- Meeting the needs of low and moderate income residents
- Focusing on low and moderate income areas or neighborhoods
- Coordination and leveraging of resources
- Response to expressed needs
- Sustainability and/or long-term impact
- The ability to demonstrate measurable progress and success.

### **HOME Consortium – Housing Program**

The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low and moderate income households, as well as housing serving populations with special needs.

Bensalem Township is part of the Bucks County HOME Program Consortium. The Urban County administers the program on behalf of 53 municipalities, including Bensalem Township. Funds distributed through the Housing Program are provided to nonprofit organizations only and not to any of the participating municipalities. The Urban County finances its Housing Program with HOME entitlement funding and Act 137 Housing Trust Fund proceeds. Similar to CDBG, the program is overseen by a Housing Finance Board. This Board is appointed by the County Commissioners to review applications and make recommendations for approval. Bensalem Township appoints one person to this seven member board.

### **Annual Plans and Performance Reports**

Every five years, entitlement communities are required to prepare a five-year Consolidated Plan, outlining needs, objectives, and priorities. Annually, they must develop Action Plans describing the specific activities to be undertaken with the anticipated CDBG and HOME funds. At the end of each fiscal year, a Consolidated Annual Performance and Evaluation Report (CAPER) must be developed to report on the progress achieved by each entitlement in its efforts to invest CDBG and HOME funds in accomplishing the objectives outlined in the five year Consolidated Plan, including affirmatively furthering Fair Housing. The following narrative includes an analysis of how the Urban County and the Township furthered fair housing through their investment of these federal funds.

#### ➤ Urban County

The Action Plan for 2012 included the priorities and objectives planned by the Urban County in various HUD categories such as housing, homeless prevention, community development and others. In terms of affirmatively furthering fair housing, the best indication of this policy being implemented is the creation of new affordable rental and sales housing units for families that are located outside of impacted areas. By seeking to create new affordable family units outside of impacted areas, the Urban County is providing housing opportunities and choice for low/moderate income persons and minorities.

Specifically, the Urban County's Annual Plan typically includes as objectives

- The development of new affordable rental and ownership units to be developed by CHDO and other nonprofit organizations
- Downpayment/Closing Cost assistance to first-time homebuyers
- Assistance under the Tenant-Based Rental Assistance Program to pay rent for homeless persons trying to return to self-sufficiency
- Owner-occupied rehab assistance to bring properties up to code and allow lower income homeowners stay in their homes



- Rehab of rental units and group homes to maintain decent, quality, and affordable housing for lower income persons, and those with special needs (including persons with disabilities)

In its Consolidated Annual Performance Report, the Urban County reports on the activities completed and objectives met for the previous year, including the results of the above-mentioned activities affirmatively furthered fair housing choice.

On its plans and reports, the Urban County has been illustrating through maps the location of the proposed and implemented activities. Starting in 2010, the Urban County has increased its tracking of the projects to better illustrate their location relative to areas of minority concentration and assess the Urban County's progress in affirmatively furthering fair housing.

➤ *Bensalem Township*

Similar to the Urban County, Bensalem Township prepares a five-year Consolidated Plan and an annual Action Plan. The typical activities included in Bensalem's Action Plan include activities benefitting the needs of its lower income communities, including

- Preservation of housing – provide assistance to lower income homeowners to rehabilitate their homes to meet code standards.
- Support the actions of the Bucks County Housing Authority to improve public housing.
- Support the actions of developers (nonprofit and for-profit) seeking funds to develop housing to address the needs of the elderly.
- Support the homeless shelter that serves lower Bucks County in assisting homeless families and individuals.

In its Consolidated Annual Performance Report submitted to HUD, Bensalem reports on the activities completed and objectives met during the previous fiscal year, which allowed the community to affirmatively further fair housing choice for its residents.

***Affirmatively Furthering Fair Housing Responsibilities***

The Urban County and the Township have legal obligations to ensure that all sub-recipients of CDBG and HOME funds, including participating local units of government, affirmatively further fair housing. Towards this end, the Urban County cannot allocate nor invest entitlement funds in municipalities that impede fair housing as these actions undermine the Urban County's obligation to affirmatively further fair housing.

As recipients of CDBG funds, both the Urban County and the Township are required to adopt affirmative procedures and requirements for all CDBG and 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 grantee's policies

- A description of what the owners and/or grantee will do to affirmatively market housing assisted with CDBG or HOME funds
- A description of what owners and/or the grantee will do to inform persons not likely to apply for housing without special outreach
- Maintenance of records to document actions taken to affirmatively market CDBG- and 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.

The affirmative marketing plan for the Urban County was reviewed for this analysis.

➤ Urban County

The Bucks County affirmative marketing policy applies to any rental or ownership project containing more than five units and funded with CDBG, HOME or County funds. The Urban County policy is made part of any contract between Bucks County and a sub-recipient of CDBG, HOME or County funds for housing projects. Excluded projects include tenant-based rental assistance, owner-occupied rehabilitation, households receiving down payment assistance only, Housing Choice Voucher tenants seeking admission to a HOME-assisted project, and group homes.

Persons with limited English proficiency (LEP) are addressed and will be assisted with the translation of materials if requested. The Urban County will also disseminate the information on housing opportunities to ethnic churches, media and other community groups.

The methods for informing the public, potential tenants, sub-recipients, and owners of the plan include publication of notices in newspapers of general circulation covering the entire County, publication and distribution of printed materials and written information, and inclusion of affirmative marketing information in funding contracts.

All owners, developers and sponsors of assisted housing projects are required to develop and implement their respective affirmative marketing plan for each project. The Urban County's policy specifically details the extensive list of plan requirements that must be included for approval.

The Urban County policy requires that an owner, developer or sponsor continue outreach activities as long as, and whenever, the project waiting list is open. Affirmative marketing activities are required to begin at least 30 days prior to general marketing activities.

Fair housing training is mandated bi-annually for all owners, developers and sponsors and their staff on topics such as federal and state fair housing laws, fair housing advertising practices, and record-keeping.

The Urban County will monitor the success of all affirmative marketing procedures by comparing pre-marketing occupancy data with actual occupancy data. Failure to meet



stated goals may result in a report to HUD and prohibition from future participation in County funding programs.

The Urban County policy also includes a statement referencing its requirement to update its AI every five years, including a review of all actions, measures, procedures and initiatives to ensure equal housing opportunity for all.

➤ Bensalem Township

Bensalem Township at present has no adopted affirmative marketing policy, according to its community development administrator, as it does not directly develop, rehabilitate, or market housing, relying on external nonprofit agencies or the Bucks County Redevelopment Authority to conduct such activities. It does, however, prominently state commitment to Fair Housing and provide addresses for reporting discrimination complaints on the community development page of the municipal website. It is recommended that the Township adopt an affirmative marketing policy consistent with that of the Urban County, and ensure compliance on the part of sub-recipients that conduct housing activities within the Township that are directly or indirectly funded through CDBG, HOME or other public funding sources.

***Site and Neighborhood Selection Policy***

Recipients of HOME funds are also required to administer their programs in compliance with the regulations found at 24 CFR 983.6(b), known as the Site and Neighborhood Standards. These standards address the site location requirements for both rehabilitated and newly constructed rental units financed with HOME funds.

Site selection for HOME-assisted rehabilitated units must comply with several standards, including among other things, promoting greater choice of housing opportunities and avoiding undue concentration of assisted persons in areas containing a high concentration of LMI persons. For new construction, an additional standard is added. With few exceptions, site selection must include a location that is not in an area of minority concentration.

The jurisdiction must define the terms “area of low income concentration” and “area of minority concentration” in its Consolidated Plan document. The 2010-2014 Consolidated Plan for the Bucks County HOME Consortium describes areas of minority concentration within its jurisdiction. The Bucks County Site and Neighborhood Standards defines areas of minority concentration basically as those with

- a Census Tract with a population of a specific minority group exceeding the total percentage of that group for the County by 10 percent; or,
- a Census Tract with a total minority population concentration (all minority groups) exceeding the combined total minority population for the County by 10 percent; or,
- a racially mixed Census Tract where the implementation of a new assisted housing project would cause an increase in the proportion of minority to non-minority residents in excess of 10 percent.

### **Appointed Citizen Boards and Commissions**

Housing and housing-related issues in Bucks County are addressed by a variety of appointed citizen volunteer boards, as described below.

➤ Urban County

*Bucks County Community Development Advisory Board*

This board advises the County Commissioners on the allocation of CDBG funding. It consists of 27 members, of which the three Commissioners are ex-officio members.

*Bucks County Housing Finance Board*

The Housing Finance Board advises the County Commissioners on the administration of the Bucks County HOME Consortium funds and Act 137 Housing Trust funds. The Board consists of seven members, six of which are appointed by the County Commissioners and one by Bensalem Township.

*Bucks County Planning Commission*

The Bucks County Planning Commission (BCPC), an advisory board to the County Commission, consists of nine appointed members. BCPC board members provide guidance and advice to the Bucks County Commissioners on planning and land use issues such as subdivision plans, comprehensive planning, and zoning ordinance matters.

*Bucks County Housing Authority*

The Bucks County Housing Authority promotes adequate and affordable housing, economic opportunity and a suitable living environment, free from discrimination, through its rental properties and programs.

### **Accessibility of Residential Dwelling Units**

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 inspections procedures.

➤ Private Housing Stock

In Pennsylvania, the Universal Accessibility Act (PA Act 166) requires accessibility for persons with disabilities in certain new and rehabilitated residential and commercial property.

For new HOME-assisted units, the Urban County and the Township require compliance with 24 CFR Part 8 which implements Section 504 of the Rehabilitation Act of 1973. Multi-family development must comply with 24 CFR 100.204, which implements the Fair Housing Act construction requirements. To address the needs of persons with mobility impairments, a minimum of 5 percent of all units (or at least one unit, whichever is greater) must comply with the Uniform Federal Accessibility Standards (UFAS) required under Section 504. An additional 2 percent of the units (or at least one unit) are required to be accessible for individuals with hearing or vision impairments. To ensure full



compliance with these standards, a certification from a licensed architect stating that the design is in compliance with UFAS standards must be provided by the developer with a copy of the final site plan approval.

➤ Public Housing Stock

Section 504 of the Rehabilitation Act of 1973 and 24 CFR Part 8 require that 5 percent of all public housing units be accessible to persons with mobility impairments. Another 2 percent of public housing units must be accessible to persons with sensory impairments. In addition, an Authority's administrative offices, application offices and other non-residential facilities must be accessible to persons with disabilities. The Uniform Federal Accessibility Standards (UFAS) is the standard against which residential and non-residential spaces are judged to be accessible.

The regulations at 24 CFR 8.26, as well as HUD PIH Notice 2002-1, describe the obligation of PHAs to provide UFAS-accessible units at each project site and in a sufficient range of bedroom sizes. The intent of requiring the distribution of UFAS-accessible units in a variety of bedroom sizes is to expand housing choice for people with disabilities to the same extent that housing choice is provided to persons without disabilities.

Bucks County Housing Authority has prepared a Section 504 Needs Assessment and Transition Plan as per requirement of 24 CFR 8.51, the regulatory provisions which describe a public housing authority's obligation to comply with Section 504 accessibility requirements. Based on the HUD notifications received, the Authority stands in compliance with Section 504. A total of 32 of its 648 public housing units are accessible.

**Language Access Plan for Persons with Limited English Proficiency**

Neither the Urban County nor Bensalem Township currently has a Language Access Plan (LAP) to enhance access to services offered through the entitlement programs to persons with LEP. As a result, the Urban County and the Township should consider performing the four-factor analysis to determine the extent to which an LAP may be needed.

**Comprehensive Plan, Land Use, and Housing**

➤ Urban County

The Bucks County Comprehensive Plan was updated by the Bucks County Planning Commission and adopted by the County in December 2011. The Pennsylvania Municipalities Planning Code requires counties to update their comprehensive plans at least once every 10 years.

For land use analysis purposes, the County is divided roughly in thirds, including Lower Bucks, Central Bucks and Upper Bucks. Overall, single-family residential, rural residential and agriculture are the dominant forms of land use, accounting for 23 percent, 21 percent and 16 percent of the County's land area, respectively, in 2009. Multifamily residential accounts for 1 percent of the land area.

**Table 31 Bucks County Land Use, 2009**

Land Use	Acres	Percentage
Single-Family Residential	88,829	23%
Rural Residential	81,441	21%
Agricultural	60,908	16%
Park, Recreation, and Open Space	43,963	11%
Undeveloped	34,841	9%
Transportation and Utilities	33,394	9%
Government and Institutional	13,616	4%
Commercial	13,367	3%
Mining and Manufacturing	12,398	3%
Multifamily Residential	4,672	1%
<b>Total</b>	<b>387,429</b>	<b>100%</b>

Source: Bucks County Comprehensive Plan

Broad land use trends since the last comprehensive plan was issued in 1993 include growth of about 5 percent each in single-family residential land and parks, recreation and open space, and the loss of 7 percent in agricultural land and 6 percent of undeveloped recreation land. The share of multifamily land use remained stable, at 1 percent total. But the countywide totals obscure significant regional differences in land use, as detailed in the following narrative, derived from the comprehensive plan.

Lower Bucks is the most densely developed, urbanized area of the County, containing almost 170,000 acres and composing roughly 43 percent of the land in the County. The area encompasses the 14 southernmost municipalities, bounded by Lower Southampton, Middletown, and Lower Makefield Townships on the north. Land use in Lower Bucks (2009) is as follows:

- 20,894 acres of single family development
- 2,079 acres of multi-family development
- 935 acres of rural residential
- 1,885 acres of agricultural uses
- 6,305 acres of manufacturing and mining uses
- 5,346 acres of commercial development
- 13,010 acres of transportation and utilities
- 4,806 acres of government and institutional uses
- 9229 acres of parks, recreation and open space
- 5,158 acres undeveloped.

In general, Central Bucks contains rural and suburban land and is the transition area between Lower Bucks and Upper Bucks. Its total land area is almost 150,000 acres equaling roughly 30 percent of the County's total land. The higher density areas in Central Bucks are particularly concentrated along the Route 611, Street Road, Bristol Road and Route 202 corridors, and include: Warminster, Upper Southampton, Northampton townships, the Newtown area, and Doylestown Borough. Land use in central Bucks (2009) is as follows:



- 43,427 acres of single family development
- 1,839 acres of multi-family development
- 27,440 acres of rural residential
- 23,323 acres of agricultural uses
- 3,342 acres of manufacturing and mining uses
- 4,478 acres of commercial development
- 12,454 acres of transportation and utilities
- 6,072 acres of government and institutional uses
- 17,897 acres of parks, recreation and open space
- 9,494 acres undeveloped.

Upper Bucks is a more rural area in the northernmost part of the County, dominated by lower-density residential development. Its land area is almost 170,000 acres, equaling roughly 43 percent of the County's total land. Higher-intensity development in Upper Bucks is located around the Route 309 corridor, and the Boroughs of Quakertown, Telford (only part of which lies in Bucks County), Perkasie and Sellersville. Land use in Upper Bucks (2009) is as follows:

- 24,508 acres of single family development
- 753 acres of multi-family development
- 53,065 acres of rural residential
- 35,700 acres of agricultural uses
- 2,751 acres of manufacturing and mining uses
- 3,543 acres of commercial development
- 7,929 acres of transportation and utilities
- 2,739 acres of government and institutional
- 16,836 acres of parks, recreation and open space
- 20,190 acres undeveloped.

Regarding housing planning and land use, the comprehensive plan lists these guiding principles: promote economic opportunity, housing diversity and efficient land use. It also lists the following recommended strategies and actions by the County:

- Encourage municipalities to incorporate housing into comprehensive planning, providing technical assistance where feasible.
- Encourage municipalities to review and revise zoning and subdivision ordinances as necessary to promote housing choice, providing technical assistance where feasible. Affordability, fair housing standards, disability rights, appropriate location, need for support services and variety of housing types are among factors to be considered. Rental housing and other alternatives to single-family attached housing, infill development, traditional neighborhood development, cluster development, residential conversion, accessory apartments, age-restricted housing, live-work units, mixed use options and quasi-institutional residential uses should be afforded particular consideration.
- Support public and private efforts to rehabilitate and maintain housing stock, including disability-adaptive improvements, rehabilitation of owner-occupied and rental properties, code enforcement and historic preservation.

Regarding housing programs and administration, the recommendations of the comprehensive plan for the County are:

- Continue a leading role in Continuum of Care activities, including coordination of homeless planning, housing and allied support service project development, operations and funding;
- Coordinate federal housing and community development program planning and funding with countywide land use and growth management planning and redevelopment initiatives;
- Coordinate federal housing and community development and program planning and funding with housing and related support service and neighborhood improvement projects initiated by private and public agencies;
- Provide organizational and financial support to nonprofit agencies and other developers and managers of special-needs, supportive and general-purpose affordable housing;
- Create a countywide plan to maximize housing opportunities;
- Provide public information and education on housing issues.

The County's Comprehensive Plan acknowledges the need to provide a fair share of affordable housing to keep pace with forecast growth within the region. It notes a growing problem with lack of housing affordability, or "cost burden," defined as spending more than 30 percent of gross household income for rent or mortgage costs. The problem is most acute among renters, with half experiencing some form of cost burden, while the rate among homeowners was 38 percent, according to census data.

The plan examines a number of national and local factors affecting residential development and real estate markets in the County. The national economic downturn propelled by a crisis in housing credit markets appears to be affecting residential development and real estate sales in Bucks County in several ways. There is an extreme shortfall of rental housing affordable to the lowest-income households in Bucks County, according to studies done by the Federal Reserve Bank of Philadelphia.

While housing sales and rental prices in the County remain high compared to many other parts of the state, recent data on proposed residential development shows a drift to lower-cost housing types (multifamily, attached and semidetached), continuing even as the pace of new construction has slowed over the past five years.



**Table 32 Proposed Residential Development by Region, 2001–2010**

	Proposed Residential Development, 2001 to 2005					
	Single-Family	Semi-		Multi-	Mobile	
Region	Detached	Detached	Attached	Family	Homes	Total
Upper Bucks Region	4,272	51	1,314	1,220	0	6,857
Central Bucks Region	4,294	75	1,887	3,478	261	9,995
Lower Bucks Region	1,739	99	643	1,873	0	4,354
<b>Bucks County</b>	<b>10,305</b>	<b>225</b>	<b>3,844</b>	<b>6,571</b>	<b>261</b>	<b>21,206</b>
	Proposed Residential Development, 2006 to 2010					
	Single-Family	Semi-		Multi-	Mobile	
Region	Detached	Detached	Attached	Family	Homes	Total
Upper Bucks Region	814	54	69	798	21	1,756
Central Bucks Region	1,014	76	778	832	0	2,700
Lower Bucks Region	554	22	1,424	1,236	0	3,236
<b>Bucks County</b>	<b>2,382</b>	<b>152</b>	<b>2,271</b>	<b>2,866</b>	<b>21</b>	<b>7,692</b>

Source: Bucks County Comprehensive Plan

Multifamily housing accounted for 38 percent of proposed residential development in Lower Bucks County from 2006 to 2010, 31 percent in Central Bucks and 45 percent in Upper Bucks. The percentages—and numbers of attached and multifamily units were even greater from 2001 to 2005.

The comprehensive plan employs the “development area” concept, a widely accepted land use planning for growth management tool that has been applied in Bucks County by both the County and many of its municipalities for years. The fundamental aim of this concept is to channel future development into areas best equipped to handle growth—where infrastructure is in place or planned—while sparing significant agricultural and natural resource lands as open space. It also acknowledges the need for higher density development districts, village centers and cluster site design.

To this purpose, it embraces “smart growth” principles. Smart growth principles with particular applicability to housing include walkable neighborhoods, mixed land uses in proximity to transit, redevelopment of existing neighborhoods, and providing a range of housing options, such as houses of various sizes, townhouses, condominiums, granny flats, or affordable homes for low-income facilities to allow people of various incomes and phases of life to live, work, and eventually retire in the same community.

Key housing-related implementation strategies and actions, as recommended in the comprehensive plan, include:

- Designation of development areas countywide and matching development intensity to the appropriate areas;
- Review and potential reduction of zoning ordinance minimum lot size and setbacks for all land uses to allow greater efficiency of land use where appropriate; and
- Review and revise zoning and subdivision ordinances as necessary to promote housing choice. Consider factors such as affordability, fair housing standards, disability rights, appropriate location, need for support services and the provision of housing types;
- Explore opportunities for mixed-use, infill development. Prioritize infill and redevelopment sites for development and redevelopment.

The county in the comprehensive plan has recommended development areas of appropriate intensity and is prepared to provide technical assistance to municipalities in achieving smart growth objectives. In Pennsylvania, however, the ultimate regulatory power behind land development decisions resides not with counties, but with municipal governments, through the formulation and administration of local controls under the Pennsylvania Municipalities Land Use Law. These include municipal or regional comprehensive plans, zoning ordinances and subdivision ordinances, as well as building and development permits.

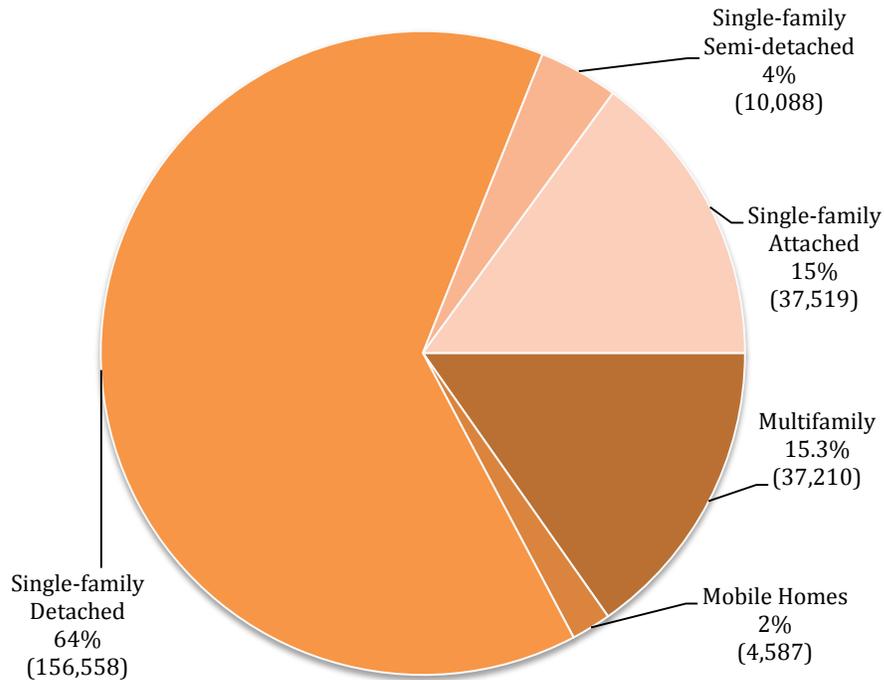
As part of its comprehensive planning process, Bucks County conducted a countywide “development district analysis” to confirm that land designated as development area and zoned accordingly had the potential capacity to meet projections (high and low) of housing demand. The analysis, also known as a “fair share” analysis, concluded that more than sufficient capacity exists countywide to absorb all residential development projected by 2020 and 2030. On an individualized basis, all municipalities in Bucks County were considered to have sufficient development area to accommodate their share of the 2020 housing projections. Planning conventions suggest that this fair-share/development district analysis be updated every five years.

A similar and separate analysis was conducted for potential multifamily housing demand. This analysis found that the countywide capacity for multifamily development could exceed all 2020 and low 2030 projections of demand. On an individual municipal level, some projected shortfalls existed, but generally in rural municipalities not in the path of development, or in municipalities that are fully developed or contain natural resources that impede development. These results should be monitored and updated periodically by affected municipalities in their comprehensive planning process.

### **Diversity of Housing Types in Bucks County**

The updated Bucks County comprehensive plan includes a quantitative analysis of housing types. The overall housing stock is varied, although single-family housing predominates, accounting for nearly 64 percent of all units. The shares of single-family attached (townhouse or rowhouse-type) housing and multifamily housing (small and large apartment buildings) are shown in the chart below.

**Figure 14 Housing Type**



Source: Bucks County Comprehensive Plan

Data assembled for the comprehensive plan shows that while the number of the most affordable types of housing units—multifamily and attached single-family—are, not surprisingly, highest in the more populous, urbanized communities in Lower and Central Bucks County, several municipalities in more remote areas in Upper Bucks have significant percentages of multifamily housing, though the absolute numbers may be small, because these communities are small in population. Dublin Borough, for example, had a census population of 2,158 in 2010, and had 346 units of multifamily housing (49 percent), the largest percentage share in the County.

**Table 33 Housing Tenure Type, 2010**

	Number	Percent
<b>Total occupied housing units</b>	234,849	
Owner-occupied	181,013	77.1%
Renter-occupied	53,836	22.9%
<b>Average size of homeowner household</b>	2.78	
<b>Average size of renter household</b>	2.11	

Source: Bucks County Comprehensive Plan

**Table 34 Housing Age, 2010**

<b>Year Built</b>	<b>Number</b>	<b>Percent</b>
2005 or later	8,546	3.5%
2000 to 2004	13,594	5.5%
1990 to 1999	32,897	13.4%
1980 to 1989	35,663	14.5%
1970 to 1979	48,357	19.7%
1960 to 1969	32,304	13.1%
1950 to 1959	43,110	17.5%
1940 to 1949	8,761	3.6%
1939 or earlier	22,730	9.2%
<b>Total</b>	<b>241,911</b>	<b>100%</b>

Source: Bucks County Comprehensive Plan

Bensalem Township is the most populous municipality in Bucks County, with a 2010 census population of 58,434. It has the largest number of both single-family attached and multifamily housing units in Bucks County, as well as the largest percentage (29 percent) of multifamily housing of any **township** in the County.

➤ Bensalem Township

The Bensalem Township Comprehensive Plan (2002) includes a residential land use policy of maintaining and enhancing the various available residential options, stating that the “focus of residential land use and zoning should be on providing a variety of housing types, especially affordable housing, and to preserve existing land use patterns” Specific goals regarding housing include the following:

- Review and strengthen the township’s code enforcement program to protect quality of life and preserve property values;
- Maintain and enhance existing housing stock, especially in older neighborhoods, through property maintenance regulations and rehabilitation initiatives; and
- Increase the visibility and availability of housing for older residents, making it easier for them to remain in Bensalem.

The township’s comprehensive plan also incorporates by reference its AI.

➤ Zoning

The Bucks County Planning Commission in 2011-2012 reviewed zoning ordinances and comprehensive plans for Bensalem Township and for 10 municipalities that had submitted applications for CDBG funds:

- Dublin Borough
- Morrisville Borough
- Perkasio Borough
- Richlandtown Borough
- Haycock Township



- Hilltown Township
- Nockamixon Township
- Northampton Township
- Warminster Township
- Warrington Township.

The ordinances selected for review represent a cross-section of municipalities in the County, as well as CDBG applicant municipalities, and one entitlement municipality (Bensalem Township). They comprise urban, suburban and rural municipalities, both within and outside the reach of scheduled public transportation service.

Analysis of zoning regulations was based on impediments to fair housing as identified by the Fair Housing Council of Suburban Philadelphia and by HUD's Fair Housing Guide. The two sources substantially coincided. The zoning analysis criteria encompassed:

- Definition of family;
- Regulation of housing facilities for persons with disabilities (i.e., group homes);
- Regulation of age-restricted housing;
- Minimum housing unit size;
- Provisions for multifamily housing and mobile homes as required under the Pennsylvania Municipalities Planning Code; and
- Provisions for a range of housing types in a variety of arrangements and densities.

Comprehensive plans contain statements of goals and policies. These plans were evaluated for statements of goals regarding housing choice and the accommodation of housing for people in various life situations.

➤ Date of Ordinance

Generally speaking, the older a zoning ordinance, the less effective it will be. Older zoning ordinances have not evolved to address changing land uses, lifestyles, and demographics. However, the age of the zoning ordinance does not necessarily mean that the regulations impede housing choice by members of the protected classes.

The ordinances reviewed in this analysis, in general, are recent. The dates of the original ordinances range from 1989 through 2011. Five of the ordinances have been updated, to varying degrees, between 2009 and 2011.

➤ Regulations for 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 particular 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, in violation of the Fair Housing Act.

Two primary purposes of a group home residence are normalization and community integration. By allowing group residences throughout the community in agreement with the same standards as applied to all other residential uses occupied by a family, the purposes of the use are not hindered and housing choice for the disabled is not impeded. Towards this end, municipalities may not impose distancing requirements on group homes for persons with disabilities. In *Horizon House Development Services, Inc. v. Township of Upper Southampton, PA*, the court found a 1,000-foot spacing requirement to be in violation of the Fair Housing Act. The court also found the Township's requirement for an applicant to seek and receive a variance from the ordinance to establish a group home within the 1,000-foot distance also to be a violation.

➤ Definition of Family

Restrictive definitions of family may impede unrelated individuals from sharing a dwelling unit. Defining family broadly advances non-traditional families and supports the blending of families who may be living together for economic purposes. Restrictions in the definition of family typically cap the number of unrelated individuals that can live together. These restrictions can impede the development of group homes, effectively impeding housing choice for the disabled. However, in some cases, caps on unrelated individuals residing together may be warranted to avoid overcrowding, thus creating health and safety concerns.

Recent court decisions have ruled against municipalities that limit the number of unrelated individuals that can live together as a family. In *ReMed Recovery Care Centers v. Township of Willistown, PA*, a court ordered the Township to grant a reasonable accommodation in order to allow a group home of eight unrelated persons rather than the five permitted under its zoning ordinance.

Ordinance and Comprehensive Plan Review

The ordinance review found identified or potential impediments to fair housing choice in each of the 11 zoning ordinances reviewed. The most frequent identified or potential impediments were in regulation of group homes (Dublin, Morrisville, Richlandtown, Haycock, Hilltown, Nockamixon, Northampton and Warminster) and in the definition of family (Dublin, Morrisville, Perkasio, Haycock, Nockamixon, and Northampton).

The identified and potential impediments in group home zoning ordinance provisions typically involved group home development standards, spacing requirements, and/or occupancy limits more restrictive than those applied to other forms of residential uses. The impediments related to definition of family typically involved occupancy limits more restrictive than those applied to other residential uses.

One municipality had potential impediments in its regulation of age-restricted housing, and three municipalities—one of which was Bensalem Township—regulated housing unit size under their zoning ordinances; unit size is already regulated under the mandatory



statewide construction code used throughout the Commonwealth, so it is duplicative and unnecessary to do so by ordinance. To reinforce fair housing practice, it was also recommended that Bensalem amend the general provisions of its zoning ordinance to include language authorizing the zoning officer to make reasonable accommodation in interpreting and implementing the ordinance with respect to housing for persons with disabilities.

Each of the examined ordinances provided for a reasonable range of multifamily housing types and mobile homes. None of the comprehensive plans contained regulations that would independently restrict fair housing.

➤ Recommendations

While only municipal zoning ordinances for Bensalem Township and the Urban County's potential CDBG and HOME grantees were reviewed for this AI, a total of 17 municipalities in Bucks County have identifiable or potential impediments to fair housing related to group home zoning regulations, according to the Fair Housing Council of Suburban Philadelphia. The Urban County should not allocate CDBG or HOME funds to these municipalities until such time as the zoning ordinances are amended to eliminate identified or potential impediments. Bensalem Township should amend its ordinance to eliminate potential impediments.

Municipalities with zoning ordinances found to include potential or identified impediments to fair housing choice were offered technical assistance from the Bucks County Planning Commission in revising their ordinances. Most accepted the offer, and have completed or are in the process of amending their ordinances. The Bucks County Department of Business and Community Development will require compliance with the Fair Housing Act by all CDBG grantees and applicants. It is recommended that the Planning Commission examine zoning ordinances and comprehensive plans for all other municipalities in the county, and likewise offer technical assistance in Fair Housing compliance.

**Public Housing**

Bucks County Housing Authority owns and manages a total of 648 units of public housing located in nine of the County's 54 municipalities, which includes 574 units of elderly housing and 74 units of family housing. Families with children comprise 10 percent of the tenant households; households with a disabled member comprise 6 percent. Non-White households represent 13 percent of all tenant households.

As of June 2012, there were 912 applicant households on the waiting list for public housing. Of these, families with children accounted for 34 percent. Households with a disabled member represented 29 percent of all applicant households; however, only 37 of these applicants were in need of an accessible unit. Non-White households represented 36 percent of all waiting list applicants.

In addition to public housing, the Authority administers the Section 8 Housing Choice Voucher Program for some 3,000 households. Families with children accounted for 30 percent of all Section 8 households as of June 2012. Households with a disabled member represented 59

percent of all voucher holders; however, it is unknown how many of these may require an accessible housing unit. Non-White households represented 24 percent of all voucher holders.

The waiting list for vouchers is extensive, and was closed in July 2009 because of high numbers. Of the 1,556 households with applications pending as of 2012, families with children represented 53 percent of all applicants, and households with a disabled member, 35 percent. Non-White households accounted for 29 percent of the waiting list.

**Table 35 Characteristics of Public Housing Households and Waiting List Applicants, June 2012**

	Current Tenants		Waiting List	
	Number	Percent	Number	Percent
<b>Total Households</b>	<b>645</b>	<b>100%</b>	<b>912</b>	<b>100%</b>
Extremely Low Income (<30% MFI)	419	65%	664	73%
Very Low Income (>30% but <50% MFI)	187	29%	213	23%
Low Income (>50% but <80%)	39	6%	35	4%
Families with Children	62	10%	307	34%
Elderly Households (1 or 2 persons)	536	83%	340	37%
Individuals/Families with Disabilities	37	6%	265	29%
White Households	556	86%	584	64%
Black Households	80	12%	312	34%
Other Race of Households	9	1%	16	2%
Residents in BCHA Jurisdiction	NA	NA	637	70%
<b>Characteristics by Bedroom Size</b>				
0 Bedroom	0	0%	0	0%
1 Bedroom	566	88%	599	66%
2 Bedrooms	31	5%	199	22%
3 Bedrooms	33	5%	93	10%
4 Bedrooms	13	2%	14	2%
5+ Bedrooms	2	0%	7	1%

Note: Percentage totals may not equal 100% due to rounding.

Source: Bucks County Housing Authority

**Table 36 Characteristics of Section 8 Households and Waiting List Applicants, June 2012**

	Current Tenants		Waiting List	
	Number	Percent	Number	Percent
<b>Waiting List Total</b>	<b>3,233</b>	<b>100%</b>	<b>1,556</b>	<b>100%</b>
Extremely Low Income (<30% MFI)	NA	NA	1,074	69%
Very Low Income (>30% but <50% MFI)	NA	NA	506	31%
Low Income (>50% but <80%)	0	0%	0	0%
Families with Children	1,045	32%	825	53%
Elderly Households (1 or 2 persons)	1,144	35%	264	17%
Individuals/Families with Disabilities	1,831	57%	545	35%
White Households	2,408	74%	1,120	72%
Black Households	738	23%	389	25%
Other Race of Households	87	3%	62	4%
Residents in BCHA Jurisdiction	NA	NA	1,276	82%
<b>Characteristics by Bedroom Size</b>				
0 Bedroom	0	0%	16	1%
1 Bedroom	1,688	52%	871	56%
2 Bedrooms	1,154	36%	498	32%
3 Bedrooms	302	9%	156	10%
4 Bedrooms	7	0%	31	2%
5+ Bedrooms	8	0%	1	0%

Note: Percentage totals may not equal 100% due to rounding.

Source: Bucks County Housing Authority



An interview was conducted with the Executive Director of BCHA, who provided the following information in December 2011.

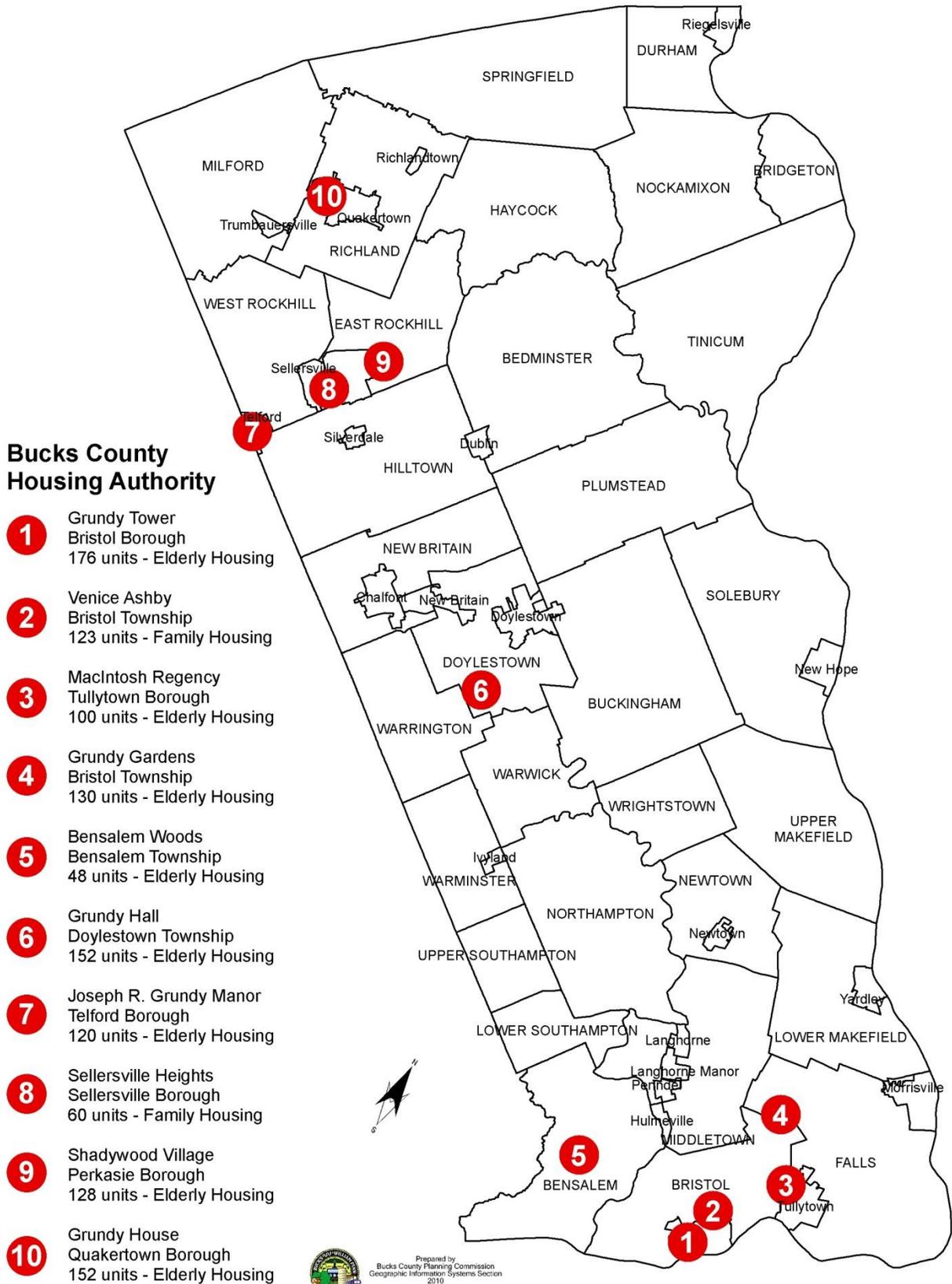
BCHA utilizes a site-based waiting list for two of its public housing developments. Grundy Manor in Telford, consisting of 120 one-bedroom units, and Venice Ashby II, BCHA's only family development consisting of 61 units, maintain site-based waiting lists. A single waiting list is maintained for all elderly applicants desiring a unit at the remaining four developments—Grundy Towers, Grundy Gardens, Bensalem Woods and MacIntosh Regency. When an applicant is contacted about an available unit at one of these four sites, s/he must take the unit offered at the time or risk being moved to the bottom of the waiting list. As of December 2011, there were 243 elderly applicants waiting for a public housing unit in Bucks County. In addition, there were 162 families with children and 158 families with members with disabilities waiting for one of the 61 family units at Venice Ashby II. For all potential public housing applicants, BCHA policy does not permit an applicant to reject a unit without losing his/her place on the waiting list.

Non-elderly persons with physical disabilities who apply for public housing in Bucks County have limited options when it comes to accessible units. BCHA's Designated Housing Plan requires that non-elderly disabled applicants for elderly public housing units be provided with a Section 8 voucher when their name is at the top of the waiting list. In an effort to expand affordable and accessible housing options for persons with disabilities, BCHA has partnered with the Penn Foundation to provide project-based vouchers for 12 units in Penn Villa, a new accessible development for persons with disabilities. This project was financed through the Low Income Housing Tax Credit program. In addition, BCHA maintains a list of Section 8 landlords and will inform applicants with disabilities of the availability of accessible units if these are known.

The demand for accessible and affordable housing by persons with physical disabilities is demonstrated through the extensive waiting lists for subsidized housing in Bucks County. As of June 2012, there were 672 applicants with a household member with a disability waiting for Section 8 vouchers (24 percent of 2,800); however, it is unknown how many of these may require an accessible unit. Another 158 applicant households with a disabled member are on the waiting list for public housing. Current tenant demographics include 1,831 households with members with disabilities utilizing Section 8 vouchers (57 percent of 3,233) and another 37 households residing in public housing (6 percent of 648).

The housing choices of applicants who receive Section 8 Housing Choice Vouchers through BCHA are greatly expanded both in number and location compared to those of applicants seeking public housing units. The map on the following page illustrates the location of all Section 8 participating properties in Bucks County. About half of all units are concentrated in Lower Bucks County. Of the remaining Section 8 units, about one quarter are located in Upper Bucks County with moderate concentrations found in Quakertown, Perkasie and Sellersville. The remaining units are dispersed throughout Central Bucks County.

According to the County, about 50 percent of the County's total population resides in only 17 percent of the County (Lower Bucks). As a result, the concentration of Section 8 voucher holders is more a function of where the most available housing is located.



Prepared by  
Bucks County Planning Commission  
Geographic Information Systems Section  
2010



Two policy documents utilized by BCHA were reviewed for this analysis. A summary of the reviews of the administrative plans for both public housing and the Section 8 Housing Choice Voucher Program are included below.

➤ Section 8 Housing Choice Voucher Administrative Plan

Section 2-I.B. of the Section 8 Admin Plan includes a fair housing policy in which BCHA states its anti-discrimination policy. The list of protected classes includes race, color, religion, sex, national origin, age, familial status, disability, marital status and sexual orientation.

BCHA's policy relative to reasonable accommodations is set forth in Section 2-II.A. of the Plan. Participants with a disability must request a special accommodation in order to be treated differently than other (non-disabled) voucher holders. BCHA has a request form for this purpose. In order to be considered as a person with a disability, the applicant or voucher holder must certify that they meet the ADA definition of disability, i.e., a physical or mental impairment that substantially limits one or more of the major life activities, a record of such impairment or being regarded as having such an impairment. The BCHA will then utilize reliable, knowledgeable and professional representatives to verify the disability.

In Section 2-III.B., BCHA's policy relative to persons with limited English proficiency is stated. BCHA will consider translating documents into other languages based on the number of applicants and participants who do not speak English. In cases where fewer than 50 persons speak a particular foreign language, BCHA will provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of written materials at no cost to the individual.

In Section 3-III.A. of the Plan, BCHA states that it will not deny Section 8 vouchers on the basis that the applicant is or has been a victim of domestic violence, dating violence or stalking. In Section 3-III.G., BCHA states its policy to keep confidential any information provided by victims of domestic violence, dating violence or stalking. BCHA will release such information only in limited circumstances, such as when the victim authorizes the release, as part of an eviction proceeding or when it is otherwise compelled by law to release the information.

In order to be eligible to receive a Section 8 Housing Choice Voucher, the applicant must qualify as a "family." In Section 3-I.A. of the Admin Plan, BCHA defines "family" as a single person or a group of persons consisting of two or more elderly persons or disabled persons living together. "Family" also includes one or more elderly or disabled persons living with one or more live-in aides. A child that is temporarily away from home because of placement in foster care is considered a member of the family. At least one member of the family must be a U.S. citizen or have eligible immigration status.

BCHA policy also includes a family comprised of two or more persons who are not related by blood, marriage, adoption, or other operation of law but who either can demonstrate that they lived together previously or certify that each individual's income and other resources will be available to meet the needs of the family.

In Section 4-III.C., BCHA establishes a waiting list preference for applicants who live or work in Bucks County. The BCHA policy also includes a homeless preference where the Authority will provide one out of every 10 vouchers that turnover to an applicant identified as homeless and selected by criteria established by the Local Housing Committee of the Bucks County Human Services Housing Coalition.

Any applicant or participant who feels that he or she has been impacted negatively may request an informal review by BCHA staff. A notice of the findings of the informal review is provided to the appellant in writing. Furthermore, BCHA must always provide the opportunity for an informal hearing before terminating Section 8 assistance. BCHA's policies recognize that the presence of a disability may be treated as a mitigating circumstance during the hearing process. Examples of mitigating circumstances include persons with cognitive disorders that may not have fully understood conditions of continued Section 8 assistance.

In Chapter 13 of the Section 8 Admin Plan, BCHA states its commitment to encouraging the participation of landlords in all areas of the County. BCHA has established an official policy of actively recruiting property owners with rental units located outside areas of poverty and minority concentration. This is achieved through outreach to landlords in all areas of Bucks County through distribution of printed material to owners and managers, contacting owners and managers by phone or in person, participating in community-based organizations comprised of owners and managers, and developing working relationships with owners and real estate broker associations. BCHA also pledges to affirmatively further fair housing by providing participants with a broad range of housing options, including "porting out" to other jurisdictions when such measures promote the goals of racial integration and de-concentration of poverty.

Section 16-II.B. states that BCHA will consider a payment standard higher than 100% when a reasonable accommodation is required for a family that includes a person with a disability.

➤ Public Housing Admission and Continued Occupancy Plan (ACOP)

Chapter 1, Section A of the ACOP includes a non-discrimination policy in which BCHA states its anti-discrimination policy. The list of protected classes includes race, sex, color, age, religion, familial status, disability, handicap or national origin. This section also includes a reasonable accommodation/modification policy for persons with disabilities. Such persons will be provided with reasonable accommodation/modification, as defined in the ACOP, upon admission or at any time when notification is provided to a project manager. Notification can be made in writing or verbally to a project manager. A notice of this policy is available in large print upon request. BCHA also offers assistance in reviewing the provisions of the ACOP to persons with disabilities.

Section C of Chapter 2 defines the Authority's admission procedures. All applicants must qualify as a family. The term "family" is defined as a group of persons living together and related by blood, marriage, adoption, guardianship or operation of law. The term "family" also includes a group of persons who are not so related but have demonstrated a stable relationship of at least one year.



The term “family” also includes a single individual with no children who is pregnant at the time of admission or in the process of securing legal custody of any individual under the age of 18. Finally, the term “family” also includes an elderly person, a displaced person, or a single person. A family may include foster children and live-in aides if they are living, or will live, regularly with the family. A “live-in aide” is defined as a person determined by BCHA to be essential to the care and well-being of a family member, is not obligated to support the family member, and would not be living in the unit except to provide supportive services.

Chapter II of the ACOP establishes waiting list preferences. BCHA has a waiting list preference for applicants for Grundy Tower, Grundy Gardens, Bensalem Woods, Macintosh Regency, Venice Ashby Phase II, and the Bristol Rehab properties. First preference is given to applicants who live, work, or have been hired to work in Bucks County. A second preference is given to applicants on the Out-of-Bucks County waiting list. BCHA has also adopted a local preference for working families at Venice Ashby Phase II and Bristol Rehab properties and recognizes a local preference for placing elderly and disabled applicant families over other single families in designated buildings. There is no residency preference for applicants for Grundy Manor.

In an addendum to its ACOP, BCHA establishes a procedure for residents to present complaints and grievances. Applicants who wish to dispute any management action must present their grievance, in writing or verbally, within five calendar days of the disputed action to the project office. Residents may file a grievance when they feel that a BCHA action or inaction has adversely affected their rights, duties, welfare or status. The decision of the hearing officer is binding.

### **Taxes**

Taxes impact housing affordability. While not an impediment to fair housing choice, real estate taxes can impact the choice that households make with regard to where to live. Tax increases can be burdensome to low-income homeowners, and increases are usually passed on to renters through rent increases. Tax rates for specific districts and the assessed value of all properties are the two major calculations used to determine revenues collected by a jurisdiction. Determining a jurisdiction’s relative housing affordability, in part, can be accomplished using tax rates.

However, straight comparison of tax rates to determine whether a property is affordable or unaffordable gives an incomplete and unrealistic picture of property taxes. Local governments with higher property tax rates, for example, may have higher rates because the assessed values of properties in the community are low, resulting in a fairly low tax bill for any given property. In all of the communities surrounding a jurisdiction, comparable rates for various classes of property (e.g., residential, commercial, industrial) are assigned to balance each community’s unique set of resources and needs. These factors and others that are out of the municipality’s control must be considered when performing tax rate comparisons.

Real estate taxes are levied on land and buildings and provide primary revenue streams for counties, municipalities, and school districts throughout Pennsylvania. County assessment offices establish the market value of each property and then apply a pre-determined ratio to establish a property’s assessed value. The ratio varies from county to county. From this

assessment each taxing jurisdiction levies a uniform tax millage rate against the assessed value of each property. Levies are measured in tenths of a cent and commonly called “mills.” Levies are multiplied by the assessed value of a property to calculate a property owner’s real estate tax.

Pennsylvania and Bucks County have several tax relief programs. Elderly and permanently disabled citizens are eligible for a statewide tax rebate program, and the Bucks County Board of Assessment oversees the homestead exclusion for owner-occupied properties in the County. Residents can appeal their assessed property value.

Bucks County had a county-wide millage rate of 23.2 mills in 2012-2013, in addition to individual municipality and school district rates. The assessment ratio was 10.8 percent of assessed valuation as of 2012.

For taxpayers in Bucks County, the single largest factor in the total millage rate is the school district in which their property is located. For example, in Bensalem Township, the school tax levy accounts for 77.2 percent of the total property tax, while municipal and county taxes combined account for the remaining 22.8 percent. School tax rates are highest in Morrisville Borough, which operates its own small school district, Bristol Borough, and Bristol Township, thus raising the overall millage for residential properties that are generally valued at the lower end of the spectrum in the County. Total millage rates throughout the County (exclusive of Telford Borough, which lies partially in Montgomery County and pays school taxes to that county) range from 120.14 mills per \$1,000 of assessed residential value in the riverfront resort community of New Hope Borough, to 241.43 mills per \$1,000 of assessed value in Morrisville.

Table 35 details millage rates by municipality in Bucks County, broken down by both municipality and school district. The total tax rate consists of municipality, school district and county millages. The Bucks County tax rate of 23.2 mills has been factored into the overall millage. For the purpose of illustration, the estimated yearly tax bill was calculated for the average assessed housing value in 2012 in each municipality. The table lists the municipalities in the order of lowest tax bill to highest tax bill.

The six municipalities with areas of concentration of minorities are highlighted. Most have average residential tax bills that fall within the low-to-mid range for Bucks County, accompanied by relatively low housing values, as indicated by assessed valuation. For example, Falls and Warminster townships and Bristol Borough have estimated tax bills that fall well within the lowest third for the County, while Bensalem Township falls at the outer reaches of the lowest third. In Bensalem Township, a home owner would pay a yearly tax bill of \$4,287 on the median valued house of \$249,200. By contrast, Morrisville Borough has an estimated tax average residential tax millages that falls within the mid-range for half of all Bucks municipalities, yet the median housing value in Morrisville, which operates its own school district and pays the highest rate of school taxes in the County, is at the lower end of the spectrum. The tax bill in Morrisville would be equivalent to just over 24 percent of average assessed housing value, the highest ratio in the County. And the estimated total millage in Middletown Township is within the top third of Bucks County municipalities.



**Table 37 Bucks County Millage Rates by Taxing Body, 2012**

Municipality	Municipality Millage	School District Millage	Total Millage*	Average Assessed Housing Value (2012)	Estimated Annual Tax Bill
Telford Borough	5.630	28.005	56.510	\$24,324	\$1,375
Tullytown Borough	11.500	150.300	185.000	\$17,920	\$3,315
Quakertown Borough	1.625	141.510	166.335	\$19,941	\$3,317
Falls Township	7.220	150.300	180.720	\$19,434	\$3,512
Sellersville Borough	16.000	123.017	162.217	\$21,691	\$3,519
Richlandtown Borough	1.250	141.510	165.960	\$21,499	\$3,568
New Britain Borough	21.875	122.800	167.875	\$21,410	\$3,594
Penndel Borough	15.500	152.000	190.700	\$20,351	\$3,881
Trumbauersville Borough	2.500	141.510	167.210	\$23,700	\$3,963
Warminster Township	17.070	116.070	156.340	\$25,521	\$3,990
Richland Township	9.500	141.510	174.210	\$23,188	\$4,040
Bristol Borough	49.890	154.000	227.090	\$17,824	\$4,048
Perkasie Borough	5.750	123.017	151.967	\$26,766	\$4,068
Dublin Borough	10.000	123.017	156.217	\$26,308	\$4,110
Bridgeton Township	6.000	110.340	139.540	\$29,958	\$4,180
Bensalem Township	19.500	144.350	187.050	\$22,920	\$4,287
Bristol Township	23.988	192.269	239.457	\$18,043	\$4,321
Silverdale Borough	2.750	123.017	148.967	\$29,250	\$4,357
Morrisville Borough	40.930	177.300	241.430	\$18,113	\$4,373
Riegelsville Borough	11.750	154.420	188.316	\$23,277	\$4,383
Yardley Borough	16.730	150.300	190.230	\$23,936	\$4,553
Hulmeville Borough	9.970	152.000	185.170	\$24,888	\$4,609
Upper Southampton Township	21.880	116.070	161.150	\$28,904	\$4,658
Chalfont Borough	13.500	122.800	159.500	\$29,664	\$4,731
Lower Southampton Township	14.080	152.000	189.280	\$25,025	\$4,737
West Rockhill Township	5.250	123.017	151.467	\$32,229	\$4,882
Ivyland Borough	13.500	116.070	152.770	\$32,534	\$4,970
Milford Township	2.000	141.510	166.710	\$30,300	\$5,051
Nockamixon Township	6.000	110.340	139.540	\$36,327	\$5,069
Langhorne Borough	12.196	152.000	187.396	\$27,285	\$5,113
Doylestown Borough	11.220	122.800	183.910	\$27,896	\$5,130
Newtown Township	2.500	112.560	138.260	\$37,767	\$5,222
Springfield Township	4.500	110.340	138.040	\$37,959	\$5,240
East Rockhill Township	8.135	123.017	154.352	\$34,106	\$5,264
New Britain Township	12.063	122.800	158.063	\$34,039	\$5,380
New Hope Borough	12.225	84.715	120.140	\$45,419	\$5,457
Durham Township	4.000	110.340	137.540	\$39,705	\$5,461
Hilltown Township	8.750	123.017	154.967	\$35,419	\$5,489
Warrington Township	11.550	122.800	157.550	\$35,465	\$5,588
Middletown Township	17.570	152.000	192.770	\$29,091	\$5,608
Northampton Township	11.143	112.560	146.903	\$39,768	\$5,842
Bedminster Township	7.500	123.017	153.717	\$38,166	\$5,867
Langhorne Manor Borough	9.375	152.000	184.575	\$32,240	\$5,951
Plumstead Township	13.250	122.800	159.250	\$37,851	\$6,028
Haycock Township.	5.000	141.510	169.710	\$35,626	\$6,046
Newtown Borough	9.000	112.560	144.760	\$42,002	\$6,080
Tinicum Township	8.500	110.340	142.040	\$44,116	\$6,266
Doylestown Township	10.250	122.800	156.250	\$40,124	\$6,269
Warwick Township	15.250	122.800	161.250	\$39,253	\$6,330
Buckingham Township	5.500	122.800	151.500	\$49,666	\$7,524
Lower Makefield Township	15.120	150.300	188.620	\$41,622	\$7,851
Solebury Township	19.560	84.715	127.475	\$65,505	\$8,350
Wrightstown Township	6.580	112.560	142.340	\$60,877	\$8,665
Upper Makefield Township	12.853	112.560	148.613	\$71,506	\$10,627

\*Total millage includes municipality, school district, and county (23.2) millages

Sources: Bucks County Board of Assessment

**Public Transit**

Households without a vehicle, which in most cases are low-moderate income households, are at a disadvantage in accessing jobs and services, particularly if public transit is inadequate or absent. 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 (of concentrations of minority and LMI persons) and employment opportunities are key to expanding fair housing choice.

In 2000, there were 11,148 transit-dependent households in Bucks County, comprising 5.1 percent of all households. By comparison, there were 1,981 households (8.4 percent) in Bensalem Township that were transit-dependent. Renters were far more likely to be transit-dependent than homeowners, as 14.3 percent of renters in Bucks County and 15.3 percent in Bensalem Township did not have access to a vehicle, compared to 2.4 percent and 3.4 percent of owner households, respectively.<sup>14</sup>

In 2010 the vast majority of County residents (90.6 percent) drove to work, with 82.5 percent in Bucks County and 81.2 percent in Bensalem Township driving alone. Throughout Bucks County, only 2.8 percent of residents utilized public transportation to get to work; in Bensalem Township, the rate was slightly higher 5.3 percent. The railway system was the most popular mode of public transportation in both geographic areas. Among those who used public transportation to work, 74.6 percent in Bucks County and 49.8 percent in Bensalem Township used the rail system.

Blacks and Hispanics in Bucks County were far more likely to use public transit than Whites. In Bucks County, only 2.6 percent of Whites used public transit compared to 5.7 percent of Blacks, 6.1 percent of Asians, and 7.3 percent of Hispanics. As noted previously, more workers overall used public transit in Bensalem Township and, unlike the County, the rates of ridership among Whites, Blacks, and Asians were comparable. Hispanics, on the other hand, were over 2 to 4 times more likely to use public transit than other races.

**Table 38 Means of Transportation to Work, 2010**

	Bucks County		Bensalem Township	
	#	%	#	%
<b>Total</b>	<b>313,254</b>	<b>100.0%</b>	<b>31,425</b>	<b>100.0%</b>
<b>Car, truck, or van:</b>	<b>283,920</b>	<b>90.6%</b>	<b>28,511</b>	<b>90.7%</b>
Drove alone	258,518	82.5%	25,503	81.2%
Carpooled	25,402	8.1%	3,008	9.6%
<b>Public transportation:</b>	<b>8,991</b>	<b>2.8%</b>	<b>1,626</b>	<b>5.3%</b>
Bus or trolley bus	1,628	0.5%	703	2.3%
Subway or elevated	598	0.2%	113	0.4%
Railroad	6,709	2.1%	810	2.6%
Motorcycle	277	0.1%	11	0.0%
Bicycle	547	0.2%	28	0.1%
Walked	5,529	1.8%	545	1.8%
Other means	1,264	0.4%	134	0.4%
Worked at home	12,911	4.1%	561	1.8%

Source: U.S. Census Bureau, 2006-2010 American Community Survey (S0802)

<sup>14</sup> U.S. Census Bureau, Census 2000 SF-3 (H44)



**Table 39 Percent of Workers using Public Transportation by Race, 2010**

	<b>Bucks County</b>	<b>Bensalem Township</b>
White	2.6%	4.9%
Black	5.7%	8.4%
Asian	6.1%	6.4%
Hispanic	7.3%	20.0%

**SEPTA**

Bucks County is served primarily by Southeastern Pennsylvania Transportation Authority (SEPTA) and Bucks County Transportation Management Authority (TMA Bucks). SEPTA is the sixth-largest transit system in the country, providing about 330 million passenger trips throughout five counties the Southeastern Pennsylvania region in 2009. The multi-modal transit system offers 144 fixed routes on buses, trolleys, regional rails, and subways. TMA Bucks provides five fixed-route bus routes, offering connecting services during peak hours.

➤ Destinations and Routes

SEPTA offers 14 bus routes throughout Bucks County, in addition to four railway routes. Amtrak also runs an additional railway route through lower Bucks County. The Rush Bus service, provided by TMA Bucks, connects residents to these regional services during morning and evening rush hour, Monday through Friday. Most SEPTA-run rail and bus services operate from about 4:00 a.m. to 1:00 a.m. during weekdays, with a couple of routes operating throughout the night.

Public transportation services are concentrated in the more populated municipalities in southern Bucks County. Residents of municipalities in the northern and eastern parts of the County are virtually without access to public transportation. The exception is the bus route extending a short distance into Telford Borough and Hilltown Township along county Line Road. Within Bensalem Township, transportation routes primarily serve industrial parks and shopping areas in the municipality, as well as connection lines into neighboring Philadelphia.

According to local affordable housing providers, the absence of adequate public transportation throughout Bucks County limits the development of affordable housing to those areas served by public transit. It should be noted in this context, however, that employment centers, services, population and housing continue to be more numerous in the Lower Bucks County communities served by public transit options.

➤ Accessibility

All SEPTA and TMA Bucks fixed-route buses are equipped with wheelchair lifts or ramps, in accordance with the American with Disabilities Act (ADA). Regional rail cars are also accessible for passengers with mobility devices. For those unable able to access fixed-route bus services, SEPTA provides ADA para-transit services throughout the region. Bucks County Transport, a private nonprofit corporation, also provides shared-ride services and transportation to medical appointments for elderly and disabled residents countywide.

The recent economic downturn has left SEPTA hard hit and facing significant budget deficits. Fare increases in the range of 6 to 9 percent took effect in 2010.

#### **DVRPC**

The Delaware Valley Regional Planning Commission (DVRPC) is the designated metropolitan planning organization (MPO) for Southeastern Pennsylvania and neighboring counties in New Jersey. As such, DVRPC develops the long-range transportation plans required by federal regulations and funding sources. DVRPC updated its plan titled *Connections: The Regional Plan for a Sustainable Future*. This plan seeks “to connect people in the cities, suburbs and rural communities throughout the Delaware Valley; ...to connect transportation, land use, the economy, and the environment in a comprehensive way; ...and to create a competitive, efficient, equitable and sustainable region.” If achieved, the goals memorialized in this plan could expand fair housing choice for Bucks County and the entire Delaware Valley.

One of the primary goals envisioned in *Connections* is the proposed development of transit-oriented developments (TODs) anchored around the region’s rail stations and other transit facilities. The creation of higher density, mixed-use developments proximate to public transit facilities can provide an opportunity for the inclusion of an affordable housing component and, therefore, greater housing choice for members of the protected classes in Bucks County. Furthermore, the proposed linkages between “transportation investments with economic development ...as a foundation and catalyst to affect positive community change ...” speaks directly to the potential for creating housing choice in communities of opportunity in Bucks County. TODs are also among the smart growth elements and diverse residential types recommended in the County comprehensive plan.

#### ➤ *Employment and Housing*

DVRPC in 2011 issued *The Mismatch Between Housing and Jobs*, a study geared toward identifying alternatives for achieving a better regional balance between jobs and housing and promoting socioeconomic balance and diversity throughout Greater Philadelphia. The study includes a map (Figure 1, p. 9) correlating “affordable” municipalities with employment centers.

Affordable municipalities as identified by DVRPC are those where a household earning the regional median will spend less than 45 percent of its income for housing plus transportation. (This definition differs from the HUD housing affordability standard capping housing expenditures at 30 percent of income.)

Employment centers, according to DVRPC’s definition, are integrated, concentrated areas of non-residential development that share transportation and land use linkages, have at least 500 employees, and have an employment density of at least 0.5 employees per acre. These centers form the backbone of the region’s economy.

The DVRPC map showed one of the highest correlations in the region between employment centers and affordable municipalities in Bucks County, particularly in the lower and central portions of the County, which contain the bulk of the population. Bristol Township and Borough in Lower Bucks, Warminster Township and Doylestown Borough in Central Bucks, and Quakertown Borough in Upper Bucks were depicted as affordable municipalities containing employment centers. The primary exceptions were one highly



rural township in Upper Bucks (Tinicum), and one in Central Bucks (Wrightstown) with small populations and few jobs, and lacking good access to public transportation, that were deemed affordable municipalities, but have few jobs within their borders.

Most of the municipalities in the County designated as affordable by DVRPC are located within or adjacent to employment centers or are on public transit lines that also serve local employment centers. They typically have greater concentrations of low-income and minority population; Bucks County, however, has the lowest overall poverty rate and percentage of minority population in the 9-county Greater Philadelphia region, according to Census data compiled by DVRPC. Municipalities in lower Bucks typically have reasonable highway and public transit access to employment centers in Philadelphia and Mercer County, NJ, as well.

Other data sources also point to employment concentrated in, but not confined to, the lower part of Bucks County. The Pennsylvania Department of Labor and Industry as of the 2<sup>nd</sup> quarter of 2011 identified the 10 largest employers in Bucks County as follows:

- Central Bucks School District
- St. Mary Medical Center
- Giant Food Stores
- Healthcare Services
- Northtec, LLC
- Doylestown Hospital
- Bucks County
- Wal-Mart
- Woods Services
- Pennsbury School District.

These employers are located predominantly in Lower Bucks County, with the exception of the Central Bucks School District and Doylestown Hospital, which are based in Central Bucks, and Giant Food Stores, Wal-Mart and Bucks County government, which are countywide.

## **B. Private Sector**

### ***Real Estate Practices***

Bucks County is served by the Bucks County Association of Realtors. New members receive instruction in fair housing as part of the PA Act 10 Realtor Code of Ethics training. Once licensed, each salesperson and broker is required to accumulate 14 hours of continuing education over a two-year period. As part of the continuing education classes, licensees receive fair housing training. Fair housing classes are taught by education providers licensed through the Pennsylvania Real Estate Commission. There are also optional and continuing education courses available online through the National Association of Realtors and the Pennsylvania Association of Realtors.

The Association provides fair housing information through occasional mailings, but its primary source of contact is through weekly e-mail distributions. Members of the Association are referred to the Pennsylvania Association of Realtors website and the National Association of Realtors website for additional information on fair housing.

The Association has adopted a procedure for dealing with breaches of ethics. Injured parties may file a complaint with the secretary of the Association. The complaint is reviewed by an appointed grievance committee. The committee conducts a professional standards hearing in which it renders an opinion on whether the complaint is justified. When it is determined that a violation has occurred, the case is referred to the Pennsylvania Real Estate Commission. According to the Association, there have been no complaints filed with the Realtors within the past few years, although a few complaints have been filed with the Fair Housing Council of Suburban Philadelphia.

From time to time, the Association invites fair housing advocates to speak at its functions. Specifically, there is interaction between the Association's Affordable Housing Committee, the Bucks County Fair Housing Committee, and the Diversity Committee of the Bucks County Human Relations Council.

The multi-list form utilized by the Association includes a description of a dwelling's accessibility features that could be used to market the property to persons with disabilities. This is a searchable feature within the database. All brokers in the area are permitted to participate in the local Multi-List Service.

The Association provides scholarships for licensing education, and recruits prospective agents who may be members of the protected classes. The Association has been actively involved in fair housing initiatives throughout Bucks County. The Association assisted with promoting the County spearheaded landlord workshops held to provide information and legal advice to area landlords in conjunction with local attorneys and judges. The Association nominated the Bucks County Housing Group's First-Time Homebuyer Boot Camp for a national NAR award for promoting home ownership opportunities and education to minority homebuyers. The Association financially contributes to the works of the Bucks County Housing Group, Habitat for Humanity, the Family Service Homeless Shelter, and Interfaith Housing, all in an effort to promote and advocate for fair housing in Bucks County.

### **Home Mortgage Financing**

#### ➤ *Mortgage Lending Practices*

Under the terms of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.), any commercial lending institution that makes five or more home mortgage loans must report all residential loan activity to the Federal Reserve Bank under the terms of the Home Mortgage Disclosure Act (HMDA). The HMDA regulations require most institutions involved in lending to comply and report information on loans denied, withdrawn, or incomplete by race, sex, and income of the applicant. The information from the HMDA statements assists in determining whether financial institutions are serving the housing needs of their communities. The data also helps to identify possible discriminatory lending practices and patterns.



The most recent HMDA data available for Bucks County is from 2010. Reviewing this data for a five-year term, beginning in 2006, establishes trends over time and helps to determine the need to encourage area lenders, other business lenders, and the community at large to actively promote existing programs and develop new programs to assist residents in securing home mortgage loans for home purchase.

The data focus on the number of homeowner mortgage applications received by lenders for home purchase of one- to four-family dwellings and manufactured housing units across Bucks County. The information is provided for the primary applicant only; co-applicants were not included in the analysis. In addition, where no information is provided or categorized as not applicable, no analysis has been conducted due to lack of information. The following table summarizes five years of HMDA data by race, ethnicity and action taken on the application, with detailed information to follow. More detailed data tables are provided in Appendix B.

**Table 40 \*Summary of Mortgage Loan Activity in Bucks County, 2006-2010**

Loan Applications	2006		2007		2008		2009		2010	
	#	%	#	%	#	%	#	%	#	%
White	13,183	70.7%	11,358	71.8%	8,159	76.0%	7,586	81.7%	7,140	83.6%
Black	417	2.2%	316	2.0%	191	1.8%	170	1.8%	186	2.2%
Asian/Pacific Islander	667	3.6%	598	3.8%	450	4.2%	468	5.0%	477	5.6%
Other Race	79	0.4%	73	0.5%	44	0.4%	40	0.4%	11	0.1%
Race Not Provided	4,299	23.1%	3,465	21.9%	1,885	17.6%	1,017	11.0%	725	8.5%
Hispanic	496	2.7%	430	2.7%	266	2.5%	239	2.6%	206	2.4%
<b>Total</b>	<b>18,645</b>	<b>100.0%</b>	<b>15,810</b>	<b>100.0%</b>	<b>10,729</b>	<b>100.0%</b>	<b>9,281</b>	<b>100.0%</b>	<b>8,539</b>	<b>100.0%</b>
Loans Originated	#	%	#	%	#	%	#	%	#	%
White	8,380	83.8%	6,454	79.0%	4,951	84.3%	4,470	83.0%	4,061	84.3%
Black	236	2.4%	144	1.8%	107	1.8%	82	1.5%	95	2.0%
Asian/Pacific Islander	420	4.2%	356	4.4%	262	4.5%	262	4.9%	273	5.7%
Other Race	37	0.4%	39	0.5%	21	0.4%	28	0.5%	6	0.1%
Race Not Provided	928	9.3%	1,178	14.4%	530	9.0%	546	10.1%	381	7.9%
Hispanic	293	2.9%	225	2.8%	159	2.7%	134	2.5%	106	2.2%
<b>Total</b>	<b>10,001</b>	<b>100.0%</b>	<b>8,171</b>	<b>100.0%</b>	<b>5,871</b>	<b>100.0%</b>	<b>5,388</b>	<b>100.0%</b>	<b>4,816</b>	<b>100.0%</b>
Loans Denied	#	%	#	%	#	%	#	%	#	%
White	948	72.6%	750	74.3%	628	78.5%	513	75.2%	503	76.3%
Black	53	4.1%	45	4.5%	15	1.9%	20	2.9%	19	2.9%
Asian/Pacific Islander	40	3.1%	43	4.3%	45	5.6%	46	6.7%	41	6.2%
Other Race	14	1.1%	10	1.0%	11	1.4%	1	0.1%	1	0.2%
Race Not Provided	251	19.2%	161	16.0%	101	12.6%	102	15.0%	95	14.4%
Hispanic	51	3.9%	53	5.3%	22	2.8%	25	3.7%	23	3.5%
<b>Total</b>	<b>1,306</b>	<b>100.0%</b>	<b>1,009</b>	<b>100.0%</b>	<b>800</b>	<b>100.0%</b>	<b>682</b>	<b>100.0%</b>	<b>659</b>	<b>100.0%</b>

*\*Numerical and percentage totals exclude Hispanics, who are also counted under various racial categories.*

*Source: Home Mortgage Disclosure Act database*

The period covered in the table includes the run-up to the national housing market crisis that began to unfurl in earnest in 2008, and its aftermath, yielding a sharp decline in mortgage applications from the market peak in mid-decade. From 2006 to 2010, the number of loan applications in Bucks County decreased more than 100 percent, declining from a total of 18,645 in 2006 to 8,539 in 2010. The steepest decline, of nearly one-third, took place between 2007 and 2008. The number of applications has continued to fall since then. The percentage of applications resulting in loans, however, increased slightly during that period, from 53.6 percent to 56.4 percent, likely reflecting more stringent underwriting practices and self-selection among prospective borrowers.

Whites constituted 92.5 percent of the Bucks County population as of the 2010 census. The percentages of the largest minority groups in the county were as follows: Blacks/African Americans, 3.3 percent; Asians/Pacific Islanders, 2.7 percent; and Hispanics (who may be of any race), 2.3 percent. Over the course of the five years under examination in this report, Blacks were generally underrepresented in the pool of mortgage applicants compared to their numbers in the general population, Asians were overrepresented, and Hispanics were represented in percentages roughly equivalent to their share of the population. Whites were significantly underrepresented, but these findings may be compromised by the large share of applicants (ranging from a low of 8.5 percent in 2010 to a high of 23.1 percent in 2006) who did not provide information on their race. It should be noted that a significant increase over time in the percentage of applicants identified as White, from 70.7 percent in 2006 to 83.6 percent in 2010, correlated nearly directly with the decreasing share of applicants who did not identify themselves by race, suggesting that most of those who did not provide identification according to race were White.

On the basis of race and ethnicity, there were notable trends during this five-year period as illustrated in Figure 15. The percentage of loan originations was lowest for Black applicants with the rate dipping to 45.6 percent in 2007 but rebounding to 56 percent in 2008, achieving a rate comparable to Asians and Hispanics. By 2008, the rate of loan originations was nearly equal among Whites, Blacks, Asians and Hispanics, ranging from 56 percent to 60.7 percent, before declining for all groups, but particularly among Blacks and Hispanics, in the next two years.

Analysis of mortgage loan denial data reveals other trends, as illustrated in Figure 16. In 2006 and 2007, Black applicants were denied at far greater rates than Whites, Asians and Hispanics. In some cases, Blacks were twice as likely to be denied home mortgages as Asians and Whites. However, by 2008, the denial rate among Blacks fell dramatically and was more comparable to the denial rate among Whites and Hispanics, before rising again in 2009 and 2010.

Denial rates by income level and race/ethnicity revealed significant trends for 2006-2010 as illustrated in Table 41. For this analysis, lower income households included households with incomes between 0 percent and 80 percent of the County median household income, while upper income households included those with incomes above 80 percent of median.

In 2006, the denial rate of Black upper income applicants was 11.3 percent, a rate almost comparable to White lower income applicants (at 12.8 percent), and nearly double that of White upper income applicants. This trend intensified in 2007 when the denial rate among Black upper income applicants was 15.2 percent, higher than the denial rate among all lower income applicants, including Blacks. By 2008, the denial rate among Black upper income applicants had decreased by more than half from 2007 and was between the denial rates among White and Hispanic upper income households. Notably, denial rates among Asians in 2008 were comparable for all income levels.



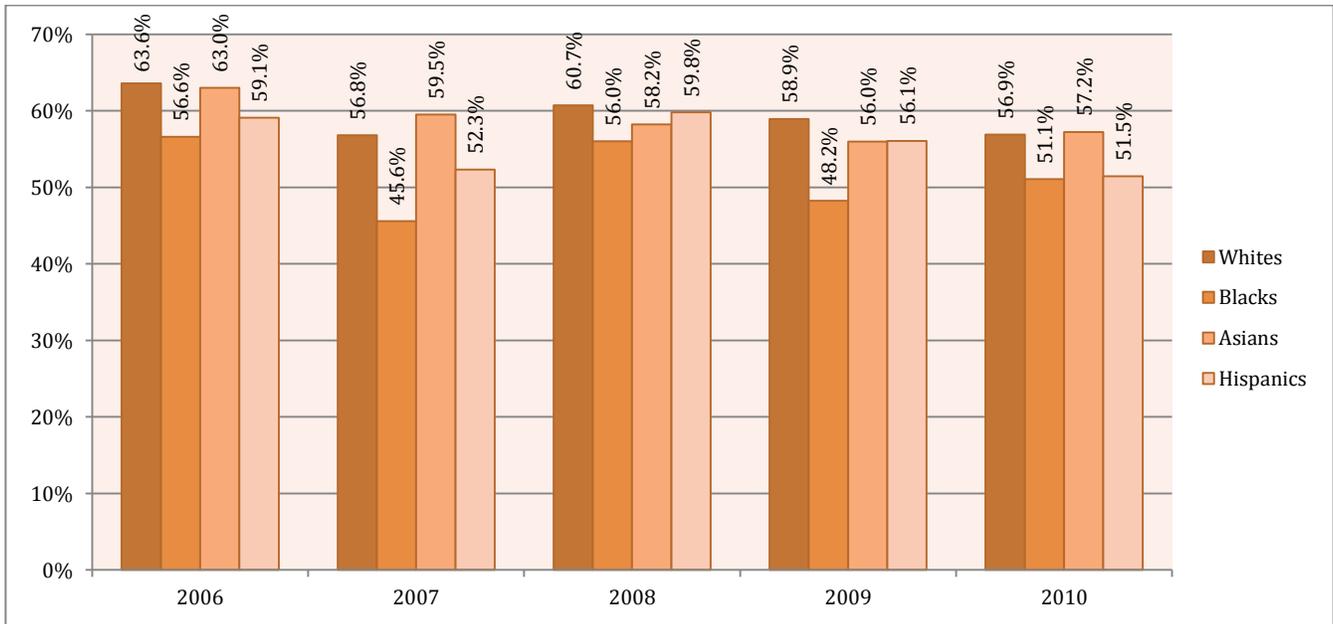
Mortgage denial patterns following the market crisis of 2008 were uneven. Loan denials among White and Hispanic lower-income applicants remained fairly stable, while those for Blacks and Asians rose from lower rates in 2007-2008. Denial rates for upper-income White, Black, and Asian applicants generally declined from 2009-2010, while denial rates among upper-income Hispanic applicants increased. Overall application numbers were lower during those two years, and absolute numbers of minority mortgage applications were modest, particularly among Blacks and Hispanics.

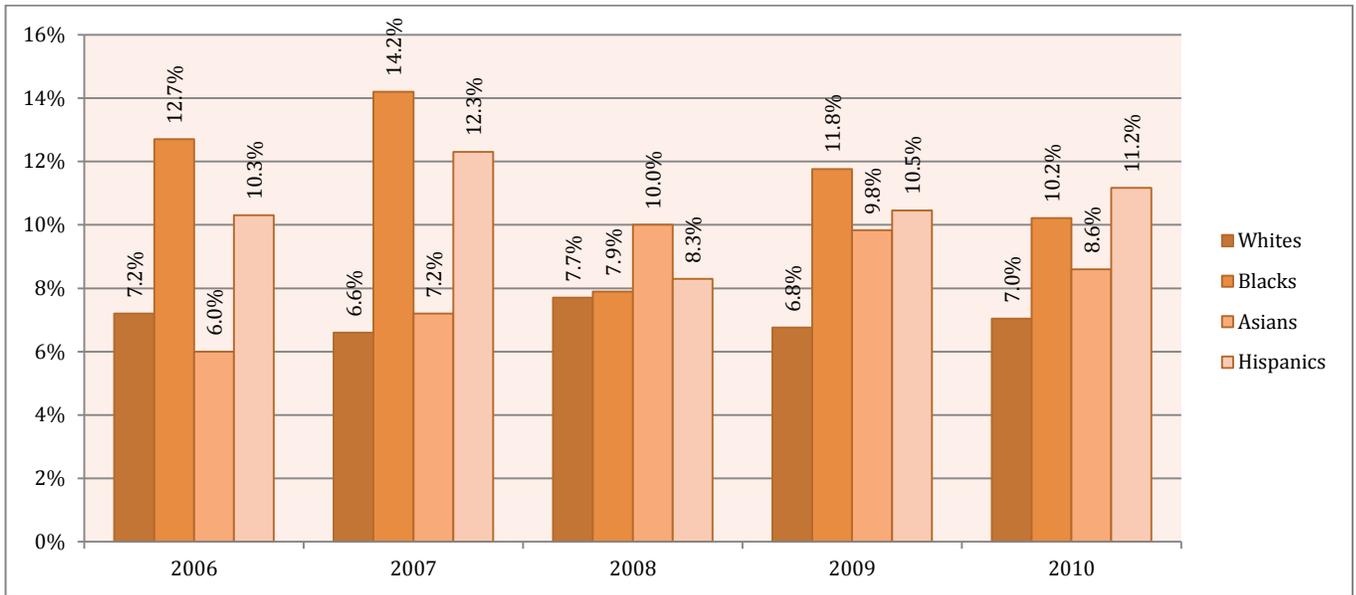
**Table 41 Loan Denials by Race/Ethnicity and Income in Bucks County, 2006-2010**

	2006	2007	2008	2009	2010
<b>Lower Income Applicants</b>					
White	12.8%	10.4%	13.5%	8.6%	9.7%
Black	20.5%	10.5%	12.0%	17.1%	12.6%
Asian	13.3%	10.7%	9.8%	14.4%	13.2%
Hispanic	23.1%	13.9%	12.3%	12.1%	11.6%
<b>Upper Income Applicants</b>					
White	6.2%	5.8%	6.2%	5.2%	5.1%
Black	11.3%	15.2%	6.7%	6.1%	7.2%
Asian	5.5%	6.4%	9.9%	8.5%	5.8%
Hispanic	6.6%	10.9%	6.8%	8.2%	10.6%

Source: Home Mortgage Disclosure Act database

**Figure 15 Rates of Loan Originations by Race and Ethnicity in Bucks County, 2006-2010**



**Figure 16 Rates of Loan Denials by Race and Ethnicity in Bucks County, 2006-2010**

The data in this section suggest that members of minority groups other than Asians may be numerically underrepresented in the pool of mortgage applicants, as well as overrepresented among those denied mortgage financing. The reasons are not clear from the data available to this study, although it is likely that household income plays a part. Efforts should be made to maintain and expand homebuyer counseling programs, including the County's First-Time Homebuyer program and funding support for counseling programs provided by nonprofit agencies.

➤ High-Cost Lending

The widespread housing finance market crisis of recent years has brought a new level of public attention to lending practices that victimize vulnerable populations. Subprime lending, designed for borrowers who are considered a credit risk, has increased the availability of credit to low-income persons. At the same time, some subprime lenders have exploited borrowers, piling on excessive fees, penalties and interest rates that make financial stability difficult to achieve. Higher monthly mortgage payments make housing less affordable, increasing the risk of mortgage delinquency and foreclosure and the likelihood that properties will fall into disrepair. In other cases, the borrowers have credit scores, income levels and down payments high enough to qualify for conventional, prime loans. But, they are nonetheless steered toward more expensive subprime mortgages. Minority groups have fallen disproportionately into the category of subprime borrowers.<sup>15</sup>

<sup>15</sup> HMDA analyses in larger metropolitan areas across the United States have provided conclusive evidence that minority groups pay more for their mortgages. For example, a 2007 analysis by New York University's Furman Center for Real Estate and Urban Policy found that Black- and Hispanic-majority neighborhoods were more likely to borrow from a subprime lender than White-majority neighborhoods with similar income levels. Also in 2007, the NAACP sued two of the nation's largest mortgage lenders, HBC and Wells Fargo, for "systematic, institutionalized racism" in lending, including giving subprime rates to Black customers who qualified for better rates while giving better rates to White customers. This type of mortgage discrimination has been alleged in a growing number of cities.



The practice of targeting minorities for subprime lending constitutes mortgage discrimination.

Since 2005, Housing Mortgage Disclosure Act (HMDA) data has included price information for loans priced above reporting thresholds set by the Federal Reserve Board. This data is provided by lenders via Loan Application Registers and can be aggregated to complete an analysis of loans by lender or for a specified geographic area. HMDA does not require lenders to report credit scores for applicants, so the data does not indicate which loans are subprime. It does, however, provide price information for loans considered “high-cost.” A loan is considered high-cost if it meets one of the following criteria:

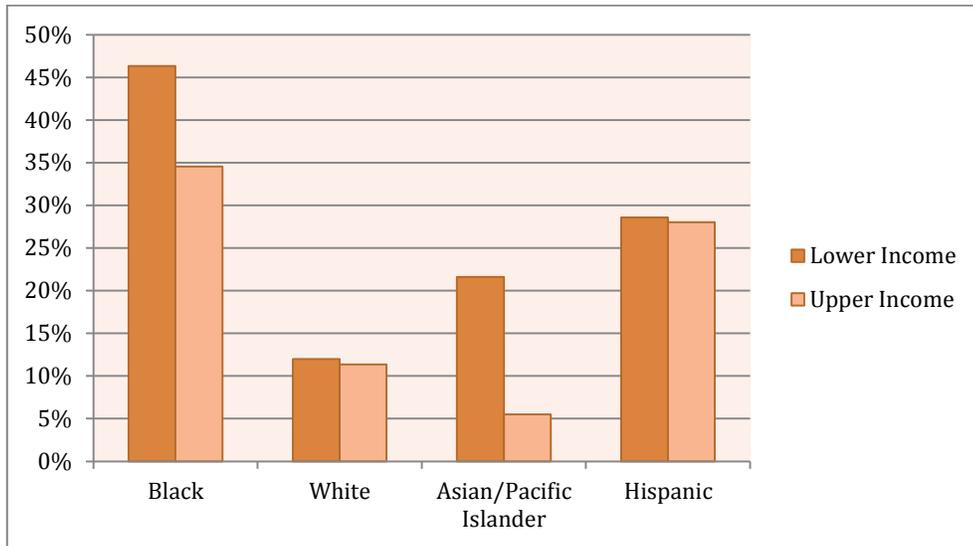
- A first-lien loan with an interest rate at least three percentage points higher than the prevailing U.S. Treasury standard at the time the loan application was filed. The standard is equal to the current price of comparable-maturity Treasury securities.
- A second-lien loan with an interest rate at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

Not all loans carrying high APRs are subprime; and, not all subprime loans carry high interest rates. However, high-cost lending is a strong predictor of subprime lending, and it can also indicate a heavier housing cost burden, increasing the risk of mortgage delinquency.

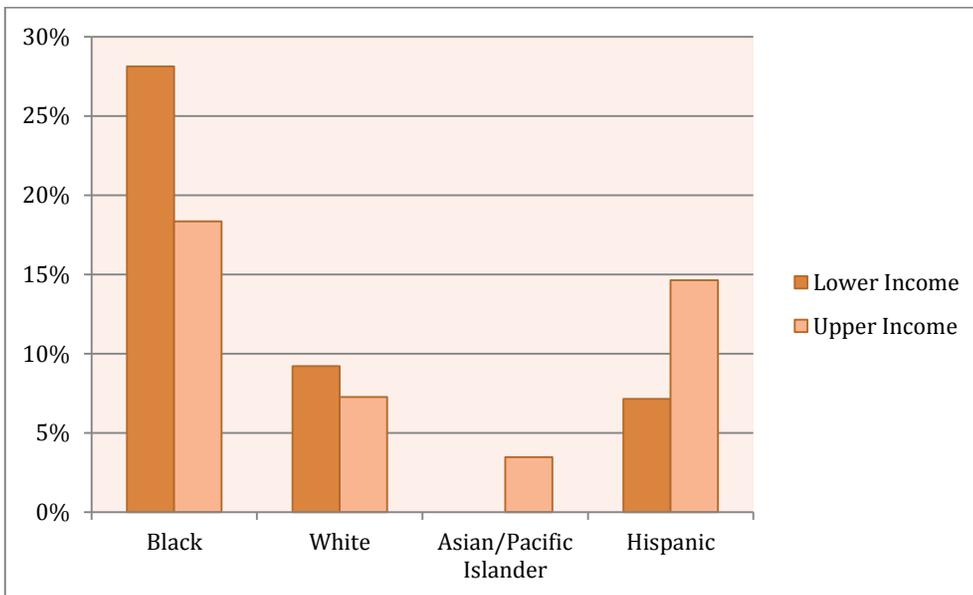
HMDA compiled data on high-cost loans for the period 2006-2008. In the following three figures, the rates of high-cost loans in Bucks County are compared by race/ethnicity and income level. Across the three-year period, the most notable trend is the high-cost loans among African American/Black households compared to all other groups. Although the rate of high-cost loans among African American/Black lower income households decreased from 46.3 percent in 2006 to 23 percent in 2008, the overall share was still higher than among other racial/ethnic groups. Notably, it was the fact that upper income African American/Black households received higher-cost loans compared to other groups. For example, African American/Black upper income households were three times (34.6 percent) as likely to get a higher cost loan than White (12 percent) lower income households.

Similar trends were noted for 2007 when Black upper income households were twice as likely to receive high-cost loans than White lower income households. Disparities were noted among Hispanic households as well where upper income households were twice as likely as lower income households to receive high-cost mortgages. By 2008, Black and Hispanic lower income households were still more likely to receive high-cost loans than White lower income households, but overall the rates were trending lower. This may have been the result of tightening lending standards following the start of the housing market crisis.

**Figure 17** Distribution of High-Cost Mortgage Loans by Race/Ethnicity and Income, 2006

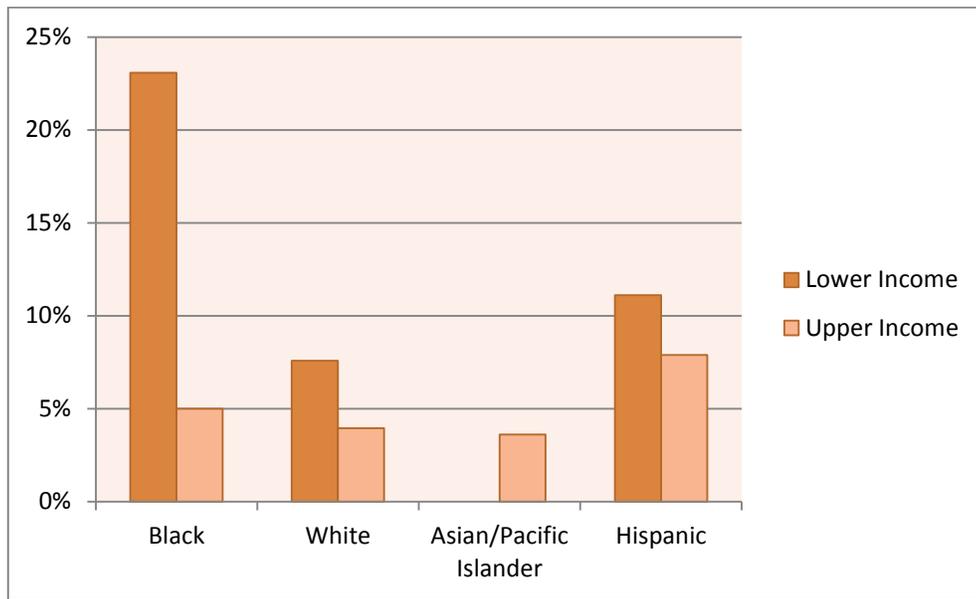


**Figure 18** Distribution of High-Cost Mortgage Loans by Race/Ethnicity and Income, 2007





**Figure 19 Distribution of High-Cost Mortgage Loans by Race/Ethnicity and Income, 2008**



The data suggest that subprime lending is a problem that disproportionately affects lower-income minority households. Homebuyer education programs should include information on “predatory lending” and how to avoid it.

## V. ASSESSMENT OF CURRENT FAIR HOUSING POLICY, PROGRAMS AND ACTIVITIES

### A. Current Fair Housing Policy

Fair housing choice is a goal that is clearly stated in public policy documents and demonstrated through a wide range of implementing initiatives. The local decision-making process is viewed through a “fair housing filter” that evaluates the significance of policies, actions, plans, permits, approvals and funding choices. Many policy documents were reviewed for this AI to determine the extent to which the Urban County and Bensalem have incorporated fair housing policy into various aspects of their respective local units of government.

#### *Urban County*

##### **Comprehensive Plan**

The Bucks County Comprehensive Plan is the Urban County’s encompassing document intended to guide land use decisions at the municipal level, and so affects the potential creation of fair housing choice for members of the protected classes. Under the Pennsylvania Municipalities Planning Code, however, the county plan serves as an advisory document for municipalities, who directly implement their own land use planning and zoning.

- The *Bucks County Comprehensive Plan* identifies a need to review and update land use regulations in order to provide housing choice, affordability, and diversity of housing types. It also acknowledges the need to provide a fair share of affordable housing to keep pace with forecasted growth within the region. To this purpose, the County has supplied technical assistance, and will continue to do so, to municipalities to ensure that local zoning ordinances are in compliance with provisions of the Fair Housing Act.
- The plan promotes higher density development districts, village centers and cluster site design, to be situated according to growth management and other planning criteria. These measures advance housing diversity.
- In light of increasing rents and sales values, the plan acknowledges that lower income households will have the most difficulty in finding and maintaining affordable housing. The plan calls for the County to play a coordination and support role in housing and community development activities funded through HUD and carried out by public and private agencies.

##### **Site and Neighborhood Standards**

The Urban County’s Site and Neighborhood Selection outlines policy for the HOME Program. The policy outlines specific criteria to identify areas of minority concentration and, thus, creating a basis for creating housing opportunities outside such areas, while preventing actions that would lead to the creation of additional areas of such concentration.



### **Boards and Authorities**

Overall, the boards provide a fairly reasonable representation of geography and local perspectives. However, they are largely composed of elected public officials. Broader representation by members of protected classes, including minorities, LMI households and women, should be considered to ensure the perspectives, opinions and experiences of members of the protected classes are adequately considered, along with the incorporation of fair housing choice into all of the appropriate decision-making processes.

### **Bensalem Township**

The Township has a planning commission that carries out land use planning and regulatory advisory activities, but currently has no public advisory agency for its CDBG program; decision-making is implemented by the community development department. It is recommended that Bensalem consider establishing such an advisory board, including program beneficiaries and members of protected classes, to provide input on program and project decisions.

## **B. Progress since the Previous AIs**

### ***Urban County and Bensalem Township***

The Urban County's previous AI was completed in 2004 and Bensalem Township's was completed in 2003. The AI's included an analysis of areas of minority concentration and areas of concentration of LMI persons by census tract. Comparisons were made throughout the document about income and housing conditions and trends relative to these impacted areas.

Fair housing complaints filed in the Township were reviewed and analyzed; trends within the complaint data were noted. Key stakeholders were interviewed and consulted. Specific public policies, such as the Township's zoning ordinance and its entitlement programs, were analyzed for potential impediments to fair housing choice. Private sector policies were also analyzed for impediments. Based on the demographic trends and policy analyses, a list of findings was derived. This served as the basis for detailed recommendations provided. Proposed recommendations included education and outreach activities, policy revisions and expansion of housing choice.

### ***Bristol Township***

Although Bristol Township is a separate HUD entitlement community, and submits its own AI to HUD, it was reviewed for this AI because it is located within the political boundaries of Bucks County. The current AI for Bristol Township is dated 2009. The report documents basic population data, including LMI areas.

Throughout the document, the lack of affordable housing remains the primary theme, with high real estate taxes identified as the primary impediment to affordable housing. There is a heavy emphasis on the physical development of the municipality and how the Township attempts to improve facilities and services with limited resources. The ordinance was reviewed, and the definition for "family" and the provisions regulating group homes were noted to be non-discriminatory. The recommendations included primarily physical improvement activities without any mention of how these would affirmatively further fair housing.

## C. Current Fair Housing Programs and Activities

These types of activities implemented by entitlement communities can be generally categorized according to the following:

- Education and outreach – involves education and training on fair housing laws, the rights and responsibilities of individuals; includes the dissemination of resource materials, information on how to file a discrimination complaint.
- Policy development – involves the establishment of policies that are key to the implementation of fair housing laws; includes housing site selection policies, land use and zoning, Section 8 mobility programming.
- Enforcement – involves monitoring of sub-recipients to ensure compliance with all programmatic requirements, processing discrimination complaints, attempting mediation or conciliation settlements; includes allocating funds to legal aid attorneys to handle complaints and to advocacy organizations to conduct real estate testing.
- Expansion of housing choice – involves the creation of housing opportunities for members of the protected classes; includes allocation of entitlement funds to develop new housing units outside of impacted areas.

An evaluation of the current fair housing activities and programs in the Urban County and Bensalem Township was conducted for this Analysis.

### **Urban County**

The Urban County's fair housing program activities have involved the following:

- Development of Affirmative Marketing Policy and its distribution to all sub-recipients of CDBG and HOME funds
- Development of Site and Neighborhood Standards and their distribution to all entities involved in the rehab and development of housing for lower income persons and those with special needs
- Creation and distribution of English and Spanish language brochures providing basic information about fair housing, examples of potential violations, and contact information to report violations.
- Distribution of fair housing posters to all nonprofit organizations providing housing services in Bucks County.
- Development of a county-wide housing program directory listing funding resources, eligibility criteria and fair housing requirements.
- Fair housing training in the form of housing organization workshops, onsite staff training and landlord workshops.
- Provision of fair housing education and training to local sub-recipients of CDBG, HOME, ESG and SHP funds.
- Display of the fair housing logo in correspondence and documents.
- Public education including fair housing newsletters and fact sheets on zoning for fair housing.



- Undertaking a “Don’t Borrow Trouble Campaign” in conjunction with neighboring counties to support a predatory lending hotline, legal assistance to persons involved in predatory lending, and public education and outreach.
- Continued funding for the Owner-Occupied Rehab Program implemented by the Redevelopment Authority to bring up to code the housing of lower income persons.
- Continued funding for first-time homebuyer program with down payment and closing cost assistance
- Continued funding support for Community Housing Development Organization (CHDO) for the development of rental housing and lease-to-purchase housing
- Provision of funding support for the development of housing for disabled veterans, seniors, and other persons with special needs
- Continued operational support for the largest senior housing project in the County (New Hope Manor)
- Continued support for the rehab of both housing and service facilities serving lower income persons and those with special needs, including those with HIV/AIDS
- Provision of funding to support legal services to lower income persons involved in housing discrimination or other related matters
- Requirement that all funded projects involve facilities already accessible or made accessible as part of project implementation.
- Continued operational support for three major shelter operators (Family Service, Bucks County Housing Group, A Woman’s Place)
- Continued funding support to maintain and expand Enterprise Zone, which encompasses areas of six communities, encompassing the largest concentration of minorities in the County
- Continued funding support for two revolving loan programs, providing assistance to businesses located in the Enterprise Zone and other urbanized areas (e.g., boroughs) to create jobs for lower income persons.
- Support for business counseling activities to assist lower income persons (particularly, women and minorities) to go into business or expand existing business
- Workshops to help Minority/Women Business Enterprises (MBEs/WBEs) become certified with both the state and federal governments, and do business with the County
- Partnership with Legal Aid and the Fair Housing Council of Suburban Philadelphia to organize workshops to educate landlords on their rights and obligations under the Fair Housing Act and other housing laws.
- Co-sponsorship with the Fair Housing Council of suburban Philadelphia of fair housing trainings for the Bucks County Homeless Coalition of Care, and for municipal officials.
- Continued support to TMA to help increase public transportation and other arrangements that facility access to jobs to persons who are low/moderate income
- Continued advocacy and support for land use planning by local municipalities

### ***Bensalem Township***

The following is a summary of the accomplishments attained by Bensalem Township:

- Housing rehabilitation assistance in conjunction with the assistance of the county redevelopment authority.
- The Township continued to fund the homeless shelter now operated by the Family Service Association of Bucks County. The Township partnered with the Bucks County Housing

- Development Corporation to provide housing units for physically disabled persons. The Township purchased two properties for the development of 36 units.
- The Township continued to work with local municipalities on promoting an Enterprise Zone and was an active participant on the task force.
- The Township worked with the Bucks County Redevelopment Authority and the Industrial Development Authority to promote economic development activities.
- The Township continued to participate in the expansion of the Bucks County Transportation Management Association (TMA). TMA is working to increase public transportation in the area.
- The Township continued to work with area agencies and groups on issues related to the Delaware River, including land reclamation and clean-up. The Township rezoned the waterfront corridor to assist in the redevelopment of the waterfront. Two developments were approved by Council.
- The Township has allocated \$950,000 in CDBG funds for purchase of a site on which the Bucks County Housing Development Corporation plans to build housing for low-income veterans.

#### **D. Partnership and Regional Coordination**

As noted previously, the Urban County of Bucks County and Bensalem Township collaborated to jointly prepare this AI. This regional approach was intended to facilitate the identification and mitigation of impediments to fair housing choice that transcend municipal boundaries. At the same time, the county's other major entitlement municipality, Bristol Township, has chosen to implement Fair Housing policy on a parallel track, through its own AI, which poses some limits to coordinated, comprehensive action.

Several of the fair housing stakeholders, including Bucks County Housing Authority and local advocacy organizations are integral to the regional fair housing landscape. Education and outreach initiatives, in particular, are most effective when conducted at the regional level. By combining resources and searching for regional solutions to fair housing issues to the extent practicable, this AI can incorporate affirmative action on the part of the Urban County and the Township to affirmatively further fair housing. In addition, a regional AI is more conducive to expansion of housing choice within Bucks County.

#### **E. Fair Housing Advocacy Organizations**

There are several fair housing advocacy organizations that service Bucks County and its municipalities. They are as follows:

##### ***Bucks County Fair Housing Committee***

Following the completion of its AI in 2004, the Urban County established the Bucks County Fair Housing Committee. The committee meets periodically to discuss and organize activities and to implement the recommendations in the 2004 AI. Membership tends to be relaxed and informal, and only a small number of members have been actively participating.

##### ***Fair Housing Council of Suburban Philadelphia***

The Council was founded in 1956 and is the nation's oldest fair housing council. The Council is a Qualified Fair Housing Enforcement Organization as designated by HUD and has been serving Bucks County for over 20 years. The Council sponsors and participates in educational workshops



and forums, and develops educational materials to train consumers, counselors, and local leaders how to recognize discriminatory housing practices.

Notably, the Council conducts real estate testing throughout the Philadelphia region, including Bucks County. Through its testing, the Council has challenged discriminatory practices at over 46,000 housing units. The Council has recovered over \$1.5 million for victims of housing discrimination.

In addition to its enforcement work, the Council distributes flyers and educational materials to consumer, counselors, housing professionals and others. Council staff have published articles in Realtor News Magazine and distributed numerous fair housing guides. At HUD's request, the Council has sponsored numerous fair housing conferences and trainings in Region 3. According to the Council, its extensive experience demonstrates that bona fide housing discrimination complaints increase as more people become aware of their rights and pursue action, and that proactive outreach to municipalities and housing providers is an effective technique to reduce future discrimination.

### ***Legal Aid of Southeastern Pennsylvania***

Legal Aid of Southeastern Pennsylvania provides legal representation to low income people lacking access to legal representation to empower them to solve problems through legal education and increased access to the courts. The organization has been serving the counties of Bucks, Chester, Delaware and Montgomery since 2001. The organization provides a Fair Housing Newsletter, which is funded through a contract with the Bucks County Department of Community and Business Development.

Other activities include a workshop for Bucks County landlords. The workshops typically involve presentations by Legal Aid, the Fair Housing Council of Suburban Philadelphia, a local district judge and local code enforcement officials. Typical topics include Fair Housing issues (e.g., reasonable accommodation requirements), landlord and tenant law, code enforcement, as well as other related laws and regulations. Due to their success and large attendance, the workshops are held about three times each year to provide convenient access and geographic coverage of the entire county.

### ***Fair Housing Rights Center in Southeastern Pennsylvania***

The Fair Housing Rights Center is a nonprofit organization begun in 1992 to ensure equal access to housing opportunities for all persons. The Center provides education on fair housing law, provides assistance to individuals who have experienced housing discrimination, monitors communities for compliance with fair housing laws, and offers counseling and information on housing related issues.

The Fair Housing Rights Center is a HUD-designated FHIP entity. A Fair Housing Initiative Program entity partners with HUD to help people identify government agencies that handle complaints of housing discrimination. FHIPs also conduct preliminary investigation of claims, including sending testers to properties suspected of practicing housing discrimination. The Fair Housing Center is a Private Enforcement Initiative (PEI) FHIP that offers a range of assistance to the nationwide network of fair housing groups. The Center is funded by HUD to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices.

## VI. GENERAL FAIR HOUSING OBSERVATIONS

This section of the AI outlines the major observations, emanating from the analysis conducted for this report. The information includes the results of primary and secondary research that define the underlying conditions, trends, and context for fair housing planning in Bucks County and Bensalem Township. The observations in and of themselves do not necessarily constitute impediments to fair housing choice. Rather, they are intended as a contextual framework for the impediments to fair housing choice that are discussed in the next section of the AI.

### **Demographic**

Both the Urban County and the Township have experienced significant growth rates between 1960 and 2010. Such growth has resulted in a continuous demand for housing units to accommodate the increasing population.

- Minority residents accounted for 25 percent of the total population growth in the Urban County, with Asians the fastest-growing minority group. In Bensalem Township, minorities represented the total net increase in population growth since 1990.
- There are a total of seven Census Tracts of minority concentration in the Urban County and Bensalem. These areas are located in Bensalem Township, Bristol Borough (2), Falls Township, Middletown Township, Morrisville Borough, and Warminster Township.
- The Urban County is “moderately segregated” with a dissimilarity index of 38.3 for Whites and African American/Blacks. The dissimilarity indices for Whites/Asians and Whites/Hispanics are significantly lower at 22.3 and 28.4, respectively. Bucks County as a whole has a segregation index that is in the low-to-mid-range for suburban counties in the Philadelphia region.
- Bensalem Township has what is classified as a low degree of segregation, with a dissimilarity index of 26.1 for Whites and African Americans/Blacks, and a slightly higher index of 28.1 for Whites/Asians. The segregation index for Whites/Hispanics, at 37.3, is rated moderate.
- African American/Black and Hispanic households were more likely to have lower incomes in Bensalem Township than elsewhere in Bucks County. African Americans were disproportionately represented among lower income households compared to Whites across the Urban County.
- There are 10 census block groups in the Urban County that include concentrations of lower/moderate income persons and minorities. These are found in Bristol Borough, Falls Township, Morrisville Borough and Warminster Township. In Bensalem Township, there are three low/moderate income block groups that are also areas of minority concentration.
- Persons with disabilities were twice as likely to live in poverty than persons without disabilities. In the Urban County, 7.5 percent of persons with a disability were living in poverty compared to 3.2 percent for persons without a disability, as of 2005 to 2007. In



Bensalem Township, 13 percent of persons with a disability were living in poverty compared to 5.8 percent of persons without a disability.

- Female-headed households with children accounted for approximately one-third of all families living below the poverty level in both the Urban County and the Township.
- In Bucks County, there are five language groups (i.e., Spanish, Russian, Gujarati, Chinese, and Korean) with more than 1,000 persons in each group that have limited proficiency in speaking English (LEP). Based on the Federal Register of January 22, 2007, and at [www.lep.gov](http://www.lep.gov), Bucks County should conduct the four-factor analysis to determine the extent to which the translation of vital documents is necessary to assist persons with LEP in accessing its federal entitlement programs. If it is determined that the need for a Language Access Plan (LAP) exists, the Urban County must prepare the LAP in order to comply with Title VI of the Civil Rights Act of 1964.
- In four of the six municipalities containing areas of concentration of minority residents (Bristol Borough, Falls Township, Middletown Township, Morrisville Borough, and Warminster Township), a total net increase of 3,749 housing units was noted, representing 9.1 percent of the total net increase in the Urban County between 1990 and 2009. These municipalities, however, encompass 19.2 percent of the total Urban County population, suggesting that housing production may not be keeping pace with demand and need, particularly for housing affordable to lower-income households.

Most of units added were in two of the more populous municipalities, Middletown (1,887 units) and Warminster (1,829 units). These four municipalities are older, largely built-out boroughs and townships with limited opportunities for new residential development.

- In Bensalem, Census Tract 1002.08, an area of concentration of Hispanics (and low/moderate income) experienced a net gain of housing units, potentially providing increased housing opportunity for those groups.
- Renter-occupied multi-family units represented nearly 14 percent of the occupied housing stock in the Urban County in 2010, but accounted for nearly 34 percent of the housing stock in Bensalem. Rental units are more concentrated in populous, urbanized areas in Lower Bucks County, which are easily accessible to employment centers and public transit, and include both impacted and non-impacted areas, but several boroughs in Central and Upper Bucks County, though small in absolute population numbers, have shares of rental housing ranging from one-third to nearly one-half of all units. These figures represent a reasonable range of housing choice countywide. The share of attached single-family housing, which accounts for percent of all units, represents a secondary source of relatively affordable housing.
- Nearly one-third of all multi-family rental units in Bensalem Township were located in two areas of concentration of minority residents.
- Blacks and Hispanics are much more likely to be renters than home owners in the Urban County and in the Township as a result of lower incomes and the market price of for-sale housing.

- A lack of larger dwelling units consisting of three or more bedrooms has a disproportionately greater impact on minority families who tend to live in larger families. An inadequate inventory of larger units causes overcrowding, increased wear and tear, and substandard living for these families. In the Urban County, 7,883 units, or 22.7 percent of the rental housing stock, contained three or more bedrooms as of 2010. In Bensalem Township, 850 units, or 9.4 percent of the rental housing stock, contained three or more bedrooms.
- Median housing value increased 32.8 percent in the Urban County from 1990 to 2010, while real household income decreased by 0.4 percent. In Bensalem Township, median housing value also outpaced real household income at higher rates of 33.4 percent, versus 10.9 percent.
- The magnitude of the loss of affordable rental units in the Urban County, as documented by research by the Federal Reserve Bank of Philadelphia, severely restricts housing choice for households in the lowest income brackets, in particular minorities, who have significantly lower incomes than Whites. Even in Bensalem Township, which has a proportionately larger rental housing inventory than the Urban County, the loss of affordable rental units will likely have a disproportionate impact on minority households.
- Overall rental vacancy rates remained low, and the number of “affordable” housing units renting for less than \$700 a month declined greatly in both the Urban County and in Bensalem from 2000 to 2010.
- A single individual renter, who receives \$698 in monthly Social Security Income (SSI) cannot afford a one-bedroom unit in Bucks County at the HUD fair market rent of \$899. This situation disproportionately impacts the elderly, persons with disabilities and other individuals who have little or no income.
- To varying degrees among household types, minority households are more likely than White households to experience housing problems such as cost burden, overcrowding, and substandard units.
- The waiting lists for public housing and for Section 8 vouchers include far higher percentages of families with children, non-White households, households with disabled members, and households of extremely low income, as compared to current public housing occupants and Section 8 households. Most public housing in the County is restricted to occupancy by the elderly.

### ***Fair Housing Profile***

- Race and disability, followed by family status, were the primary reasons for a majority of the housing complaints from Bucks County filed with federal and state fair housing agencies between 2007 and 2011.
- Currently, the Fair Housing Council of Suburban Philadelphia does not track fair housing complaints by municipality (except for the City of Philadelphia, which forms Philadelphia County.). If it were practicable for the Fair Housing Council of Suburban Philadelphia to track complaints by the basis of discrimination and provide testing results by individual



HUD entitlement community, then each entitlement community could consider this information when conducting fair housing planning (including the preparation of an AI) and designing its fair housing initiatives.

- Race continues to be the primary basis of discriminatory complaints in the Philadelphia region, according to the 2009 testing audit conducted by the Fair Housing Council of Suburban Philadelphia, indicating a continuing for real estate testing. Disability also ranked high as a complaint during the period of 2007-2011, evidence that education, information and referral regarding fair housing issues for persons with disabilities remains important.

## VII. RECOMMENDED ACTION STEPS TO PROMOTE FAIR HOUSING CHOICE

The following observations identified through the AI process warrant further attention and/or remediation. Specific actions are recommended not only to ameliorate potential or identified impediments, but also to assist the Urban County and Bensalem Township in affirmatively furthering fair housing choice.

### A. Public Sector

The steps listed below are directed toward expanding the consideration of fair housing implications in CDBG and HOME funding and programmatic decisions made by the Urban County or by Bensalem Township.

#### ***CDBG Funding Allocation Process***

##### ➤ Ensuring Fair Housing Compliance

The Urban County CDBG and HOME programs lack a fair housing “filter” to guide the establishment of policies, program guidelines and funding decisions. In terms of fair housing compliance, the County requires the adoption and submission of an anti-discrimination policy by all entities applying for Urban County CDBG and HOME funds. The County also conducts mandatory workshops and other training events to educate funding recipients of their obligations under the Fair Housing Act. Documentation and review of funding recipients’ policies and ordinances to ensure compliance with the Fair Housing Act has taken place in conjunction with the preparation of this AI, and remedial or preventive measures have been recommended where warranted.

##### ➤ Allocation Formula and Fair Housing Compliance

The Urban County utilizes a formula to determine the amount of CDBG funding that will be made available to local units of government. The use of the formula method might not be the best way to ensure that municipalities are fully compliant with their obligations to affirmatively further fair housing.

The Bucks County Community Development Advisory Board consists of 27 members who review new CDBG project proposals and make funding recommendations to the Board of County Commissioners. The Board has had a limited role in the evaluation of projects from municipalities that are allocated funding by formula, as compared to the review performed for those of pool municipalities and nonprofit organizations.

**Action Step 1:** Analyze each request for CDBG/HOME housing assistance in terms of geographic location. Proposed projects that expand fair housing choice in non-concentrated census tracts should receive special consideration.

**Action Step 2:** Continue to map the location of all new CDBG/HOME-assisted housing projects relative to their location in impacted areas. Analyze this information to determine the relative breakdown of projects in impacted areas versus



projects in non-concentrated areas. Establish internal goals for achieving balance relative to projects in impacted areas versus projects in non-concentrated areas. Consider the results of the analysis before finalizing funding decisions during the Consolidated Plan and Annual Plan processes. Include this analysis in the CAPER when reporting on yearly achievements.

**Action Step 3:** Instead of using a formula, consider an outcome oriented, needs-based approach to allocating CDBG funds to local units of government. Include fair housing as a criterion for making funding allocation decisions.

**Action Step 4:** Evaluate the effectiveness of the 27 member advisory committee in reviewing CDBG project proposals. If the decision is reached to maintain the Advisory Committee, reduce the number of local government representatives and increase representation on the part of persons or organizations that bring a fair housing orientation to the selection process. Provide fair housing training to all members of the advisory committee.

**Action Step 5:** Revise outreach and application materials for the advisory committee to encourage participation by members of protected classes.

**Action Step 6:** Publish the AI and CAPER AFFH performance report on the county website.

**Action Step 7:** Continue to implement affirmative marketing for all housing programs involving CDBG, HOME, or other HUD funding.

**Action Step 8:** Bensalem Township should adopt a written AFFH policy consistent with that of the Urban County and with HUD standards, and require adherence by subrecipients of CDBG and other HUD funding.

**Action Step 9:** Bensalem Township should consider establishing a CDBG advisory panel, including representative of protected classes, to provide input on allocation of CDBG and other HUD funding.

***Housing Maintenance and Conditions***

**Action Step 1:** Affirmatively market the owner-occupied housing rehabilitation program operated through the Bucks County Redevelopment Authority, targeting lower income members of protected classes and geographic areas of racial and ethnic concentration where housing rehabilitation needs are apparent.

**Action Step 2:** Continue the HOME and Section 8 rental assistance programs, considering expansion should funding become available.

**Action Step 3:** Explore means of promoting rehabilitation of substandard housing rented to lower income households.

***Municipal Regulations***

A number of municipal zoning ordinances for CDBG applicant communities reviewed during the AI were found to impose dispersal requirements, family relationship requirements or other undue limitations on group homes.

**Action Step 1:** Continue to require each community that applies for Urban County CDBG and/or HOME funds, and applicants for CDBG funds in Bensalem Township to attend an interactive fair housing workshop sponsored by the County and including a presentation by the Fair Housing Council of Suburban Philadelphia. Clearly communicate their responsibility to affirmatively further fair housing. Clearly define the Urban County's standards for affirmatively further fair housing.

**Action Step 2:** Continue to review municipal land use policies and practices against the Urban County's standards for AFFH, providing technical land use planning assistance to local units of government as needed to identify and overcome procedural and regulatory barriers to fair housing and affordable housing. Local elected officials, planning commission members and zoning hearing board members should be encouraged to participate in the technical assistance process.

**Action Step 3:** Require all applicants for CDBG and HOME funds to officially adopt a resolution committing to AFFH. Require all applicants for CDBG and HOME funds to submit a signed AFFH resolution and an AFFH certification as part of the application process.

**Action Step 4:** Award CDBG and HOME funds only to those local units of government that demonstrate compliance with the Urban County's standards for Affirmatively Furthering Fair Housing. Continue to provide technical assistance to local units of government that are still working to achieve compliance with the Urban County's standards for AFFH.

***The Urban County's HOME policies***

The Urban County has established an underwriting standard applicable to HOME-assisted acquisition-rehab-resale home ownership transactions that limits the amount of HOME assistance to the difference between the appraised value of the property and the buyer's primary mortgage.

**Action Step 1:** In order to maintain maximum flexibility in expanding fair housing choice, the appropriate level of subsidy should continue to be determined on a project-by-project basis during the subsidy layering review process for all home ownership projects. The Urban County should be prepared to provide the full



extent of subsidy allowable under HUD’s HOME Program for difficult to develop projects, including projects located in non-concentrated areas.

### ***Public Transit Services***

Public transit service is largely limited to highly populated areas in lower Bucks County. While this might be understandable from transportation management and fiscal perspectives, it has the effect of limiting fair housing choice. Residents in the northern and eastern area of the county have very limited public transit options.

**Action Step 1:** Continue to work with SEPTA as part of the update to its 2035 long range plan, and with the Bucks County Transportation Management Agency, to explore the feasibility of expanding public transit service in high growth areas of the county, including the creation of ride-to-work transit routes.

Continue to support the smart growth concept to encourage housing development near transit and transportation services.

### ***Site and Neighborhood Standards***

The Urban County’s Site and Neighborhood Standards Policy defines areas of concentration of racial and ethnic minorities.

**Action Step 1:** Update the definition of minority and ethnic concentration as new census data is released. Plot the location of concentrated areas on a census tract map of the County. Publish this information on the County’s website and distribute it to affordable housing developers as part of the CDBG/HOME application kit.

### ***Planning, Zoning and Land Use***

The County’s comprehensive plan is one instrument to articulate the County’s housing policy and its commitment to affirmatively further fair housing. The County in 2011 updated its comprehensive plan in compliance with the Pennsylvania Municipalities Planning Code (PMPC), which requires a plan update not less than once every 10 years. The PMPC (Section 301(a)2.1) requires a comprehensive plan to address current and potential demand for housing of various types, for households at all income levels, a component known as the “Fair Share” plan. The County, however, is limited to an advisory role in municipal-level land use decision making.

**Action Step 1:** Continue to provide technical assistance to municipalities through the Bucks County Planning Commission. Specific areas of assistance include fair housing compliance related to land use and zoning, and municipal “fair share” analyses, and implementation of transit-oriented, mixed-use and other development types that foster efficient land use and housing choice.

**Action Step 2:** Coordinate preparation of countywide housing opportunities plan.

### ***Sale and Rental of Housing***

According to the Fair Housing Council of Suburban Philadelphia, housing discrimination remains a problem in Bucks County. Race continues to be one of the primary bases for discrimination complaints.

**Action Step 1:** Continue to fund and support the efforts of local and regional fair housing advocacy organizations in undertaking paired real estate testing, both for rental and sales housing, education, training, and outreach activities.

### ***Board Representation***

Members of protected classes appear to be underrepresented on appointed housing boards and commissions, which are heavily populated by elected officials. Representation of members of protected classes on housing and housing-related boards and commissions increase the likelihood that decisions and policies will have the effect of expanding fair housing choice.

**Action Step 1:** Affirmatively recruit minorities, persons with disabilities, women, and LMI persons to serve on publicly appointed housing boards and commissions. Strive to achieve representation equal to at least the relative presence of these groups in the County's population.

### ***Section 8 Vouchers***

Section 8 Housing Voucher holders should be encouraged to consider units located in various areas of the County. In order to expand fair housing choice, BCHA should promote the mobility of voucher holders.

**Action Step 1:** Continue to recruit participating landlords in non-concentrated areas of the County and continue to maintain a list of participating landlords that offer apartments in non-concentrated areas of the County and provide this list to voucher holders.

**Action Step 2:** Within the constraints of the HUD regulations and the funding provided, explore ways to increase the Section 8 payment standard for properties located in non-concentrated areas in order to induce the participation of landlords.

**Action Step 3:** Maintain records on efforts undertaken to encourage mobility and results achieved.

### ***Limited English Proficiency***

In Bucks County, there are four language groups with significant numbers of persons who speak English less than "very well," including Spanish (7,221 LEP persons), Russian (2,874 LEP persons), Korean (1,198 LEP persons) and Gujarati (1,049 LEP persons) native to the Indian state of



Gujarat). Under the Civil Rights Act of 1964, the County must ensure that LEP persons have access to the County’s information, programs and services, including the translation of “vital” documents when the number of LEP persons exceeds certain thresholds.

**Action Step 1:** In order to comply with Title VI of the Civil Rights Act of 1964, the County should conduct the four factor analysis to determine the extent to which the translation of vital documents is necessary to assist persons with limited English proficiency (LEP).

## **B. Private Sector**

### ***Mortgage Finance***

The ability to secure mortgage financing at competitive rates continues to prove more problematic for minority homebuyers, although overall rates of loan approval have been improving. Beyond its limited First-Time Homebuyer program, the County has no direct role in housing finance, but it can also continue to support efforts to prepare moderate-income households, which are likely to include members of protected classes, to apply for mortgage loans, which supports applications by these households for bank financing.

**Action Step 1:** The County should review its underwriting and administrative guidelines for the First-Time Homebuyer Program to ensure that it nondiscriminatory in terms of household type, available in non-impacted areas of the County, and marketed affirmatively.

**Action Step 2:** The Urban County should continue funding lending and financial management education programs offered to prospective first-time homebuyers by qualified nonprofit providers.

### VIII. SIGNATURE PAGE FOR THE URBAN COUNTY OF BUCKS COUNTY

By my signature I certify that the Analysis of Impediments to Fair Housing Choice for the Urban County of Bucks County and Bensalem Township is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program regulations.

  
\_\_\_\_\_  
County Commissioner  
Robert G. Loughery, Chairman  
\_\_\_\_\_  
County Commissioner  
Charles H. Martin, Vice Chairman  
\_\_\_\_\_  
County Commissioner  
Diane M. Ellis-Marseglia, LCSW

ATTEST:

  
\_\_\_\_\_  
Chief Clerk  
Lynn T. Bush

Date 3-10-14





JOSEPH DIGIROLAMO  
MAYOR

RECEIVED  
BUCKS COUNTY  
DEC 27 2013  
PLANNING  
COMMISSION

December 23, 2013

Lynn Bush, Executive Director  
Bucks County Planning Commission  
The Almshouse  
Neshaminy Manor Center  
1260 Almshouse Road  
Doylestown, PA 18901

**Subject: Analysis of Impediment**

Dear Ms. Bush:

This is to verify that Bensalem Township has reviewed and accepted the Analysis of Impediments to Fair Housing Choice.

Should you have any questions or require any additional information, please contact William Cmorey, Director of Administration for Bensalem Township.

Sincerely,

Joseph DiGirolamo  
Mayor

JDG/ct



## **IX. SIGNATURE PAGE FOR BENSLEM TOWNSHIP**

By my signature I certify that the Analysis of Impediments to Fair Housing Choice for the Urban County of Bucks County and Bensalem Township is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program regulations.

---

Township Council  
Joseph Pillieri, President

---

Executive  
Joseph DiGirolamo, Mayor

ATTEST:

---

Manager/Municipal Administrator  
Edward Kisselback

Date \_\_\_\_\_





# Apendices



## APPENDIX A: STAKEHOLDERS IN THE AI PLANNING PROCESS

Type of Organization	Contact Name	Title	Name of Organization
<b>Community Development Staff</b>	Vitor Vicente	Director	BC Dep. of Community Development
	Martha Woglom	HOME ProgramAdmin.	BC Dep. of Community Development
	Carole Janssens	CDBG Program Admin	BC Dep. of Community Development
<b>Public Housing Authority</b>	Don Grohdahl	Public Housing Director	BC Housing Authority
	Bonnie Bascio	Section 8 HCV Manager	BC Housing Authority
<b>Advocacy organizations for persons with mobility impairments and other disabilities</b>	Mike Rathaczak	Executive Director	Aldie Counseling Center
	Robert Schram	Executive Director	BARC
			BEELONG
			Bethanna
	Dan Fraley	Director	BC Military Affairs
	Brian Duke	Executive Director	BC Area Agency on Aging
	Tony Anella	Executive Director	BC Association for Retired and Senior Citizens
			BC Association for the Blind and Visually Impaired
	David Rogers	President	BC Council for Individuals w/ Disabilities
			BC Dep. of Mental Health/Mental Retardation
			BC Drug & Alcohol Commission
	Roger Collins	Executive Director	BC Opportunity Council
			BC Services for Deaf & Hard of Hearing
	Carole Bottari	Executive Director	Bucks/Montgomery Center for Human Services
			Catholic Social Services
	Emily Yaskowski	Manager	Center for Independent Living
			Community Options
	Audrey Tucker	Executive Director	Family Services of Bucks County
			Fighting AIDS Continuously Together
			Foundations Behavioral Health
			Gilda's Club
	Cheryl Schoell	Executive Director	Northwestern Human Services of Bucks County
			The Salvation Army
John M. Page	Executive Director	Southeastern PA Council on Alcoholism & Drug Dependency	
Lorna Michelson	Executive Director	YWCA of Bucks County	
Donna Byrne	Executive Director	A Woman's Place	
Bill Burns	Shelter Director	Red Cross Shelter	
<b>Local human rights organization/s that deal directly with fair housing complaints, including FHAP and FHIP organizations</b>	Diane Paul	Chairperson	BC Human Relations Council
	Katiria Nunez	Executive Director	Latino Leadership Alliance of Bucks County
	John Jordan	Executive Director	National Association for Advancement of Colored People (NAACP)
	Barbara Clak	Executive Director	Network of Victims Assistance
	James Berry	Executive Director	Fair Housing Council of Suburban Philadelphia
	Angela McIver	Executive Director	Fair Housing Rights Center of Southeastern Pennsylvania
<b>Realtors Association</b>	Jane Forth	Executive Vice President	Bucks County Association of Realtors
	Lisa Frey	Director of Professional Development	Bucks County Association of Realtors
<b>Planning and zoning department</b>	Lynn T. Bush	Executive Director	BC Planning Commission
	Barry Seymour	Executive Director	Delaware Valley Regional Planning Commission
<b>Public transit agency</b>			Bucks County Transport
	William D. Rickett	Executive Director	BC TMA SEPTA
<b>Landlord organization</b>	Pamela Benett	Excutive Director	Apartment Association of Greater Philadelphia
<b>Legal aid organizations</b>	Elizabeth Fritsch	Executive Director	Legal Aid
	Deanna Mindler	Executive Director	Bucks County Bar Association
<b>Housing providers</b>	Charles H. Diamond	Executive Director	BC Housing Development Corp.
	Nancy Szamborski	Executive Director	BC Housing Group
			Christ's Home for Children
	Bethann McNamara	Executive Director	CO-MANS
	Joan Reading	Executive Director	Credit Counseling Center
	John C. Komisor	Executive Director	Delta Community Supports
	Frank Gallagher		Doylestown Area FISH
	Albert Zbik	Executive Director	Galilee Village
	Ted Millard	Executive Director	Good Friends
			Growth Horizons
	Linda Andrews	Executive Director	Habitat for Humanity of Bucks County
	Chris Auth	Executive Director	Interfaith Housing Development Corporation
	Jay Spector	President	JEVS
	Karen Kispert	Executive Director	Keystone Opportunity Center
	Phil Braun	Associate Executive Director	Lenape Valley Foundation
	Connie Karasow	Executive Director	Libertae
	Alice Agnew	Regional Director	LifePath
	Richard Pine	Executive Director	Livengrin
	John Goshow	Executive Director	Penn Foundation
	Karen Graff	Executive Director	Pendel Mental Health
			Pennridge FISH
	Robert White	Executive Director	BC Redevelopment Authority
	John Howell	Executive Director	Today, Inc.
David Gilgoff	President	Valley Youth House	
Robert C. Griffith	President	Woods Services	



## APPENDIX B: HMDA DATA TABLES

**Table 42 Home Mortgage Disclosure Act (HMDA) Data, Bucks County, 2006**

	Total Applications*		Originated		Approved Not Accepted		Denied		Withdrawn/Incomplete	
	Number	%	Number	%	Number	%	Number	%	Number	%
<b>Loan Type</b>										
Conventional	18,060	96.9%	9,669	53.5%	1,158	6.4%	1,281	7.1%	5,677	31.4%
FHA	492	2.6%	279	56.7%	10	2.0%	21	4.3%	173	35.2%
VA	92	0.5%	52	56.5%	2	2.2%	4	4.3%	34	37.0%
FSA/RHS	1	0.0%	1	100.0%	-	0.0%	-	0.0%	-	0.0%
<b>Loan Purpose: Home Purchase</b>										
One to four-family unit	18,358	98.5%	9,923	54.1%	1,109	6.0%	1,180	6.4%	5,864	31.9%
Manufactured housing unit	287	1.5%	78	27.2%	61	21.3%	126	43.9%	20	7.0%
<b>Applicant Race</b>										
American Indian/Alaska Native	22	0.1%	11	50.0%	-	0.0%	7	31.8%	3	13.6%
Asian/Pacific Islander	667	3.6%	420	63.0%	69	10.3%	40	6.0%	128	19.2%
Hawaiian	57	0.3%	26	45.6%	3	5.3%	7	12.3%	21	36.8%
Black	417	2.2%	236	56.6%	26	6.2%	53	12.7%	93	22.3%
Hispanic**	496	2.7%	293	59.1%	34	6.9%	51	10.3%	109	22.0%
White	13,183	70.7%	8,380	63.6%	926	7.0%	948	7.2%	2,710	20.6%
No information	1,768	9.5%	926	52.4%	146	8.3%	251	14.2%	400	22.6%
Not applicable	2,531	13.6%	2	0.1%	-	0.0%	-	0.0%	2,529	99.9%
<b>Applicant Sex</b>										
Male	10,942	58.7%	6,927	63.3%	781	7.1%	804	7.3%	2,247	20.5%
Female	4,373	23.5%	2,701	61.8%	312	7.1%	382	8.7%	900	20.6%
No information	786	4.2%	369	46.9%	77	9.8%	120	15.3%	197	25.1%
Not applicable	2,544	13.6%	4	0.2%	-	0.0%	-	0.0%	2,540	99.8%
<b>Total</b>	<b>18,645</b>	<b>100.0%</b>	<b>10,001</b>	<b>53.6%</b>	<b>1,170</b>	<b>6.3%</b>	<b>1,306</b>	<b>7.0%</b>	<b>5,884</b>	<b>31.6%</b>

Source: Federal Financial Institutions Examination Council, 2006

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

\* Total applications do not include loans purchased by another institution.

\*\* Hispanics are classified as an ethnic group, not a race.



**Table 43 Home Mortgage Disclosure Act (HMDA) Data, Bucks County, 2007**

	Total Applications*		Originated		Approved Not Accepted		Denied		Withdrawn/Incomplete	
	Number	%	Number	%	Number	%	Number	%	Number	%
<b>Loan Type</b>										
Conventional	15,090	95.4%	7,807	51.7%	1,083	7.2%	975	6.5%	4,903	32.5%
FHA	618	3.9%	304	49.2%	12	1.9%	28	4.5%	269	43.5%
VA	99	0.6%	58	58.6%	2	2.0%	5	5.1%	33	33.3%
FSA/RHS	3	0.0%	1	33.3%	-	0.0%	1	33.3%	-	0.0%
<b>Loan Purpose: Home Purchase</b>										
One to four-family unit	15,502	98.1%	8,070	52.1%	1,016	6.6%	899	5.8%	5,191	33.5%
Manufactured housing unit	308	1.9%	100	32.5%	81	26.3%	110	35.7%	15	4.9%
<b>Applicant Race</b>										
American Indian/Alaska Native	30	0.2%	12	40.0%	3	10.0%	6	20.0%	9	30.0%
Asian/Pacific Islander	598	3.8%	356	59.5%	41	6.9%	43	7.2%	151	25.3%
Hawaiian	43	0.3%	26	60.5%	5	11.6%	4	9.3%	8	18.6%
Black	316	2.0%	144	45.6%	30	9.5%	45	14.2%	75	23.7%
Hispanic**	430	2.7%	225	52.3%	39	9.1%	53	12.3%	107	24.9%
White	11,358	71.8%	6,454	56.8%	861	7.6%	750	6.6%	3,075	27.1%
No information	1,873	11.8%	1,177	62.8%	157	8.4%	161	8.6%	297	15.9%
Not applicable	1,592	10.1%	1	0.1%	-	0.0%	-	0.0%	1,591	99.9%
<b>Applicant Sex</b>										
Male	9,618	60.8%	5,576	58.0%	704	7.3%	626	6.5%	2,513	26.1%
Female	3,934	24.9%	2,251	57.2%	321	8.2%	305	7.8%	967	24.6%
No information	664	4.2%	341	51.4%	72	10.8%	78	11.7%	134	20.2%
Not applicable	1,594	10.1%	2	0.1%	-	0.0%	-	0.0%	1,592	99.9%
<b>Total</b>	<b>15,810</b>	<b>100.0%</b>	<b>8,170</b>	<b>51.7%</b>	<b>1,097</b>	<b>6.9%</b>	<b>1,009</b>	<b>6.4%</b>	<b>5,206</b>	<b>32.9%</b>

Source: Federal Financial Institutions Examination Council, 2007

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

\* Total applications do not include loans purchased by another institution.

\*\* Hispanics are classified as an ethnic group, not a race.

**Table 44 Home Mortgage Disclosure Act (HMDA) Data, Bucks County, 2008**

	Total Applications*		Originated		Approved Not Accepted		Denied		Withdrawn/Incomplete	
	Number	%	Number	%	Number	%	Number	%	Number	%
<b>Loan Type</b>										
Conventional	8,393	78.2%	4,679	55.7%	682	8.1%	692	8.2%	2,201	26.2%
FHA	2,097	19.5%	1,066	50.8%	45	2.1%	99	4.7%	864	41.2%
VA	224	2.1%	118	52.7%	7	3.1%	8	3.6%	90	40.2%
FSA/RHS	15	0.1%	8	53.3%	-	0.0%	1	6.7%	6	40.0%
<b>Loan Purpose: Home Purchase</b>										
One to four-family un	10,526	98.1%	5,808	55.2%	700	6.7%	712	6.8%	3,147	29.9%
Manufactured housing unit	203	1.9%	63	31.0%	34	16.7%	88	43.3%	14	6.9%
<b>Applicant Race</b>										
American Indian/Alaska Native	14	0.1%	5	35.7%	2	14.3%	6	42.9%	1	7.1%
Asian/Pacific Islander	450	4.2%	262	58.2%	42	9.3%	45	10.0%	86	19.1%
Hawaiian	30	0.3%	16	53.3%	1	3.3%	5	16.7%	8	26.7%
Black	191	1.8%	107	56.0%	10	5.2%	15	7.9%	55	28.8%
Hispanic**	266	2.5%	159	59.8%	20	7.5%	22	8.3%	64	24.1%
White	8,159	76.0%	4,951	60.7%	585	7.2%	628	7.7%	1,871	22.9%
No information	935	8.7%	530	56.7%	94	10.1%	101	10.8%	190	20.3%
Not applicable	950	8.9%	-	0.0%	-	0.0%	-	0.0%	950	100.0%
<b>Applicant Sex</b>										
Male	6,750	62.9%	4,112	60.9%	481	7.1%	527	7.8%	1,525	22.6%
Female	2,574	24.0%	1,541	59.9%	191	7.4%	223	8.7%	576	22.4%
No information	449	4.2%	217	48.3%	62	13.8%	50	11.1%	105	23.4%
Not applicable	956	8.9%	1	0.1%	-	0.0%	-	0.0%	955	99.9%
<b>Total</b>	<b>10,729</b>	<b>100.0%</b>	<b>5,871</b>	<b>54.7%</b>	<b>734</b>	<b>6.8%</b>	<b>800</b>	<b>7.5%</b>	<b>3,161</b>	<b>29.5%</b>

Source: Federal Financial Institutions Examination Council, 2008

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

\* Total applications do not include loans purchased by another institution.

\*\* Hispanics are classified as an ethnic group, not a race.



**Table 45 Home Mortgage Disclosure Act (HMDA) Data, Bucks County, 2009**

	Total Applications*		Originated		Approved Not Accepted		Denied		Withdrawn/Incomplete	
	Number	%	Number	%	Number	%	Number	%	Number	%
<b>Loan Type</b>										
Conventional	4,533	62.1%	3,239	71.5%	311	6.9%	441	9.7%	542	12.0%
FHA	2,506	34.3%	1,957	78.1%	72	2.9%	207	8.3%	270	10.8%
VA	197	2.7%	141	71.6%	7	3.6%	23	11.7%	26	13.2%
FSA/RHS	67	0.9%	51	76.1%	1	1.5%	11	16.4%	4	6.0%
<b>Loan Purpose: Home Purchase</b>										
One to four-family unit	7,128	97.6%	5,341	74.9%	357	5.0%	601	8.4%	829	11.6%
Manufactured housing unit	175	2.4%	47	26.9%	34	19.4%	81	46.3%	13	7.4%
<b>Applicant Race/Ethnicity</b>										
American Indian/Alaska Native	35	0.5%	28	80.0%	1	2.9%	1	2.9%	5	14.3%
Asian	369	5.1%	247	66.9%	31	8.4%	46	12.5%	45	12.2%
Native Hawaiian/Pacific Islander	19	0.3%	15	78.9%	1	5.3%	-	0.0%	3	15.8%
Black or African American	131	1.8%	82	62.6%	8	6.1%	20	15.3%	21	16.0%
White	5,856	80.2%	4,470	76.3%	284	4.8%	513	8.8%	589	10.1%
Hispanic**	187	2.6%	134	71.7%	8	4.3%	25	13.4%	20	10.7%
No information	893	12.2%	546	61.1%	66	7.4%	102	11.4%	179	20.0%
Not applicable	-	0.0%	-	-	-	-	-	-	-	-
<b>Applicant Sex</b>										
Male	4,833	66.2%	3,614	74.8%	244	5.0%	419	8.7%	556	11.5%
Female	2,087	28.6%	1,558	74.7%	105	5.0%	216	10.3%	208	10.0%
No information	382	5.2%	216	56.5%	42	11.0%	47	12.3%	77	20.2%
Not applicable	1	0.0%	-	0.0%	-	0.0%	-	0.0%	1	100.0%
<b>Total</b>	<b>7,303</b>	<b>100.0%</b>	<b>5,388</b>	<b>73.8%</b>	<b>391</b>	<b>5.4%</b>	<b>682</b>	<b>9.3%</b>	<b>842</b>	<b>11.5%</b>

Source: Federal Financial Institutions Examination Council, 2009

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

\* Total applications do not include loans purchased by another institution.

\*\* Hispanics are classified as an ethnic group, not a race.

**Table 46 Home Mortgage Disclosure Act (HMDA) Data, Bucks County, 2010**

	Total Applications*		Originated		Approved Not Accepted		Denied		Withdrawn/Incomplete	
	Number	%	Number	%	Number	%	Number	%	Number	%
<b>Loan Type</b>										
Conventional	4,196	64.1%	3,048	72.6%	257	6.1%	405	9.7%	486	11.6%
FHA	2,113	32.3%	1,593	75.4%	69	3.3%	234	11.1%	217	10.3%
VA	203	3.1%	147	72.4%	12	5.9%	15	7.4%	29	14.3%
FSA/RHS	39	0.6%	29	74.4%	1	2.6%	5	12.8%	4	10.3%
<b>Loan Purpose: Home Purchase</b>										
One to four-family unit	6,391	97.6%	4,770	74.6%	319	5.0%	589	9.2%	713	11.2%
Manufactured housing unit	160	2.4%	47	29.4%	20	12.5%	70	43.8%	23	14.4%
<b>Applicant Race/Ethnicity</b>										
American Indian/Alaska Native	9	0.1%	6	66.7%	-	0.0%	1	11.1%	2	22.2%
Asian	370	5.6%	261	70.5%	20	5.4%	38	10.3%	51	13.8%
Native Hawaiian/Pacific Islander	15	0.2%	12	80.0%	-	0.0%	3	20.0%	-	0.0%
Black or African American	135	2.1%	95	70.4%	8	5.9%	19	14.1%	13	9.6%
White	5,374	82.0%	4,061	75.6%	260	4.8%	503	9.4%	550	10.2%
Hispanic**	159	2.4%	106	66.7%	11	6.9%	23	14.5%	19	11.9%
No information	647	9.9%	381	58.9%	51	7.9%	95	14.7%	120	18.5%
Not applicable	1	0.0%	1	100.0%	-	0.0%	-	0.0%	-	0.0%
<b>Applicant Sex</b>										
Male	4,414	67.4%	3,320	75.2%	216	4.9%	407	9.2%	471	10.7%
Female	1,762	26.9%	1,281	72.7%	82	4.7%	200	11.4%	199	11.3%
No information	374	5.7%	215	57.5%	41	11.0%	52	13.9%	66	17.6%
Not applicable	1	0.0%	1	100.0%	-	0.0%	-	0.0%	-	0.0%
<b>Total</b>	<b>6,551</b>	<b>100.0%</b>	<b>4,817</b>	<b>73.5%</b>	<b>339</b>	<b>5.2%</b>	<b>659</b>	<b>###</b>	<b>736</b>	<b>11.2%</b>

Source: Federal Financial Institutions Examination Council, 2010

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

\* Total applications do not include loans purchased by another institution.

\*\* Hispanics are classified as an ethnic group, not a race.