

Analysis of Impediments to Fair Housing Choice



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

April 2020

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➤ 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, Bristol Township 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; Bristol and Bensalem Townships receive CDBG funding from HUD and are members of the County's HOME Consortium.

Lead Agency

Bucks County (through its Office of Community and Economic Development and its Department of Housing Services in collaboration with the Planning Commission) have jointly taken the lead in being 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 County of Bucks Entitlement Areas, Bristol and Bensalem Townships. The document is intended to be used as a tool to provide direction for leadership, guide the allocation of resources, and serve as a 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, the Pennsylvania Human Rights Act, along with other pertinent legislation. Further, this document provides a demographic overview, a fair housing profile, an evaluation of policies, and an assessment of Fair Housing policy, programs and activities. The AI ends with a summary of conclusions, potential impediments as identified in the body of the document, and activities to address the same.

Comments

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

Bucks County Department of Housing and Community Development
1260 Almshouse Road
Doylestown, PA 18901
Phone: 215-345-3845
E-mail: cedhs@buckscounty.org

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, but are not limited to:

- Conducting an Analysis of Impediments to Fair Housing Choice
- Developing actions to overcome the effects of identified impediments to fair housing

HUD interprets these elements to include:

- Analyzing housing discrimination in a jurisdiction and working toward its elimination
- Promoting Fair Housing Choice for all
- 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 Fair Housing Act works to prevent discrimination to select classes of individuals when housing is made unavailable to them by landlords, direct housing providers, real estate companies and other entities that may be involved in the housing process. Below is an analysis of the exemptions and prohibitions that are classified in this act.

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:

- 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.

- *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. Consequently, individuals residing in Pennsylvania have only slightly more protection under state law than under federal law in the area of housing discrimination. The chart below 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 Pennsylvania¹

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	•	•
Pregnancy	•	•
Ancestry		•
Age (40 and older)		•
Use of Guide/Support Animal		•
Association/Relationship with an Individual with a Disability		•

¹ Pennsylvania Human Relations Act, Federal Fair Housing Act

The Pennsylvania Human Relations 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, but are not limited to:

- 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.

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.

Rehabilitation Act of 1973

This act, through section 504, prohibits the denial of benefits, exclusion from participation of discrimination as a direct result of a handicap. A handicap individual is defined as anyone who (a) has a physical or mental disability which for such individual constitutes or results in a substantial handicap to employment and (b) can reasonably be expected to benefit in terms of employability from vocational rehabilitation services.²

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.³

² Additional information concerning the Rehabilitation Act of 1973 may be found at: https://www.eeoc.gov/eeoc/history/ada25th/rehab_act-1973.cfm.

³ 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.⁴

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 with 32 inches of passage space
- A bathroom on the first floor big enough to accommodate the use of a wheelchair

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 2014 Analysis of Impediments to Fair Housing Choice for the Urban County and Bensalem Township
- The 2017 Annual Action Plan for Bensalem Township
- The 2019 Analysis of Impediments to Fair Housing Choice for Bristol Township
- Fair housing complaints filed with HUD and the PA Human Relations Commission since 2015
- The *Bucks County Comprehensive Plan*, Bristol Township Comprehensive Plan and the Bensalem Township Comprehensive Plan

⁴ A complete description of the guidelines can be found at <http://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards/ufas>.

- Municipal zoning ordinances
- Administrative policies concerning housing and community development
- Financial lending institution data from the Home Mortgage Disclosure Act (HMDA) database
- Previous Consolidated Annual Performance and Evaluation Reports (CAPER) for each unit of government
- Residential segregation data available from Census Scope
- The Testing statistics of 2017-2019 from the Housing Equality Center of Southeastern PA

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. That being said, this source was also widely used throughout the report.

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.

G. The Relationship between Fair Housing and Affordable Housing

This document goes beyond an analysis of the adequacy of affordable housing in Bucks County’s Urban County, Bristol and Bensalem Townships. 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 quality and affordable housing and related services in the county’s entitlement jurisdictions.

➤ DEMOGRAPHIC INFORMATION

A. Demographic Profile

Population Trends

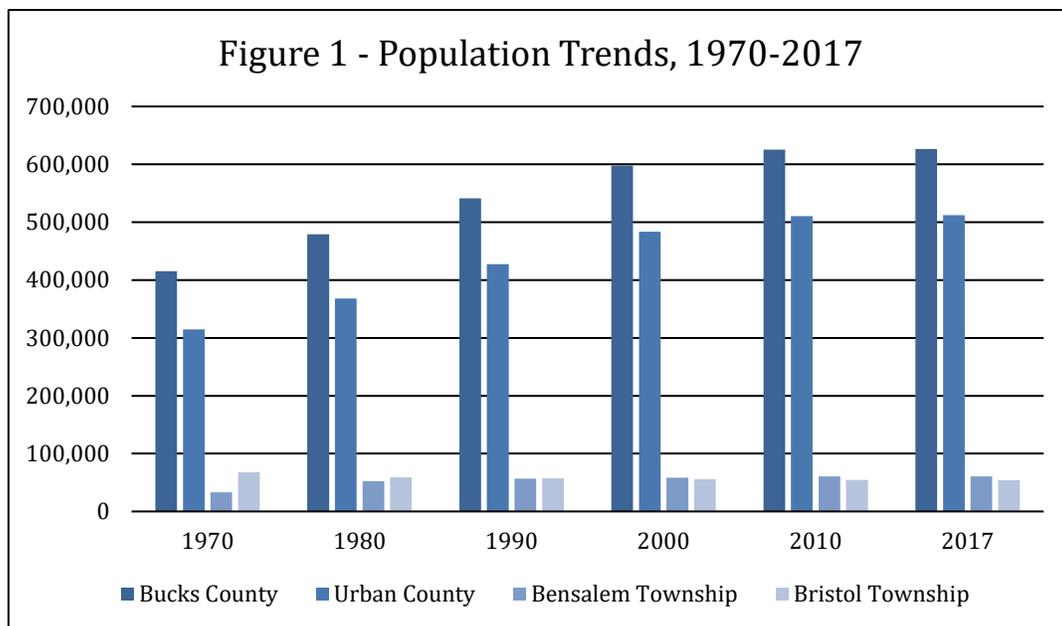
In the past five decades, Bucks County has grown from a primarily rural setting with 415,056 residents in 1970 to a more diverse community of 626,486 residents by 2017. Its growth has significantly outpaced that of Pennsylvania as a whole. In recent years, however, the rate of growth in Bucks County 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 approximately doubled its population, growing from 33,038 residents in 1970 to 60,418 in 2017. Though contrarily, the HUD entitlement community of Bristol Township has decreased in population, dropping from 67,498 in 1970 to 54,036 in 2017.

Table 2 Population Trends, 1970-2017 ⁵

Population Trends	1970	1980	1990	2000	2010	2017	Percent Change 1970 - 2017
Bucks County	415,056	479,211	541,174	597,635	625,249	626,486	50.9%
Urban County*	314,520	368,110	427,257	483,680	510,240	512,032	62.8%
Bensalem Township	33,038	52,368	56,788	58,434	60,427	60,418	82.9%
Bristol Township	67,498	58,733	57,129	55,521	54,582	54,036	-20.0%
Pennsylvania	11,319,366	11,855,687	11,881,643	12,281,054	12,702,379	12,790,505	13.0%

Figure 1 Population Trends, 1970-2017



⁵ Sources: U.S. Census 1970, 1980, 1990, 2000, 2010, American Community Survey 5-year estimates 2013-2017

Minority population growth has been steadily increasing at a fast pace for all entitlement areas. Between 2000 and 2017, the number of minority residents more than doubled in the Urban County, Bristol Township and Bensalem Township.

Table 3 Population by Race and Ethnicity, 2000-2017 ⁶

Period/Area	Total Population	White	Black	Asian	Other Races	Hispanic
2000						
Bucks County	597,635	552,588	19,495	13,627	11,925	14,005
Urban County*	483,680	456,327	10,758	8,579	8,016	9,361
Bensalem Township	58,434	48,443	4,047	3,860	2,084	2,505
Bristol Township	55,521	47,818	4,690	1,188	1,825	2,139
2010						
Bucks County	625,249	557,647	22,376	24,008	21,218	26,782
Urban County*	510,240	467,745	12,381	16,299	13,815	17,651
Bensalem Township	60,427	45,712	4,419	6,163	4,133	5,091
Bristol Township	54,582	44,190	5,576	1,546	3,270	4,040
2017						
Bucks County	626,486	554,141	24,757	28,758	18,830	29,393
Urban County*	512,032	464,123	15,371	20,175	12,363	18,712
Bensalem Township	60,418	44,865	4,377	7,054	4,122	5,650
Bristol Township	54,036	45,153	5,009	1,529	2,345	5,031

**Bucks County exclusive of Bensalem Township and Bristol Township*

One factor to note is the increased diversity among minorities. Whereas in 2000 African American residents accounted for 29 percent of all minorities in the Urban County, their share of the total minority population declined to 22.9 percent by 2017. Similarly, while in 2000 African American residents represented 32.3 percent of the minority population in Bensalem Township, their share declined to 20.9 percent by 2010. This trend continues in Bristol Township, with the population dropping from 47.6 percent of residents in 2000 to 35.9 percent in 2017.

Conversely, the number of Asian/Pacific Islander residents has increased significantly both in actual numbers and as a segment of the minority population. In 2000, Asian/Pacific Islander residents represented 23.3 percent of the minority population in the Urban County. Their share rose to 30.1 percent by 2017. The pattern in Bensalem Township was nearly identical, with Asian/Pacific Islander residents increasing from 30.8 percent of all minorities in 2000 to 33.7 percent by 2017. However in Bristol Township, there was a decrease evident, dropping from 12.1 percent in 2000 to 10.9 percent in 2017.

Hispanic residents are the other major minority group experiencing population growth. During the same period, this group more than doubled its number, increasing from 9,361 in 2000 to 18,712 in 2017. In Bensalem, Hispanic residents nearly doubled in number from 2000 to 2017 with 2,505 residents and 5,650 residents, respectively. In Bristol, the Hispanic resident population more than doubled, with 2,139 in 2000 to 5,031 in 2017.

⁶ Sources: U.S. Census 2000 and 2010, American Community Survey 5-year estimates 2013-2017

Figure 2 Racial/Ethnic Minority Characteristics in the Urban County, 2000-2017 ⁷

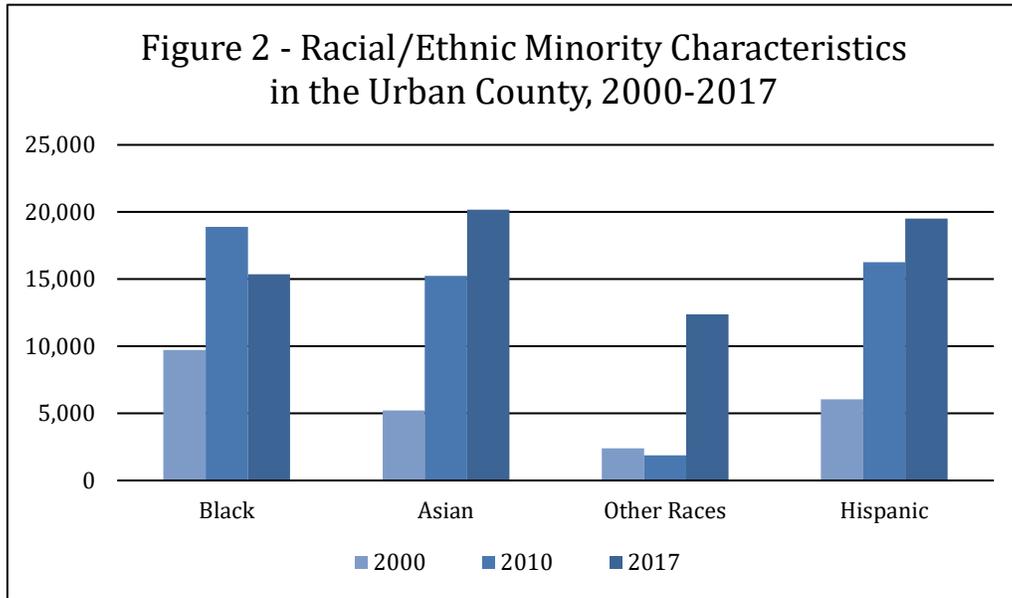
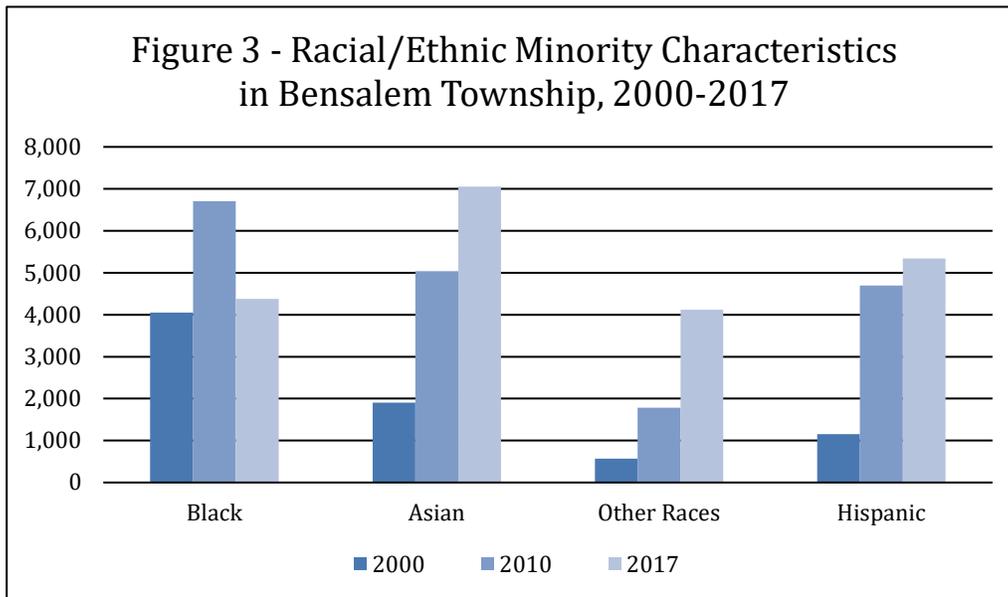


Figure 3 Racial/Ethnic Minority Characteristics in Bensalem Township, 2000-2017 ⁸



⁷ U.S. Census 2000 and 2010, American Community Survey 5-year estimates 2013-2017

⁸ U.S. Census 2000 and 2010, American Community Survey 5-year estimates 2013-2017

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.

For the remainder of this report, the analysis is limited to White residents, African American residents, and Hispanic residents and Asian/Pacific Islander residents. The other groups are simply too decentralized throughout the county, without any areas of sufficient concentration, making their numbers too small to analyze.

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, Bristol Township and Bensalem Township were reviewed and the following results were obtained, based on data pulled through 2017:

- **African American Residents**
In the Urban County, African American residents accounted for 3 percent of the population. Seven Census Tracts (one each in Middletown, Warminster and Falls townships and two in Morrisville and Bristol Borough) had a percentage of population of 9 percent or more.

- **Asian Residents**
Asian residents represented 3.9 percent of the total Urban County population. One Census Tracts in the Urban County had an Asian population concentration equal to or greater than 10 percent.

- **Hispanic Residents**
Hispanic residents represented 3.8 percent of the total County population. Warminster Township had a Hispanic population of more than 30 percent, the greatest of any other Census Tract.

Table 4 Census Tracts with Concentrations of Minority Populations in the Urban County, 2017 ⁹

Municipality	Census Tract	Total Population	Race and Ethnicity			
			White	Black	Asian	Hispanic
Bristol Borough	1006	3,929	79.1%	9.1%	0.3%	17.0%
Bristol Borough	1007	3,241	66.0%	20.9%	0.6%	12.5%
Middletown Township	1008.11	4,751	61.1%	18.5%	15.4%	4.5%
Warminster Township	1016.05	3,993	75.3%	9.6%	2.6%	30.7%
Morrisville Borough	1057.02	2,710	80.0%	13.8%	1.2%	3.7%
Morrisville Borough	1057.04	6,717	72.9%	19.7%	3.9%	7.5%
Falls Township	1058.01	6,338	69.9%	22.9%	5.2%	5.6%
Bucks County (Urban County)		512,032	90.6%	3.0%	3.9%	3.8%

⁹ American Community Survey 2017

For the most part, the areas of African American residential 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 exception is Census Tract 1016.05 in Warminster Township, which is an outlier in the data contrary to a usually high population ratio.

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 2017 data, are as follows:

- African American Residents
In Bensalem Township, African American residents accounted for 7.3 percent of the total population. No Census Tract had a concentration of 15.7 percent or greater.

- Asian Residents
Asian residents accounted for 11.7 percent of the Township’s population. No Census Tract had a concentration of 19.8 percent or greater.

- Hispanic Residents
Hispanic Residents made up 8.8 percent of the population in Bensalem Township. Census Tract 1002.08 had a Hispanic population in excess of 23.8 percent.

Table 5 Areas of Racial and Ethnic Concentration in Bensalem Township, 2017 ¹⁰

Bensalem Census Tract	Total Population	Race and Ethnicity			
		White	Black	Asian	Hispanic
1001.02	3,030	74.8%	3.1%	19.4%	7.0%
1001.03	2,491	88.7%	3.7%	0.8%	5.6%
1001.04	4,330	53.9%	15.6%	18.4%	16.2%
1001.05	3,186	92.4%	1.2%	2.0%	8.6%
1002.01	4,362	72.5%	15.1%	8.0%	5.5%
1002.06	5,282	71.6%	6.2%	15.8%	7.9%
1002.07	4,167	75.7%	10.7%	10.5%	6.7%
1002.08	6,160	65.7%	12.4%	10.6%	23.8%
1002.09	9,276	63.2%	4.7%	19.7%	7.4%
1002.1	7,472	78.1%	5.6%	6.7%	6.5%
1002.11	6,866	87.7%	3.5%	7.3%	6.0%
1002.12	3,796	85.4%	4.8%	6.8%	8.6%
Bensalem Total	60,418	74.3%	7.3%	11.7%	8.8%

¹⁰ American Community Survey 2017

Bristol 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 2017 data, are as follows:

- African American Residents
In Bristol Township, African American residents accounted for 9.3 percent of the total population. The highest concentration is found in tract 1004.03 with 39.2 percent of the population.
- Asian Residents
Asian residents accounted for 2.8 percent of the Township's population. No Census Tract had a concentration of 10.3 percent or greater.
- Hispanic Residents
Hispanic Residents made up 9.3 percent of the population in Bristol Township. No Census Tract had a population in excess of 19.4 percent.

Table 5.1 Areas of Racial and Ethnic Concentration in Bristol Township, 2017 ¹¹

Bristol Census Tract	Total Population	Race and Ethnicity			
		White	Black	Asian	Hispanic
1003.02	4,828	95.6%	0.8%	1.3%	7.4%
1003.03	4,870	64.2%	25.0%	1.8%	19.3%
1003.04	2,555	71.1%	22.4%	3.1%	8.5%
1003.06	3,545	70.4%	14.4%	10.2%	8.7%
1003.07	5,065	78.4%	9.5%	5.7%	11.0%
1004.01	6,014	88.1%	5.1%	1.0%	13.0%
1004.02	7,223	88.3%	5.2%	1.9%	9.3%
1004.03	2,199	55.0%	39.2%	0.9%	17.4%
1004.04	6,383	93.6%	4.2%	0.9%	6.6%
1004.06	3,606	85.5%	4.4%	5.7%	2.6%
1004.07	1,014	94.3%	2.2%	0.2%	1.7%
1004.08	6,734	92.4%	2.9%	2.3%	4.2%
Bristol Total	54,036	83.5%	9.3%	2.8%	9.3%

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

¹¹ American Community Survey 2017

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.¹² 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 and African American persons in the Urban County was 29.4 in 2017. This is indicative of a lower level of segregation. The data indicate that in order to achieve full integration among White persons and Black persons in the County, 29.4 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 to Asian person’s index was calculated at 16.4 percent, the White to Hispanic person’s index at 18, and the White to multi-race person’s index at 19.6 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.

Table 6 Urban County Dissimilarity Indices (DI), 2017¹³

Urban County DI	DI with White Population	Population	Percent of Total Population
White	-	464,123	90.6%
Black	29.4	15,371	3.0%
Asian	16.4	20,175	4.0%
Other Race	19.6	12,363	2.4%
Hispanic*	18.0	18,712	3.7%
Total	-	512,032	100.0%

Bensalem Township

The dissimilarity index for Whites/African American persons in Bensalem Township was 30 percent in 2017. 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 African American persons in the Township, 30 percent of Black residents would have to move to a different location within Bensalem Township.

¹² The index of dissimilarity is a commonly used demographic tool for measuring inequality. For a given geographic area, the index is equal to $1/2 \sum \text{ABS} [(b/B)-(a/A)]$, 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.

¹³ American Community Survey 2013-2017 5-year estimates

The Index of Dissimilarity for the other minority groups were as follows: 26 percent for White and Asian persons and 24 percent for White and Hispanic persons and 30.5 percent for White and Other Race persons. Indices for the other groups cannot be as reliably interpreted individually since their individual populations in many cases are less than 1,000.

Table 7 Bensalem Township Dissimilarity Index Rankings, 2017 ¹⁴

Bensalem Township DI	DI with White Population	Population	Percent of Total Population
White	-	44,865	74.3%
Black	30.0	4,377	7.2%
Asian	26.0	7,054	11.7%
Other Race	30.5	4,122	6.8%
Hispanic*	24.0	4,697	7.8%
Total	-	60,418	100.0%

Bristol Township

The dissimilarity index for Whites/African American persons in Bristol Township was 44.5 percent in 2017. That figure indicates a mid- level of segregation for the two groups, within the municipality. The data indicate that in order to achieve full integration among White persons and African American persons in the Township, 44.5 percent of African American residents would have to move to a different location within Bristol Township.

The Index of Dissimilarity for the other minority groups was lower: 36.5 percent for White and Asian persons, 23.5 percent for White and Hispanic persons, and 23.0 percent for Other Races and White persons. These numbers indicate that Asians are slightly less segregated than Blacks, while being more segregated than Hispanics are. This indicates that African American and Asian persons have the highest rate of dissimilarity index ranking for minorities in Bristol Township.

Table 7.1 Bristol Township Dissimilarity Index Rankings, 2017 ¹⁵

Bristol Township DI	DI with White Population	Population	Percent of Total Population
White	-	45,153	83.6%
Black	44.5	5,009	9.3%
Asian	36.5	1,529	2.8%
Other Race	23.0	2,345	4.3%
Hispanic*	23.5	5,031	9.3%
Total	-	54,036	100.0%

¹⁴ American Community Survey 2013-2017 5-year estimates

¹⁵ American Community Survey 2013-2017 5-year estimates

To place the dissimilarity indices for the Urban County and the Townships 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 the African American population, in the lower range for segregation involving the Hispanic population, and in the higher range for segregation involving the Asian population. Bristol and 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, 2017 ¹⁶

PA County DI	White Population	Black Population	Asian Population	Hispanic Population*	Total	DI White/Black	DI White/Asian	DI White/ Hispanic
Bucks	557,647	22,376	34,008	26,782	625,249	48.2	68.7	33.0
Berks	342,148	20,143	5,382	67,355	411,442	48.3	34.8	34.5
Chester	426,707	30,623	19,296	32,503	498,883	47.2	48.8	37.5
Delaware	558,979	110,260	26,277	26,537	558,979	69.9	41.1	37.0
Lehigh	276,286	21,440	10,247	65,615	349,497	49.9	60.5	34.0
Montgomery	649,021	69,351	51,565	34,233	799,874	48.6	39.2	33.7
Northampton	256,895	14,986	7,203	31,179	297,735	44.5	49.1	38.2
Philadelphia	626,221	661,839	96,405	187,611	1,526,006	74.0	62.1	47.0

**Hispanic ethnicity is counted independently of race.*

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 White and Asian persons 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. Asian persons have the highest median income at \$76,720 followed by White persons at \$63,017.

¹⁶ CensusScope; University of Michigan Population Studies Center's Racial Residential Segregation Measurement project; U.S. Census (DP-1)

Table 9 Median Household Income and Poverty Rates by Race/Ethnicity, 2017 ¹⁷

Median Household Income and Poverty Rate	Median Household Income	Poverty Rate
Bucks County	\$82,031	6.1%
White	\$83,540	5.4%
Black	\$50,753	16.5%
Asian	\$102,175	4.8%
Hispanic	\$50,625	16.7%
Bensalem Township	\$61,025	10.2%
White	\$63,017	8.1%
Black	\$42,437	23.1%
Asian	\$76,720	5.8%
Hispanic	\$33,442	33.4%
Bristol Township	\$61,321	10.0%
White	\$65,007	8.9%
Black	\$38,698	21.7%
Asian	\$62,074	4.1%
Hispanic	\$46,806	13.0%

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 11.3 percent of White households earned less than \$25,000 compared to 19.4 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 39.5 percent of Black households.

In Bensalem Township, 15.9 percent of the White households earned less than \$25,000 compared to 30.0 percent of African Americans. At the upper end of the spectrum, 40.3 percent of White households earned \$75,000 or more while only 22.0 percent of African American households fell into that category of household earnings.

¹⁷ ACS 17

Table 10 Household Income Distribution by Race, 2017 ¹⁸

Household Income Distribution by Race	Total	\$0 to \$24,999	\$25,000 to \$49,999	\$50,000 to \$74,999	\$75,000 and higher
All Households					
Bucks County	235,909	12.6%	16.9%	16.5%	54.0%
Urban County*	192,655	11.5%	15.4%	16.0%	57.1%
Bensalem Township	23,834	17.7%	23.9%	18.7%	40.0%
Bristol Township	19,420	17.6%	23.2%	19.0%	40.2%
White Households					
Bucks County	214,504	12.1%	16.6%	16.5%	54.9%
Urban County*	179,242	11.3%	15.2%	16.6%	57.5%
Bensalem Township	18,848	15.9%	24.7%	19.1%	40.3%
Bristol Township	16,414	15.8%	21.8%	20.1%	42.3%
Black Households					
Bucks County	8,784	24.0%	25.2%	18.0%	32.9%
Urban County*	4,930	19.4%	21.3%	19.8%	39.5%
Bensalem Township	1,880	30.0%	27.2%	20.8%	22.0%
Bristol Township	1,974	29.8%	33.0%	10.7%	26.5%
Asian Households					
Bucks County	8,276	10.0%	12.9%	14.4%	63.5%
Urban County*	5,793	9.0%	10.4%	12.7%	67.9%
Bensalem Township	2,050	12.4%	16.3%	17.6%	53.7%
Bristol Township	433	3.9%	29.6%	21.9%	44.6%
Hispanic or Latino Households					
Bucks County	8,953	21.8%	27.6%	18.8%	31.8%
Urban County*	5,758	17.8%	22.7%	21.1%	38.4%
Bensalem Township	1,928	33.3%	40.3%	13.6%	12.9%
Bristol Township	1,267	22.7%	30.9%	16.0%	30.4%

¹⁸ ACS17

Figure 4 Household Income Distribution by Race in the Urban County, 2017

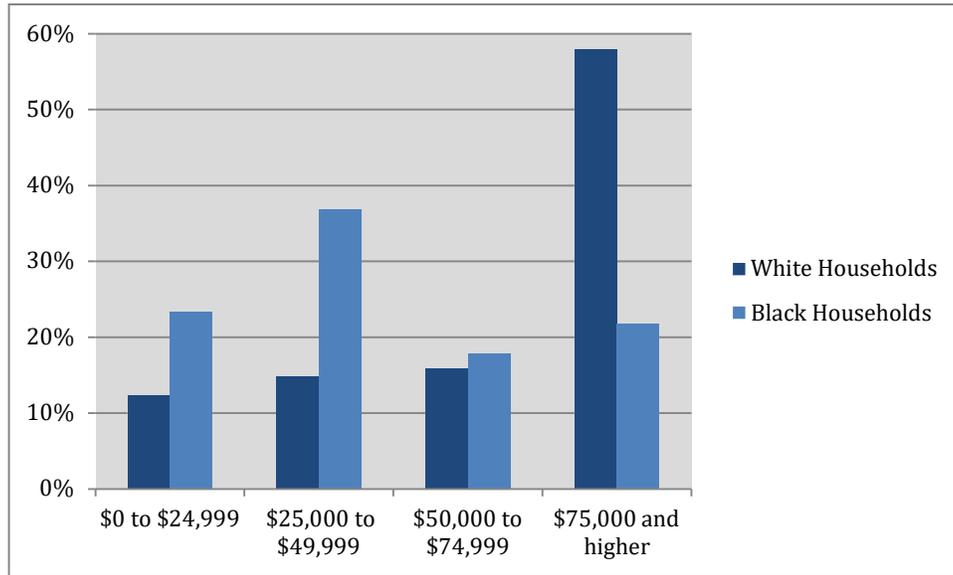


Figure 5 Household Income Distribution by Race in Bensalem Township, 2017

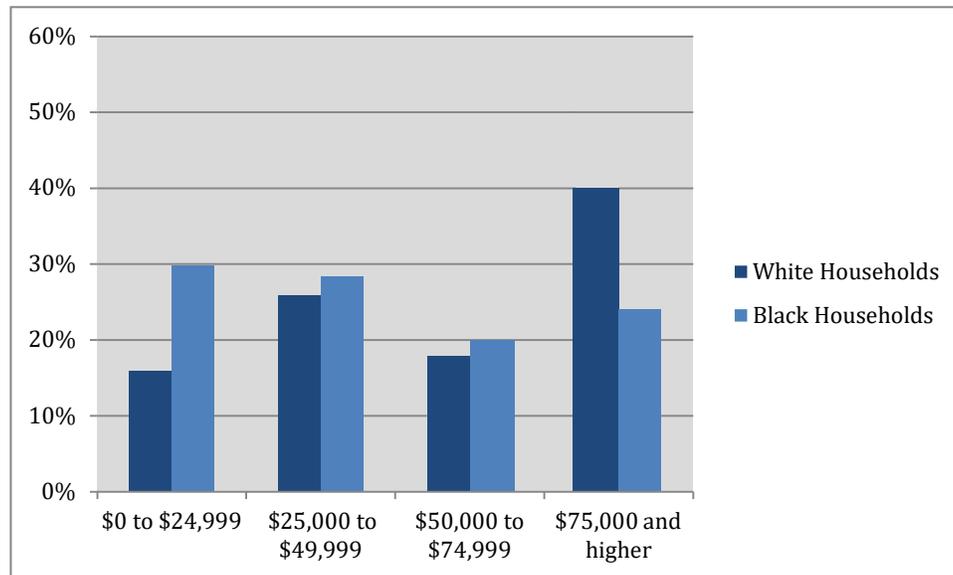
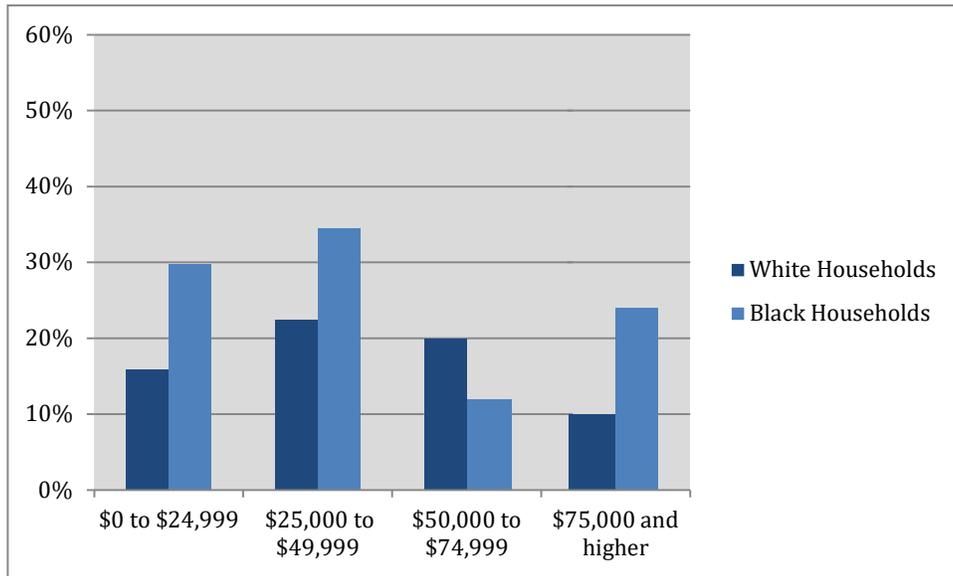


Figure 5.1 Household Income Distribution by Race in Bristol Township, 2017



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, Bensalem Township and Bristol Township.

HUD data reveals that there are 113 census block groups throughout the County of Bucks with at least 30 percent of its population being considered to be LMI status. Further, and captured below in Table 11, there are 23 census block groups in the Urban County where at least 50 percent of residents meet the criterion for LMI status.

Table 11 Areas of LMI Persons and Minority Concentration in the Urban County ¹⁹

Census Tract	Block Group	Low/Moderate Income Persons		
		Number	Universe	Percent
1005.00	1	650	1,085	59.9%
	2	900	1,680	53.8%
1006.00	1	670	985	68.0%
	2	940	1,690	55.6%
	3	515	995	51.8%
1007.00	1	415	600	69.2%
	3	765	1,080	70.8%
1008.03	1	1,175	2,125	55.3%
1008.07	1	410	795	51.6%
1008.11	3	1,860	2,630	70.7%
1011.00	1	880	1,260	69.8%
1014.05	4	1,355	2,465	55.0%
1016.03	2	410	780	52.6%
1016.05	1	1,035	1,305	79.3%
	2	1,930	2,920	66.1%
1016.07	1	505	885	57.1%
1018.07	1	1,145	2,005	57.1%
1025.00	1	470	890	52.8%
1027.00	3	370	670	52.2%
1031.01	1	330	610	54.1%
1031.02	1	540	695	77.7%
	3	290	485	59.8%
1031.03	1	1,710	2,700	63.3%
1034.00	2	745	1,400	53.2%
1057.04	1	1,010	1,420	71.1%
1058.05	1	975	1,930	50.5%
	2	930	1,280	72.7%
	3	520	785	66.2%
1058.07	1	1,190	2,240	53.1%
	2	790	1,560	50.6%
1058.11	1	490	650	75.4%
	5	710	1,370	51.8%
1065.00	1	770	1,505	51.2%

In Bensalem Township, there are eight census tract where at least 50 percent of residents (for whom this rate is determined) meet the criterion for LMI status. These populations are reflected in Table 12 below.

¹⁹ U.S. Department of Housing & Urban Development, 2015

Table 12 Areas of LMI Persons and Minority Concentration in Bensalem Township ²⁰

Census Tract	Block Group	Low/Moderate Income Persons		
		Number	Universe	Percent
1001.02	1	430	735	58.5%
1001.03	2	1,125	1,500	75.0%
1001.04	2	1,705	2,620	65.1%
1002.01	3	645	1,170	55.1%
1002.07	2	1,810	2,300	78.7%
1002.08	1	1,290	2,085	61.9%
	2	875	1,310	66.8%
	3	590	890	66.3%
	4	1,395	1,445	96.5%
1002.09	1	1,620	2,900	55.9%
1002.10	4	1,035	1,480	69.9%

In Bristol Township, there are 10 census tracts where at least 50 percent of residents (for whom this rate is determined) meet the criterion for LMI status. These populations are reflected in Table 12.1 below.

Table 12.1 Areas of LMI Persons and Minority Concentration in Bristol Township ²¹

Census Tract	Block Group	Low/Moderate Income Persons		
		Number	Universe	Percent
1003.02	1	470	735	64.0%
	2	700	1,390	50.4%
1003.03	2	1,100	2,145	51.3%
	3	1,220	1,645	74.2%
1003.04	1	1,645	2,360	69.7%
1003.06	1	1,360	1,970	69.0%
	2	900	1,350	66.7%
1003.07	2	320	610	52.5%
	4	900	1,185	76.0%
1004.01	2	835	1,205	69.3%
1004.02	1	790	975	81.0%
	3	315	555	56.8%
	4	725	1,240	58.5%
	5	810	1,425	56.8%
1004.03	2	1,165	1,585	73.5%
1004.04	5	480	595	80.7%
1004.08	1	525	945	55.6%

²⁰ U.S. Department of Housing & Urban Development, 2015

²¹ U.S. Department of Housing & Urban Development, 2015

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.

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). As of 2017 and throughout Bucks County as a whole, there is an estimated 29,368 citizens who have some type of disability.²²

Income Discrepancies

According to the National Organization on Disabilities, a significant income gap exists for persons with disabilities, given their lower rate of employment. Of the county’s population of disabled persons, there is an estimated 46.3 percent who are currently participating in various areas of the labor force. An estimated 40.7 percent are currently unemployed.

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 7.8 percent in 2000 to 8.5 percent in 2017, while female-headed households with children have remained consistent at 4.0 percent. There was a slight increase in the rate of male-headed households with children, from 1.5 percent to 2.3 percent. Comparatively, married-couple families with children have decreased from 31.3 percent to 23.2 percent.

In Bensalem Township, the proportion of female-headed households has increased from 10.7 percent in 2000 to 11.5 percent in 2017, and female-headed households with children decreased from 5.3 in 2000 to 4.3 in 2017. There was a slight increase in the rate of male-headed households with children, from 1.7 percent to 2.3 percent. Comparatively, married-couple families with children have decreased from 24.4 percent to 18 percent.

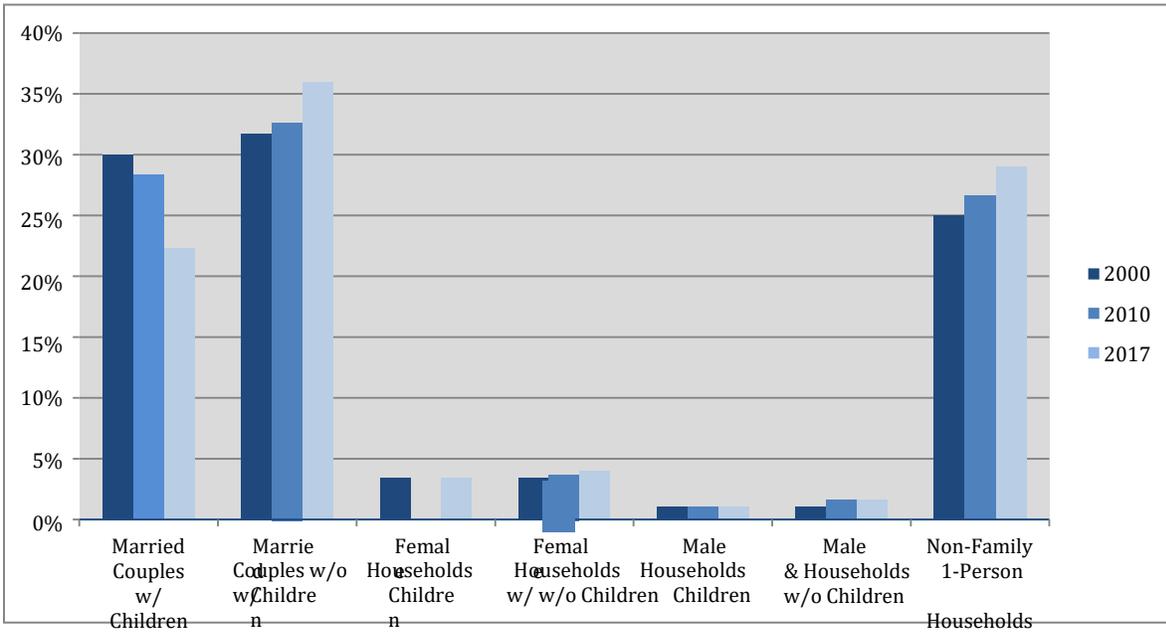
In Bristol Township, the proportion of female-headed households has increased from 12.7 percent in 2000 to 13.6 percent in 2017, and female-headed households with children decreased from 6.2 in 2000 to 5.7 in 2017. There was a slight decrease in the rate of male-headed households with children, from 2.8 percent to 2.1 percent. Comparatively, married-couple families with children have decreased from 24.2 percent to 18 percent.

²² ACS Employment Status, Age and Education 2017

Table 13 Households by Type and Presence of Children, 2000-2017 ²³

Households by Type and Presence of Children	Total Households	Family Households										Non-family and 1-person Households	
		Percent of Total	Married-couple families		Female-headed Households			Male-headed Households					
			Percent of Total	With Children	Without Children	Percent of Total	With Children	Without Children	Percent of Total	With Children	Without Children		
2000													
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%	
Bristol Township	19,733	73.6%	55.6%	25.2%	30.4%	12.7%	6.2%	6.5%	5.3%	2.8%	2.5%	26.4%	
2010													
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%	
Bristol Township	20,561	70.5%	52.3%	20.5%	31.8%	12.2%	6.0%	6.2%	6.0%	2.6%	3.4%	29.5%	
2017													
Bucks County	235,909	71.0%	57.7%	22.2%	35.5%	9.2%	4.2%	5.0%	4.1%	1.6%	2.5%	29.0%	
Urban County*	192,655	71.7%	59.7%	23.2%	36.5%	8.5%	4.0%	4.5%	3.5%	1.4%	2.1%	28.3%	
Bensalem Township	23,834	65.9%	48.2%	18.0%	30.2%	11.5%	4.7%	6.8%	6.2%	2.3%	3.8%	34.1%	
Bristol Township	19,420	70.2%	50.4%	18.0%	32.4%	13.6%	5.7%	8.0%	6.2%	2.1%	4.1%	29.8%	

Figure 6 Households by Type and Presence of Children in the Urban County, 2000-2017



²³ U.S. Census Bureau 2000 (SF-3, P10), American Community Survey 2006-2010 5-year estimates (B11001, B11003), American Community Survey 2013-2017 5-year estimates (B11001, B11003)

Figure 7 Households by Type and Presence of Children in Bensalem Township, 2000-2017

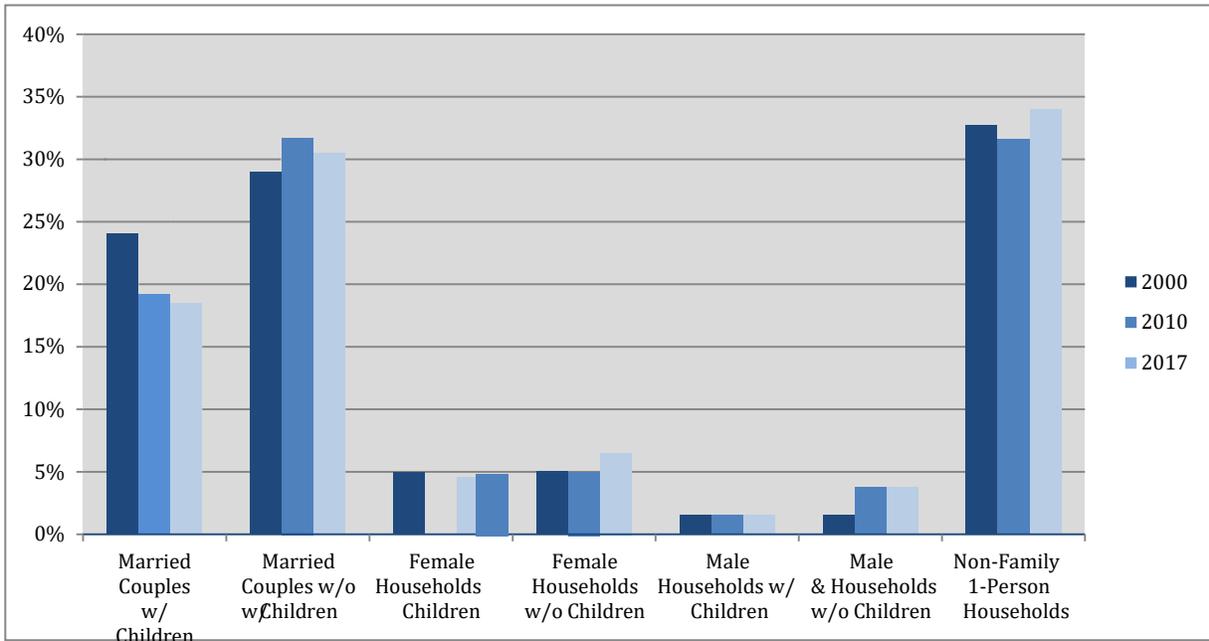
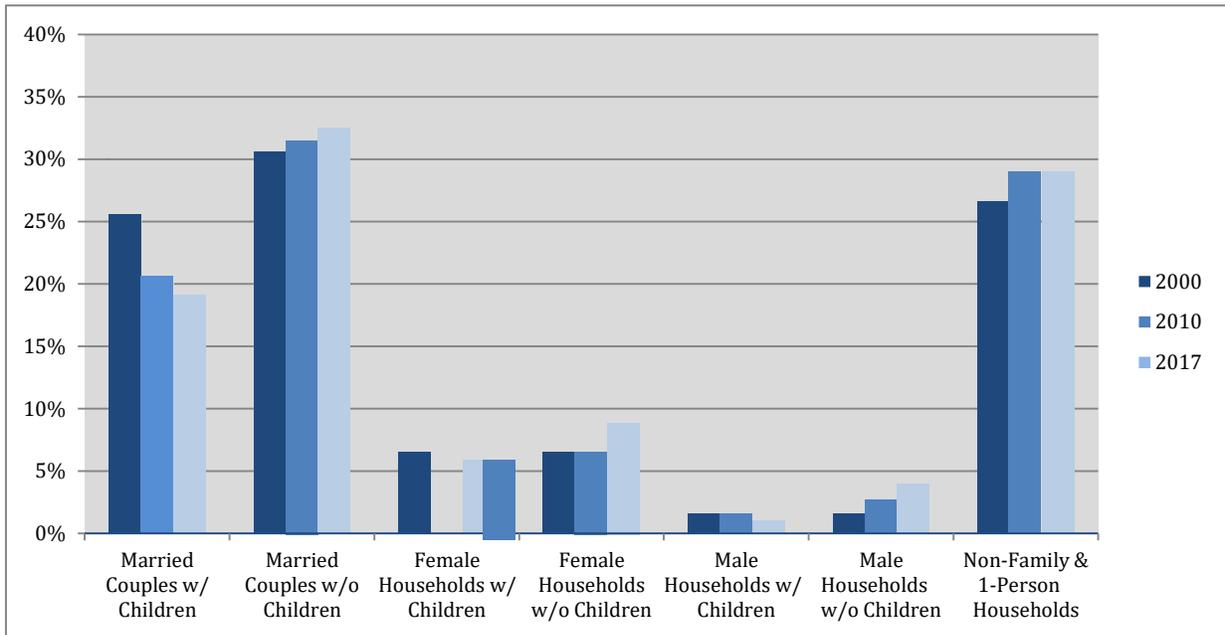


Figure 7.1 Households by Type and Presence of Children in Bristol Township, 2000-2017



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 1964.²⁴

²⁴ 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.

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 there are five main languages for persons who speak English less than “very well”. Ranked in order from the highest number of speakers, these 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, 2017 ²⁵

Language Group	Number of LEP Persons	Percent of Total Population
Spanish	6,684	1.1%
Russian	3,287	0.55%
Gujarati	1,750	0.29%
Chinese	1,184	0.20%
Korean	852	0.14%

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 1964.²⁶ The term “vital document” referenced within the code 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 2017 was 5.4 percent, which was lower than Pennsylvania’s rate of 6.5 percent, as indicated on Table 15. Similarly, unemployment in the Urban County is 1.5 percent lower than the state on average. Male unemployment is highest in Bristol Township at 8.7 percent, which is 3.7 percent higher than the Urban County and 2.6 percent higher than Bensalem Township. Likewise with respect to female unemployment, Bristol

Township is the highest at 7.7 percent, which is 2.7percent higher than the Urban County and 1.6 percent higher than Bensalem Township.

²⁵ American Community Survey 2011-2015 5-year estimates (B16001)

²⁶ The four-factor analysis is detailed in the *Federal Register* dated January 22, 2007.

This trend carries with White population and Asian population unemployment rates. The Hispanic population also has the highest unemployment in Bristol Township but only marginally, by 0.1 percent, versus the Urban County but 3.9 percent higher than in Bensalem Township. African Americans, however, have the greatest rate of unemployment in the state at 13.7 percent. Comparing the Urban County, Bensalem Township and Bristol Township, Bensalem Township has the highest rate of African American unemployment at 10 percent. This is 0.4 percent higher than the Urban County, and a substantial 3 percent higher than Bristol Township.

Table 15 Civilian Labor Force, 2017 ²⁷

Civilian Labor Force	Pennsylvania		Bucks County		Urban County		Bensalem Township		Bristol Township	
	Total	Percent	Total	Percent	Total	Percent	Total	Percent	Total	Percent
Total CLF	6,518,993	100.0%	345,501	100.0%	280,875	100.0%	33,961	100.0%	30,665	100.0%
Employed	6,096,977	93.5%	326,994	94.6%	266,955	95.0%	31,898	93.9%	28,141	91.8%
Unemployed	422,016	6.5%	18,507	5.4%	13,920	5.0%	2,063	6.1%	2,524	8.2%
Male CLF	3,394,124	100.0%	182,083	100.0%	147,763	100.0%	18,318	100.0%	16,002	52.2%
Employed	3,160,895	93.1%	171,688	94.3%	139,878	95.0%	17,205	93.9%	14,605	91.3%
Unemployed	233,229	6.9%	10,395	5.7%	7,885	5.0%	1,113	6.1%	1,397	8.7%
Female CLF	3,124,869	100.0%	163,418	100.0%	133,112	100.0%	15,643	100.0%	14,663	47.8%
Employed	2,936,082	94.0%	155,306	95.0%	127,077	95.0%	14,693	93.9%	13,536	92.3%
Unemployed	188,787	6.0%	8,112	5.0%	6,035	5.0%	950	6.1%	1,127	7.7%
White CLF	5,427,232	100.0%	308,118	100.0%	256,476	100.0%	25,595	100.0%	26,047	100.0%
Employed	5,135,158	94.6%	291,997	94.8%	244,061	95.2%	24,021	93.9%	23,915	91.8%
Unemployed	292,074	5.4%	16,121	5.2%	12,415	4.8%	1,574	6.1%	2,132	8.2%
Black CLF	644,193	100.0%	13,150	100.0%	8,373	100.0%	2,116	100.0%	2,661	100.0%
Employed	556,099	86.3%	11,948	90.9%	7,567	90.4%	1,906	90.0%	2,475	93.0%
Unemployed	88,094	13.7%	1,202	10.1%	806	9.6%	210	10.0%	186	7.0%
Asian CLF	214,480	100.0%	15,855	100.0%	10,689	100.0%	4,177	100.0%	989	100.0%
Employed	202,116	94.2%	15,216	96.0%	10,335	96.7%	3,967	95.0%	914	92.4%
Unemployed	12,364	5.8%	639	4.0%	354	3.3%	210	5.0%	75	7.6%
Hispanic CLF	385,951	100.0%	15,550	100.0%	10,234	100.0%	1,956	100.0%	2,360	100.0%
Employed	340,541	88.2%	14,353	92.3%	9,372	91.6%	2,821	95.4%	2,160	91.5%
Unemployed	45,410	11.8%	1,197	7.7%	862	8.4%	135	4.6%	200	8.5%

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.

A. Housing Market

Housing Inventory

Between 2000-2017 the Urban County housing stock increased by 11.6 percent, from 181,477 to 202,579 units.

²⁷ ACS 2013-2017 5yr

Table 16 Trends in Housing Inventory, 2000-2017 ²⁸

Municipality	2000		2010		2017		Change 2000-2017	
	Number	Percent of Total Housing Units	Number	Percent of Total Housing Units	Number	Percent of Total Housing Units	Number	Percent of Total Housing Units
Bucks County	225,498	100.0%	245,956	100.0%	248,873	100.0%	23,375	10.4%
Urban County	181,477	80.5%	199,823	81.2%	202,579	81.4%	21,102	11.6%
Bedminster Township	1,868	0.8%	2,561	1.0%	2,864	1.2%	996	53.3%
Bensalem Township	23,535	10.4%	25,246	10.3%	25,369	10.2%	1,834	7.8%
Bridgeton Township	612	0.3%	622	0.3%	606	0.2%	-6	-1.0%
Bristol Borough	4,207	1.9%	4,237	1.7%	4,061	1.6%	-146	-3.5%
Bristol Township	20,486	9.1%	20,887	8.5%	20,925	8.4%	439	2.1%
Buckingham Township	5,861	2.6%	7,433	3.0%	7,515	3.0%	1,654	28.2%
Chalfont Borough	1,404	0.6%	1,556	0.6%	1,662	0.7%	258	18.4%
Doylestown Borough	4,055	1.8%	4,129	1.7%	4,101	1.6%	46	1.1%
Doylestown Township	6,200	2.7%	6,636	2.7%	6,152	2.5%	-48	-0.8%
Dublin Borough	869	0.4%	959	0.4%	943	0.4%	74	8.5%
Durham Township	525	0.2%	518	0.2%	508	0.2%	-17	-3.3%
East Rockhill Township	1,883	0.8%	2,120	0.9%	2,016	0.8%	133	7.1%
Falls Township	13,528	6.0%	13,609	5.5%	13,561	5.5%	33	0.2%
Haycock Township	841	0.4%	947	0.4%	909	0.4%	68	8.1%
Hilltown Township	4,370	1.9%	5,574	2.3%	5,815	2.3%	1,445	33.1%
Hulmeville Borough	356	0.2%	392	0.2%	351	0.1%	-5	-1.4%
Ivyland Borough	199	0.1%	338	0.1%	304	0.1%	105	52.8%
Langhorne Borough	649	0.3%	677	0.3%	602	0.2%	-47	-7.2%
Langhorne Manor Borough	336	0.1%	326	0.1%	323	0.1%	-13	-3.9%
Lower Makefield Township	11,931	5.3%	12,184	5.0%	12,486	5.0%	555	4.7%
Lower Southampton Township	7,333	3.3%	7,362	3.0%	7,380	3.0%	47	0.6%
Middletown Township	15,713	7.0%	17,316	7.0%	17,331	7.0%	1,618	10.3%
Milford Township	3,161	1.4%	3,687	1.5%	3,784	1.5%	623	19.7%
Morrisville Borough	4,313	1.9%	3,902	1.6%	3,893	1.6%	-420	-9.7%
New Britain Borough	930	0.4%	969	0.4%	1,036	0.4%	106	11.4%
New Britain Township	3,969	1.8%	4,266	1.7%	4,329	1.7%	360	9.1%
New Hope Borough	1,251	0.6%	1,398	0.6%	1,428	0.6%	177	14.1%
Newtown Borough	936	0.4%	1,027	0.4%	996	0.4%	60	6.4%
Newtown Township	6,848	3.0%	7,618	3.1%	7,741	3.1%	893	13.0%
Nockamixon Township	1,411	0.6%	1,493	0.6%	1,604	0.6%	193	13.7%
Northampton Township	13,138	5.8%	14,274	5.8%	14,437	5.8%	1,299	9.9%
Penndel Borough	927	0.4%	964	0.4%	1,143	0.5%	216	23.3%
Perkasie Borough	3,378	1.5%	3,396	1.4%	3,474	1.4%	96	2.8%
Plumstead Township	4,103	1.8%	4,465	1.8%	5,292	2.1%	1,189	29.0%
Quakertown Borough	3,631	1.6%	3,876	1.6%	3,795	1.5%	164	4.5%
Richland Township	3,877	1.7%	5,016	2.0%	5,263	2.1%	1,386	35.7%
Richlandtown Borough	451	0.2%	497	0.2%	509	0.2%	58	12.9%
Riegelsville Borough	403	0.2%	412	0.2%	386	0.2%	-17	-4.2%
Sellersville Borough	1,827	0.8%	1,804	0.7%	1,757	0.7%	-70	-3.8%
Silverdale Borough	329	0.1%	327	0.1%	286	0.1%	-43	-13.1%
Solebury Township	3,207	1.4%	3,747	1.5%	4,004	1.6%	797	24.9%
Springfield Township	1,972	0.9%	2,142	0.9%	2,133	0.9%	161	8.2%
Telford Borough	1,015	0.5%	1,072	0.4%	1,041	0.4%	26	2.6%
Tinicum Township	1,834	0.8%	1,907	0.8%	2,085	0.8%	251	13.7%
Trumbauersville Borough	382	0.2%	385	0.2%	416	0.2%	34	8.9%
Tullytown Borough	819	0.4%	789	0.3%	766	0.3%	-53	-6.5%
Upper Makefield Township	2,598	1.2%	3,100	1.3%	3,065	1.2%	467	18.0%
Upper Southampton Township	6,123	2.7%	6,120	2.5%	6,113	2.5%	-10	-0.2%
Warminster Township	11,644	5.2%	13,418	5.5%	13,528	5.4%	1,884	16.2%
Warrington Township	6,314	2.8%	8,442	3.4%	8,699	3.5%	2,385	37.8%
Warwick Township	4,050	1.8%	5,241	2.1%	5,414	2.2%	1,364	33.7%
West Rockhill Township	1,701	0.8%	2,267	0.9%	2,382	1.0%	681	40.0%
Wrightstown Township	986	0.4%	1,088	0.4%	1,114	0.4%	128	13.0%
Yardley Borough	1,209	0.5%	1,218	0.5%	1,176	0.5%	-33	-2.7%

²⁸ 2017 ACS DP04

In Bensalem Township, the total housing stock increased 7.8 percent, from 23,535 to 25,369 units. In six census tracts, the net increase exceeded 100 units during this period. The charts that follow illustrate the net change in housing inventory from 2000 to 2017 in the two jurisdictions.

Table 17 Trends in Total Housing Inventory in Bensalem Township, 2000-2017 ²⁹

Bensalem Township Census Tract	2000		2010		2017		Change 2000-2017	
	Number	Percent of Total Housing Units	Number	Percent of Total Housing Units	Number	Percent of Total Housing Units	Number	Percent of Total Housing Units
Bensalem Township	23,535	100.0%	25,246	100.0%	25,369	100.0%	1,834	7.8%
1001.02	1,391	5.9%	1,483	5.9%	1,488	5.9%	97	7.0%
1001.03	1,085	4.6%	1,122	4.4%	1,141	4.5%	56	5.2%
1001.04	1,810	7.7%	1,890	7.5%	1,903	7.5%	93	5.1%
1001.05	1,239	5.3%	1,231	4.9%	1,251	4.9%	12	1.0%
1002.01	1,707	7.3%	1,698	6.7%	1,688	6.7%	-19	-1.1%
1002.06	1,818	7.7%	1,968	7.8%	2,006	7.9%	188	10.3%
1002.07	1,507	6.4%	1,857	7.4%	1,821	7.2%	314	20.8%
1002.08	2,648	11.3%	2,737	10.8%	2,805	11.1%	157	5.9%
1002.09	3,463	14.7%	3,960	15.7%	3,955	15.6%	492	14.2%
1002.10	2,563	10.9%	2,692	10.7%	2,700	10.6%	137	5.3%
1002.11	2,867	12.2%	3,185	12.6%	3,204	12.6%	337	11.8%
1002.12	1,437	6.1%	1,423	5.6%	1,407	5.5%	-30	-2.1%

In Bristol Township, the total housing stock increased 2.1 percent, from 20,486 to 20,925 units. In four census tracts, the net increase of 50 or more units during this period. The charts that follow illustrate the net change in housing inventory from 2000 to 2017 in the two jurisdictions.

²⁹ 2017 ACS DP04

Table 17.1 Trends in Total Housing Inventory in Bristol Township, 2000-2017 ³⁰

Bristol Township Census Tract	2000		2010		2017		Change 2000-2017	
	Number	Percent of Total Housing Units	Number	Percent of Total Housing Units	Number	Percent of Total Housing Units	Number	Percent of Total Housing Units
Bristol Township	20,486	100.0%	20,887	100.0%	20,925	100.0%	439	2.1%
1003.02	1,901	9.3%	1,876	9.0%	1,884	9.0%	-17	-0.9%
1003.03	1,870	9.1%	1,917	9.2%	1,917	9.2%	47	2.5%
1003.04	1,094	5.3%	1,096	5.2%	1,144	5.5%	50	4.6%
1003.06	1,282	6.3%	1,394	6.7%	1,402	6.7%	120	9.4%
1003.07	2,032	9.9%	2,098	10.0%	2,096	10.0%	64	3.1%
1004.01	2,411	11.8%	2,601	12.5%	2,569	12.3%	158	6.6%
1004.02	2,382	11.6%	2,386	11.4%	2,389	11.4%	7	0.3%
1004.03	828	4.0%	829	4.0%	835	4.0%	7	0.8%
1004.04	2,394	11.7%	2,396	11.5%	2,395	11.5%	1	0.04%
1004.06	1,487	7.3%	1,498	7.2%	1,507	7.2%	20	1.3%
1004.07	483	2.4%	489	2.3%	484	2.3%	1	0.2%
1004.08	2,322	11.3%	2,307	11.0%	2,303	11.0%	-19	-0.8%

Types of Housing Units

As of 2017, ACS reported 192,655 occupied housing units in the Urban County. Of these, 152,684 were owner-occupied and 39,971 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 row house 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, 4,336 units of the owner-occupied housing stock in the Urban County consisted of multi-family units, equivalent to 2.8 percent of the owner-occupied inventory. By comparison, there were far more multi-family units within the rental housing stock. Of the 39,971 renter-occupied units, 26,208 consisted of multi-family units, equivalent to 65.5 percent of the rental housing stock. The highest concentration of these units is found in Bensalem Township with 8,843, accounting for about 34 percent.

³⁰ 2017 ACS DP04

Table 18 Housing Units in Structures in the Urban County, 2017

Municipality	Total, excluding vacant DU	Owner-Occupied				Renter-Occupied				Percent Renter-Occupied Multi-Family Units ₃
		Total	Single-Family ₁	Multi-Family ₂	Percent Multi-Family	Total	Single-Family ₁	Multi-Family ₂	Percent Multi-Family	
Bucks County	235,909	180,670	172,096	4,717	2.6%	55,239	16,471	38,315	69.4%	16.2%
Urban County*	192,655	152,684	145,269	4,336	2.8%	39,971	13,367	26,208	65.6%	13.6%
Bedminster Township	2,677	2,440	2,380	42	1.7%	237	187	35	14.7%	1.3%
Bensalem Township	23,834	13,865	12,957	177	1.3%	9,969	1,082	8,843	88.7%	37.1%
Bridgeton Township	552	457	444	2	0.4%	95	21	56	58.9%	10.1%
Bristol Borough	3,760	1,876	1,785	91	4.9%	1,884	616	1,244	66.0%	33.1%
Bristol Township	19,420	14,121	13,870	204	1.4%	5,299	2,022	3,264	61.6%	16.8%
Buckingham Township	7,214	6,635	6,387	20	0.3%	579	397	169	29.2%	2.3%
Chalfont Borough	1,539	1,304	1,249	47	3.6%	235	81	154	65.5%	10.0%
Doylestown Borough	3,771	2,083	2,024	47	2.3%	1,688	276	1,412	83.6%	37.4%
Doylestown Township	5,894	4,658	4,527	80	1.7%	1,236	491	745	60.3%	12.6%
Dublin Borough	899	449	425	24	5.3%	450	45	405	90.0%	45.1%
Durham Township	455	405	399	3	0.7%	50	30	20	40.0%	4.4%
East Rockhill Township	2,003	1,543	1,523	10	0.6%	460	413	47	10.2%	2.3%
Falls Township	12,652	9,033	8,033	35	0.4%	3,619	433	3,063	84.6%	24.2%
Haycock Township	865	768	759	5	0.7%	97	53	37	38.1%	4.3%
Hilltown Township	5,574	4,460	4,320	27	0.6%	1,114	722	392	3520.0%	7.0%
Hulmeville Borough	332	252	241	11	4.4%	80	41	35	43.8%	10.5%
Ivyland Borough	304	260	256	4	1.5%	44	26	18	40.9%	5.9%
Langhorne Borough	541	327	324	3	0.6%	214	30	184	86.0%	34.0%
Langhorne Manor Borough	318	252	249	3	1.2%	66	15	51	77.3%	16.0%
Lower Makefield Township	12,000	10,760	10,303	432	4.0%	1,240	425	806	65.0%	6.7%
Lower Southampton Township	7,085	5,730	5,457	0	0.0%	1,355	334	1,021	75.4%	14.4%
Middletown Township	16,584	12,473	12,340	106	0.8%	4,111	573	3,518	85.6%	12.2%
Milford Township	3,688	3,405	3,244	123	3.6%	283	223	44	15.5%	1.2%
Morrisville Borough	3,520	2,155	2,115	31	1.4%	1,365	590	775	56.8%	22.0%
New Britain Borough	982	761	704	27	3.5%	221	157	49	22.2%	5.0%
New Britain Township	4,221	3,589	3,495	14	0.4%	632	257	364	57.6%	8.6%
New Hope Borough	1,164	683	637	46	6.7%	481	63	418	86.9%	35.9%
Newtown Borough	940	687	666	21	3.1%	253	77	176	69.6%	18.7%
Newtown Township	7,487	6,372	6,150	222	3.5%	1,115	540	575	51.6%	7.7%
Nockamixon Township	1,426	1,144	1,120	0	0.0%	282	204	66	23.4%	4.6%
Northampton Township	13,975	12,448	11,924	518	4.2%	1,527	674	853	55.9%	6.1%
Pennel Borough	1,079	467	467	0	0.0%	612	60	552	90.2%	51.2%
Perkasie Borough	3,389	2,319	2,296	12	0.5%	1,070	325	745	69.6%	22.0%
Plumstead Township	4,793	4,201	3,901	42	1.0%	592	422	132	22.3%	2.8%
Quakertown Borough	3,609	2,101	2,038	51	2.4%	1,508	383	1,125	74.6%	31.2%
Richland Township	5,044	4,374	3,599	60	1.2%	670	438	204	30.4%	4.0%
Richlandtown Borough	488	356	356	0	0.0%	132	56	76	57.6%	15.6%

Riegelsville Borough	355	259	253	6	2.3%	96	47	49	51.0%	13.8%
Sellersville Borough	1,635	1,249	1,147	102	8.2%	386	137	244	63.2%	14.9%
Silverdale Borough	281	206	206	0	0.0%	75	57	18	24.0%	6.4%
Solebury Township	3,607	3,194	3,141	53	1.7%	413	284	129	32.2%	3.6%
Springfield Township	2,084	1,786	1,760	0	0.0%	298	199	99	33.2%	4.8%
Telford Borough	992	493	453	40	8.1%	499	97	402	80.6%	40.5%
Tincum Township	1,809	1,483	1,483	0	0.0%	326	176	141	43.3%	7.8%
Trumbauersville Borough	389	292	285	0	0.0%	97	31	66	68.0%	17.0%
Tullytown Borough	735	446	434	3	0.7%	289	82	207	71.6%	28.2%
Upper Makefield Township	2,865	2,646	2,646	0	0.0%	219	203	16	7.3%	0.6%
Upper Southampton Township	5,875	4,878	4,621	246	5.0%	997	263	725	72.7%	12.3%
Warminster Township	13,091	9,095	8,116	968	10.6%	3,996	1,237	2,752	68.9%	21.0%
Warrington Township	8,414	6,929	6,509	420	6.0%	1,485	540	945	63.6%	11.2%
Warwick Township	5,327	5,084	4,935	149	2.9%	243	181	62	25.5%	1.2%
West Rockhill Township	2,247	1,677	1,565	28	1.7%	570	98	459	80.5%	20.4%
Wrightstown Township	1,057	966	966	0	0.0%	91	23	68	74.7%	6.4%
Yardley Borough	1,068	774	612	162	20.9%	294	34	260	88.4%	24.3%

In Bensalem Township, there were 23,834 occupied housing units in 2017. Of these, 13,865 were owner-occupied and 9,969 were renter-occupied, as noted in Table 19. Only 1.3 percent of the owner-occupied housing stock included multi-family units, compared to 88.7 percent of the rental housing inventory. Fifty percent of the Census Tracts have 0 owned multi-familial units. 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, 2017

Municipality	Total, excluding vacant DU	Owner-Occupied				Renter-Occupied				Percent Renter-Occupied Multi-Family Units ₃
		Total	Single-Family ₁	Multi-Family ₂	Percent Multi-Family	Total	Single-Family ₁	Multi-Family ₂	Percent Multi-Family	
Bensalem Township	23,834	13,865	12,957	177	1.3%	9,969	1,082	8,843	88.7%	37.1%
1001.02	1,322	317	315	0	0.0%	1,005	37	968	96.3%	73.2%
1001.03	1,107	538	505	33	6.1%	569	105	464	81.5%	41.9%
1001.04	1,771	622	622	0	0.0%	1,149	9	1,140	99.2%	64.4%
1001.05	1,187	1,058	1,048	10	0.9%	129	49	80	62.0%	6.7%
1002.01	1,593	1,375	1,168	0	0.0%	218	101	110	50.5%	6.9%
1002.06	1,904	1,042	1,006	36	3.5%	862	225	637	73.9%	33.5%
1002.07	1,718	753	753	0	0.0%	965	40	925	95.9%	53.8%
1002.08	2,624	962	945	0	0.0%	1,662	52	1,610	96.9%	61.4%
1002.09	3,636	1,622	1,607	0	0.0%	2,014	196	1,818	90.3%	50.0%
1002.10	2,668	2,529	2,036	71	2.8%	139	102	0	0.0%	0.0%
1002.11	2,903	1,679	1,660	19	1.1%	1,224	133	1,091	89.1%	37.6%
1002.12	1,401	1,368	1,292	8	0.6%	33	33	0	0.0%	0.0%

In Bristol Township, there were 19,420 occupied housing units in 2017. Of these, 14,121 were owner-occupied and 5,299 were renter-occupied, as noted in Table 19.1. Only 1.4 percent of the owner-occupied housing stock included multi-family units, compared to 61.6 percent of the rental housing inventory. Seventy five percent of Census Tracts in Bristol Township owner-occupied properties have 0 multi-family units. This further indicates a need for multi-family owned units as it is clear that the vast majority of multi-family dwellings are renter-occupied. In Census Tract 1004.07, there were only single family rental units; no multi-family rental units were counted in the housing inventory.

Table 19.1 Housing Units in Structures in Bristol Township, 2017

Municipality	Total, excluding vacant DU	Owner-Occupied				Renter-Occupied				Percent Renter-Occupied Multi-Family Units ₃
		Total	Single-Family ₁	Multi-Family ₂	Percent Multi-Family	Total	Single-Family ₁	Multi-Family ₂	Percent Multi-Family	
Bristol Township	19,420	14,121	13,870	204	1.4%	5,299	2,022	3,264	61.6%	16.8%
1003.02	1,690	1,343	1,335	0	0.0%	347	172	175	50.4%	10.4%
1003.03	1,643	1,131	1,131	0	0.0%	512	328	184	35.9%	11.2%
1003.04	1,064	318	318	0	0.0%	746	144	602	80.7%	56.6%
1003.06	1,334	825	791	34	4.1%	509	113	396	77.8%	29.7%
1003.07	1,942	1,229	1,229	0	0.0%	713	200	500	70.1%	25.8%
1004.01	2,385	1,825	1,670	155	8.5%	560	130	430	76.8%	18.0%
1004.02	2,340	1,655	1,655	0	0.0%	685	456	229	33.4%	9.8%
1004.03	804	608	585	7	1.2%	196	150	46	23.5%	5.7%
1004.04	2,249	1,821	1,821	0	0.0%	428	199	229	53.5%	10.2%
1004.06	1,410	968	960	8	0.8%	442	25	417	94.3%	29.6%
1004.07	425	411	411	0	0.0%	14	14	0	0.0%	0.0%
1004.08	2,134	1,987	1,964	0	0.0%	147	91	56	38.1%	2.6%

In the Urban County, among White persons, the home ownership rate was 93 percent, which was slightly higher than the whole of Bucks County which is 90.9 percent. Approximately 2.6 percent of all African American persons owned their homes, and about 3.0 percent of all Asian persons were home owners. Hispanic persons have the lowest percentage of home ownership in the Urban County with 1.5 percent.

Table 20 Homeownership by Race/Ethnicity, 2017 ³¹

Municipality	Total, excluding vacant DU	White		Black		Asian		Hispanic	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent
Bucks County	235,909	214,504	90.9%	8,784	4.1%	8,276	3.9%	4,311	1.8%
Urban County*	192,655	179,242	93.0%	4,930	2.6%	5,793	3.0%	2,884	1.5%
Bedminster Township	2,677	2,550	1.2%	0	0.0%	113	1.4%	14	0.3%
Bensalem Township	23,834	18,848	8.8%	1,880	21.4%	2,050	24.8%	638	14.8%
Bridgeton Township	552	545	0.3%	1	0.0%	3	0.0%	5	0.1%
Bristol Borough	3,760	3,240	1.5%	303	3.5%	22	0.3%	147	3.4%
Bristol Township	19,420	16,414	7.7%	1,974	22.5%	433	5.2%	789	18.3%
Buckingham Township	7,214	6,800	3.2%	15	0.2%	264	3.2%	145	3.4%
Chalfont Borough	1,539	1,463	0.7%	12	0.1%	55	0.7%	29	0.7%
Doylestown Borough	3,771	3,570	1.7%	68	0.8%	62	0.7%	68	1.6%
Doylestown Township	5,894	5,780	2.7%	18	0.2%	75	0.9%	94	2.2%
Dublin Borough	899	831	0.4%	3	0.0%	10	0.1%	7	0.2%
Durham Township	455	455	0.2%	0	0.0%	0	0.0%	25	0.6%
East Rockhill Township	2,003	2,003	0.9%	0	0.0%	0	0.0%	0	0.0%
Falls Township	12,652	10,851	5.1%	1,152	13.1%	423	5.1%	146	3.4%
Haycock Township	865	855	0.4%	0	0.0%	10	0.1%	18	0.4%
Hilltown Township	5,574	5,252	2.5%	148	1.7%	135	1.6%	14	0.3%
Hulmeville Borough	332	316	0.1%	4	0.0%	5	0.1%	4	0.1%
Ivyland Borough	304	266	0.1%	2	0.0%	33	0.4%	3	0.1%
Langhorne Borough	541	519	0.2%	15	0.2%	0	0.0%	0	0.0%
Langhorne Manor Borough	318	306	0.1%	2	0.0%	5	0.1%	3	0.7%
Lower Makefield Township	12,000	10,960	5.1%	271	3.1%	586	7.1%	170	3.9%
Lower Southampton Township	7,085	6,824	3.2%	41	0.5%	161	2.0%	100	2.3%
Middletown Township	16,584	14,762	6.9%	703	8.0%	775	9.4%	330	7.7%
Milford Township	3,688	3,604	1.7%	37	0.4%	5	0.1%	21	0.5%
Morrisville Borough	3,520	2,870	1.3%	536	6.1%	66	0.8%	61	1.4%
New Britain Borough	982	948	0.4%	4	0.1%	30	0.4%	22	0.5%
New Britain Township	4,221	4,026	1.9%	52	0.6%	119	1.4%	93	2.2%
New Hope Borough	1,164	1,132	0.5%	0	0.0%	14	0.2%	7	0.2%
Newtown Borough	940	936	0.4%	0	0.0%	4	0.0%	0	0.0%
Newtown Township	7,487	6,748	3.1%	76	0.9%	520	6.3%	143	3.3%
Nockamixon Township	1,426	1,401	0.7%	18	0.2%	7	0.1%	0	0.0%
Northampton Township	13,975	13,243	7.2%	91	1.0%	542	6.5%	212	4.9%
Penndel Borough	1,079	797	0.4%	171	1.9%	54	0.7%	0	0.0%
Perkasie Borough	3,389	3,277	1.5%	80	0.9%	26	0.3%	18	0.4%
Plumstead Township	4,793	4,623	2.2%	34	0.4%	85	1.0%	173	4.0%
Quakertown Borough	3,609	3,394	1.6%	70	0.8%	57	0.7%	92	2.1%
Richland Township	5,044	4,736	2.2%	113	1.3%	94	1.1%	113	2.6%
Richlandtown Borough	488	467	0.2%	19	0.2%	0	0.0%	4	0.1%
Riegelsville Borough	355	353	0.2%	0	0.0%	2	0.0%	4	0.1%

³¹ 2017 ACS B25006, 2017 ACS B25003I (Hispanic)

Sellersville Borough	1,635	1,559	0.7%	8	0.1%	18	0.2%	87	2.0%
Silverdale Borough	281	272	0.1%	2	0.0%	5	0.1%	0	0.0%
Solebury Township	3,607	3,475	1.6%	13	0.1%	95	1.1%	27	0.6%
Springfield Township	2,084	2,048	1.0%	0	0.0%	36	0.4%	0	0.0%
Telford Borough	992	905	0.4%	40	0.5%	7	0.1%	0	0.0%
Tinicum Township	1,809	1,793	0.8%	0	0.0%	0	0.0%	12	0.3%
Trumbauersville Borough	389	382	0.2%	4	0.0%	0	0.0%	9	0.2%
Tullytown Borough	735	712	0.3%	2	0.0%	11	0.1%	8	0.2%
Upper Makefield Township	2,865	2,655	1.2%	106	1.2%	104	1.3%	33	0.8%
Upper Southampton Township	5,875	5,758	2.7%	0	0.0%	92	1.1%	13	0.3%
Warminster Township	13,091	12,119	5.6%	353	4.0%	272	3.3%	193	4.5%
Warrington Township	8,414	7,642	3.6%	215	2.5%	483	5.8%	77	1.8%
Warwick Township	5,327	5,081	2.4%	16	0.2%	209	2.5%	70	1.6%
West Rockhill Township	2,247	2,181	1.0%	39	0.4%	27	0.3%	28	0.6%
Wrightstown Township	1,057	984	0.5%	30	0.3%	38	0.5%	22	0.5%
Yardley Borough	1,068	973	0.5%	43	0.5%	34	0.4%	20	0.5%

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.

In Bensalem Township, among White persons, the home ownership rate was 79.1 percent, which was significantly less than the Urban County (93 percent) and the whole of Bucks County (90.3 percent). Approximately 7.9 percent of all African American persons owned their homes, and about 8.6 percent of all Asian persons were home owners. These figures are higher when compared to the Urban County. Hispanic persons have the lowest percentage of home ownership in the Township with just 2.7 percent.

Table 21 Homeownership by Race/Ethnicity in Bensalem Township, 2017

Census Tract	Total, excluding vacant DU	White		Black		Asian		Hispanic	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent
Bensalem Township	23,834	18,848	79.1%	1,880	7.9%	2,050	8.6%	638	2.7%
1001.02	1,322	1,063	5.6%	41	2.2%	206	10.0%	11	1.7%
1001.03	1,107	1,036	5.5%	37	2.0%	0	0.0%	14	2.2%
1001.04	1,771	1,059	5.6%	319	17.0%	243	11.9%	16	2.5%
1001.05	1,187	1,163	6.2%	0	0.0%	10	0.5%	61	9.6%
1002.01	1,593	1,264	6.7%	185	9.8%	71	3.5%	56	8.8%
1002.06	1,904	1,468	7.8%	97	5.2%	195	9.5%	8	1.3%
1002.07	1,718	1,395	7.4%	161	8.6%	110	5.4%	14	2.2%
1002.08	2,624	1,702	9.0%	415	22.1%	230	11.2%	57	8.9%
1002.09	3,636	2,626	13.9%	244	13.0%	552	26.9%	129	20.2%
1002.10	2,668	2,260	12.0%	132	7.0%	238	11.6%	174	27.3%
1002.11	2,903	2,565	13.6%	183	9.7%	124	6.0%	19	3.0%
1002.12	1,401	1,247	6.6%	66	3.5%	71	3.5%	79	12.4%

In Bristol Township, as of 2017, among White persons, the home ownership rate was 84.5 percent, which was significantly less than the Urban County (93 percent) and the whole of Bucks County (90.3 percent). Approximately 10.2 percent of all African American persons owned their homes, and about 4.1 percent of all Hispanic persons were home owners. These figures are higher than when compared to the Urban County. Asian persons have the lowest percentage of home ownership in the Township with 2.2 percent.

Table 21.1 Homeownership by Race/Ethnicity in Bristol Township, 2017

Census Tract	Total, excluding vacant DU	White		Black		Asian		Hispanic	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent
Bristol Township	19,420	16,414	84.5%	1,974	10.2%	433	2.2%	789	4.1%
1003.02	1,690	1,626	9.9%	7	0.4%	18	4.2%	61	7.7%
1003.03	1,643	1,037	6.3%	465	23.6%	26	6.0%	135	17.1%
1003.04	1,064	768	4.7%	199	10.1%	36	8.3%	0	0.0%
1003.06	1,334	984	6.0%	189	9.6%	120	27.7%	86	10.9%
1003.07	1,942	1,526	9.3%	248	12.6%	76	17.6%	66	8.4%
1004.01	2,385	2,199	13.4%	135	6.8%	16	3.7%	97	12.3%
1004.02	2,340	2,052	12.5%	187	9.5%	32	7.3%	73	9.3%
1004.03	804	458	2.8%	315	16.0%	15	3.5%	49	6.2%
1004.04	2,249	2,098	12.8%	86	4.4%	18	4.2%	136	17.2%
1004.06	1,410	1,223	7.5%	81	4.1%	52	12.0%	22	2.8%
1004.07	425	408	2.5%	17	0.9%	0	0.0%	7	0.9%
1004.08	2,134	2,035	12.4%	45	2.3%	24	5.5%	57	7.2%

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, then the members of the protected classes need more bedrooms to accommodate their larger household, which produces a fair housing concern because the restriction on the size of the unit will have a negative impact on members of the protected classes. The latest data from the 2010 Census demonstrated that across Bucks County, minorities were much more likely than White persons to live in families with three or more persons. Among individual minority groups, Asian persons and Hispanic persons had the highest rates of larger family households.

Table 22 Families with Three or More Persons, 2010 ³²

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%

In the Urban County, renter-occupied unit specifications were wide spread across the three categories seen in Table 23. The largest, by a slim margin, are two bedroom units at 38 percent. Owner-occupied housing units however are predominantly represented by units with three or more bedrooms, accounting for 87 percent. The lowest Urban County owner-occupied units are 0-1 bedrooms with only 1.4 percent overall.

In Bensalem Township, renter-occupied unit specifications were nearly evenly split between zero to one bedrooms units and two bedroom units as seen in Table 23. The largest, by a slim margin, are zero to one bedroom units at 49.9 percent. Owner-occupied housing units however are inordinately represented by units with three or more bedrooms, accounting for 84.9 percent. The lowest township owner-occupied units are 0-1 bedrooms with only 1.6 percent overall.

In Bristol Township, renter-occupied unit specifications were wide spread across the three categories seen in Table 23. By a slim margin, the largest are zero to one bedroom units at 37.6 percent. Owner-occupied housing units however are significantly represented by units with three or more bedrooms, accounting for 79.4 percent. The lowest township owner-occupied units are 0-1 bedrooms with only 5.4 percent overall. Bristol Township perfectly mirrors trends of the Urban County in this category.

Table 23 Housing Units by Number of Bedrooms, 2017 ³³

Size of Housing Units	Renter-Occupied Housing Stock		Owner-Occupied Housing Stock	
	Number of Units	% Total Units	Number of Units	% Total Units
Urban County				
0-1 bedroom	16,313	37.6%	2,335	1.4%
2 bedrooms	16,470	38.0%	19,132	11.6%
3 or more bedrooms	10,603	24.4%	143,462	87.0%
Total	43,386	100.0%	164,929	100.0%
Bensalem Township				
0-1 bedroom	4,978	49.9%	176	1.3%
2 bedrooms	4,185	42.0%	1,914	13.8%
3 or more bedrooms	806	8.1%	11,775	84.9%
Total	9,969	100.0%	13,865	100.0%
Bristol Township				
0-1 bedroom	709	37.6%	101	5.4%
2 bedrooms	587	31.2%	285	15.2%
3 or more bedrooms	588	31.2%	1,490	79.4%
Total	1,884	100.0%	1,876	100.0%

³² U.S. Census Bureau, Census 2010

³³ ACS 2017

Cost of Housing

Increasing housing costs are not necessarily 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 surrounding areas.

Real household income in Bucks County increased 6.3 percent between 2000 and 2017. This rate was outpaced by the surge in median housing value of 49.7 percent. By comparison, median gross rent increased about 23.1 percent. In Bensalem Township, real household income decreased by 5.1 percent while median housing value grew by more than 49 percent. Similar to the County trend, Bristol Township saw a real household income increase, though by a much larger margin, with 27.5 percent growth. Likewise, the township's median housing value increase was the highest of the three areas, exhibiting a growth of 88.8 percent. Median gross rent was also the highest in Bristol with a growth margin of 62.1 percent.

Table 24 Trends in Median Housing Value, Rent and Income, 2000-2017

	Median Housing Value	Median Gross Rent	Median Household Income
2000			
Bucks County	\$210,909	\$951	\$77,187
Bensalem Township	\$169,942	\$972	\$64,277
Bristol Township	\$107,700	\$607	\$48,090
2010			
Bucks County	\$320,500	\$1,013	\$74,941
Bensalem Township	\$269,300	\$995	\$59,567
Bristol Township	\$223,100	\$888	\$54,626
2017			
Bucks County	\$315,700	\$1,171	\$82,031
Bensalem Township	\$254,200	\$1,127	\$61,025
Bristol Township	\$203,300	\$984	\$61,321
Percent Change 2000-2017			
Bucks County	49.7%	23.1%	6.3%
Bensalem Township	49.6%	15.9%	-5.1%
Bristol Township	88.8%	62.1%	27.5%

Rental Housing

Ideally, if household income increased at a faster rate than median gross rents, it would be easier for households to find affordable rental housing units. In reality, both the Urban County and Bensalem Township and Bristol Township have lost substantial numbers of affordable rental units since 2010. Between 2010 and 2017, the number of affordable rental units renting for \$500-699 decreased more than 34 percent in the Urban County, more than 50 percent in Bensalem Township, and more than 71 percent in Bristol township. What is a positive trend is that in all three areas examined, the number of units for rent at less than \$500 increased. In the Urban County the number of units grew by more than 12 percent, in Bensalem Township by nearly 112 percent and in in Bristol Township by 50 percent.

Table 25 Loss of Affordable Rental Housing Units, 2010-2017

Units Renting for:	2010	2017	Change 2010-2017	
			Number	Percent
Urban County*				
Less than \$500	2,316	2,601	285	12.3%
\$500 to \$699	3,137	2,052	-1,085	-34.6%
\$700 to \$999	9,703	6,851	-2,852	-29.4%
\$1,000 or more	18,251	26,877	8,626	47.3%
Bensalem Township				
Less than \$500	332	703	371	111.7%
\$500 to \$699	582	256	-326	-56.0%
\$700 to \$999	11,948	2,282	-9,666	-80.9%
\$1,000 or more	7,391	6,556	-835	-11.3%
Bristol Township				
Less than \$500	258	387	129	50.0%
\$500 to \$699	847	239	-608	-71.8%
\$700 to \$999	2,383	2,005	-378	-15.9%
\$1,000 or more	1,588	2,290	702	44.2%

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 2017 ACS data, there are 21,874 households earning less than \$20,000 in Bucks County as a whole, equivalent to about 9.2 percent of the total households. However, there are approximately 2,906 renters who are paying \$500 for rent, which would mean that only 13 percent of this population has access to affordable housing. This clearly demonstrates a need for housing that is available and affordable county wide, specifically for LMI individuals.³⁴

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.

³⁴ 2017 ACS Housing Cost and income 2013-2017

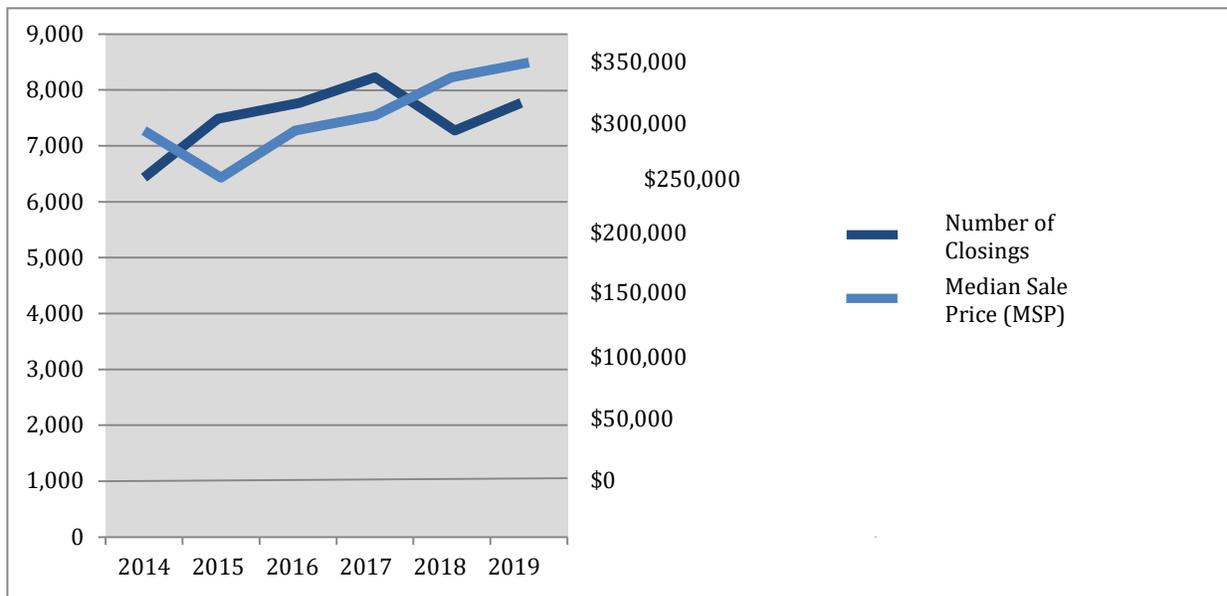
Sales Market

The sales market in Bucks County has roughly followed national trends and other local areas. It has had growth in the number of sales between 2014 and 2017, followed by a slight decline in 2017 and a rise again in 2019. At the peak of market volume in 2017, a total of 8,079 units were sold countywide. Despite the variance in closings year to year, the median sale price has seen a steady increase over the six years examined. Since 2014, there has been more than a 13 percent increase in the median sale price. This would indicate a supply shortage as the demand has remained consistent. Further, the increase in sale price would be indicative of continuing affordability and/or mortgage finance issues that would disproportionately affect prospective low-to-moderate- income homebuyers, including those from protected classes.

Table 26 Bucks County Housing Market Trends, 2014-2019 ³⁵

	Number of Closings	Median Sale Price (MSP)
2014	6,656	273,750
2015	7,580	250,245
2016	7,913	282,500
2017	8,079	302,880
2018	7,153	310,250
2019	7,985	317,000
Total	45,366	

Figure 8 Bucks County Housing Market Trends, 2014-2019



³⁵ Bright Multiple Listing Service, Bucks County Association of Realtors

Protected Class Status and Housing Problems

Lower income households of all types experience high rates of housing problems. 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. Tables 27 and 28 detail rates of housing problems for renters and homeowners in the Urban County, Bensalem Township and Bristol Township, respectively, by household race and ethnicity.

Rates of housing problems among lower income renters in the Urban County ranged from a high of 34.1 percent among White households to a low of 1.4 percent for Asian households. The corresponding figures in Bensalem ranged from a high of 28.6 percent for White households, to a low of 1.4 percent for Asian households. In Bristol, figures ranged from a high of 25.4 percent for White households, to a low of 0.3 percent for Asian households.

Rates of housing problems among lower income homeowners in the Urban County ranged from a high of 15.0 percent to a low of 0.2 percent for African American households. In Bensalem Township, rates of housing problems among lower income homeowners ranged from a high of 24 percent among Hispanic households, to a low of 0.3 percent among African American households. In Bristol Township, rates of housing problems among lower income homeowners ranged from a high of 21.8 percent among White households, to a low of 0.3 percent among Asian households.

Table 27 Lower Income Households with Housing Problems in the Urban County, 2016 ³⁶

	Households 0-80% of MFI	
	Total	Percent with a Housing Problem
Renters		
White	13475	34.1%
African American	1335	3.4%
Asian	545	1.4%
Hispanic	1475	3.7%
Total	17092	43.2%
Owners		
White	22620	15.0%
African American	320	0.2%
Asian	405	0.3%
Hispanic	475	0.4%
Total	23905	15.8%

³⁶ HUD/ACS 2016

Table 28 Lower Income Households with Housing Problems in Bensalem Township, 2016 ³⁷

	Households 0-80% of MFI	
	Total	Percent with a Housing Problem
Renters		
White	2,820	28.6%
African American	825	8.4%
Asian	325	3.3%
Hispanic	705	7.1%
Total	4,753	48.2%
Owners		
White	2,235	16.2%
African American	35	0.3%
Asian	115	0.8%
Hispanic	335	24.0%
Total	2,745	20.0%

Table 28.1 Lower Income Households with Housing Problems in Bristol Township, 2016 ³⁸

	Households 0-80% of MFI	
	Total	Percent with a Housing Problem
Renters		
White	1,365	25.4%
African American	745	13.9%
Asian	25	0.5%
Hispanic	195	3.6%
Total	2,355	43.8%
Owners		
White	3,060	21.8%
African American	295	2.1%
Asian	40	0.3%
Hispanic	210	1.5%
Total	3,765	26.8%

Tables 29, 30 and 30.1 detail the disparity in rates of housing problems among lower income elderly in the Urban County, Bristol Township, and Bensalem Township, as this demographic is highly prone to experiencing housing insecurity.

³⁷ HUD/ACS 2016

³⁸ HUD/ACS 2016

Table 29 Lower Income Elderly Households with Housing Problems in the Urban County, 2016 ³⁹

Urban County	Total	Elderly Households 0-80% of MFI with a Problem	Percent
Renters	795	70	8.8%
Owners	19,575	3,710	19.0%

Table 30 Lower Income Elderly Households with Housing Problems in the Bensalem Township, 2016 ⁴⁰

Bensalem Township	Total	Elderly Households 0-80% of MFI with a Problem	Percent
Renters	675	545	80.7%
Owners	2,360	1,070	45.3%

Table 30.1 Lower Income Elderly Households with Housing Problems in the Bristol Township, 2016 ⁴¹

Bristol Township	Total	Elderly Households 0-80% of MFI with a Problem	Percent
Renters	230	165	71.7%
Owners	1,835	1,070	58.3%

Lower income elderly homeowner households had the lowest rate of housing problems in the Urban County, at 19 percent, which is down significantly from 54 percent in 2011. At 45.3 percent, compared to the Urban County, there is a large increase of LMI seniors experiencing problems in Bensalem Township. Similarly in Bristol Township, it climbs further to 58.3 percent for home owners, which is the highest of the three areas examined. That being said, when comparing Bensalem and Bristol Townships, Bensalem has a higher population of distressed individuals with 2,360, as opposed to the 1,835 living in Bristol Township.

Similar to homeowners, low income elderly households with rental concerns are again at the lowest at 8.8 percent. Conversely, Bensalem Township renters in this demographic experience problems at a higher percentage with 80.7 percent, whereas senior residents in Bristol are slightly better off with only 71.7 percent of this population experiencing problems. It is further important to note that Bensalem has a greater pool of the population at 675 individuals, while there are only 230 in Bristol. This indicates that the need is truly greater in Bensalem to resolve issues amongst these elderly renters.

These findings suggest the need to continue the funding and marketing of the countywide

³⁹ HUD/ACS 2016

⁴⁰ HUD/ACS 2016

⁴¹ HUD/ACS 2016

program to rehabilitate owner-occupied housing. This is 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 due to funding limitations. Methods of promoting housing code enforcement and of assisting the rehabilitation of housing occupied by lower income households should also be explored.

➤ **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 in which a charge or a finding of discrimination has been reported. 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.

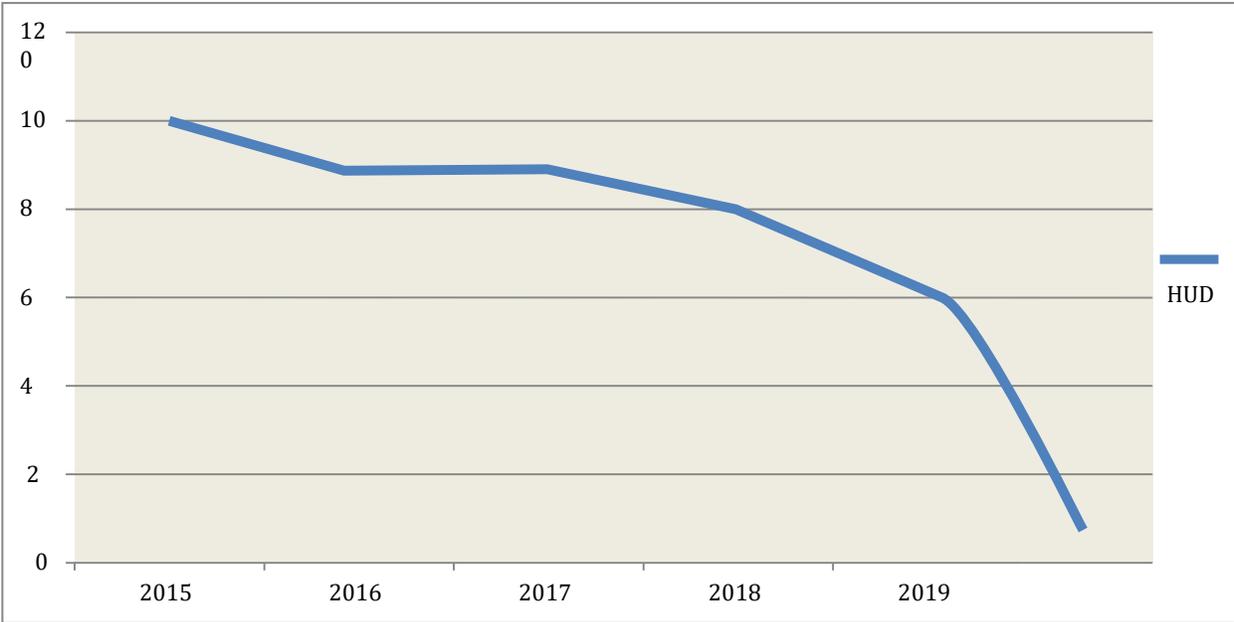
A. Fair Housing Complaints

It's difficult to view the number of filed complaints as an indicator for fair housing problems. 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 2015 through March 2020. In total, 43 complaints originating in Bucks County were filed with HUD, for an average of about 8 per year. The volume of HUD cases was heaviest in 2015, with 10 cases filed. At this point in time, the year with the least number of complaints is 2020 with one complaint, which is trending lower than previous years as it is now the end of quarter one. Of the five year total, nine complaints were filed in Bensalem Township, the most of any listed municipality in the County. The second highest municipality was Levittown with eight complaints. Other places where multiple complaints originated were often the more populous and urbanized communities of Lower and Central Bucks, including Warminster, Chalfont, Doylestown and Jamison.

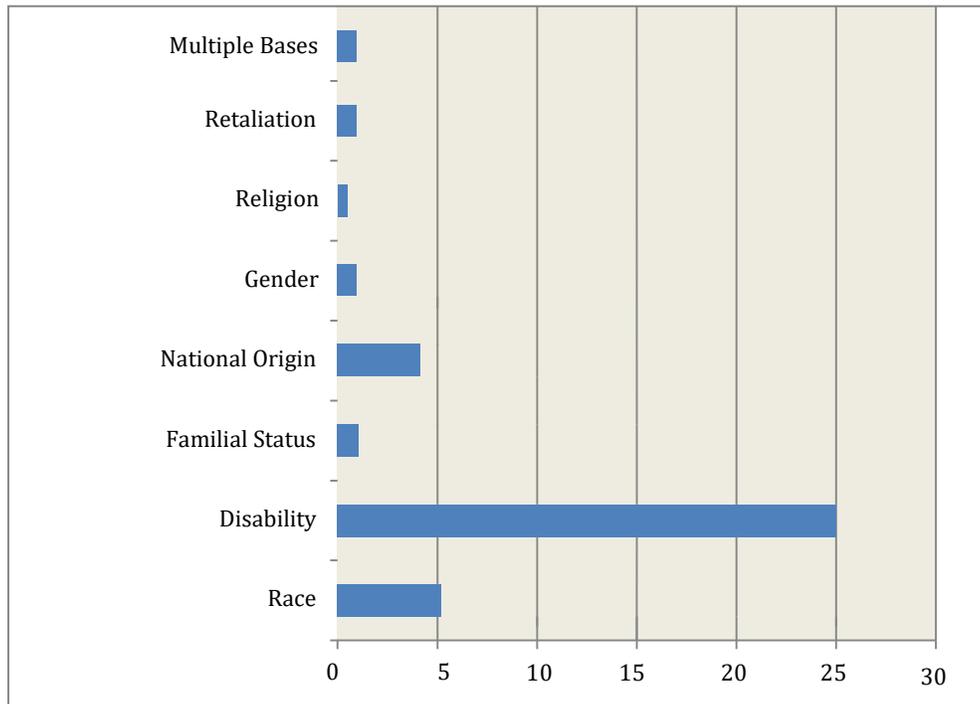
Figure 9 Housing Complaints Filed with HUD and PHRC in Bucks County, 2015-2020



Source: HUD

Disability was the most common basis for complaint, followed by race and national origin, with five and four complaints respectively. Two HUD complaints were filed with multiple counts; retaliation, gender, and familial status. The basis with the smallest number of complaints was religion, which only had one complaint filed over the last five years.

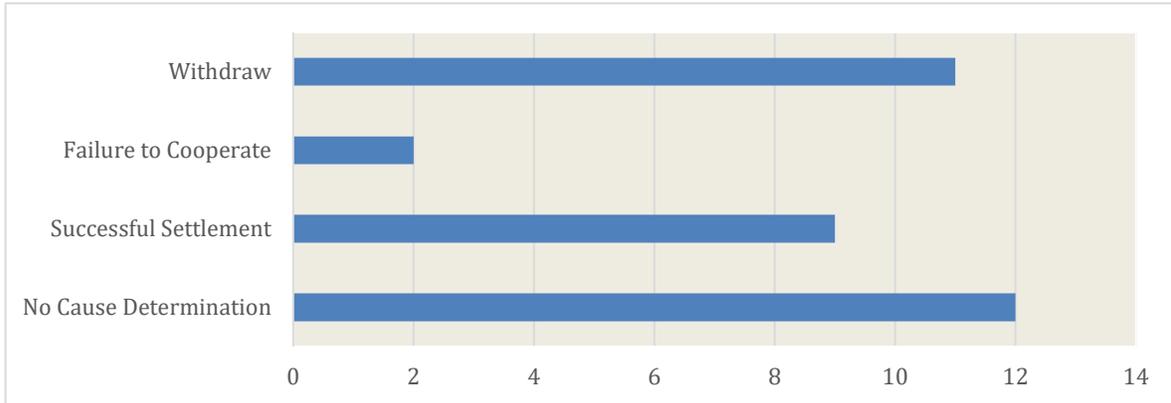
Figure 10 HUD Complaints by Basis of Discrimination in Bucks County, 2015-2020



Source: HUD

Of the 43 complaints filed with HUD, 34 have been closed. Of these, 20 involved the basis of disability, accounting for about 59 percent. The second highest basis was national origin, with four, followed by race, retaliation, gender and familial status each with two. Religion and multiple bases each also had one complaint closed.

Figure 11 Resolution of HUD Complaints in Bucks County, 2015-2020



Source: HUD

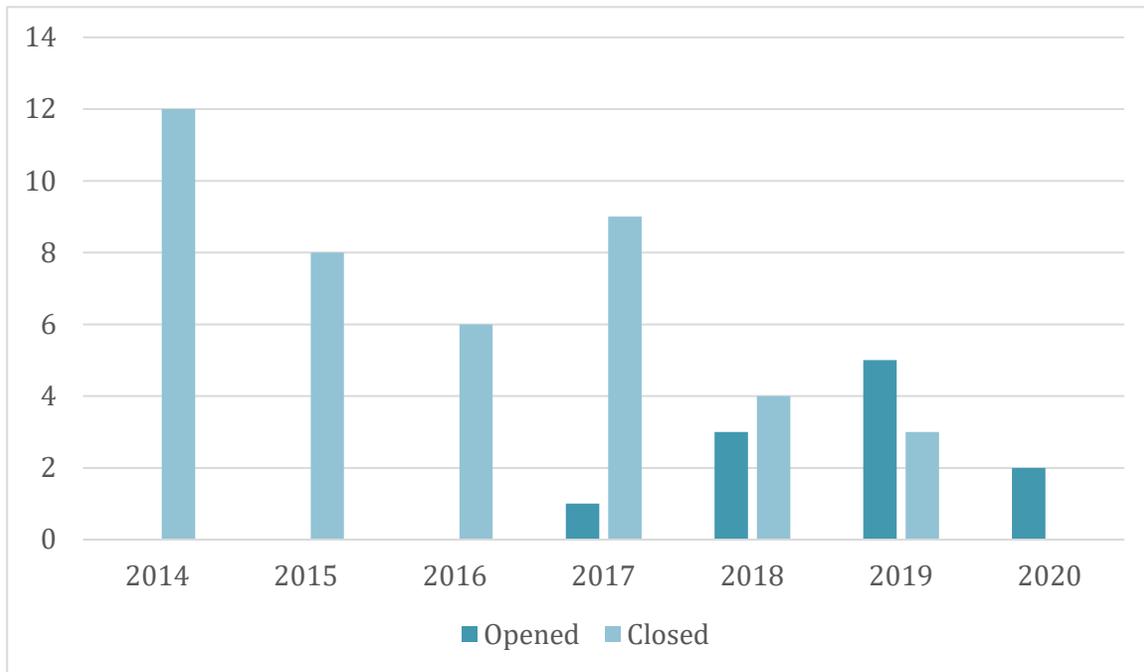
Of the 34 complaints that were closed, 12 were dismissed due to no cause determination. No Cause determinations were the highest reason for case closure throughout 2015 and 2020. The second highest cause for case closure was withdraw by complainant after resolution with 11, or 32 percent. The third highest reason for closure was a successful settlement with nine cases, and the fourth was a failure to cooperate with two complaints.

Pennsylvania Human Relations Commission

The Pennsylvania Human Relations Commission (PHRC) provided data on housing complaints that originated in Bucks County between 2014 and 2020. During these five plus years, there were a total of 53 filings, equivalent to an average of about 10 cases per year. The breakdown of opened and closed complaints are summarized in Figure 12.

For the 42 cases that were closed since 2014, PHRC was unable to disclose the reason for the suit, or the method in which the case was closed. Overall, the rate at which cases were closed is higher than the rate at which they were opened over the timeframe examined. Compared to HUD, the PHRC closed 8 more cases within the same time frame. However, HUD has a much higher rate of complaints coming in than PHRC, which is indicative of a wide variety of complaints across multiple departments. This in turn makes it more difficult to mitigate at a higher level.

Figure 12 PHRC Complaints by Basis of Discrimination in Bucks County, 2014-2020 ⁴²



Fair Housing Council of Suburban Philadelphia

The Council reported that a total of 32 housing discrimination complaints were filed from Bucks County in 2019. However, the Council did not have the resources to provide a summary of the complaints by basis for discrimination. It is important to note that a number of the complaints filed with the Council could have been referred to HUD and PHRC.

B. Patterns and Trends in Fair Housing Complaints

In previous years, race continually tended to be the primary basis for discriminatory complaints at all levels. That has changed in the 2014 through 2020 time frame being examined, disability is now the leading cause, followed by race and national origin at a close third.

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. Testers must:

- Be capable of following instructions and be objective and observant on a test
- Have excellent writing skills and attention to detail
- Have no affiliation with any entity engaged in the listing, renting, selling, financing or insuring of real estate property
- Never have been terminated or asked to leave a position because of fraud or dishonesty
- Not have a criminal record

⁴² PHRC

- Have reliable transportation to travel to and from testing sites
- Have access to fax and/or e-mail

C. Existence of Fair Housing Discrimination Suit

Currently, there are no known pending fair housing discrimination suits involving Bucks County, Bristol Township or Bensalem Township.

D. Determination of Unlawful Segregation

Currently there are no known pending unlawful segregation orders involving Bucks County, Bristol Township or Bensalem Township.

➤ EVALUATION OF PUBLIC AND PRIVATE SECTOR POLICIES

A. Public Sector

An important element of this analysis includes an examination of public policy in terms of its impact on housing choice. This section evaluates the public policies in the Urban County, Bristol Township 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 and lower income households has shifted much of the challenge in affordable housing production to state, county, and local government decision makers.

The Community Development Block Grant (CDBG) 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

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.

Each year, the Urban County, Bristol Township and Bensalem 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

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. Further, written guidelines are provided to all applicants in an effort to promote a transparent application process to all potential recipients. 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 2017 Annual Action Plan, the township's statement of objectives are as follows:

- The conservation and expansion of the township housing.
- The conservation and expansion of the township housing stock for all persons, but principally those of low- and moderate- income.
- The expansion and improvement of the quality and quantity of community services and facilities, principally for persons of low- and moderate- income
- The promotion of economic development and the creation of new jobs along with the retention of existing jobs
- The elimination of slum and blight and the prevention of blighting influences
- The elimination of conditions which are detrimental to health, safety and public welfare
- The preparation of plans for better utilization of land and other natural resources.
- The restoration and preservation of properties with historic value.

Bristol Township

CDBG funding allocation decisions are overseen by the Township's Office of Community Development. According to its 2019 Analysis of Impediments, the following objectives are targeted for the next five years:

- Meeting the statutory requirements of the CDBG Program
- Meeting the needs of low and moderate income residents
- Aid in the prevention or elimination of slum or blight
- Meet urgent community development needs

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 and Bristol are part of the Bucks County HOME Program Consortium. The Urban County administers the program on behalf of 54 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. The program is overseen by the Housing Department under the Human Services Division.

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 towards accomplishing the objectives outlined in the five year Consolidated Plan, including affirmatively furthering Fair Housing.

Urban County

The Action Plan for 2019 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 representation 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.

The Urban County's Annual Plan typically includes the following as objectives:

- Build inclusive, sustainable communities
- Provide decent housing
- Increase availability of affordable housing
- Improve the housing crisis response team

Bensalem Township

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

- Housing Rehabilitation
- Homeless shelter assistance
- ADA infrastructure support and improvement

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.

Bristol Township

Bristol Township, in their 2019 Analysis of Impediments, formulated three main strategies to combat the displacement of residents due to economic pressures. These strategies include:

- Encourage mixed-income development in areas with a high concentration of poverty or a single racial group.
- Increase access to public infrastructure and public facilities in low wealth, minority concentrated areas.
- Encourage development of affordable housing for low- and moderate-income households in high-opportunity neighborhoods.

In its Consolidated Annual Performance Report submitted to HUD, Bristol 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, Bristol Township and Bensalem 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.

As recipients of CDBG funds, both the Urban County, Bristol Township and Bensalem 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 when 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 with 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. Further, the Urban County's 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 funded 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 does not have an adopted affirmative marketing policy as part of its most current Annual Action Plan, as it does not directly develop, rehabilitate, or market housing. Instead, the township relies on external nonprofit agencies or the Bucks County Redevelopment Authority to conduct such activities. It does, however, prominently state its commitment to Fair Housing and provides 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.

Bristol Township

Bristol Township does reference affirmative marketing within its most recent Analysis of Impediments published in 2019. It is recommended that the Township continue to implement its affirmative marketing policy to 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. This recommendation is consistent with the language found within the 2019 Analysis of Impediments.

Site and Neighborhood Standards 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 as those within 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 the Urban County are addressed by a variety of appointed citizen volunteer boards, as described below.

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 into 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.⁴³

For new HOME-assisted units, the Urban County, Bristol Township and Bensalem Township require compliance with 24 CFR Part 8 which implements Section 504 of the Rehabilitation Act of 1973.⁴⁴ Further, multi-family developments 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.⁴⁵

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

⁴³ <https://www.dli.pa.gov/Documents/Regulations/bois/universalaccessibilityact.pdf>

⁴⁴ <https://www.dol.gov/agencies/oasam/centers-offices/civil-rights-center/statutes/section-504-rehabilitation-act-of-1973>

⁴⁵ <https://www.justice.gov/crt/fair-housing-act-1>

Standards (UFAS)⁴⁶ is the standard against which all residential and non-residential spaces are judged to be accessible.

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.

Language Access Plan for Persons with Limited English Proficiency

Neither the Urban County, nor Bensalem or Bristol Townships, currently have 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 Townships 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 is currently being updated from its previous 2011 version. The Pennsylvania Municipalities Planning Code requires counties to update their comprehensive plans at least once every 10 years. Therefore, the information in this section was pulled from data held with the Bucks County Planning Commission.

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 use accounts for 1 percent of the land area.

Table 31 Bucks County Land Use, 2009 ⁴⁷

Land Use	Acres	Percent
Single-Family Residential	88,006.56	22.1%
Rural Residential	79,923.12	20.1%
Agricultural	62,151.36	15.6%
Park, Recreation, and Open Space	44,435.34	11.2%
Undeveloped	33,788.01	8.5%
Transportation and Utilities	44,081.12	11.1%
Government and Institutional	14,015.38	3.5%
Commercial	14,119.60	3.5%
Mining and Manufacturing	13,054.00	3.3%
Multifamily Residential	4,550.62	1.1%
Total	398,125.11	100.0%

Broad land use trends since the last comprehensive plan was issued in 1993 include growth

⁴⁶ <https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards/ufas>

⁴⁷ 2011 Bucks County Comprehensive Plan

of about 5 percent each in single-family residential land and parks, recreation and open space, and the loss of approximately 7 percent in agricultural land and about 6 percent of undeveloped recreation land. The share of multifamily land use remained stable, at 1.1 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 72,153.16 acres. The area encompasses the 14 southernmost municipalities, bounded by Lower Southampton, Middletown, and Lower Makefield Townships on the north. Land use in Lower Bucks (2012) is as follows:

- Single-Family Residential - 20,853.26
- Rural Residential - 910.34
- Agricultural - 1,840.22
- Parks, Recreation, and Open Space - 8,949.96
- Undeveloped - 4,899.13
- Transportation and Utilities - 15,576.74
- Government and Institutional - 4,897.5
- Commercial - 5,367.98
- Mining and Manufacturing - 7,009.04
- Multifamily Residential - 1,848.99
- Total - 72,153.16 acres

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 155,000 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 (2012) is as follows:

- Single-Family Residential - 42,793.69
- Rural Residential - 27,353.55
- Agricultural - 23,317.19
- Parks, Recreation, and Open Space - 18,306.04
- Undeveloped - 9,365.73
- Transportation and Utilities - 17,874.80
- Government and Institutional - 6,309.11
- Commercial - 4,544.74
- Mining and Manufacturing - 3,349.41
- Multifamily Residential - 1,777.09
- Total - 154,991.35 acres

Upper Bucks is the most rural area, and is located in the northernmost part of the County. It is 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), Perkasio and Sellersville. Land use in Upper Bucks (2012) is as follows:

- Single-Family Residential - 24,359.61
- Rural Residential - 51,659.23
- Agricultural - 36,993.95

- Parks, Recreation, and Open Space - 17,179.34
- Undeveloped - 19,523.15
- Transportation and Utilities - 10,629.58
- Government and Institutional - 2,808.77
- Commercial - 4,206.88
- Mining and Manufacturing - 2,695.55
- Multifamily Residential - 924.54
- Total - 170,980.6 acres

Regarding housing planning and land use, the 2011 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 2011 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 2011 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," which is defined as spending more than 30 percent of gross household income for rent or mortgage costs.

The plan examined a number of national and local factors affecting residential development

and real estate markets in the County. The national economic downturn at the time the plan was written propelled by a crisis in housing credit markets appears to have affected residential development and real estate sales in Bucks County in several ways. While this climate has changed over the past decade, the housing shortage for individuals with the lowest levels of income is still relevant today.

With housing sales and rental prices in the County remaining 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. This trend is yet to be examined as an ongoing factor in today’s economy. That being said, the rental and sales prices have continued to climb in recent years and it is likely this evaluation will be much the same as it was in 2011.

Table 32 Proposed Residential Development by Region, 2015–2019 ⁴⁸

Region	Proposed Residential Development, 2015 - 2019					
	Single-Family Detached	Semi-Detached	Attached	Multi-Family	Mobile Home	Total
Upper Bucks Region	319	146	346	335	0	1146
Central Bucks Region	1197	60	679	1213	46	3195
Lower Bucks Region	289	10	321	670	0	1290
Bucks County	1805	216	1346	2218	46	5631

Multifamily housing accounted for 51.9 percent of proposed residential development in Lower Bucks County from 2015 to 2019, 37.9 percent in Central Bucks and 29.2 percent in Upper Bucks. The percentages—and numbers of attached and multifamily units through this time frame are greater than those from 2005-2010.

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 of 2011, include:

- Designation of development areas countywide and matching development

⁴⁸ BCPC

- 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.

In the most recent Comprehensive Plan, the county recommended development areas of appropriate intensity and was equipped 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.

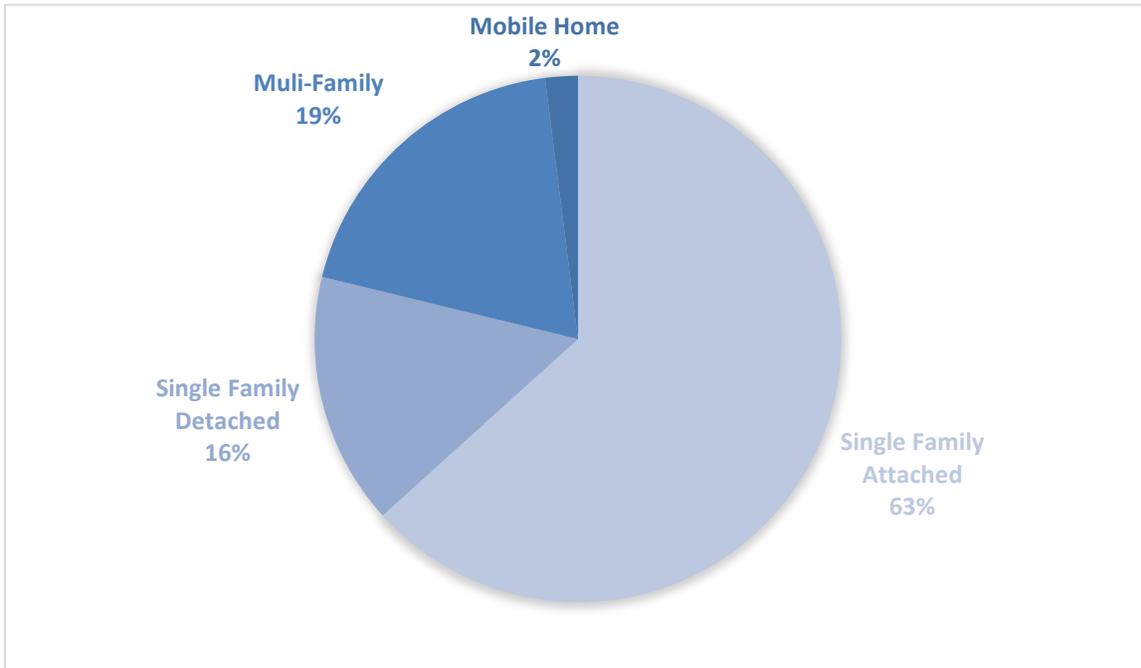
As part of its comprehensive planning process leading up to the 2011 version, Bucks County conducted a countywide “development district analysis” to confirm that land designated as development area and zoned accordingly had the potential capacity to meet projections (high and low) of housing demand. 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. This has seemed to have come to fruition with the growth figures demonstrated in Table 32. On an individual municipal level, some projected shortfalls existed, but generally was not expressed in rural municipalities not in the path of development, or in municipalities that are fully developed or contain natural resources that impede development.

Diversity of Housing Types in Bucks County

The updated Bucks County comprehensive plan published in 2011 includes a quantitative analysis of housing types. These figures have been updated in this analysis using ACS data from 2017. While overall housing stock is varied, single-family housing predominates, accounting for 63 percent of all units. The shares of single-family attached (townhouse or row house- type) housing and multifamily housing (small and large apartment buildings) are shown in Figure 13 below.

Figure 13 Housing Type ⁴⁹



The data assembled 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. As is evident in Figure 13, there is a very small percentage of housing across the county considered to be mobile home units. These units are localized in the Central Bucks region of the county, which is surprising considering the highest density of the population is in the lower region of the county.

Table 33 Housing Tenure Type, 2017 ⁵⁰

Tenure Type	Number	Percent
Total occupied housing units	235,909	100.0%
Owner-occupied	180,670	76.6%
Renter-occupied	55,239	23.4%
Average size of homeowner household	2.75	
Average size of renter household	2.16	

⁴⁹ 2017 Housing Inventory County and Municipal

⁵⁰ ACS 17

Table 34 Housing Age, 2017 ⁵¹

Year Built	Number	Percent
2014 or later	1,155	0.5%
2010 to 2013	2,949	1.2%
2000 to 2009	23,018	9.2%
1990 to 1999	33,166	13.3%
1980 to 1989	37,874	15.2%
1970 to 1979	42,256	17.0%
1960 t 1969	32,022	12.9%
1950 to 1959	41,821	16.8%
1940 to 1949	8,294	3.3%
1939 or earlier	26,318	10.6%
Total Housing Units	248,873	100.0%

Bensalem Township

The Bensalem Township’s Building and Planning Department operate using a residential land use policy to maintain and enhance the various available residential options, stating that they “protect and promote the existence of sound and wholesome residential buildings, dwelling units and neighborhoods by enforcement of such standards, regulations and procedures as will remedy the existence or prevent the development or creation of dangerous, substandard, or unsanitary and deficient residential buildings and dwelling units.”⁵²

Bristol Township

“Residential construction has varied considerably since 2000. In 2001, there was a spike in units due to multi-unit developments but then permits issued decreased until 2006 when construction began again. By 2008, Bristol Township saw a decrease in permits and issued relatively few until 2017.”⁵³ The Township runs its permits through the Zoning Board as applications are submitted.

Zoning

Analysis of zoning regulations is 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.

⁵¹ ACS 17

⁵² <https://www.bensalempa.gov/building--planning.html>

⁵³ Bristol Township AI 2019

Comprehensive Plans have, and will continue to have, statements of goals and policies related to zoning. Plans are typically 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.

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 is 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.

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.

Public Housing

Bucks County Housing Authority owns and manages a total of 645 units of public housing located throughout the County. 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 February 2020, there were 935 applicant households on the waiting list for public housing. Of these, families with children represented 24 percent and households with a disabled member represented 16 percent of all applicant households; however, Non-White households represented 32 percent of all waiting list applicants.

In addition to public housing, the Authority administers the Section 8 Housing Voucher Program for qualified individuals throughout the community.

“Eligibility for a rental voucher is determined by the BCHA based on the total annual gross income and family size and is limited to U.S. citizens and specified categories of non-citizens who have eligible immigration status. In general, the family’s income may not exceed 50% of the median income for the county or metropolitan area in which the family chooses to live. Median income levels are published by HUD and vary by location. The BCHA can provide you with the income limits for your area and family size. During the application process, the BCHA will collect information on family income, assets, and family composition.”⁵⁴

There are currently 2,997 vouchers distributed to Bucks County residents, of which 841 are families with children, and 1,947 are families with a disabled individual. Thirteen percent of families utilizing this program are non-white households.

There are 724 families currently on the waitlist for Section 8 Housing Voucher Program. Of these families 39 percent have children and 42 percent are families with a disabled individual. Thirty-one percent of families utilizing this program are non-white households.

Table 35 Characteristics of Public Housing Households and Waiting List Applicants, February 2020

	Current Tenants		Waiting List	
	Number	Percent	Number	Percent
Total Households	621	100%	935	100%
Extremely Low Income (<30% MFI)	399	65%	616	66%
Very Low Income (>30% but <50%)	187	29%	245	26%
Low Income (>50% but <80%)	35	6%	74	8%
Families with Children	39	10%	220	24%
Elderly Households (1 or 2 persons)	562	83%	778	83%
Individuals/Families with Disabilities	29	6%	153	16%
White Households	562	86%	635	68%
Black Households	73	12%	251	27%
Other Race of Households	50	1%	49	5%
Residents in BCHA Jurisdiction	NA	NA	497	53%
Characteristics by Bedroom Size				
0 Bedroom	0	0%	0	0%
1 Bedroom	566	88%	698	66%
2 Bedrooms	31	5%	69	22%
3 Bedrooms	33	5%	48	10%
4 Bedrooms	13	2%	102	2%
5+ Bedrooms	2	0%	18	1%

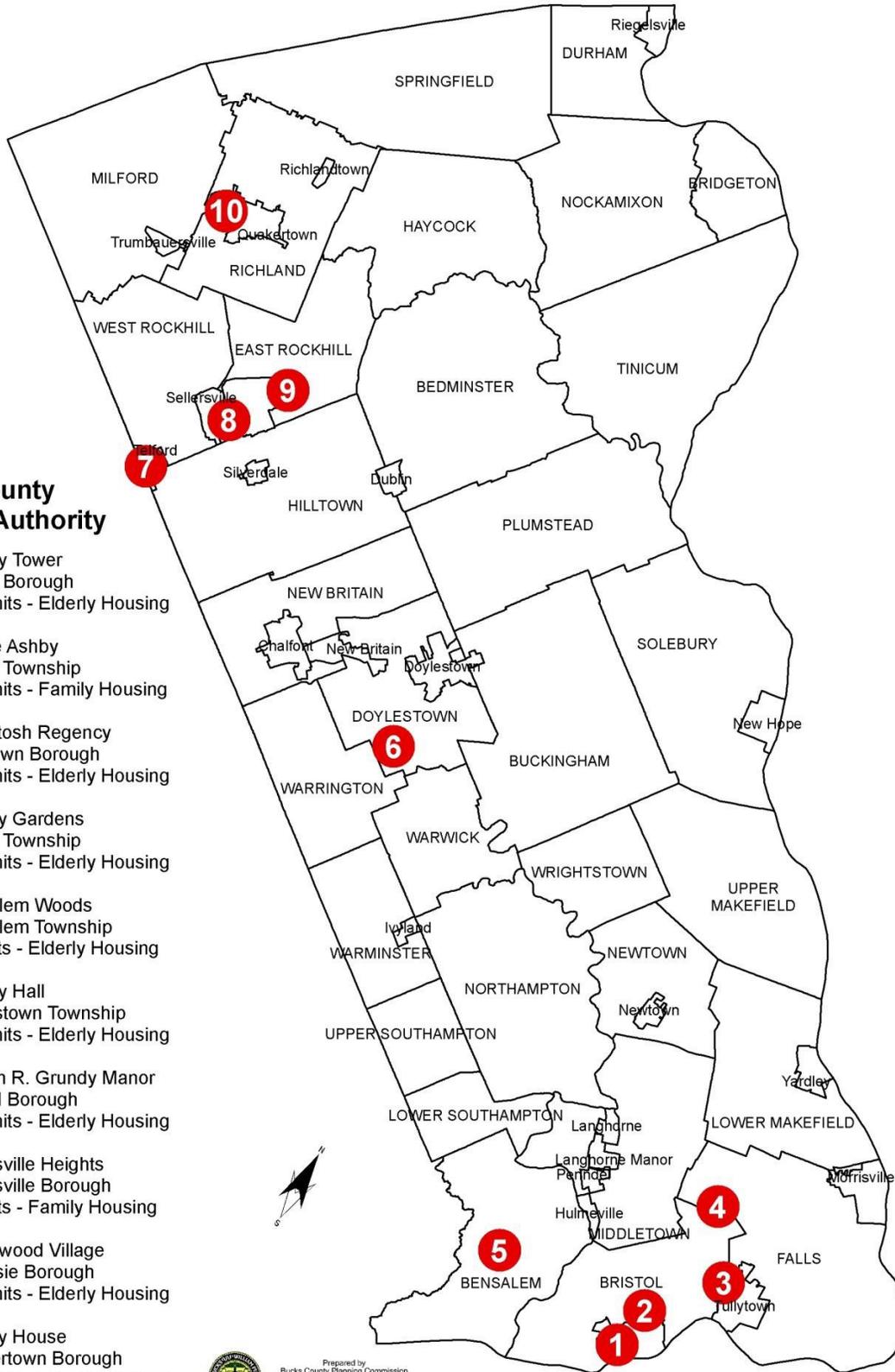
⁵⁴ <http://buckscountyhousingauthority.org/housing-choice-voucher-program/>

Table 36 Characteristics of Section 8 Households and Waiting List Applicants, February 2020

	Current Tenants		Waiting List	
	Number	Percent	Number	Percent
Total	2,977	100%	724	100%
Extremely Low Income (<30% MFI)	NA	NA	1,074	67%
Very Low Income (>30% but <50%)	NA	NA	172	24%
Low Income (>50% but <80%)	3	0%	3	0%
Families with Children	841	28%	282	39%
Elderly Households (1 or 2 persons)	998	34%	161	22%
Individuals/Families with Disabilities	1,947	65%	303	42%
White Households	2,107	75%	506	70%
Black Households	753	25%	192	27%
Other Race of Households	117	4%	26	4%
Residents in BCHA Jurisdiction	NA	NA	566	78%
Characteristics by Bedroom Size				
0 Bedroom	0	0%	0	0%
1 Bedroom	1,990	67%	419	58%
2 Bedrooms	644	22%	197	27%
3 Bedrooms	276	9%	94	13%
4 Bedrooms	40	1%	14	2%
5+ Bedrooms	5	1%	0	0%

Bucks County Housing Authority

- 1** Grundy Tower
Bristol Borough
176 units - Elderly Housing
- 2** Venice Ashby
Bristol Township
123 units - Family Housing
- 3** MacIntosh Regency
Tullytown Borough
100 units - Elderly Housing
- 4** Grundy Gardens
Bristol Township
130 units - Elderly Housing
- 5** Bensalem Woods
Bensalem Township
48 units - Elderly Housing
- 6** Grundy Hall
Doylestown Township
152 units - Elderly Housing
- 7** Joseph R. Grundy Manor
Telford Borough
120 units - Elderly Housing
- 8** Sellersville Heights
Sellersville Borough
60 units - Family Housing
- 9** Shadywood Village
Perkasie Borough
128 units - Elderly Housing
- 10** Grundy House
Quakertown Borough
152 units - Elderly Housing



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 include 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. and 2-III.C., 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.B. of the Admin Plan, BCHA defines "family" as a single person or a group of persons consisting of one or more elderly persons or disabled persons living together. The term "Household" has recently been accepted to include one or more live-in aides, foster children and adults. 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 for 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 a municipality’s tax rates to determine whether a property is affordable or has higher property tax rates may not be practical. For example, neighboring areas may have higher rates because the assessed values of properties in the examined 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 to provide primary revenue streams for counties, municipalities, and school districts throughout Pennsylvania. County tax 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 24.45 mills in 2018-2019, in addition to the individual municipality and school district rates.

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 80.9 percent of the total property tax, while municipal and county taxes combined account for the remaining 19.1 percent. In Bristol Township, the school tax levy accounts for 81.9 percent of the total property tax, while municipal and county taxes combined account for the remaining 18.1 percent.

Table 37 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 24.45 mills has been factored into the overall millage. The table lists the municipalities in alphabetical order, not by millage.

Table 37 Bucks County Millage Rates by Taxing Body, 2018 ⁵⁵

Municipality	Municipality Millage 2018	School District Millage	Total Millage
Bedminster Twp	7.5	135.2555	167.206
Bensalem Twp	20.5	162.834	207.784
Bridgeton Twp	6	115	145.45
Bristol Boro	57.89	154	236.34
Bristol Twp	23.98	220.14	268.57
Buckingham Twp	4	124.1	152.55
Chalfont Boro	18.25	124.1	166.8
Doylestown Boro	15.175	124.1	163.725
Doylestown Twp	12.375	124.1	160.925
Dublin Boro	21.25	135.2555	180.956
Durham Twp	6	115	145.45
E Rockhill Twp	12.235	135.2555	171.941
Falls Twp	7.22	167.54	199.21
Haycock Twp.	6	168.83	199.28
Hilltown Twp	8.75	135.2555	168.456
Hulmeville Boro	14.5	163.1	202.05
Ivylnd Boro	13.5	144.2716	182.222
Langhorne Boro	18.19625	163.1	205.746
Langhorne Manor Boro	13.275	163.1	200.825
Lower Makefield Twp	20.25	170.076	214.776
Lower South Twp	14.08	163.1	201.63
Middletown Twp	17.57	163.1	205.12
Milford Twp	2	168.83	195.28
Morrisville Boro	46.85	219.8249	291.125
New Britain Boro	27.375	124.1	175.925
New Britain Twp	12.0625	124.1	160.613
New Hope Boro	13.77	102.3418	140.562
Newtown Boro	13.75	126.301	164.501
Newtown Twp	4.5	126.301	155.251

⁵⁵ Bucks County Board of Assessment, 2020

Nockamixon Twp	6	115	145.45
Northampton Twp	14.9111	126.301	165.662
Penndel Boro	30.8	163.1	218.35
Perkasie Boro	6.25	135.2555	165.956
Plumstead Twp	14.94	124.1	163.49
Quakertown Boro	1.625	168.83	194.905
Richland Twp	11.3	168.83	204.58
Richlandtown Boro	5	168.83	198.28
Riegelsville Boro	12.5	115	153.45
Sellersville Boro	24	135.2555	183.706
Silverdale Boro	9	135.2555	168.706
Solebury Twp	23.8102	102.34180	150.602
Springfield Twp	12	115	151.45
Telford Boro	6.64		
Tinicum Twp	8.5	115	147.95
Trumbauersville Boro	2.5	168.83	195.78
Tullytown Boro	11.5	170.076	206.026
Upper Makefield Twp	7.6025	126.301	158.354
Upper South Twp	23.88	144.2716	192.602
Warminster Twp	17.07	144.2716	185.792
Warrington Twp	16.12	124.1	164.67
Warwick Twp	15.25	124.1	163.8
West Rockhill Twp	7.25	135.2555	166.956
Wrightstown Twp	9.23	126.301	159.981
Yardley Boro	24.73	170.076	219.256

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 link between residential areas, especially areas with high concentrations of minority and LMI persons, and employment opportunities are key to expanding fair housing choice.

In 2017 the vast majority of County residents (88.9 percent) drove to work, with 92.1 percent driving alone, and only 7.9 carpooling. Interestingly enough, 5.1 percent of county workers work from home with no need for commuter services. In Bensalem Township, 90.4 percent of the total population drive to work, with 87.5 percent driving alone. A smaller percentage than what is reflected county wide work from home within the township. Only 2.5 percent of its working population fall into this category. It trends even further down in Bristol Township as there was only 1.6 percent of their employed population working from home. A staggering 93.7 percent, the highest of the three areas examined, drive to work in Bristol Township, of which 88.9 percent drive alone.

Throughout Bucks County, a mere 3.3 percent utilized public transportation, with the rail system accounting for the vast majority. Of this 3.3 percent, 81.5 are white persons, with Asian persons making up the second largest population at 8.9 percent. In Bensalem Township, 3.6 percent of its working population commutes using public transportation, with white individuals making up the majority of that group with 57.4 percent. Similar to the county at large, Asian individuals make up the next largest group with 25.2 percent. In Bristol Township, 3.2 percent of the working population utilizes public transportation and while white persons make up the majority at 77.7 percent, the African American population is the second largest with 13.1 utilizing public transportation as a means of travel.

Table 38 Means of Transportation to Work, 2017 ⁵⁶

Means of Transportation	Bucks County		Bensalem Township		Bristol Township	
	Number	Percent	Number	Percent	Number	Percent
Total	320,937	100.0%	30,998	100.0%	27,697	100.0%
Car, truck, or van	285,456	88.9%	28,027	90.4%	25,950	93.7%
Drove alone	262,838	92.1%	24,533	87.5%	23,072	88.9%
Carpooled	22,618	7.9%	3,494	12.5%	2,878	11.1%
Public transportation (excluding taxicab):	10,576	3.3%	1,108	3.6%	894	3.2%
Bus or trolley bus	1,722	16.3%	290	26.2%	310	34.7%
Subway or elevated	528	5.0%	106	9.6%	17	1.9%
Railroad	8,150	77.1%	712	64.3%	567	63.4%
Bicycle	644	0.2%	85	0.3%	62	0.2%
Walked	5,806	1.8%	726	2.3%	235	0.9%
Taxicab, motorcycle, or other means	2,053	0.6%	269	0.9%	122	0.4%
Worked at home	16,402	5.1%	783	2.5%	434	1.6%

Table 39 Percent of Workers using Public Transportation by Race, 2017 ⁵⁷

	Bucks County	Bensalem Township	Bristol Township
White	81.5%	57.4%	77.7%
African American	6.2%	6.7%	13.1%
Asian	8.9%	25.2%	3.6%
Hispanic	3.7%	5.7%	10.2%

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 302 million passenger trips throughout five counties the Southeastern Pennsylvania region in 2018. The multi-modal

⁵⁶ ACS 2017

⁵⁷ ACS 2017

transit system offers 195 fixed routes on buses, trolleys, regional rails, and subways. TMA Bucks provides “Rush Bus” services in Bristol and Richboro-Warminster. Collectively, TMA supports eight stops along its’ two routes, all of which provide peak hour service between SEPTA bus routes and regional rail lines.

Destinations and Routes

SEPTA offers 13 bus routes throughout Bucks County, in addition to two railway routes. 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 around 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. These transportation lines run into the city of Philadelphia as well as parts of New Jersey to increase availability to commuting residents. Residents of municipalities in the northern and eastern parts of the County have limited access to public transportation. The exception is the bus route extending a short distance into Telford Borough and Hilltown Township along county Line Road. Additionally, Bucks County Transport provides bus services (the Dart) in Doylestown Township, Doylestown Borough, New Britain Borough, New Britain Township and Chalfont Borough.

The absence of adequate public transportation throughout all regions of 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 and Central Bucks County communities served by public transit options, as compared to Upper Bucks County.

Accessibility

All SEPTA buses are equipped with wheelchair lifts or ramps, in accordance with the American with Disabilities Act (ADA), and there are currently over 100 accessible stations. Regional rail cars are also accessible for passengers with mobility devices. For those unable 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.

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 2045: Plan for Greater Philadelphia”. This plan focuses on five core principles, “sustain the environment; develop livable communities; expand the economy; advance equity and foster diversity; and create an integrated, multimodal transportation network.” The principals that are applied in this plan could expand fair housing choice for Bucks County and the entire Delaware Valley.

In addition to Connections 2045, DVRPC puts together annual Planning Work Programs. For fiscal year 2020, the vision of the plan “for the Greater Philadelphia Region is a prosperous, innovative, equitable, resilient, and sustainable region that increases mobility choices by investing in a safe and modern transportation system; that protects and preserves our natural resources while creating healthy communities; and that fosters greater opportunities

for all.”⁵⁸

Employment and Housing

In 2016, DVRPC issued an Analytical Data Report for Regional, County, and Municipal Employment Forecast from 2015-2045 as part of its long-range planning activities. Regionally, DVRPC estimates that there will be a gain of 373,000 jobs by 2045, which would demonstrate approximately a 12 percent increase to the market. The bulk of this growth is anticipated to be concentrated in suburban areas such as Bucks County. Bucks County, specifically, is likely to see an 11.9 percent increase by 2045, which very closely mirrors what is anticipated throughout the region with only a 0.1 percent variance.

DVRPC enumerated 20 municipalities across the region that have the highest anticipated absolute change in employment over the next 15 years. The only municipality from Bucks County on this list was Upper Dublin Township (at number twenty), which is anticipated to see an absolute change of 3,400 employees. DVRPC developed an additional list of 20 municipalities that have the highest forecasted percentage change in their workforce over the same time frame. Two municipalities represented Bucks County: Dublin Borough at number four with an anticipated increase of 84 percent; and Sellersville Borough at number nineteen with an anticipated increase of 52 percent. These estimates are consistent with ongoing development projects in the Upper Bucks region.⁵⁹

In November 2011, the DVRPC published *The Mismatch between Housing and Jobs*⁶⁰, a study and discussion on Achieving Balance within the Housing and Employment communities. 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 alone 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.

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 2nd quarter of 2019 identified the 10 largest employers in Bucks County as follows:⁶¹

- Giant Food Stores, LLC
- Central Bucks School District

⁵⁸ <https://dvrpc.org/WorkProgram/pdf/WorkProgram2020Final.pdf>

⁵⁹ <https://dvrpc.org/Reports/ADR023.pdf>

⁶⁰ <https://dvrpc.org/Reports/ADR023.pdf>

⁶¹ <https://www.workstats.dli.pa.gov/Documents/County%20Profiles/Bucks%20County.pdf>

- Doylestown Hospital
- St. Mary Medical Center
- Bucks County
- Northtec, LLC
- Excel Companion Care, LLC
- Woods Services
- Wal-Mart Associates, Inc
- 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 the Code of Ethics. Realtors who have chosen to join the National Association are required to abide by the Code of Ethics established by the association in 1913. 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.

From time to time, the Association invites fair housing advocates to speak at its functions. Specifically, there is interaction between the Reach Out Committee, the Government Affairs Committee, and the Diversity Committee 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 has been actively involved in fair housing initiatives throughout Bucks County. The Association assisted with promoting the Fair Housing Expo. The Expo exhibits informative stands from the Bucks County Human Relations Council, Lenape Valley Foundation, Bucks Housing Group, Women's Council of Realtors, Housing Equality Center of

Pennsylvania, and many more. Additionally, the Association puts on Continued Learning Education Programs focused on Fair Housing laws and regulations to keep Bucks County realtors informed.⁶²

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 2017. Reviewing this data 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 focuses 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, as well as refinancing and home equity loans. 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 one year of HMDA data by race, ethnicity and action taken on the application, with detailed information to follow.

Table 40 Summary of Mortgage Loan Activity in Bucks County, 2017⁶³

	2017	
Loan Applications	#	%
White	16,874	71.7%
African American	466	2.0%
Asian	1,079	4.6%
Other Race	2,768	11.8%
Race Not Provided	2,348	9.9%
Total	23,535	100.0%
Loans Originated	#	%
White	11,809	80.3%
African American	308	2.1%
Asian	753	5.1%
Other Race	226	1.5%
Race Not Provided	1,603	11.0%
Total	14,699	100.0%

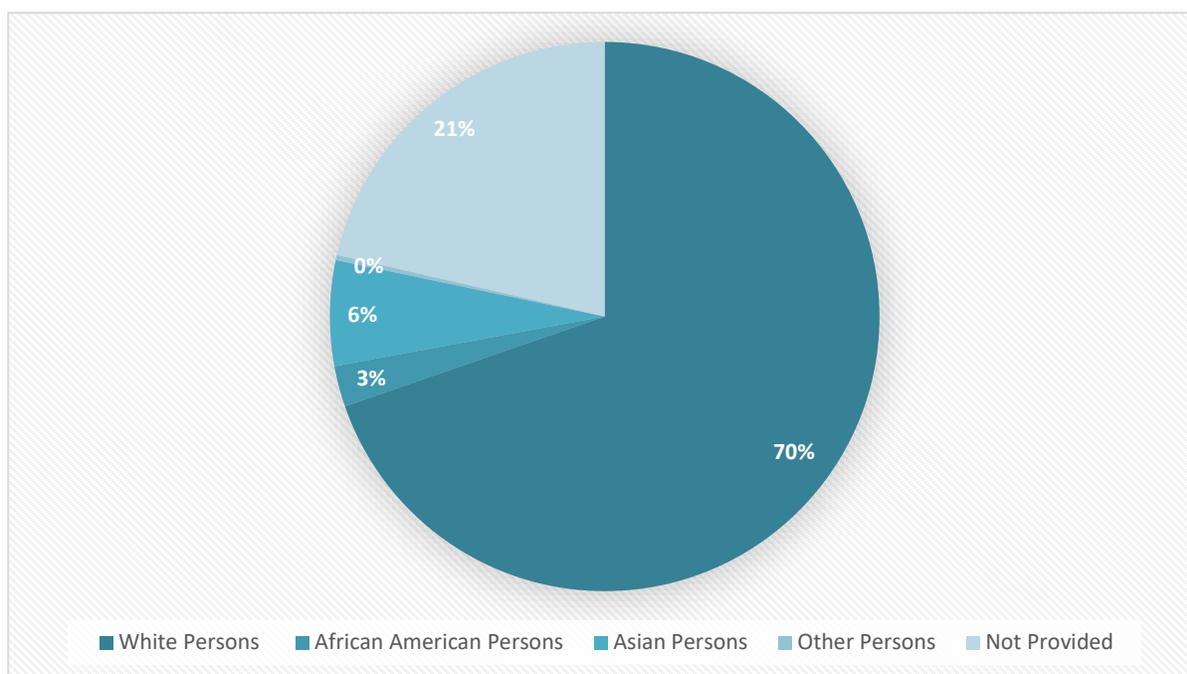
⁶² <http://www.bucksrealtor.com/events/2018/04/09/continuing-education/come-to-the-fair-housing-expo-and-learn/>

⁶³ https://www.consumerfinance.gov/data-research/hmda/historic-data/?geo=pa&records=all-records&field_descriptions=labels

Table 40 provides a look at the loan applications submitted in 2017 as a whole. There were a total of 23,535 loan applications submitted for the housing industry, including home origination loans, home equity loan and refinancing loans. The greatest demographic applying for these loan types were white persons with 71.7 percent of the application pool. Of the other demographics that were provided, Asian persons were the second highest with 4.6 percent, followed by African American persons at just two percent. While it is not required to provide race or ethnicity, it leaves a gap for analysis in this case amounting to about 9.9 percent. Therefore, the population of applications from other minority races may not be accurate, though it is reported for 2017 to be around 11.8 percent. Additionally, these figures on accepted loan applications do not account for the Hispanic community across the county, which further skews the data.

The information in the Loans Originated area of Table 40 represents loans originated for the purchase of one- to four-family dwellings and manufactured housing units across Bucks County alone. The period covered in the table is one year covering applications for this specific reason during 2017, which is the latest year that data is available from HMDA. There were a total of 14,499 submitted and accepted for home purchase in 2017. The greatest demographic applying for these loan types were White persons with 80.3 percent of the application pool. Of the other demographics that were provided, Asian persons were the second highest with 5.1 percent, followed by African American persons at 2.1 percent. While it is not required to provide race or ethnicity, it leaves a gap for analysis in this case amounting to about 11 percent. Therefore, again, the population of applications from other minority races may not be accurate. Additionally, these figures on accepted loan applications do not account for the Hispanic community across the county, which further skews the data.

Figure 14 Rates of Loan Originations by Race and Ethnicity in Bucks County, 2017



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: African Americans, 3.3 percent; Asians/Pacific Islanders, 2.7 percent; and Hispanics (who may be of any race),

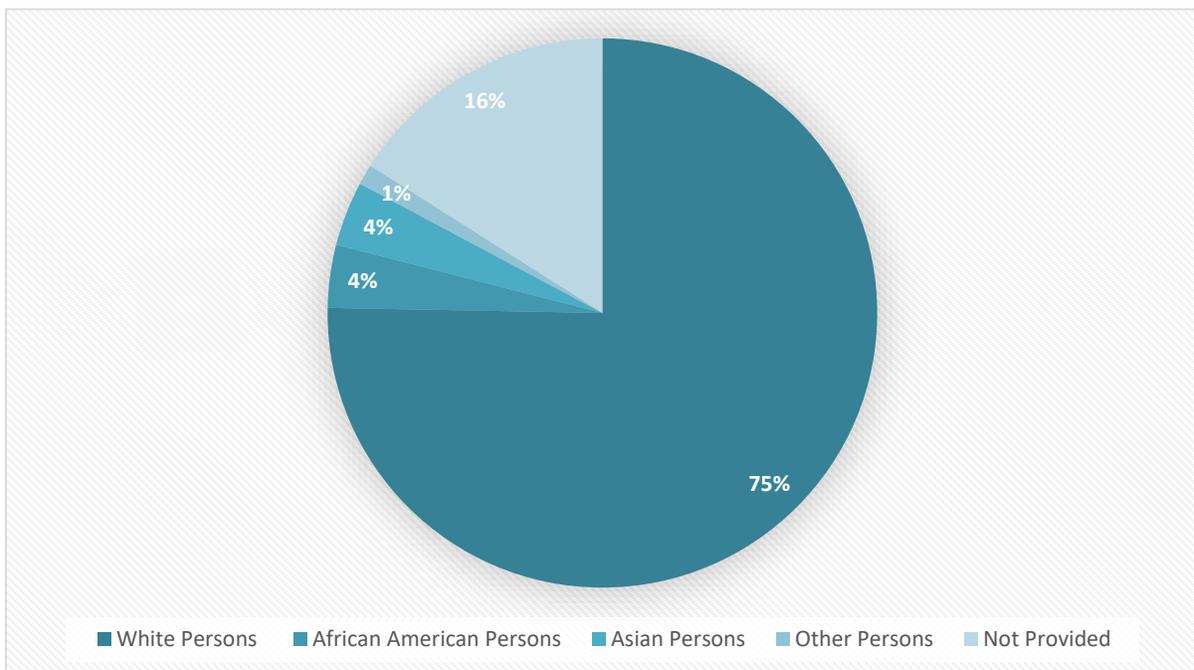
2.3 percent. Based on these statistics, the pattern found in analyzing accepted loan applications in 2017 demonstrates a higher rate of Asian persons purchasing homes, refinancing and taking out home equity loans on their homes than the African American community. This is interesting to note as we look to the future and should be examined further as to the reasoning behind this trend.

Table 41 Loan Denials by Race/Ethnicity and Income in Bucks County, 2017

Loan Denials	#	%
White	2,704	75.3%
African American	134	3.7%
Asian/Pacific Islander	137	3.8%
Other Race	42	1.2%
Race Not Provided	574	16.0%
Total	3,591	100.0%

Analysis of mortgage loan denial data reveals other trends, as illustrated in Table 41. In 2017, White person applicants were denied at far greater rates than African Americans, Asians and other races by a significant ratio. There were a total of 3,591 denials in 2017 and of them, 75.3 percent were white persons. While it is not required to provide race or ethnicity, those not providing data leave a gap for analysis in this case amounting to about 16 percent, the second largest demographic of denials. The third largest demographic is Asian persons by a 0.1 percent margin at 3.8 percent, followed by African American persons with 3.7 percent. It is important to note that the population of applications from other minority races may not be accurate, though it only accounts for 1.2 percent of total denials. Additionally, these figures on accepted loan applications do not account for the Hispanic community across the county, which further skews the data.

Figure 15 Rates of Loan Denials by Race and Ethnicity in Bucks County, 2017



High-Cost Lending

Subprime lending, designed for borrowers who are considered a credit risk, has increased the availability of credit to low-income persons over the last two decades. 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, 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.

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.

➤ **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 implemented initiatives. The local decision-making process evaluates the significance of policies, actions, plans, permits, approvals and funding choices. Many initiatives were reviewed for this AI to determine the extent to which the Urban County, Bristol and Bensalem Townships 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 overarching 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's 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 Standards outline policy for the HOME Program. The policy outlines specific criteria to identify areas with minority concentrations and, thus, creates a basis for creating housing opportunities outside such areas while preventing actions that would lead to the creation of additional areas with minority concentrations.

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 should be considered to ensure the perspectives, opinions and experiences of all people 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, and currently operates under their own Citizen Participation Plan to monitor their CDBG program, according to their 2017 Annual Action Plan. As of this action plan, the top projects for the township to take on using CDBG funds are: the homeless shelter, housing rehabilitation, curb cutting, and project administration.

Bristol Township

The Township's Office of Community Development department carries out land use planning and regulatory advisory activities. Further, this department adheres to Bristol Township's Citizen Participation Plan, which was passed in 2016, as required through the acceptance of CDBG funds.

B. Progress since the Previous AIs

Urban County and Bensalem Township

The Urban County and Bensalem Township's previous AI was completed in 2014 and included an analysis of areas of minority concentrations 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. Specific public policies, such as the Township's zoning ordinances 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 analysis, 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

The most recent AI for Bristol Township was finalized in 2019. The report outlines the community's profile through demographic, economic, and housing analysis. These profile points, in conjunction with fair housing and public sector policy, are used to detail current impediments and recommendations for future growth.

There are six impediments that recommendations have been made to amend. They are: (1) the lack of fair housing awareness and education, (2) the need for fair housing information translated for limited English-speaking residents, (3) insufficient access to public transportation, (4) the lack of new housing development, (5) the shortage of affordable units in a range of sizes, and (6) the displacement of residents due to economic pressures.

C. Current Fair Housing Programs and Activities

The 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, and 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, and Section 8 mobility programming.
- *Enforcement* – involves monitoring 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, Bristol Township and Bensalem Township was conducted for this analysis.

Urban County

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

- Display of the fair housing logo in correspondence and documents.
- Continued funding for the Owner-Occupied Rehab Program implemented by the Redevelopment Authority and Habitat for Humanity of Bucks County to bring the housing of lower income persons up to code.
- Continued funding of the first-time homebuyer program with down payment and closing cost assistance.
- Support the development of housing for disabled veterans, seniors, and other persons with special needs.
- 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.
- Promote funding projects that involve facilities that are accessible.
- Continued operational support for three major shelter operators (Family Service, Bucks County Housing Group and A Woman's Place).
- Continued funding support to maintain Enterprise Zones.
- Continued funding support for the 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.
- Partnership with Legal Aid and the Housing Equality Center of Pennsylvania to organize workshops to educate landlords on their rights and obligations under the Fair Housing Act and other housing laws.
- Co-sponsorship of training sessions with the Housing Equality Center of Pennsylvania through the Bucks County Homeless Coalition of Care.
- Continued advocacy and support for land use planning by local municipalities.

Bensalem Township

The following is a summary of the accomplishments and continuing programs in Bensalem Township:

- Continue funding the FSA Emergency Homeless Shelter.
- Continue funding the owner occupied program.
- Housing rehabilitation assistance in conjunction with the assistance of the county redevelopment authority.
- 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.
- Continued operational support for three major shelter operators (Family Service, Bucks County Housing Group and A Woman's Place).

Bristol Township

The following is a summary of the accomplishments attained and continuing programs in Bristol Township⁶⁴:

- Continue to implement affirmative marketing for all housing programs involving HUD funding.
- 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.
- 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 of housing, education, training and outreach activities.
- 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.
- 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.

D. Partnership and Regional Coordination

As noted previously, data from the Urban County, Bristol Township, and Bensalem Township was pulled to prepare this AI. This approach was intended to facilitate the identification and mitigation of impediments to fair housing choice that transcend municipal boundaries.

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

⁶⁴ Bristol Township Consolidated Plan, 2019.

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:

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 on how to recognize discriminatory housing practices.

Additionally, 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 and has recovered over \$1.5 million for victims of housing discrimination.

Due to the Council's excellent efforts, and 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. This empowers 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 Economic Development.

Other activities organized by Legal Aid 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 for the entire county.

Fair Housing Rights Center in Southeastern Pennsylvania

The Fair Housing Rights Center is a HUD-designated Fair Housing Initiative Program (FHIP) entity. The Fair Housing Rights Center in Southeastern Pennsylvania is a nonprofit organization that was started 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 FHIP also conducts preliminary investigations of claims, including sending testers to properties suspected of practicing housing discrimination. Further, 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.

➤ 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, Bristol Township 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 Profile

Both the Urban County and the Township have experienced significant growth rates between 1970 and 2017. Such growth has resulted in a continuous demand for housing units to accommodate the increasing population.

- In the Urban County, Asian persons account for 3.9 percent of the population, which is the highest concentration of any minority groups throughout the county.
- In Bensalem Township, Asian persons accounted for 11.7 percent of the Township's population. No Census Tract had a concentration of 19.8 percent or greater. The highest minority population in this township.
- In Bristol Township, African American residents accounted for 9.3 percent of the total population. The highest concentration is found in tract 1004.03 with 39.2 percent of the population.
- The dissimilarity index for Whites and African American persons in the Urban County was 29.4 in 2017. The White to Asian person's index was calculated at 16.4 percent, the White to Hispanic person's index at 18, and the White to multi-race person's index at 19.6 percent.
- The poverty rate among African American persons was more than four times the rate for Whites in Bucks County. Poverty also seems higher among Hispanics and lowest among Asians.
- In the Urban County, only 11.3 percent of White households earned less than \$25,000 compared to 19.4 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 39.5 percent of Black households.
- The median household income for African American/Black households in the urban county was \$50,753, equivalent to 60.7 percent of the median income for White households and only 49.6 percent that of Asian households. Hispanic households seem to fare slightly worse with a median income of \$50,625 across the Urban County.
- In Bucks County, the five languages with the highest number of persons who speak English less than "very well" are Spanish, Russian, Gujarati, Chinese and Korean.
- Unemployment in Bucks County in 2017 was 5.4 percent, which was lower than Pennsylvania's rate of 6.5 percent.

- According to the National Organization on Disabilities, a significant income gap exists for persons with disabilities, given their lower rate of employment. Of the county's population of disabled persons, there is an estimated 46.3 percent who are currently participating in various areas of the labor force. An estimated 40.7 percent are currently unemployed.
- HUD data reveals that there are 113 census block groups throughout the County of Bucks with at least 30 percent of its population being considered to be LMI status. Further, there are 23 census tract groups in the Urban County where at least 50 percent of residents meet the criterion for LMI status.
- As of 2017 and throughout Bucks County as a whole, there is an estimated 29,368 citizens who have some type of disability. ⁶⁵
- In the Urban County, the proportion of female-headed households has increased from 7.8 percent in 2000 to 8.5 percent in 2017, while female-headed households with children have remained consistent at 4.0 percent. There was a slight increase in the rate of male-headed households with children, from 1.5 percent to 2.3 percent. Comparatively, married-couple families with children have decreased from 31.3 percent to 23.2 percent.
- The dissimilarity index for Whites/African American persons in Bensalem Township was 30 percent in 2017. The Index of Dissimilarity for the other minority groups were as follows: 26 percent for White and Asian persons and 24 percent for White and Hispanic persons and 30.5 percent for White and Other Race persons. Indices for the other groups cannot be as reliably interpreted individually since their individual populations in many cases are less than 1,000.
- The dissimilarity index for Whites/African American persons in Bristol Township was 44.5 percent in 2017. That figure indicates a mid- level of segregation for the two groups, within the municipality. The Index of Dissimilarity for the other minority groups was lower: 36.5 percent for White and Asian persons, 23.5 percent for White and Hispanic persons, and 23.0 percent for Other Races and White persons.

Fair Housing Profile

- Disability was the primary reason for a majority of the housing complaints from Bucks County that were filed with federal and state fair housing agencies.
- 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 on 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.

⁶⁵ ACS Employment Status, Age and Education 2017

➤ 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, Bristol Township 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, Bristol Township or Bensalem Township.

CDBG Funding Allocation Process

Action Step 1: Analyze requests for housing assistance through an outcome oriented review with a needs-based approach to allocating funds.

Action Step 2: Increase access to public infrastructure and public facilities in low wealth, minority concentrated areas.

Action Step 3: Provide technical assistance in affirmative marketing to recipients of county-administered housing development funds. Ensure equal inclusion in housing programs for all protected classes in the county.

Action Step 4: Collaborate with area housing developers who provide additional affordable housing options including mixed use developments, single family and multi-family housing. Encourage development of affordable housing for low- and moderate-income households in high-opportunity neighborhoods.

Action Step 5: Explore ways in which the County of Bucks can work with the Housing Equality Center of Pennsylvania (HECP) to provide fair housing technical assistance and training opportunities sub recipients including for municipal staff and housing providers.

Housing Maintenance and Conditions

Action Step 1: Continue the HOME and Section 8 rental assistance programs, considering expansion should funding become available.

Action Step 2: Explore means of promoting rehabilitation of substandard housing rented to lower income households.

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. Three (3) objectives originate from the statutory purposes of HUD's formula grant programs. These are explained in further detail below

Action Step 1: Creating a suitable living environment entails improving the safety and livability of neighborhoods, increasing access to quality facilities and services, and reducing the isolation of income groups within an area through integration of low-income housing opportunities.

Action Step 2: Providing decent affordable housing requires helping homeless persons obtain appropriate housing and assisting those at risk of homelessness, preserving the affordable housing stock, increasing availability of permanent housing that is affordable to low- and moderate income persons without discrimination, and increasing the supply of supportive housing.

Action Step 3: Expanding economic opportunities involves creating jobs that are accessible to low- and moderate-income persons, making mortgage financing available for low- and moderate income persons at reasonable rates, providing access to credit for development activities that promote long-term economic and social viability of the community, and empowering low-income persons to achieve self-sufficiency to reduce generational poverty in federally assisted and public housing.

Public Transit Services

Public transit service is largely limited to highly populated areas in lower and central 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 limited public transit options.

Action Step 1: Continue to work with SEPTA as part of the update to its 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.

Action Step 2: Work with regional and local entities, including BCPC, in planning and other studies to improve travel in and around the County.

Action Step 2: 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. Further, distribute the data 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 updated plan is currently being drafted by the Bucks County Planning Commission.

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. Look to implement inclusionary zoning evaluations with municipalities in the future.

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. Disability is the primary basis for discrimination complaints at this time, but race continues to be a large contributor as well.

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

Action Step 2: Continue to support pre-purchase counseling programs for potential first time homebuyers.

Board Representation

Members of protected classes appear to be underrepresented on appointed housing boards and commissions, which are heavily populated by elected officials. Representation by members of protected classes on housing and housing-related boards and commissions increases 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: 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 2: Maintain records on efforts undertaken to encourage mobility and results achieved.

Limited English Proficiency

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 is 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.

➤ **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.

Diane Ellis-Marseglia, Chair

Robert Harvie, Vice Chair

Gene DiGirolamo, Commissioner

ATTEST:

Gail Humphrey
Chief Clerk

DATE: _____



SIGNATURE PAGE FOR BENSALEM TOWNSHIP

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

Joseph Pillieri,
Township Council President

Joseph DiGirolamo, Mayor

ATTEST:

Date _____



SIGNATURE PAGE FOR BRISTOL TOWNSHIP

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

Craig Bowen,
Township Council President

Randee Elton, Township Manager

ATTEST:

Date _____



Appendix

APPENDIX A: STAKEHOLDERS IN THE AI PLANNING PROCESS

Contact Name	Title	Name of Organization
Margie McKeivitt	Chief Operating Officer	County of Bucks
Deanna Giorno	Deputy Chief Operating Officer	County of Bucks
Luke Rosanova	Planner	BC Planning Commission
Mike Roedig	Director of Planning Services	BC Planning Commission
Jeff Fields	Director of Housing Services	County of Bucks
Jessica Kimmel	CDBG Program Admin	County of Bucks
Don Grondahl	Public Housing Director	BC Housing Authority
	Section 8 HCV Manager	BC Housing Authority
Gerald Birkelbach	Executive Director	Aldie Counseling Center
Mary Sautter	Executive Director	BARC
Rein Clabbers	Chairperson	Bethanna
Dan Fraley	Director	BC Military Affairs
Kathy Bennett	Executive Director	BC Area Agency on Aging
John A. Greer, III	Executive Director	BC Association for Retired and Senior Citizens
		BC Association for the Blind and Visually Impaired
Cindy Grezeszak	Director	BC Dep. of Mental Health/Developmental Programs
Diane Rosati	Director	BC Drug & Alcohol Commission
		BC Opportunity Council
Most Rev. John McIntyre	President	Catholic Social Services
Caitlin Chasar	Executive Director	Center for Independent Living
Murielle Kelly	Director of Housing Services	Family Services of Bucks County
		The Salvation Army
Bill Wiegman	President	Southeastern PA Council on Alcoholism & Drug Dependency
Karen Ann Ulmer Pendergast	President	YWCA of Bucks County
Ifeoma Aduba	Interim Chief Executive Officer	A Woman's Place
		Red Cross Shelter
Peggy Dator	Chairperson	BC Human Relations Council
Michael Romeu	President	Latino Leadership Alliance of Bucks County
		National Association for Advancement of Colored People (NAACP)
Penelope Ettinger	Executive Director	Network of Victims Assistance
Rachel Wentworth	Executive Director	Fair Housing Council of Suburban Philadelphia
Anthony Lewis	President	Fair Housing Rights Center of Southeastern Pennsylvania
Pamela Croke	Executive Vice President	Bucks County Association of Realtors
Lisa Frey	Director of Professional Development	Bucks County Association of Realtors
Evan Stone	Executive Director	BC Planning Commission
Barry Seymour	Executive Director	Delaware Valley Regional Planning Commission
		Bucks County Transport
Linda Boyer	Chairperson	BC TMA
Pasquale Deon	Chairman	SEPTA
		Legal Aid of Southeastern PA
Gregory Nardi	Executive Director	Bucks County Bar Association
		BC Housing Development Corp.
Erik Clare	Executive Director	BC Housing Group
John Bryant	Chief Executive Officer	Christ's Home for Children
		CO-MANS
Robert Szwajkos	President	Credit Counseling Center
David Wyher	Chief Executive Officer	Delta Community Supports
		Doylestown Area FISH
Florence Kawoczka	Executive Director	Habitat for Humanity of Bucks County
Clarence Smith	President	Interfaith Housing Development Corporation
Ivan Szeftel	Chair	JEVS
Arlene Daily	Executive Director	Keystone Opportunity Center
Sharon Curran	Chief Executive Officer	Lenape Valley Foundation
Adam Flager	Board President	Libertae
Kaj Karch	President	LifePath
		Livengrin
Dorothy Weik-Hange	Chair	Penn Foundation
Karen Graff	Executive Director	Pendel Mental Health
Sean Schafer	Board Chairman	BC Redevelopment Authority
Col. Leonard J. Lobel	President	Today, Inc.
Thomas Harrington	President	Valley Youth House
Tine Hansen-Turton	President	Woods Services