

# **Assessment of Fair Housing**

## **2022**

City of Philadelphia &  
Philadelphia Housing Authority

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## Introduction: Approach to the 2022 Assessment of Fair Housing

The 2022 Assessment of Fair Housing (AFH) for the City of Philadelphia and the Philadelphia Housing Authority (PHA) draws on public engagement and the analysis of relevant governmental (e.g., The Census Bureau's American Community Survey) and administrative (e.g., home sales and filings of rental evictions) databases to arrive at a set of substantive and achievable goals. These five-year goals are in furtherance of fair housing rights for Philadelphians.

The AFH documents the extent to which protected classes under the Fair Housing Act have differential access to quality housing choices and neighborhood opportunity, the barriers preventing such access, the success of recent efforts to promote fair housing, and strategies to increase equitable access. The proposed activities primarily focus on housing, but also address factors beyond housing itself that contribute to inequality between communities.

The AFH begins with a summary of progress on the goals laid out in the 2016 AFH, the implementation framework presented in the 2018 Housing Action Plan, and additional policy, program, and investment accomplishments that further fair housing. Activities of note include some that were not explicitly designed to address fair housing, but advance housing equality for protected classes, including initiatives related to the eviction process and responses to the COVID-19 pandemic. New local funding invested in housing and related programs has also been critical to realizing progress on fair housing goals, as the AFH process is not one associated with dedicated financial resources. The 2022 goals and strategies will build on these recent efforts and investments, and address emerging issues identified through the assessment process.

## Community Participation Process

### **The 2022 Assessment of Fair Housing Resident Survey**

The City released a web-based survey that received public responses for a month. The survey link was distributed by text message, social media, and mailings and Neighborhood Advisory Committees (NACs). There were 5,604 valid responses (residents of Philadelphia who are age 18+ and make decisions for their household). Efforts to survey a diverse range of residents included the use of a contact list of mobile phone numbers from VAN (the Voter Access Network). The City randomly selected 20,000 residents from VAN to get a sample that was roughly representative of Philadelphia's racial demographics. Additional texts were sent to areas of the city with low response rates and large communities of color. In total the effort contacted 72,000 residents via text, 10,000 by post card, tens of thousands through email, and thousands more via social media. The survey was available in seven languages in addition to English<sup>1</sup>. NACs were tasked with spreading the word about the survey and encouraging to the communities that they serve to complete it. Still, the demographics of survey respondents differed somewhat from characteristics of all household heads in Philadelphia; respondents were somewhat more likely to be White, to own their home, and to have a higher level of educational attainment than demographic data from the American Community Survey (ACS) would suggest, all common types of over-representative responses in public opinion surveys. The Urban Institute, which had been supporting DHCD in the survey process, developed a set of statistical weights to adjust for these differences. The weights were defined to line up to the ACS surveyed households on the following characteristics of the household or head of household: own or rent; race/ethnicity of household head; female or male; education for age 25+; age; and household makeup (one-person households and those with a child under 18).

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<sup>1</sup> Arabic, Chinese, French, Portuguese, Russian, Spanish, and Vietnamese.

The survey results reveal substantial differences across various groups of residents protected under the federal or state fair housing law related to key fair housing issues, including the ability to find and maintain housing, access to financing, and neighborhood satisfaction.

### **Community engagement activities**

Community Capacity Builders (CCB) facilitated a series of semi-structured discussions with community partners to collect feedback on fair housing priorities. This included presentations at five community partner meetings, three focus groups with housing service providers, and an online community feedback tool available in English, Spanish, and Chinese. The tool was open for two weeks to give respondents an opportunity to provide feedback to open-ended discussion questions similar to those used in the discussions. A full summary of community discussions and these is available in Appendix B.

## **Assessment of Past Goals and Actions**

### **Housing Action Plan**

Philadelphia's Department of Planning and Development's released "Housing for Equity: An Action Plan for Philadelphia," in 2018.<sup>2</sup> The Plan is the synthesis of several housing reports and working committee recommendations – including the 2016 AFH and the AFH Stakeholder group -- into one comprehensive, action-oriented document. The Plan's strategies foster economic growth, ensure sustainable neighborhoods, and promote fair and equitable access to quality, affordable housing opportunities, through the creation or preservation of 100,000 affordable units in ten years. From 2019 through June of 2021, the city had achieved a third of this goal (33,882 homes). This includes the preservation (through repair or financial assistance) of 2,600 ownership and 179 rental units, and production of 2,535 new ownership and 923 new rental units in the first six months of 2021 alone, through both public intervention and market activity. The vast majority of units house Black Philadelphians. Preservation strategies include expanding the Adaptive Modifications Program, which provides home modifications to people with disabilities to improve access and mobility, increased funding for the Basic Systems Repair Program, which fixes roofs and major systems, and assistance resolving tangled titles. Strategies to create new affordable units include Philly First Home (also noted below) and the Home Buy Now employer down payment assistance program.

### **Housing Programs, Investments, and Legislation Introduced Since 2016**

The City of Philadelphia has implemented a number of measures that address housing and neighborhood disparities since the 2016 AFH was completed. Several programs focused on reducing and preventing evictions, which were first identified as disproportionately affecting Black neighborhoods in the 2016 AFH. Many of the programs launched during the COVID-19 pandemic addressed longstanding problems that were made more severe by the health and economic impacts of the pandemic. PHA collaborates with the City on a broad range of housing and neighborhood initiatives including development of the Housing Action Plan and other activities to further the goals and strategies identified in the 2016 AFH. New laws and new and ongoing initiatives include:

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<sup>2</sup><https://www.phila.gov/documents/housing-for-equity-an-action-plan-for-philadelphia/>

***Second Chance Initiative (2016)*** is a voucher pilot program implemented by PHA to provide supportive services and housing subsidies to formerly incarcerated returning citizens that are active participants in good standing with the Eastern District Federal Court Supervision to Aid Reentry (STAR) Program and Mayor's Office of Reintegration Services (RISE) Program. PHA also is implementing a pilot initiative with the Pennsylvania First Judicial Court's MENTOR program to allow qualified returning citizens who are referred by and working with the MENTOR program to move in with existing PHA public housing households.

***Preservation of Public Housing (2016):*** PHA has closed on over 1,800 housing units through the Rental Assistance Demonstration (RAD) program including conversions of existing public housing and "transfer of assistance" from vacant, unviable scattered site units to new housing developed by PHA and its partners. PHA is planning additional public housing RAD conversions and will also utilize HUD's new "Faircloth to RAD" initiative to create new affordable housing.

***Philadelphia Eviction Prevention Project (2017)*** was a collaboration among six agencies that introduced a Lawyer of the Day in Landlord Tenant Court, courtroom navigators, a new informational website (phillytenant.org), and laid the groundwork for City Council's passage of Right to Counsel legislation.

***Philly First Home (PFH) down payment assistance program (2018)*** provides grants of up to \$10,000 for first-time home buyers (80% of grant recipients in the first 18 months were people of color).

***Right to Counsel legislation (passed 2019, funded and implemented 2022):*** Provides for no-cost access to an attorney for tenants earning <200% of poverty; currently piloted in two zip codes (those pilot zip codes had high numbers and rates of eviction filings, and high rates of family poverty. Each zip code is home to 75%+ Black residents).

***Good Cause Eviction legislation (2019)*** offers protections to month-to-month renters by giving the tenant 30 days' notice that a lease will end and requiring a stated "good cause" such as nonpayment of rent, breach of the lease, damage to property, or nuisance behavior.

***Philadelphia Housing Authority Opening Doors to Homeownership Program (enhanced program launched in 2019)*** consolidated PHA's existing HUD-approved Section 5h Homeownership Program, Housing Choice Voucher (HCV) Homeownership Program, other new development homeownership initiatives and homeownership readiness and counseling support initiatives. In late 2021, PHA launched a new program with local partners to renovate 53 vacant and distressed scattered site homes in the Brewerytown neighborhood to create affordable homeownership opportunities.

***Housing Choice Voucher Program Small Area Fair Market Rents (2019):*** PHA adopted Small Area Fair Market Rents (SAFMR) to establish payment standards for the HCV tenant-based program. PHA plans to establish exception payment standards for specific areas of revitalization, identified by blocks, groups of blocks or other geographic areas, and remove the 120% limitation for those areas undergoing significant revitalization.

***Emergency Housing Protection Act (passed 2020, successfully defended in court)*** required landlords to allow for rent repayment agreements and fee and interest waivers on back rent, and to participate in mediation if requested by the tenant.

**Eviction Moratorium (2020-2021):** The City of Philadelphia and Philadelphia Housing Authority each implemented moratoriums on eviction filings that were longer and more broadly applied than the federal moratorium issued by the CDC.

**Emergency Rental Assistance administration (2020-22)** provided \$300 million to cover rental payments for tenants who had a COVID hardship. Philadelphia's program has been noted for being more successful than other cities in moving dollars out the door to support renters. Of recipients, 67% were Black, 9% were Hispanic, and 47.2% were families with children.

**Eviction Diversion Program (2020)** requires landlords go to mediation with tenants before filing in court for eviction; while the Emergency Rental Assistance program was active, landlords were also required to apply for rental assistance.

**New Normal Budget (passed 2020)** transferred \$25 million from the City's recession reserve to fund programs designed to address social ills highlighted by COVID-19 and the George Floyd murder, such as health disparities, lack of access to fresh food, and unmet affordable housing needs.

**Tenant Screening Protections (2021)** created uniform screening criteria to prevent landlords from denying potential tenants solely based on credit scores and past evictions.

**Housing Trust Fund dedicated funding (2019 and 2021)** Council created HTF Sub fund and Mayor committed \$20M/year in 2019. In 2021, voters amended the City Charter to provide a mandatory annual appropriation of .5% of the City's General Fund budget for the Housing Trust Fund.

**Neighborhood Preservation Initiative bond (passed 2021)** commits \$400 million in funding over the next four years to housing and community development initiatives including PFH, basic systems repair, and resolving tangled titles.

**Inclusionary Zoning legislation (passed 2021)** requires any development with 10 or more housing units to set aside 20% of the units as affordable in the 3rd and 7th Council Districts.

**Philadelphia Housing Authority Landlord Incentive program (2021):** provides a signing bonus to landlords new to the Housing Choice Voucher program, with larger amounts available for units in high opportunity areas.

**Philadelphia Accelerator Fund (launched 2022):** supports Black and Brown developers to increase the supply of mixed income and unsubsidized affordable housing.

**Housing Mobility Program (Ongoing):** PHA continues to operate the Housing Opportunity Program (HOP) to support voucher participants who wish to move to areas of higher opportunity. HOP Program staff conduct outreach and marketing and provide voucher holders with housing counseling and training before, during, and after moves.

**Unit Based Voucher Program (Ongoing):** Through this program, PHA currently provides or has committed long-term operating subsidies to over 4,300 housing units, many of which offer supportive services and are developed by a wide range of qualified developers including neighborhood-based organizations.

The City and civic sector partners have made additional investments and policy changes during this period that have had a positive impact on neighborhood opportunity. These include:

- PHLpreK (2017)
- Rebuild (2018)
- Poverty Action Plan (2020)
- Philadelphia Emergency Fund for Stabilization of Early Education (2020)
- Promoting Healthy Families and Workplaces Act (paid sick leave, 2021)
- School District of Philadelphia changes to selective admit school process (2021)
- Cash assistance programs through PHCD and the Office of Community Empowerment and Opportunity (2022)

## Fair Housing Analysis

This section highlights trends and challenges within the city's housing markets related to residential segregation, housing affordability, access to housing subsidies, and neighborhood amenities, with a special focus on disparities across protected classes identified in the Fair Housing Act. Data in this section are drawn from a variety of quantitative and qualitative sources including the City's 2022 Assessment of Fair Housing Resident Survey, and qualitative data gathered from a variety of stakeholders across the city by Community Capacity Builders (CCB).

## Demographic Summary

Over the last decade Philadelphia has seen a modest growth in population, led by the city's growing Hispanic, and Asian population.

	2010		2020	
	Total Population	Share of City	Total Population	Share of City
Black	644,287	42%	613,835	38%
White	562,585	37%	550,828	34%
Hispanic	187,611	12%	238,277	15%
Asian	95,521	6%	132,408	8%
Other	8,060	1%	14,594	1%
Multiple Races	27,942	2%	53,855	3%
<b>Citywide Total</b>	<b>1,526,006</b>	<b>100%</b>	<b>1,603,797</b>	<b>100%</b>

Source: Decennial Census, 2010 - 2020

Today, the city is 38% Black, with foreign born residents comprising nearly 14% of the population. The city remains majority homeowner, with 53% of households owning their homes; while that is decline from 59% in 2000, the American Community Survey estimated a rebound in that share from a low of 51% in 2013-2017 in the most recent data available (2020). Incomes across the city remain low, with nearly one in five families living below the federal poverty line.

	Total Population	Share of City
<b>Foreign Born Residents</b>	222,566	14%
<b>Individuals with 1+ Disabilities</b>	261,440	17%
<b>Renters</b>	282,465	47%
<b>Homeowners</b>	318,872	53%
<b>Families Under 100% Poverty*</b>	62,413	19%
<b>Families 100% to 199% Poverty</b>	63,688	20%
<b>Families 200% to 299% Poverty</b>	51,454	16%
<b>Families Over 300% Poverty</b>	148,361	46%

Source: American Community Survey, 2015 – 2019

\*Poverty income is dependent on household size. The 2019 poverty threshold for a family of three was \$21,330.



## Housing Segregation and Integration

The growth of Asian and Hispanic resident populations has helped Philadelphia become less racially and ethnically segregated over time, although residential segregation between White and Black residents remains high.

The chart below shows the citywide Index of Dissimilarity, a commonly used measure of residential segregation, between 1990 and today. The Index of Dissimilarity represents the proportion of a racial or ethnic group that would need to move to create a uniform distribution of the population across a city. Values range from zero (no segregation) to 100 (total segregation). In general, values above 60 are considered highly segregated.

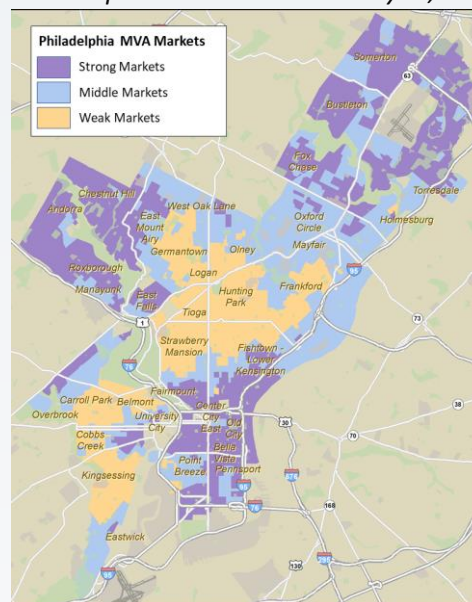
While the three types of segregation measured in the chart have declined over time (White/Black, White/Hispanic, White/Asian), the level of White/Black segregation in Philadelphia remains high.

## Market Value Analysis (MVA)

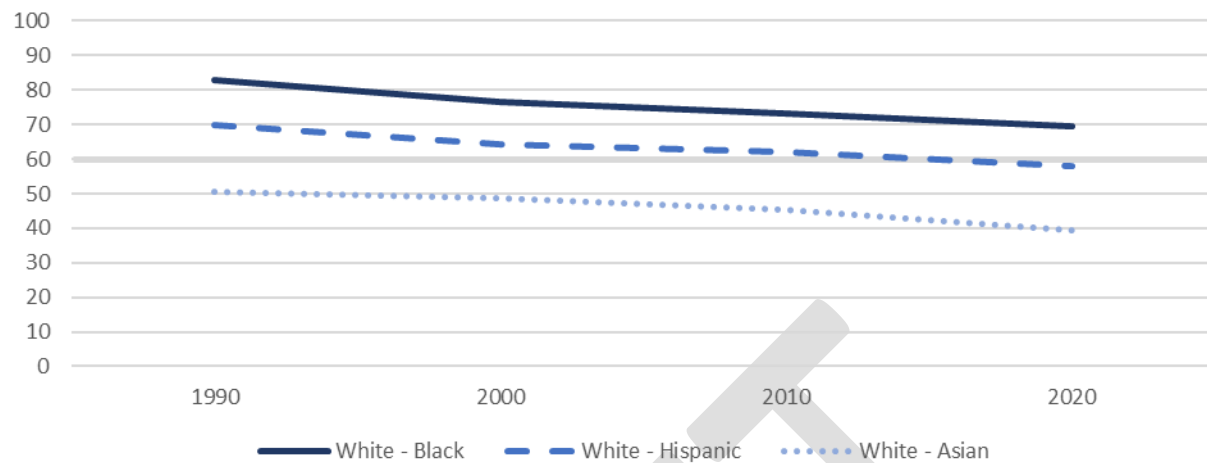
Throughout, the AFH relies on Philadelphia's Market Value Analysis (MVA) as a tool to understand housing markets at the census block group level and disparities in access and opportunity. The MVA uses a variety of market indicators to analyze and understand the nature and conditions of housing market types – ranging from the most distressed (high vacancy and foreclosure, etc.) to the strongest areas (high construction activity, high prices, etc.) – across the city.

Since creating the first MVA in 2001, Reinvestment Fund has completed seven MVAs for Philadelphia, which have been used by a range of public and private stakeholders to target strategies and interventions according to housing market types.<sup>1</sup> The most recent MVA reflects data through 2018. An update conducted later this year will reflect changes through 2022, which in some neighborhoods have been substantial; it is likely that a number of areas will change categories. The 2016 AFH used an earlier iteration of the MVA as a similar analytic framework. The nine market types identified in 2018 are simplified into the three categories for this analysis. (See Appendix C for more information).

### *Philadelphia Market Value Analysis, 2018 (Simplified)*



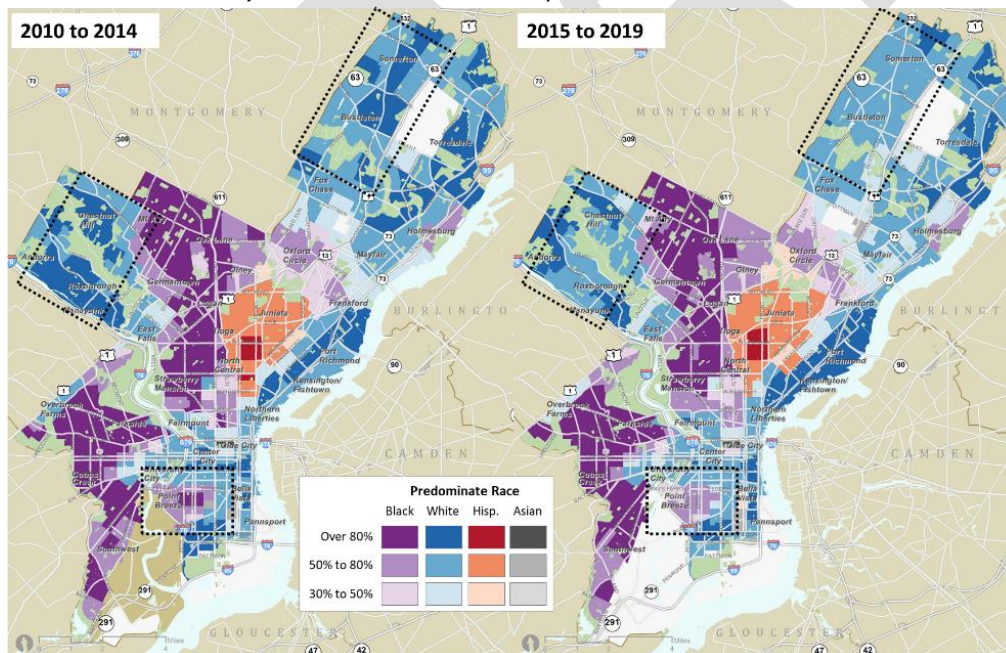
### Index of Dissimilarity, 1990 to 2020



Source: John R. Logan and Brian Stults. 2021. "The Persistence of Segregation in the Metropolis: New Findings from the 2020 Census" Diversity and Disparities Project, Brown University

The figure below shows the racial composition of the city by identifying the predominant race in each census tract between 2010-2014 and 2015-2019. The changes in predominant race illustrate that the city has fewer areas where over 80% of the population is White, particularly in Northeast and Northwest Philadelphia as highlighted on the maps. There are also some areas that were previously over 80% Black but are not longer as concentrated (notably Point Breeze in South Philadelphia).

### Predominant Race by Census Tract in Philadelphia, 2010-2014 and 2015-2019



Source: Reinvestment Fund Analysis of American Community Survey

When CCB engaged with stakeholders about integration in their communities, their conversations focused on understanding the difference between integration and gentrification. For example, while the Point Breeze neighborhood has become more diverse (the area is no longer over 80% Black),

stakeholders stated that the area's integration was achieved through a gentrification process where Black residents were forced to move due to rising housing costs.<sup>3</sup> When asked to describe what integration meant to them, stakeholders described communities that were diverse and where all residents have access to resources and stable housing without the threat of displacement.

One participant explained that while integration had historically been defined as Black residents moving to predominantly White neighborhoods, this form of integration does not also distribute resources across a city, but rather keeps them concentrated in certain areas, which only a few privileged people are able to enjoy. High-quality housing and neighborhood amenities should be available in every part of Philadelphia. This form of integration would require promoting housing options for low-income people, people of color, and people with disabilities. In addition, language access and culturally appropriate resources should be available in all neighborhoods.

Despite overall declines in residential segregation, whether associated with gentrification or not (Northeast Philadelphia stands as an example of increased integration without any signs of gentrification), substantial racial disparities in housing markets exist. The table below shows the racial composition of different housing markets identified in the Philadelphia MVA. The city's Black and Hispanic residents are disproportionately concentrated in Philadelphia's Distressed Markets, when compared with White and Asian residents.

*Population by MVA Category, by Race*

	White	Black	Asian	Hispanic	Total
<b>Strong Markets</b>	321,390	64,656	45,042	34,981	480,273
<b>% by Race</b>	67%	13%	9%	7%	100%
<b>% by Market</b>	59%	10%	40%	15%	30%
<b>Middle Markets</b>	173,698	273,214	49,437	98,479	614,457
<b>% by Race</b>	28%	44%	8%	16%	100%
<b>% by Market</b>	32%	42%	44%	42%	39%
<b>Distressed Markets</b>	26,052	292,563	11,312	93,113	431,937
<b>% by Race</b>	6%	68%	3%	22%	100%
<b>% by Market</b>	5%	45%	10%	40%	27%
<b>Unclassified Markets</b>	23,294	14,290	7,693	5,285	52,408
<b>% by Race</b>	44%	27%	15%	10%	100%
<b>% by Market</b>	4%	2%	7%	2%	3%
<b>Citywide Total</b>	544,434	644,723	113,484	231,858	1,579,075
<b>% by Race</b>	34%	41%	7%	15%	100%
<b>% by Market</b>	100%	100%	100%	100%	100%

Source: Reinvestment Fund Analysis of American Community Survey, 2015 – 2019

Single-parent households are also disproportionately concentrated in Distressed housing markets, when compared with all families, and two parent households. In CCB's outreach, a housing counselor reported

<sup>3</sup>See discussion of Reinvestment Fund's Displacement Risk Ratio analysis on page 28, which identified a relationship between rising housing costs and Black population loss between 2010 and 2019 in a number of Philadelphia neighborhoods, including Point Breeze.

that single-parent households experience more barriers to renting and higher evictions, which limits their neighborhood choices.

#### *Families with Children by MVA Category, by Family Type*

	Families with Children	Two-Parent Families	Single-Parent Families	All Family Households
<b>Strong Markets</b>	37,326 (27%)	26,130 (41%)	11,196 (15%)	103,444 (31%)
<b>Middle Markets</b>	55,658 (40%)	25,508 (40%)	30,150 (40%)	128,529 (39%)
<b>Distressed Markets</b>	41,172 (30%)	9,457 (15%)	31,715 (42%)	87,955 (26%)
<b>Unclassified Markets</b>	2,394 (1%)	1,142 (1%)	1,252 (1%)	5,988 (1%)
<b>Citywide Total</b>	136,550 (100%)	62,237 (100%)	74,313 (100%)	325,916 (100%)

Source: Reinvestment Fund Analysis of American Community Survey, 2015 – 2019

Individuals with disabilities were also living in Distressed Markets at higher rates than the overall population of the city. In outreach sessions, CCB documented a number of ways in which that it is difficult to find housing for people who use wheelchairs. Moreover, many people with disabilities are on a fixed income, and advocating for accessibility is a challenge even for middle-income people with disabilities.

#### *Population by MVA Category, by Disability Status*

	People with 1+ Disability
<b>Strong Markets</b>	21,078 (8%)
<b>Middle Markets</b>	98,628 (37%)
<b>Distressed Markets</b>	139,156 (53%)
<b>Unclassified Markets</b>	2,578 (0%)
<b>Citywide Total</b>	261,440 (100%)

Source: Reinvestment Fund Analysis of American Community Survey, 2015 – 2019

### Disparities in Access to Opportunity

To understand more about how residents assess the quality of services in their own communities, survey respondents were asked to rate different aspects of their neighborhood on a four-point scale (i.e., excellent, good, fair, poor). In some cases, results show very clear differences by race and ethnicity.

The table below presents the percent of respondents who rated each condition excellent or good. Focusing on those conditions for which there was more than a 10-percentage point difference between White respondents and Black, Hispanic, or Asian/PI respondents, there was substantially greater satisfaction among White respondents in six areas: *cleanliness of neighborhood, condition of buildings, condition of public spaces (like parks, libraries, and recreation centers), condition of business/commercial corridors, and condition of neighborhood schools.*

Hispanic and Asian/Pacific Islanders gave public transportation access the lowest ratings (62% rated good/excellent compared to 73% for all respondents). What is also noticeable is that other than access to public transportation, generally, less than 50% (and oftentimes far less than 50%) rated the conditions in their neighborhoods excellent or good.

In CCB's outreach sessions, community stakeholders pointed to a lack of adequate trash collection, policing, well-paying jobs, healthy food, trees, green spaces, and educational resources in historically under-resourced neighborhoods.

*Share of Respondents Rating Neighborhood Conditions "Good" or "Excellent", by Race/Ethnicity*

	White	Black	Hispanic	Asian/PI	All Respondents
Access to Public Transportation	78%	71%	62%	62%	73%
Condition of Buildings	62%	34%	33%	37%	46%
Condition of Public Spaces	56%	31%	32%	33%	41%
Condition of Business/Commercial Corridors	49%	33%	31%	32%	39%
Cleanliness of Neighborhood	40%	27%	27%	31%	33%
Condition of Neighborhood Schools	41%	26%	30%	27%	32%
Condition of Vacant Lots	30%	23%	21%	20%	25%
Condition of Sidewalks	29%	20%	23%	26%	24%
Condition of Streets	22%	19%	21%	20%	20%

Source: AFH Survey 2022

Households with children generally rated neighborhood conditions as worse than those that did not have children, while ratings were similar across households that did and did not have disabled members.

*Share of Respondents Rating Neighborhood Conditions "Good" or "Excellent", by Disability/ Family Status*

	Household Has Member w/ Disability	Household Doesn't Have Member w/ Disability	Household Has Children	Household Doesn't Have Children	All Respondents
Access to Public Transportation	73%	72%	63%	76%	73%
Condition of Buildings	40%	48%	35%	49%	46%
Condition of Public Spaces	38%	43%	29%	45%	41%
Condition of Business/Comm. Corridors	36%	40%	33%	41%	39%
Cleanliness of Neighborhood	31%	33%	27%	34%	33%
Condition of Neighborhood Schools	33%	31%	24%	35%	32%
Condition of Vacant Lots	26%	24%	23%	26%	25%
Condition of Sidewalks	22%	25%	20%	25%	24%
Condition of Streets	22%	19%	17%	21%	20%

Source: AFH Survey 2022

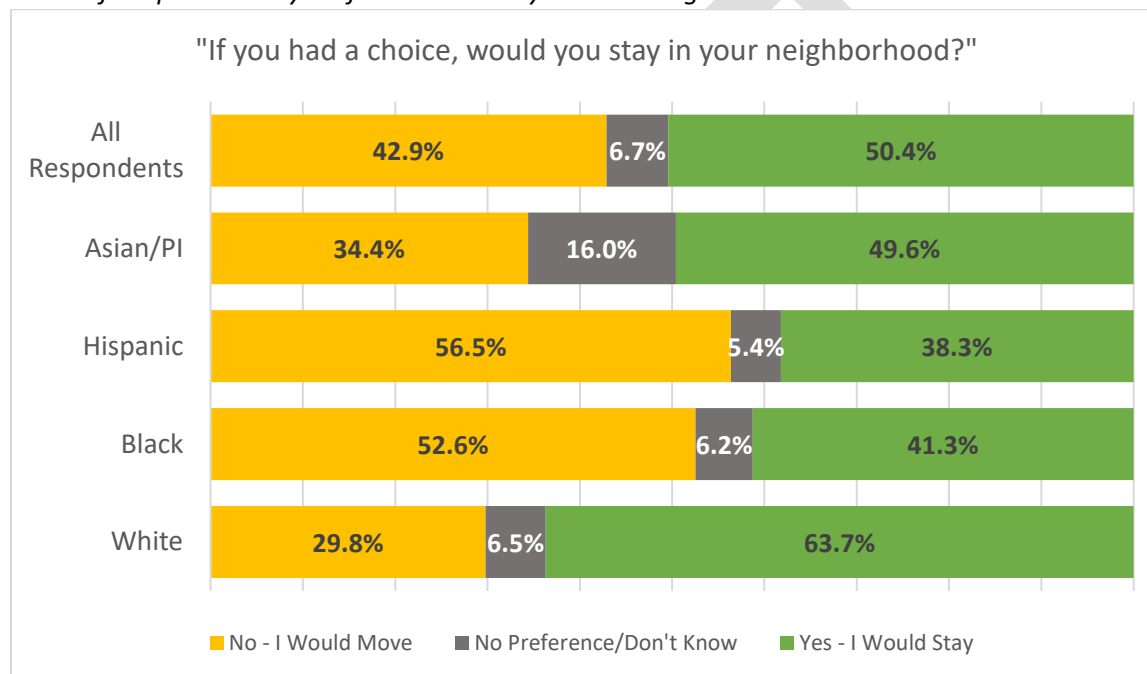


## Resident Satisfaction

Survey respondents were also asked, if given the choice, would they continue to live in their neighborhood? While half of all respondents said yes (50.3%), the data show that answers differed widely by race and ethnicity. A substantially higher percentage of Black (52.6%) and Hispanic (56.4%) people, compared to White (29.8%) and Asian/Pacific Islanders (34.4%), responded “No, I would like to move to a different neighborhood.”

Similar patterns were observed in the 2016 AFH survey, in which Black respondents were 11 points less likely than others to say that they wanted to continue living in their neighborhoods. Among CCB’s focus groups, participants identified school quality is a key reason why Black households and immigrants choose to move out of their neighborhoods.

### *Share of Respondents by Preferences To Stay In Their Neighborhood*



Source: AFH Survey 2022

## Access to Amenities

Survey respondents were also asked to rate how easy or difficult it would be for them to get to different amenities and resources on a four-point scale (i.e., very easy, somewhat easy, somewhat difficult, or very difficult). White respondents generally reported greater ease of access to all neighborhood amenities and opportunities – although differences were generally not substantial.

Access to job opportunities was one exception. White respondents were over 20 percentage points more likely to rate access to job opportunities in their neighborhoods highly (62%) compared to Black (42%) and Hispanic (39%) respondents. Asian/Pacific Islander respondents were least likely to report good access to recreation centers and playgrounds (67% vs. 82% of all respondents).

*Share of Respondents Rating Neighborhood Access "Very Easy" or "Somewhat Easy", by Race/Ethnicity*

	Black	White	Hispanic	Asian/PI	All Respondents
Pharmacy	87%	92%	86%	95%	91%
House of Worship or Spiritual Center	86%	90%	78%	83%	86%
Supermarket or Grocery Store	80%	86%	80%	86%	83%
Recreation Center or Playground	77%	91%	72%	67%	82%
Park or Green Space	76%	90%	70%	78%	81%
Businesses and Restaurants	76%	88%	75%	86%	81%
Banks or Credit Union	76%	85%	75%	83%	80%
Public Library	78%	85%	72%	73%	79%
Hospital or Health Care Facility	80%	81%	73%	76%	79%
Community or Cultural Center	62%	74%	51%	62%	65%
Job Opportunities	42%	62%	39%	54%	50%

Source: AFH Survey 2022

Households with children and households with a member with a disability both rated their access to amenities lower than their peers, although rates were generally similar.

*Share of Respondents Rating Neighborhood Access "Very Easy" or "Somewhat Easy", by Disability and Family Status*

	Household Has Member w/ Disability	Household Doesn't Have Member w/ Disability	Household Has Children	Household Doesn't Have Children	All Respondents
Pharmacy	86%	92%	88%	91%	91%
House of Worship or Spiritual Center	81%	88%	82%	87%	86%
Supermarket or Grocery Store	79%	84%	82%	83%	83%
Recreation Center or Playground	75%	84%	77%	83%	82%
Park or Green Space	73%	84%	75%	83%	81%
Businesses and Restaurants	77%	83%	79%	82%	81%
Banks or Credit Union	74%	82%	79%	80%	80%
Public Library	75%	81%	80%	76%	79%
Hospital or Health Care Facility	79%	78%	77%	80%	79%
Community or Cultural Center	60%	67%	59%	67%	65%
Job Opportunities	43%	54%	47%	51%	50%

Source: AFH Survey 2022

The previous table, which shows Black and Hispanic respondents rating their access to job opportunities lower than White or Asian respondents may reflect their inability to access higher paying and more conveniently located jobs in Philadelphia. The table below shows the average income of workers in the metro area based on where they live and work. City residents who commute to the suburbs often do so for low-wage jobs and White workers have higher wages regardless of where they live or work.

*Average Income by Place of Residence and Place of Work, by Race*

	Residents Who Leave Phila. for Work	Residents Who Work in Phila.	Non-residents that Work in Phila.
<b>Black</b>	\$16,863	\$39,834	\$58,056
<b>White</b>	\$33,853	\$65,164	\$98,182
<b>Hispanic</b>	\$14,360	\$34,707	\$63,265
<b>Asian</b>	\$19,946	\$48,192	\$90,619
<b>Multi</b>	\$18,177	\$48,425	\$74,373
<b>Other</b>	\$16,358	\$44,434	\$58,986

Source: Reinvestment Fund Analysis of American Community Survey, 2015 – 2019

In CCB’s community discussions, residents in communities of color cited a lack of amenities serving families and children as one reason residents might seek to leave the city. These concerns are partially confirmed by data on access to high quality childcare. The table below shows the share of residents that live in areas with the best access to high quality early childhood education. While access to high quality early childhood education is far less than universal throughout Philadelphia, Black and Hispanic residents were much less likely to live in areas with good access.

*Share of Citywide Population in Areas with Best Access to High-Quality Early Childhood Education*

Best Access to High Quality Early Childhood Education	
<b>Black</b>	25%
<b>White</b>	41%
<b>Hispanic</b>	28%
<b>Asian</b>	34%
<b>Total Population</b>	<b>32%</b>

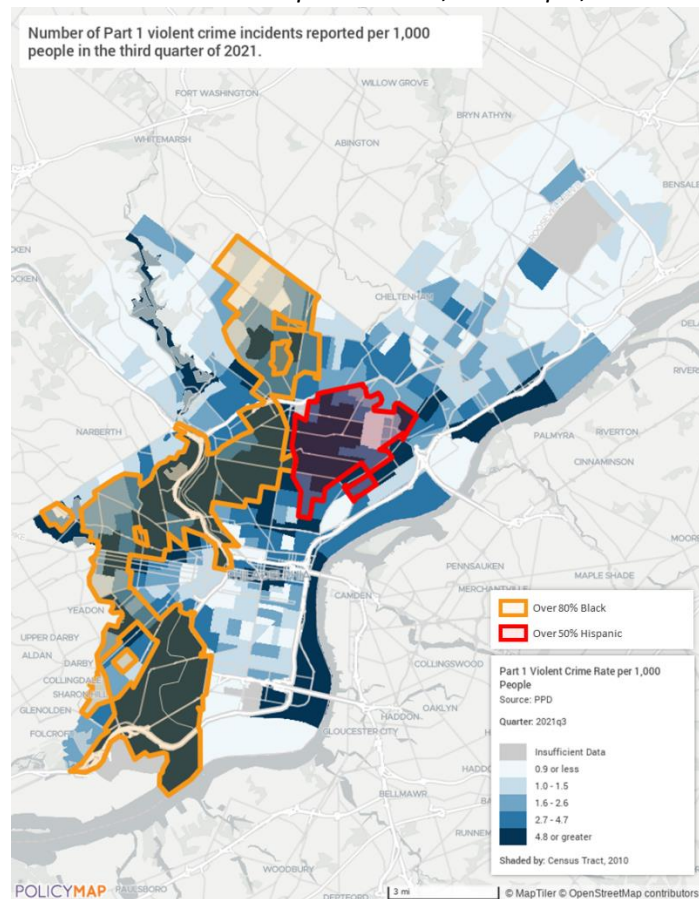
Source: Childcaremap.org

**Health and Safety**

Crime and public safety were one of the main challenges cited by residents both in the resident survey and the CCB conversations. The map below shows violent crime rates across the city. Incidents of violent crime were concentrated in communities of color, primarily Black and Hispanic communities.



### Violent Part 1 Crimes Reported Per 1,000 People, 2021 Q3



Source: [www.policymap.org](http://www.policymap.org)

Participants in community convenings agreed that public safety had deteriorated since 2016, particularly in West Philadelphia and North Philadelphia where residents identified assaults and shootings as major concerns. Housing counselors also mentioned having clients who wished to move out of these neighborhoods as a result.

In Kensington and other parts of North Philadelphia, staff from community organizations spoke about the drug trade and associated violence. They believe that the city had failed to adequately address the opioid crisis, which has disproportionately impacted Latino neighborhoods.

For Asian residents, public safety has been a top concern given the spike in attacks targeting Asian residents since the start of the pandemic.

To understand more about resident's specific public safety concerns, AFH Survey respondents were asked about the specific public safety issues in their neighborhood that concerned them. Generally speaking, a high percentage of Philadelphia residents of all races and ethnicities expressed concern with most of the issues identified on the survey. Violence and theft were the most broadly shared concerns (69% were concerned about shootings and gun violence, 58% about violent crime more broadly, 75% about theft). As it relates to violent crime, a substantially greater percentage of Black (69%), Asian/PI (64%) and Hispanic (59%) respondents compared to White (52%) expressed concern. Similarly, more than 80% of Black, 72% of Hispanic, and 63% of Asian/PI respondents expressed concern about shootings and gun violence, compared to 58% of White respondents.

Although over half of all respondents were concerned with drug activity, rates of concern were highest among Black and Hispanic residents. Under 50% of all respondents cited street lighting, dangerous traffic/crosswalks, and environmental hazards as concerns.

*Share of Respondents Identifying Safety Issues in their Neighborhood, by Race/Ethnicity*

	Black	White	Hispanic	Asian/PI	All Respondents
<b>Theft</b>	72%	79%	70%	74%	75%
<b>Shootings/Gun Violence</b>	80%	58%	72%	63%	69%
<b>Carjacking</b>	61%	61%	70%	62%	61%
<b>Violent Crime</b>	69%	52%	59%	64%	61%
<b>Drug Activity</b>	64%	53%	67%	53%	60%
<b>Poor Street Lighting</b>	51%	42%	51%	46%	47%
<b>Dangerous Traffic/Crosswalks</b>	36%	52%	46%	45%	44%
<b>Environmental Hazards (e.g., flooding, pollution)</b>	27%	26%	26%	25%	27%

Source: AFH Survey 2020

On average, households with a member with a disability and households with children were more concerned about public safety issues in their neighborhoods than other residents, although rates were generally similar in both groups. The largest differences between groups were related to shootings and gun violence. Households with a member with a disability were 7 percentage points more likely to have experienced this issue in their neighborhoods and households with children were nearly 10 percentage points more likely to have experienced this issue in their neighborhoods.

*Share of Respondents Identifying Safety Issues in their Neighborhood, by Disability and Family Status*

	Household Has Member w/ Disability	Household Doesn't Have Member w/ Disability	Household Has Children	Household Doesn't Have Children	All Respondents
<b>Theft</b>	78%	74%	75%	75%	75%
<b>Shootings/Gun Violence</b>	74%	67%	76%	67%	69%
<b>Carjacking</b>	61%	61%	63%	60%	61%
<b>Violent Crime</b>	66%	58%	66%	59%	61%
<b>Drug Activity</b>	65%	58%	65%	58%	60%
<b>Poor Street Lighting</b>	50%	46%	49%	46%	47%
<b>Dangerous Traffic/Crosswalks</b>	44%	45%	43%	45%	44%
<b>Environmental Hazards (e.g., flooding, pollution)</b>	27%	26%	28%	26%	27%

Source: AFH Survey 2020

The COVID-19 pandemic had a substantial impact on the entire city. As of March 2022, the pandemic had contributed to over 5,000 deaths in Philadelphia. The table below shows the number of deaths across sex, race, and ethnic groupings. The data show a disproportionate number of deaths from COVID-19 occurred among men and Black residents.

*COVID-19 Deaths in Philadelphia County (as of March, 2022)*

	COVID Deaths	Citywide Pop.
<b>Male</b>	2,614 (52%)	47%
<b>Female</b>	2,421 (48%)	53%
<b>Hispanic</b>	519 (10%)	15%
<b>Not Hispanic (all races)</b>	4,512 (90%)	85%
<b>White</b>	1,784 (35%)	41%
<b>Black</b>	2,516 (50%)	42%
<b>Asian</b>	211 (4%)	7%
<b>Multiple/Other</b>	524 (10%)	10%
<b>Total</b>	<b>5,035 (100%)</b>	<b>100%</b>

Source: Pennsylvania Department of Health, "COVID-19 Dashboard." Data retrieved March 22, 2022. Note that each race category in this table includes Hispanic individuals.

## Disproportionate Housing Needs

### Housing Affordability

With low incomes across the city, housing affordability was a persistent challenge in Philadelphia. One rule of thumb is that households that spend over 30% of their income on housing costs are considered housing "cost burdened." According to the latest census data, nearly 40% of Philadelphia households were cost burdened, a slight decline from the 42% observed in the 2016 AFH, with just over one-in-five households spending over 50% of their income on housing, a share that did not change since 2016.

In general, renters had higher rates of cost burden than homeowners. The table below shows the total number of households spending under 30% of income on housing, 30 to 50% of income on housing, and over 50% of income on housing.

### Share of Income Spent on Housing by Tenure and Mortgage Status

	Owners with Mortgages	Owners without Mortgages	Renters	All Households
<b>Spend Less than 30% of Income on Housing</b>	125,652 (67%)	99,876 (81%)	118,767 (46%)	344,295 (60%)
<b>Spend 30% to 50% of Income on Housing</b>	32,669 (17%)	13,510 (11%)	59,649 (23%)	105,828 (18%)
<b>Spend Over 50% of Income on Housing</b>	30,328 (16%)	10,646 (9%)	81,425 (31%)	122,399 (21%)
<b>All Households</b>	<b>188,649 (100%)</b>	<b>124,032 (100%)</b>	<b>259,841 (100%)</b>	<b>572,522 (100%)</b>

Source: American Community Survey, 2015-2019

Incomes are strongly correlated with cost burden. The table below shows the share of households spending over 30% of income on housing by household income. One reason that renters had higher rates of cost burden was that they, on average, had lower incomes than homeowners. However, even among households with the same income level, a greater proportion of renters were cost burdened than homeowners.

*Share of Households Spending Over 30% of Income on Housing by Income and Tenure*

	Homeowners	Renters	All Households
<b>Income Under \$20k</b>	80%	88%	85%
<b>Income \$20k to \$35k</b>	47%	85%	66%
<b>Income \$35k to \$50k</b>	34%	53%	43%
<b>Income \$50k to \$75k</b>	19%	21%	20%
<b>Income Over \$75k</b>	4%	4%	4%
<b>All Households</b>	<b>28%</b>	<b>54%</b>	<b>36%</b>

Source: American Community Survey, 2015-2019

CCB reported that cost has become the most pressing housing issue for renters. Participants reported that landlords have increased rents particularly in gentrifying neighborhoods. But they also reported that in historically under-resourced Philadelphia neighborhoods, an increase in investors buying properties has also led to rising rents.

These findings are echoed in ACS data for Philadelphia which show communities of color struggling with affordability at higher rates than other areas. The table below shows the proportion of households that were cost burdened by the racial and ethnic composition of their community. Rates of cost burden were nearly twice as high in predominantly Black and predominantly Hispanic communities than in predominantly White communities.

*Share of All Households Spending Over 30% of Income on Housing, by Census Tract Composition*

	Cost-Burdened Households
<b>Over 80% Black</b>	44%
<b>Over 80% Hispanic</b>	55%
<b>Over 80% White</b>	28%
<b>Citywide</b>	36%

Source: American Community Survey, 2015-2019

These disparities were also apparent in resident survey responses. Overall, 60% of respondents had experienced difficulty paying for at least one type of housing cost. Black and Hispanic respondents were more likely to struggle with rent (47.7% and 46.0%) and utilities (41.5% and 36.20%) than other groups. Asian/PI respondents were most likely to struggle with a mortgage and with home repair costs; higher than average shares of Hispanic and Black respondents also reported difficulty with repair costs.

*Share of Philadelphia Residents who Experienced Trouble with Housing Costs*

	White	Black	Hispanic	Asian/PI	All Responses
<b>Rent</b>	18.5%	47.7%	46.0%	23.5%	34.0%
<b>Utilities</b>	20.4%	41.5%	36.2%	22.7%	31.2%
<b>Home Repairs</b>	17.5%	25.6%	28.0%	30.3%	22.8%
<b>Taxes</b>	9.2%	8.3%	5.6%	10.9%	8.8%
<b>Mortgage</b>	6.1%	6.3%	6.7%	10.1%	6.5%

Source: AFH Survey 2022

For residents with disabilities, the largest struggles with housing costs were related to utilities, rent and home repairs. In each case, households with a disabled member were more likely to report housing cost challenges than their peers.

*Share of Philadelphia Residents who Experienced Trouble with Housing Costs by Presence of Member with a Disability*

	Household Has Member with a Disability	Household Did Not Member with a Disability	All Responses
<b>Rent</b>	39.7%	28.1%	34.0%
<b>Utilities</b>	45.0%	28.2%	31.2%
<b>Home Repairs</b>	37.5%	22.5%	22.8%
<b>Taxes</b>	13.2%	9.0%	8.8%
<b>Mortgage</b>	12.0%	8.1%	6.5%

Source: AFH Survey 2022

## Evictions

Black and Hispanic communities have long faced higher eviction filing rates, even when controlling for income and the presence of public housing units.<sup>4</sup> The table below shows eviction filing rates for renter households in Philadelphia between 2018 and 2022. Beginning in September 2020, landlords have had to go through the City's eviction diversion program before filing an eviction; thus, the filings in 2020-22 are represented as *diversion* cases.

*Eviction Filings 2018-19 , and 2021-22 Diversion Program Participants by Race/Ethnicity*

	Philadelphia Renters	Eviction Filings, 2018-19*	Share Renter Households with any Filing, 18-19	Eviction Diversion (pre-filing), 9/20-2/22	Renter Households with a Diversion Case, 20-22
<b>Black</b>	127,774	22,373	8.75%	12,129	6.59%
<b>White</b>	112,103	5,860	2.61%	3,070	1.90%
<b>Hispanic</b>	38,311	3,907	5.10%	1,959	3.55%
<b>Asian</b>	16,877	848	2.51%	506	2.08%
<b>Other</b>	17,199	965	2.80%	428	1.73%
<b>Total Pop</b>	<b>282,465</b>	<b>33,953</b>	<b>6.01%</b>	<b>18,092</b>	<b>4.45%</b>

Source: RF Analysis of Court Records and 2015-2019 ACS. Race of Household Estimated using BISG Methodology. For more information see: <https://www.rand.org/health-care/tools-methods/bisg.html>

\*The filing counts cover two years (2018 and 2019); diversion participant counts cover 9/1/20- 2/10/22. Rates are annualized, but diversion participation fluctuated significantly throughout this period as result of changing regulations and resources.

## Housing Quality

Survey, focus group, and census data all confirmed that communities of color and particularly renters struggled more frequently with housing quality than their peers.

<sup>4</sup> "Evictions in Philadelphia: Race (and Place) Matters," Reinvestment Fund, 2021.  
<https://www.reinvestment.com/insights/evictions-in-philadelphia-race-and-place-matters/>

### *Focus Group Findings Related to Housing Quality*

In CCB's community focus groups, residents raised the challenges that low and moderate income renters face finding safe housing in the private rental market. Residents reported that the few affordable options available in the private rental market are often in an unsafe and unhealthy condition and may be unlicensed. Tenants struggle with addressing critically needed repairs in their units and must deal with the perceived and real threat of retaliation if they report their landlords. If a tenant does decide to make their own repairs and deduct the cost from their rent, they stand the risk of eviction.

For tenants that do report housing issues to Licenses and Inspection (L&I), the agency might inspect the property and deem it uninhabitable, forcing a tenant to leave within two (2) days. Stakeholders reported that landlords even filed cases in municipal court against tenants as retaliation for contacting L&I. This has allowed landlords to essentially use the municipal court system as their own collection agency. Ultimately, this situation creates a "revolving door" of tenants who move into a unit, ask for repairs, get evicted, and then get replaced by a new tenant who faces the same repair issues.

### *Survey Results Related to Housing Quality*

Concerns with housing quality were also evident in resident survey responses. Two-thirds of respondents said they had experienced at least one housing issue related to stability or quality. Pest, mold/moisture, and heating were the most common issues. Hispanic respondents were slightly more likely to experience pests, while mold, moisture and ventilation problems were more evenly distributed. Black respondents were the most likely to report heating issues.

Households that included at least one member with a disability faced the highest rates of housing quality issues. These households were more likely to live in homes with mold (61.5%), pests (54.8%), and heating issues (30.9%).

Threats to housing stability (i.e., eviction, foreclosure) had more notable variation by race and ethnicity, and family status. One quarter of Black and 19.7% of Hispanic respondents said they had faced an eviction or risk of eviction, compared to 6.3% of White and 5.4% of Asian/PI respondents. Similarly, among respondents in a household with children, 24.8% reported that they had faced an eviction, compared with 8.0% of households without children.

While experience with foreclosures was relatively rare (3.8%), Asian/PI respondents faced them at the highest rate (more than double the White rate), followed by Hispanic and Black respondents (50% higher than the White rate).

### *Share of Survey Respondents Experiencing Housing Quality or Stability Issues, by Race/Ethnicity*

Experience with Housing Issues	White	Black	Hispanic	Asian/PI	All Responses
<b>Pests</b>	38.2%	48.1%	53.6%	46.8%	44.6%
<b>Mold, moisture, ventilation</b>	22.4%	25.5%	25.2%	19.8%	24.2%
<b>Heating</b>	15.3%	24.3%	18.1%	16.4%	20.0%
<b>Eviction or Risk</b>	6.3%	25.4%	19.7%	5.4%	15.8%
<b>Cooling</b>	11.1%	12.6%	11.2%	8.3%	11.9%
<b>Kitchen Basics</b>	1.9%	5.7%	5.8%	2.4%	4.1%
<b>Accessibility</b>	3.4%	4.3%	3.6%	6.7%	4.0%



<b>Bathroom Basics</b>	1.9%	5.4%	5.9%	4.3%	4.0%
<b>Foreclosure or Risk</b>	1.9%	3.0%	3.1%	4.1%	2.6%

Source: AFH Survey 2022

*Share of Respondents Experiencing Housing Quality or Stability Issues, by Disability and Family Status*

	Household Has Member w/ Disability	Household Doesn't Have Member w/ Disability	Household Has Children	Household Doesn't Have Children	All Responses
<b>Pests</b>	61.8%	49.8%	54.5%	54.5%	44.6%
<b>Mold, moisture, ventilation</b>	46.9%	40.6%	36.8%	47.9%	24.2%
<b>Heating</b>	35.0%	34.2%	30.8%	38.2%	20.0%
<b>Eviction or Risk</b>	22.5%	23.1%	27.6%	19.0%	15.8%
<b>Cooling</b>	22.5%	26.0%	27.8%	22.5%	11.9%
<b>Kitchen Basics</b>	10.6%	15.6%	8.9%	17.2%	4.1%
<b>Accessibility</b>	4.5%	7.3%	8.9%	6.0%	4.0%
<b>Bathroom Basics</b>	11.1%	5.6%	10.0%	5.9%	4.0%
<b>Foreclosure or Risk</b>	9.0%	10.6%	10.9%	10.1%	2.6%

Source: AFH Survey 2022

*Census Data Related to Housing Quality*

Data from the American Community Survey help illustrate how communities of color are particularly impacted by housing quality issues. The census identifies housing units with physical or financial issues as those lacking complete plumbing facilities, lacking complete kitchen facilities, having 1.01 or more occupants per room (i.e., overcrowded), having housing costs as a percentage of household income greater than 30 percent (i.e., cost burdened). The table below shows the proportion of housing units with two or more of these physical or financial issues. Census tracts that were predominantly Black and Hispanic had greater percentages of households with housing quality issues than 80%+ White areas.

*Housing Units with 2+ Physical or Financial Issues, by Predominant Race in Census Tract*

	Total Households	Housing Units with 2+ Physical or Financial Issues
<b>Population Over 80% White</b>	61,169	0.57%
<b>Population Over 80% Black</b>	139,682	1.80%
<b>Population Over 50% Hispanic</b>	40,333	4.12%
<b>All Other Areas</b>	360,153	1.79%
<b>Citywide</b>	<b>601,337</b>	<b>1.82%</b>

Source: American Community Survey, 2015 – 2019

*Homeownership and Access to Credit*

Philadelphia remains a city of homeowners, with just over half of households owning their homes. While the city has experienced a modest increase in the number of homeowners of color in recent years, homeownership rates have not returned to pre-foreclosure crisis levels and remain stubbornly lower than the rate for non-Hispanic White residents. Philadelphia would need to convert 24,865 of the city's 127,774 Black renter households and 10,722 of the city's 38,311 Hispanic renter households to equalize ownership rates.

CCB's focus groups with residents and housing counselors highlighted the ways in which the city's increasingly competitive housing market has made it difficult for residents to purchase homes. Many residents and service providers shared accounts about how potential buyers were outbid by more than \$100,000 as they tried to compete against investors or high-income residents who work in New York City or Washington, DC. Respondents noted that, in this sellers' market, some homebuyers may be foregoing important parts of the homebuying process (like inspections) so that they can proceed with a purchase.

Focus group participants also shared concerns that, for first-time homebuyers who have been pre-approved for a Federal Housing Administration (FHA) loan, sellers may refuse to accept their offers because of strict FHA requirements. Housing counselors shared that they are also seeing residents penalized by lenders for having an employment history gap or for receiving rental assistance.

These impressions from resident focus groups illustrate patterns that are apparent in mortgage data collected as part of banks' Home Mortgage Disclosure Act (HMDA) filings. HMDA filings reveal stark disparities in access to mortgages across race, ethnicity, and income in Philadelphia.

The table below shows home purchase mortgage denial rates for different groups in the city. Although denial rates have fallen across most groups, Black, Asian, Hispanic, and low-income borrowers had the highest denial rates.

*Home Purchase Mortgage Denial Rates by Race, Ethnicity, and Income of Borrower*

		Denial Rate, 2017-18	Denial Rate, 2019-20
<b>Race</b>	White	6%	5%
	Black	15%	13%
	Asian	10%	10%
	Other	5%	5%
<b>Ethnicity</b>	Hispanic	12%	9%
	Non-Hispanic	7%	7%
<b>Income</b>	Low/Mod	14%	12%
	Mid	8%	6%
	High	6%	5%
<b>Total Purchase Loans</b>		<b>8%</b>	<b>7%</b>

Source: RF Analysis of HMDA Filings, 2017 to 2020

Black and Hispanic borrowers also relied much more heavily on government Insured mortgages (i.e., loans that are insured by the VA or FHA) to purchase homes, which can be more expensive and cumbersome.

*Share of Loan Types for Home Purchase Loan Originations by Race, Ethnicity, and Income of Borrower*

	Conventional Mortgage	Government Insured
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<b>Race</b>	White	79%	21%
	Black	39%	61%
	Asian	90%	10%
	Other	74%	26%
<b>Ethnicity</b>	Hispanic	51%	49%
	Non-Hispanic	73%	27%
<b>Income</b>	Low/Mod	55%	45%
	Mid	67%	33%
	High	88%	12%
<b>Total Purchase Loans</b>		<b>71%</b>	<b>29%</b>

Source: RF Analysis of HMDA Filings, 2019 to 2020

Higher denial rates for Black borrowers persist, even after controlling for factors like income, debt-to-income ratio, and loan-to-value ratio. The table below shows denial rates for conventional home purchase mortgages by race of the borrower among well qualified borrowers and not well qualified borrowers. Well qualified Black borrowers earning over \$57,000 still had higher denial rates (12%) than White borrowers earning below \$57,000 that were not well qualified (11%).<sup>5</sup>

*Denial Rates for Conventional Home Purchase Mortgages by Applicant Race, Controlling for Loan-to-Value and Debt-to-Income, 2020*

		Not Well Qualified Borrower	Well Qualified Borrower
<b>White</b>	Below \$57k	11%	5%
	Above \$57k	5%	4%
<b>Black</b>	Below \$57k	22%	20%
	Above \$57k	14%	12%
<b>Asian</b>	Below \$57k	25%	12%
	Above \$57k	8%	5%
<b>Other Race</b>	Below \$57k	17%	12%
	Above \$57k	10%	4%

Source: RF Analysis of HMDA Filings, 2020

These disparities were also apparent in resident survey responses. Responses to the question “Do you think you were treated differently (less well) than other people looking for housing” show differential experiences for members of multiple protected classes under fair housing law.

Among all respondents who searched for housing and reported being treated differently, 63.3% selected race/ethnicity as a reason. Asian/PI, Hispanic, and Black respondents were all more than twice as likely as White respondents to cite race. Close to one-in-five respondents said they were treated differently

<sup>5</sup> For more information see: <https://www.reinvestment.com/insights/mortgage-lending-in-philadelphia-key-take-aways-from-the-2020-home-mortgage-disclosure-act-data-release/>

because of their sex and nearly one-in ten-respondents said they were treated differently because of their religion.

While national origin and immigration status were less commonly cited reasons for differential treatment overall, Asian/PI respondents were much more likely to cite these factors. About 9% of respondents selected gender identity and sexual orientation.

Source of income was a common concern for all groups. Source of income discrimination occurs when a landlord rejects a tenant who can afford to rent one of their units, based solely on the source the tenant's income. For example, if a tenant plans to rely on a rental assistance program, such as a Housing Choice Voucher, to pay a portion of their rent. We note that representatives of both fair housing organizations interviewed as part of this assessment cited increasing reports of source of income discrimination.<sup>6</sup>

*Reasons for Philadelphia Residents Who Said They Were Treated Differently*

Reason(s) Treated Differently	White	Black	Hispanic	Asian/PI	All Responses
<b>Race</b>	32.4%	67.3%	72.3%	82.4%	63.3%
<b>Source of Income</b>	54.1%	47.6%	53.6%	49.0%	49.4%
<b>Sex</b>	20.2%	19.2%	9.5%	23.9%	18.4%
<b>Disability</b>	15.6%	17.6%	11.6%	7.4%	17.3%
<b>Criminal Record</b>	4.6%	12.7%	7.2%	3.1%	10.2%
<b>Religion</b>	2.5%	8.3%	13.3%	19.6%	9.3%
<b>Gender Identity</b>	6.5%	7.7%	20.5%	7.4%	9.3%
<b>Sexual Orientation</b>	11.7%	6.5%	14.3%	6.0%	8.4%
<b>National Origin</b>	3.2%	3.9%	16.2%	21.6%	6.9%
<b>Immigration Status</b>	0.2%	0.6%	11.7%	19.3%	2.8%

Source: AFH Survey 2022

About a quarter of all survey respondents had applied for some type of home financing in the last five years (27.5%), but Black respondents were least likely to have applied (19.2%). This gap was smaller than that identified in the 2016 survey (34% of all respondents v. 14% of Black respondents).

Hispanic respondents reported the greatest share of home purchase applications, followed closely by Whites. Differences between groups were largest for refinance applications, an important tool to lower costs and access equity; 18.5% of White respondents had applied for refinancing compared to 6.1% of Black, 6.7% Hispanic, and 11.8% of Asian/PI respondents.

*Share of Survey Respondents Who Had Applied for Home Financing Products in the Last Five Years*

	Asian/PI	Hispanic	Black	White	Citywide
<b>Home Equity Loan</b>	6%	7%	5%	7%	6%

<sup>6</sup> One group noted that they are preparing to file complaints with the City's Fair Housing Commission and, in the right circumstance, a disparate impact claim to HUD.

<b>Refinance</b>	12%	7%	6%	19%	12%
<b>Purchase Loan</b>	18%	21%	12%	21%	17%

Source: AFH Survey 2022

Among survey respondents who applied for financing and were denied, credit (62.6%) and income level (50.0%) were the most common reasons given across all groups, but Black applicants were most likely turned down for credit (71.1%) and Hispanic applicants were the most often turned down for income (59.0%). Not enough savings was a bigger challenge for Black and Hispanic applicants (34.5% and 30.1%) than for White applicants (14.6%). Student loans were also a bigger challenge for Black applicants. Asian/PI responses are not included here because of the small number of responses to this question.

#### *Reasons Respondent Mortgage Applications Were Denied*

	White	Black	Hispanic	Citywide
<b>Credit</b>	49.3%	71.1%	65.9%	62.6%
<b>Income Level</b>	48.7%	45.1%	59.0%	50.0%
<b>Debt-to-Income</b>	32.2%	32.9%	22.0%	31.5%
<b>Savings</b>	14.6%	34.5%	30.1%	28.5%
<b>Down payment</b>	19.7%	27.0%	24.3%	24.4%
<b>Student Loans</b>	16.2%	23.7%	13.1%	20.0%
<b>Type of Income</b>	24.4%	12.9%	10.2%	16.3%

Source: AFH Survey 2022

Credit was also more often cited by Black respondents (42.4%) who reported having *“trouble finding safe, quality housing that you could afford in a neighborhood you liked,”* compared to 18.1% of White, 30.8% of Hispanic, and 23.4% of Asian/PI respondents. Over half of all respondents reported finding affordable units in general and in their preferred neighborhood specifically was an issue in their search.

White respondents were most likely to cite these limitations, but Black and Hispanic respondents more often were constrained by inadequate cash for upfront costs. Hispanic and Asian/PI respondents most often reported they *“did not feel welcome”* in certain neighborhoods, and Black respondents were most likely to report realtor steering and landlords’ non-acceptance of HCVs, though these were less common than other limitations (10.0%); however, they were 5-times more frequently cited by respondents of color compared to Whites.

### Reasons Philadelphia Residents Had Trouble Finding Housing

Limitation	White	Black	Hispanic	Asian/PI	All Responses
Affordability	81.9%	69.9%	74.2%	63.7%	74.1%
Quality in Price Range	63.8%	57.3%	54.4%	52.6%	58.9%
Housing in Target Neighborhood	54.7%	48.5%	47.2%	53.9%	51.0%
Deposit/DP/Closing costs	45.6%	53.1%	52.4%	39.3%	49.9%
Credit	18.1%	42.4%	30.8%	23.4%	31.6%
Cost of Utilities	26.7%	30.8%	34.7%	26.6%	29.9%
Unit Size	11.8%	17.8%	17.9%	19.4%	15.8%
Not feeling welcome	9.3%	17.4%	19.6%	20.0%	15.5%
Disability Accommodation	6.3%	8.9%	5.3%	10.8%	7.9%
HCV Acceptance	1.7%	10.6%	5.5%	7.7%	6.9%
Realtor steering	1.7%	10.0%	8.2%	4.4%	6.9%

Source: AFH Survey 2022

### Investor Activity and Changing Tenure

With Black and Hispanic residents facing greater challenges accessing mortgage credit, it is not surprising to find that in predominantly Black and Hispanic communities many properties are sold without the use of a mortgage. The table below compares the total number of home sales with the total number of mortgage loans in different communities, to highlight the substantially disparate proportion of home sales that involved a mortgage in communities of color compared to predominantly White neighborhoods.

### Home Sales with Mortgages as Share of All Home Sales, 2018 to 2020

	Originated Home Purchase Mortgages	All Home Sales	Percent of Mortgage Sales
<b>Over 80% White</b>	6,647	8,729	76%
<b>Over 80% Black</b>	5,733	16,544	35%
<b>Over 50% Hispanic</b>	1,597	5,297	30%
<b>All Other Areas</b>	26,065	42,842	61%
<b>Citywide</b>	<b>40,042</b>	<b>73,412</b>	<b>55%</b>

Source: RF Analysis of HMDA, 2018 to 2020

In community outreach sessions, residents and service providers echoed similar concerns. Participants believed potential home buyers were competing against investors and homebuyers coming from more expensive markets who were able to outbid local homebuyers with lower incomes.<sup>7</sup>

Home sales data also show that investor activity is much higher in predominantly Black and Hispanic areas. The table below shows the share of sales that were between two homeowners, sales where

<sup>7</sup> The City's Fair Practices Ordinance was amended in 2020 to include "Fair Practices Ordinance: Protections Against Unlawful Discrimination," as a means of addressing the issue of investors soliciting owners who do not wish to sell their homes, and to create a "Do Not Solicit List" (see: <https://www.phila.gov/services/property-lots-housing/sign-up-to-stop-unsolicited-offers-on-your-home/>).

investors purchased homes from homeowners, and other types of investor sales. Only 31% of sales in predominantly Black and 48% of sales in Hispanic areas were between two homeowners.

*Share of Arms-Length Home Sales by Type of Sale, 2018 to 2020*

	Homeowner to Homeowner	Homeowner to Investor	Other Sale Types
<b>Over 80% White</b>	68%	17%	14%
<b>Over 80% Black</b>	31%	29%	39%
<b>Over 50% Hispanic</b>	48%	28%	24%
<b>All Other Areas</b>	58%	20%	22%
<b>Citywide</b>	52%	22%	25%

Source: RF Analysis of OPA Property Transactions, 2018 to 2020

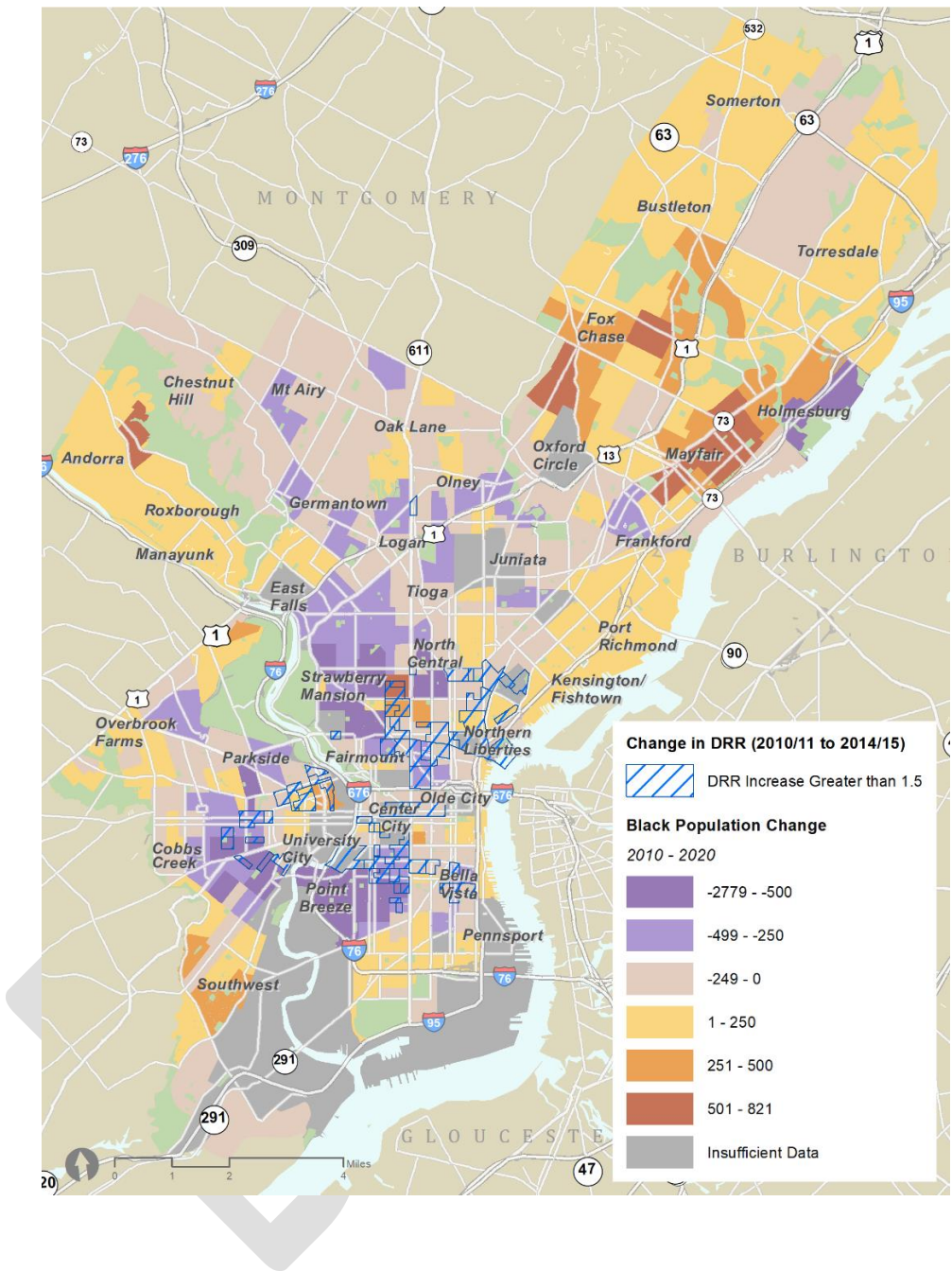
### Rising Sale Prices and Displacement Ratio

Reinvestment Fund created a metric called the DRR, or Displacement Risk Ratio to facilitate an understanding of when an area's home prices are changing in a way that exerts financial pressure on the residents. The metric is fundamentally the ratio of changing home prices to resident incomes at a fixed starting point. New home sale data are incorporated into new ratios, but incomes are frozen at the beginning of the study period, to capture the incomes of long-term residents, and adjusted only for the consumer price index. Although new income data come available each year, that new income data reflects new residents, and inclusion of the new residents would thwart the effort to understand the economic pressure that longtime residents might feel. A DRR value in any one year is akin to a snapshot of housing cost burden; the *change* in DRR is the more informative indicator of displacement risk.

Rising ratios indicate that prices in an area are rising so much that existing residents might find it economically difficult to sustain their homes (i.e., afford taxes or insurance) and/or new residents economically similar to them might find it difficult to move to the area (think, for example, of Northern Liberties, Fairmount, or Fishtown). Declining ratios on the other hand indicate that an area is not keeping pace with the city. That is, the pressure that existing residents might feel would be to leave, if they can, because the area is not providing a sustained and competitive standard (e.g., parts of Logan or Olney, Juniata). A change of 1.5 in a block group's DRR indicates that the relationship of price to income has outpaced the city average by 50% - these areas are substantially more at risk. Across Philadelphia's 1,336 block groups, 76 block groups (5.7%) had a change in DRR greater than 1.5 between 2010/11 and 2014/15, 78 block groups (5.8%) did between 2015/16 and 2019/20 – many of the same areas saw this change in both time periods.

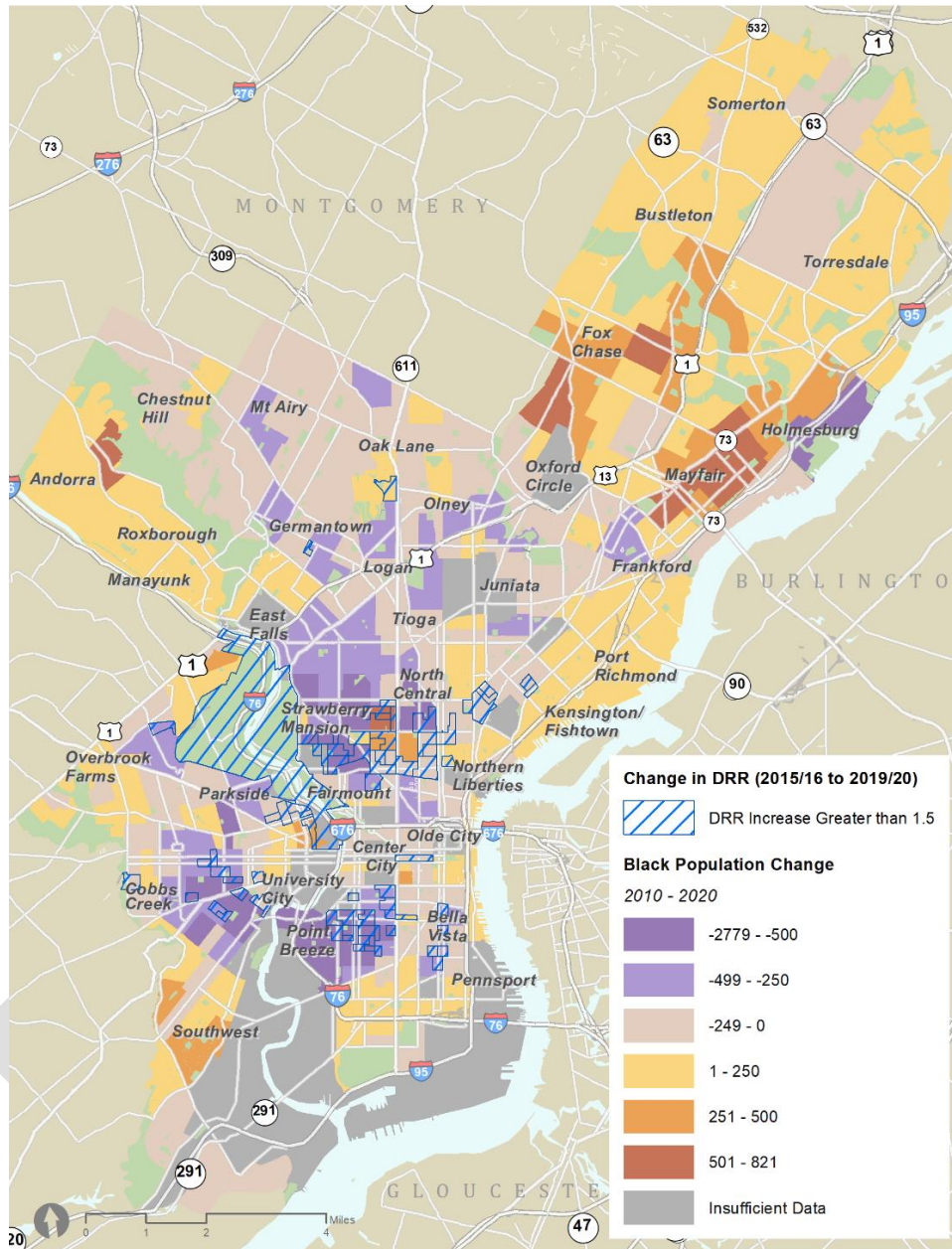
The relationship between demographic change and DRR values over different periods is complex. For example, there are places that lost Black population that had no notable increasing DRR pressure (e.g., Tioga and Allegheny West). But there are places that did have substantial pressure and lost Black population (e.g., western parts of North Philadelphia such as Strawberry Mansion and Brewerytown, Spruce Hill, Cedar Park, SW Center City, Point Breeze). And there are places that gained Black population and had high pressure (e.g., Stenton and Powelton) – and then there are those that gained Black population but did not have high pressure (e.g., Lawndale, Oxford Circle, and Fox Chase). All of this suggests that ***displacement pressure is sometimes a factor in Black population growth/decline, and sometimes it is not.*** See figures below.

Changes In Black Population 2010-2020 and Rising DRR Values (2010/2011-2014/2015)





*Changes in Black Population 2010-2020 and Rising DRR Values (2015/2016-2019/2020)*



### Publicly Supported Housing

Subsidized housing is critically important in a city with persistently low incomes and rising housing costs, however, the demand for subsidized housing far outstrips supply. The table below shows the location of subsidized housing units across the city's MVA housing markets. While a sizable share of Project-Based Section 8 and LIHTC developments are in strong markets, Public Housing and Housing Choice Voucher (HCV) usage is particularly concentrated in middle and distressed markets.

*Location of Subsidized Units by Program and MVA (2018) Market, 2020*

	Strong Markets	Middle Markets	Distressed Markets	Total Units*
<b>Public Housing</b>	2,001 (15%)	6,065 (45%)	5,492 (41%)	13,558 (100%)
<b>Project-Based Section 8</b>	3,507 (35%)	2,602 (26%)	3,950 (39%)	10,059 (100%)
<b>LIHTC</b>	3,288 (25%)	5,152 (39%)	4,723 (36%)	13,163 (100%)
<b>811/PRAC</b>	95 (32%)	41 (14%)	162 (54%)	298 (100%)
<b>202/PRAC</b>	660 (27%)	935 (38%)	836 (34%)	2,431 (100%)
<b>HCV Program</b>	2,316 (12%)	6,897 (37%)	9,510 (51%)	18,732 (100%)
<b>Total Subsidized Units</b>	11,867 (20%)	24,305 (42%)	22,060 (38%)	<b>58,232 (100%)</b>

Source: Reinvestment Fund Analysis of POSH, LIHTC Database, PHA. Values may not sum to 100%. Table excludes units in areas not classified on the 2018 MVA and 250 HCV units missing geographic information.

The table below compares HCV usage in MVA markets by displacement risk level, as measured by change in DRR.

*Location of Housing Choice Voucher Units by MVA (2018) Market and Displacement Risk (2022)*

	Lower Risk (DRR Change < 1.5)	Higher Risk (DRR Change ≥ 1.5)	Insufficient Data	Total
Strong Markets	2,207	109	0	2,316
Middle Markets	6,133	762	2	6,897
Distressed Markets	9,496	14	0	9,510
Unclassified	8	257	112	377
Citywide Total	17,844	1,142	114	19,100

Source: Reinvestment Fund Analysis. Table excludes 250 HCV units missing tract location.

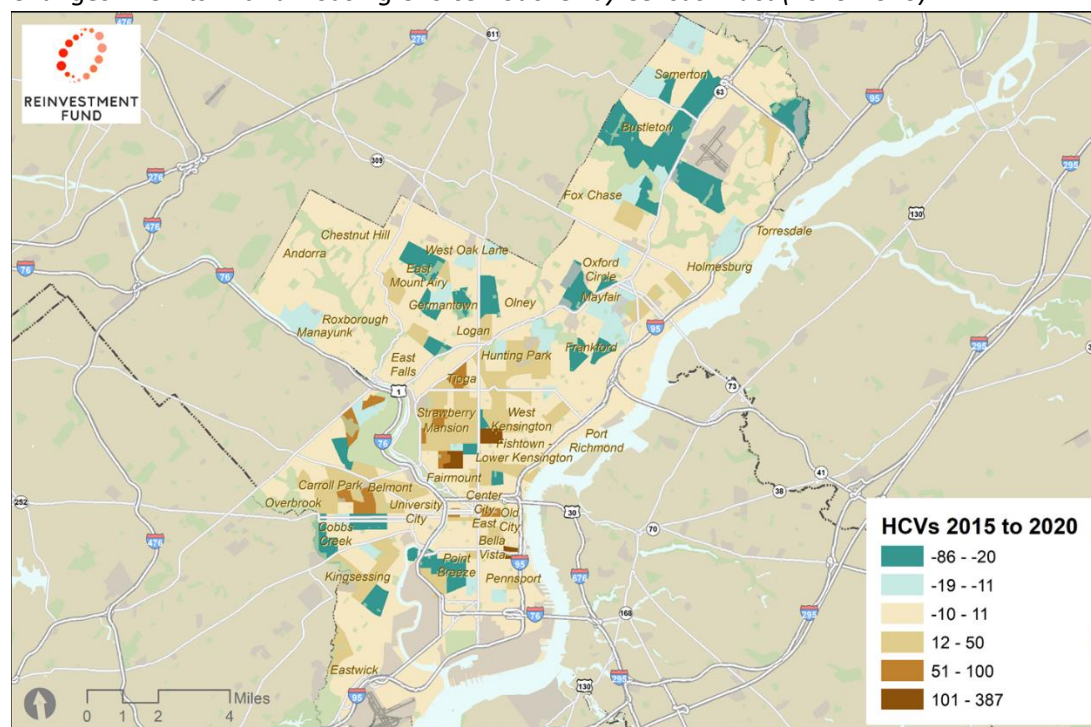
In community outreach sessions, participants linked the increasing concentration of voucher users in distressed areas with source of income discrimination and rising rents driven by gentrification. Landlords in Philadelphia are prohibited from rejecting tenants who can afford their rent but plan to use a Housing Choice Voucher, a practice known as source of income discrimination.<sup>8</sup> However, voucher prices are capped by zip code, and landlords are allowed to reject tenants whose voucher reimbursement is too low to afford their rent. Focus group participants reported that with rents increasing dramatically, voucher users have had a much harder time finding affordable housing. They believed that due to the cap on rent, their housing choices were limited to high-crime, low-cost neighborhoods. PHA notes that voucher program payment standards differ widely among zip codes, and that PHA's adoption of payment standards based on Small Area Fair Market Rents (SAFMRs) is intended to expand the range of housing choices available to voucher holders. PHA also sponsors a voluntary Housing Opportunity

<sup>8</sup> We note that the City of Philadelphia does have a prohibition in its Fair Practices Ordinance against source of income discrimination in housing. <https://www.phila.gov/services/crime-law-justice/report-a-crime-or-concern/discrimination-and-unfair-practices/file-a-complaint-about-housing-or-property-discrimination/>



Program that provides housing search, counseling and other support services to voucher holders who wish to move to areas of higher opportunity. The map below shows tract level changes in voucher use.

*Changes in Units with a Housing Choice Voucher by Census Tract (2015-2020)*



For people using vouchers, focus group participants reported that when landlords increased rents, PHA sometimes refused to raise their rent caps. PHA's ability to approve rent increases is limited by federal regulations and funding levels and may have to refuse a request for a cap increase if a landlord has not made required repairs. PHA notes that it has a formal process to review landlord rent increase requests and is required under federal regulation to determine that the rent is "reasonable" compared to other non-assisted units in the private market.

Examining where renters living in subsidized housing shows that the city's subsidized housing units are heavily concentrated in predominantly Black areas. Across subsidy program, 28% to 38% of units were located in census tracts where over 80% of the population was Black.

*Number of Subsidized Housing Units by Predominant Race of Census Tract, 2020*

	Public Housing	Project-Based Section 8	LIHTC	Other Multi-Family	HCV Program	Total Subsidized Units
<b>Over 80% Black</b>	5,332 (38%)	3,140 (28%)	4,964 (37%)	881 (32%)	8,414 (43%)	22,731 (37%)
<b>Over 80% White</b>	67 (0%)	8 (0%)	67 (0%)	208 (8%)	119 (1%)	469 (1%)
<b>Over 50% Hispanic</b>	483 (3%)	635 (6%)	823 (6%)	144 (5%)	1,292 (7%)	3,377 (6%)
<b>All Other Areas</b>	8,162 (58%)	7,444 (66%)	7,617 (57%)	1,496 (55%)	9,525 (49%)*	34,244 (56%)
<b>Citywide Totals</b>	14,044	11,227	13,471	2,729	19,350	60,821

\* Includes 250 HCV units missing tract location.

Source: Reinvestment Fund Analysis of POSH, LIHTC Database, PHA.

## Disability and Access Analysis

Overall, the city lacks an adequate supply of subsidized affordable housing, but the shortage is especially acute for seniors and people with disabilities. The table below shows the number of residents in subsidized housing in each MVA market alongside the number of people in poverty living in the same markets. Citywide the city has almost twice the number of seniors in poverty as subsidized units for seniors and nearly 10 times more people with disabilities in poverty than people with disabilities living in subsidized housing.

Community outreach sessions highlighted the difficulty individuals with disabilities have accessing affordable housing. Respondents noted that the number of accessible units overall is too low. Subsidized projects may have just 2-4 accessible units leading to a persistent gap between supply and demand. Respondents also identified unit size as an acute challenge. Many accessible units included in affordable housing developed by non-profit organizations are 1- or 2-bedroom units. This has led to a chronic shortage of housing for families where one member has a disability.

*Number of Subsidized Units and People in Poverty Among Special Populations*

	Seniors in Subsidized Units	Seniors in Poverty	People with Disabilities in Subsidized Units	People with Disabilities in Poverty
<b>Citywide Total</b>	19,049	36,114	8,562	88,802

Source: Reinvestment Fund Analysis.

## Fair Housing Enforcement

Reinvestment Fund interviewed the leaders of two local fair housing organizations: the Fair Housing Rights Center (FHRC) and the Housing Equality Center (HEC). Both organizations noted that, “Most people don’t know what fair housing is,” and that a lack of understanding among the public and housing providers alike, has hindered efforts related to fair housing. When asked to identify the top issues facing the city, fair housing organizations cited: inadequate enforcement of fair housing and related laws, limited awareness of new local protections (like the tenant screening legislation passed in 2021), and a dearth of providers who understand the trauma inherent in experiencing housing discrimination. This last point is critical, because experiences related to housing discrimination may impact how violations are (or are not) reported and should influence how investigators conduct their work.

Data on housing Fair Housing Act complaints filed with HUD indicate that most recent fair housing complaints have centered on reasonable accommodations for people with disabilities (See Appendix A for more information about complaints filed with HUD’s Mid-Atlantic Office of Fair Housing and Equal Opportunity under the Fair Housing Act). One local expert noted, when it comes to reasonable accommodations for people with disabilities, more work is needed to educate tenants and court staff on how fair housing issues are relevant in eviction proceedings. A lack of education on fair housing issues may result in tenants not exercising all the rights and protections available to them.

Although cases filed with HUD in Philadelphia did not often include income, both fair housing experts and CCB’s community feedback sessions reported that source of income discrimination was common and under-reported. This form of discrimination is especially problematic because it further restricts an already limited pool of housing that is available to low-income renters. The decline in housing choice

voucher users in certain middle or strong neighborhoods, for example, may be a product of fewer landlords accepting renters with vouchers (a practice that is illegal in Pennsylvania).

Complaints or inquiries around fairness in property tax assessments, property appraisals, property insurance, and refinancing to avoid foreclosure are also present. Experts noted that these issues may be especially problematic in appreciating markets.

Fair housing organizations recommended greater and more meaningful information sharing and education as important strategies to further fair housing. Regular meetings between the multiple city agencies and departments that touch fair housing and groups like FHRC or HEC would help disseminate more information from a centralized source and signal that fair housing is a priority for City leadership. Additional training for front line workers, like court staff involved in foreclosure or evictions, on source of income or reasonable accommodation protections would also be beneficial.

Lastly, the issue of substantial equivalency for the City's fair housing law was raised. Owing to concerns about the ability of the state's Human Relations Commission to process Philadelphia cases, substantial equivalency was offered as a means of improving the fair housing rights of Philadelphians.

*Data on filed complaints under the Fair Housing Act are provided in Appendix A.*

## Fair Housing Plan

The City and PHA will continue to implement many programs that support fair housing, including some that emerged from the 2016 AFH. The City of Philadelphia, PHA, and partners will also work towards a revised set of goals to respond to the barriers to fair housing identified in this assessment. Funding sources include CDBG, HOME, and LIHTC financing, but also include local funding sources that allow for more flexibility in program and investment decisions. Philadelphia's Housing Trust Fund and bond funding for the Neighborhood Preservation Initiative are two important funding mechanisms to support the implementation of the proposed goals.

### Preliminary Recommendations

The results of the survey, engagement, and data analysis point to a set of 8 goals to address identified issues and activities within each. Many of the activities are the continuation or expansion of approaches that have been successful in recent years. This assessment also identified a number of concerns that extend beyond the purview of major housing partners: the disparities in quality of life and access to opportunity reported by different racial and ethnic groups and by households with a disability or with children. Furthering fair housing with respect to these issues would require coordination with a broad set of partners to take an "all of government approach" to address major quality of life concerns that contribute to unequal outcomes: violent crime, neighborhood cleanliness, condition of public spaces (like parks, libraries, and recreation centers), condition of commercial corridors, and condition of neighborhood schools. Additionally, ensuring that fair housing representatives are included in the City's Housing Advisory Board meetings would help to elevate related issues.

<b>Goals and Activities</b>
<b>1. Expand services and programs to protect renters and homeowners at risk of housing instability (many of whom are people of color and/or women with children)</b>
Continue to provide housing counseling to homeowners and renters to help them remain in their homes.
Continue to provide direct assistance to homeowners and renters facing the threat of foreclosure and eviction.
Support pilot programs to promote the stability of affordable rental units.
<b>2. Preserve affordable homeownership housing</b>
Continue programs to make systems repairs for homeowner housing.
Continue programs to help homeowners have clear title to their homes and explore legislation that facilitates this process.
Partner with Revenue Department to increase participation in property tax relief programs (Homestead, LOOP, deferrals, payment plans, etc.)
Promote loans that finance both rehab and purchase for properties in need of substantial repair (e.g., PA Housing Finance Agency's HomeStyle Renovation program).
<b>3. Preserve affordable rental housing</b>
The City, in partnership with PHA, will issue a preservation RFP and select projects to preserve minimum of 100 units per year.
Work to minimize displacement and improve access to opportunity by promoting long-term affordability.
Provide landlords with tools to improve the quality, health, and safety of housing (i.e., pilot landlord rehab program and create a centralized landlord resource website).
<b>4. Expand affordable homeownership housing</b>
Continue Philly First Home, Home Buy Now, and launch Turn the Key program.
Explore pilot programs with lenders to address key impediments to mortgage financing such as poor credit and lack of loans for properties <\$150,000.
Work with state and federal partners to advance the appraisal bias task force recommendations.
<b>5. Develop affordable rental housing (with focus on high opportunity and high displacement risk areas)</b>
Identify high opportunity and rapidly appreciating areas (using tools such as market value and displacement risk analysis) and give priority points to projects that fall within these target areas, to ensure a balanced approach to affordable housing developed in other areas.
Explore policies that incentivize private sector investment in mixed-income and affordable rental housing in high opportunity areas.
PHA to continue efforts to expand housing choice voucher use to high opportunity areas.
Create new affordable housing options in areas with access to opportunity, including permanent homeless housing through the HOME-ARP process.
<b>6. Expand fair housing outreach, education, and enforcement activities</b>
Support tenant rights to prevent evictions, including mediation, legal services, and other strategies.

Support workshops led by tenant rights providers and housing counseling agencies, including LEP counselors.
Pursue feasible long-term affordability best practices to support fair housing efforts.
Promote fair housing through education and compliance testing (including law related to reasonable accommodations and modifications).
Work with the Philadelphia Commission on Human Relations (PCHR) to obtain HUD certification for substantially equivalent status.
Support efforts to identify and reduce source of income discrimination.
<b>7. Expand accessible and affordable housing for persons with disabilities</b>
Continue giving priority for affordable housing projects that exceed the 10% requirement for accessible units and 4% requirement for visitable units.
Work to secure new funding to expand Adaptive Modifications Program (AMP) for renters and homeowners.
Increase the number of accessible housing units created, including units for larger families.
<b>8. Expand housing opportunities for special needs individuals (with disabilities; at-risk women and families)</b>
Ensure all Intake Centers meet ADA Compliance.
Target outreach/education about services and vouchers to increase landlord partnerships, specifically BIPOC landlords, to increase affordable and accessible units.
Enforce compliance with City's Domestic violence ordinance. PHA will continue to comply with HUD VAWA rules.
Secure funding to support the development of units for individuals experiencing domestic violence.
Establish partnerships with developers to identify low-income units designated for survivors/victims and ensure units are accessible to individuals with disabilities.
Secure funding for: 1) repairs to rental or owner-occupied homes where families at risk of child removal due to unsafe conditions; 2) new rental housing for families at risk of children's removal due to homelessness, displacement due to eviction, utility shut offs, and unsafe conditions; 3) housing for families ready for reunification.

### Proposed Tracking

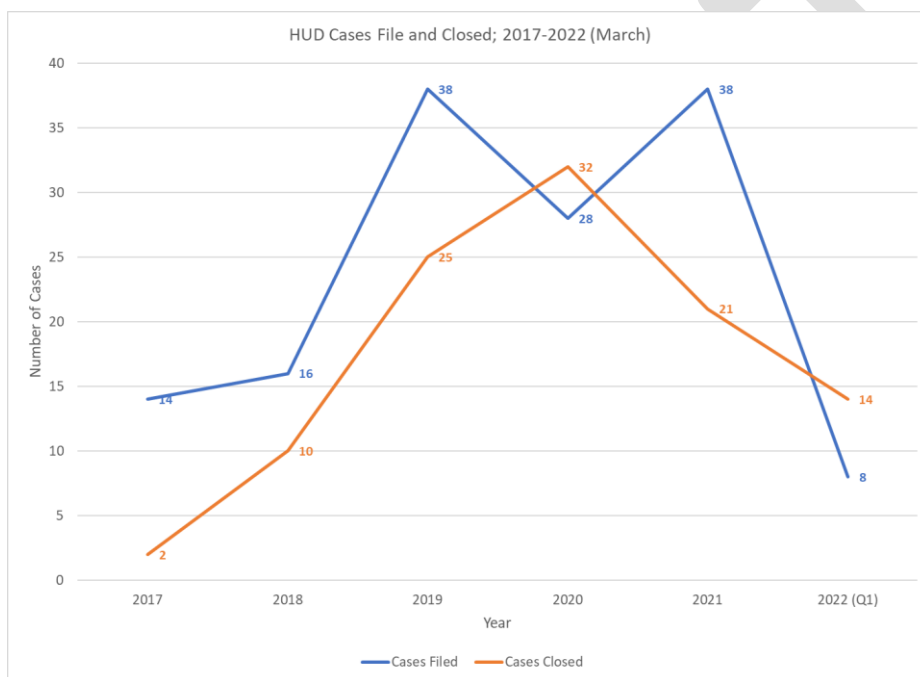
Most of the goals and activities proposed to advance fair housing also appear in the City of Philadelphia's 2022 Consolidated Plan and/or in the 2018 Housing Action Plan. The dashboard accompanying those goals has been a useful tool to track and communicate progress on activities, with breakdowns by whether the unit is owned or renter, preserved or new, and its associated income level. Those outcomes can also be included in any reporting on fair housing. Progress on fair housing goals would be facilitated by additionally tracking beneficiaries by protected class categories to the extent possible: race and ethnicity and disability and family status and tracking progress on the proposed activities that do not appear in the Consolidated Plan or Housing Action Plan.

## Appendix A

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

This section describes data on filed complaints under the Fair Housing Act that were requested and received from HUD for the period between 2017 and Q1 2022. These data include information about case volume, filing locations, bases of discrimination, and filing resolutions.

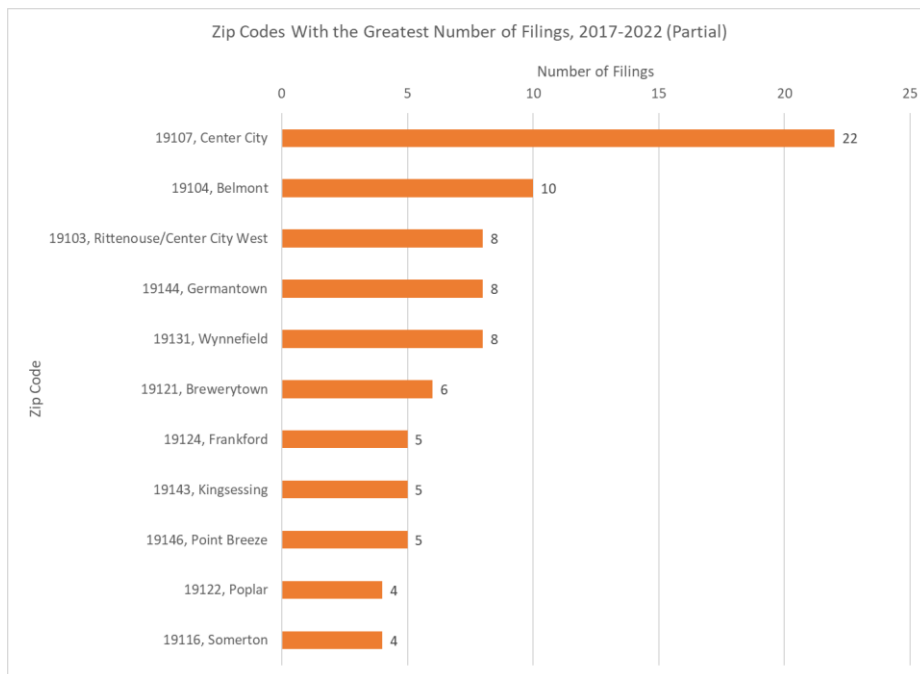
Over this time period, 142 cases were filed, and 104 cases were closed. Complaint volume was rising between 2017 and 2019 and fell in 2020 before rising again in 2021 – perhaps a manifestation of the impact of the pandemic. Closures were rising through 2020, but then fell off in 2021. (Note: 2022 is partial so it is difficult to project full year closures.)



Case filings were concentrated in a handful of zip codes in Philadelphia. Zip code 19103, which is located in Center City, had the highest number of case filings. We believe these filings are a set of related cases that relate to discrimination on the basis of disability.

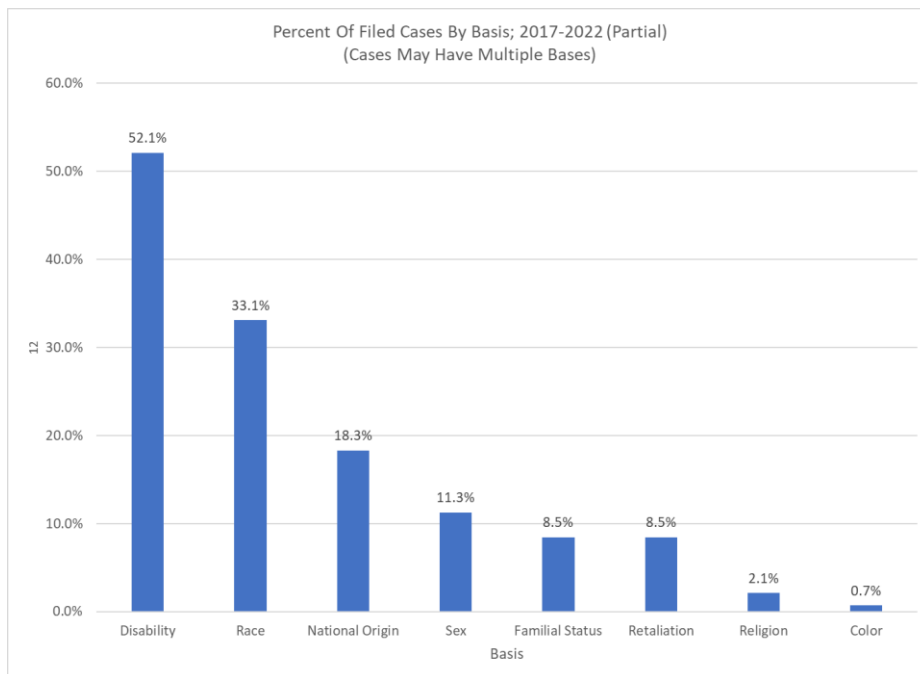
Many of the other high volume zip codes include sections of Philadelphia that are racially mixed or predominantly Black (e.g., 19104 is 43% Black, 14% Asian and 5.7% Hispanic; 19144 is 76.5% Black). Others high volume zip codes are undergoing rapid neighborhood change (e.g., 19121 and 19146).





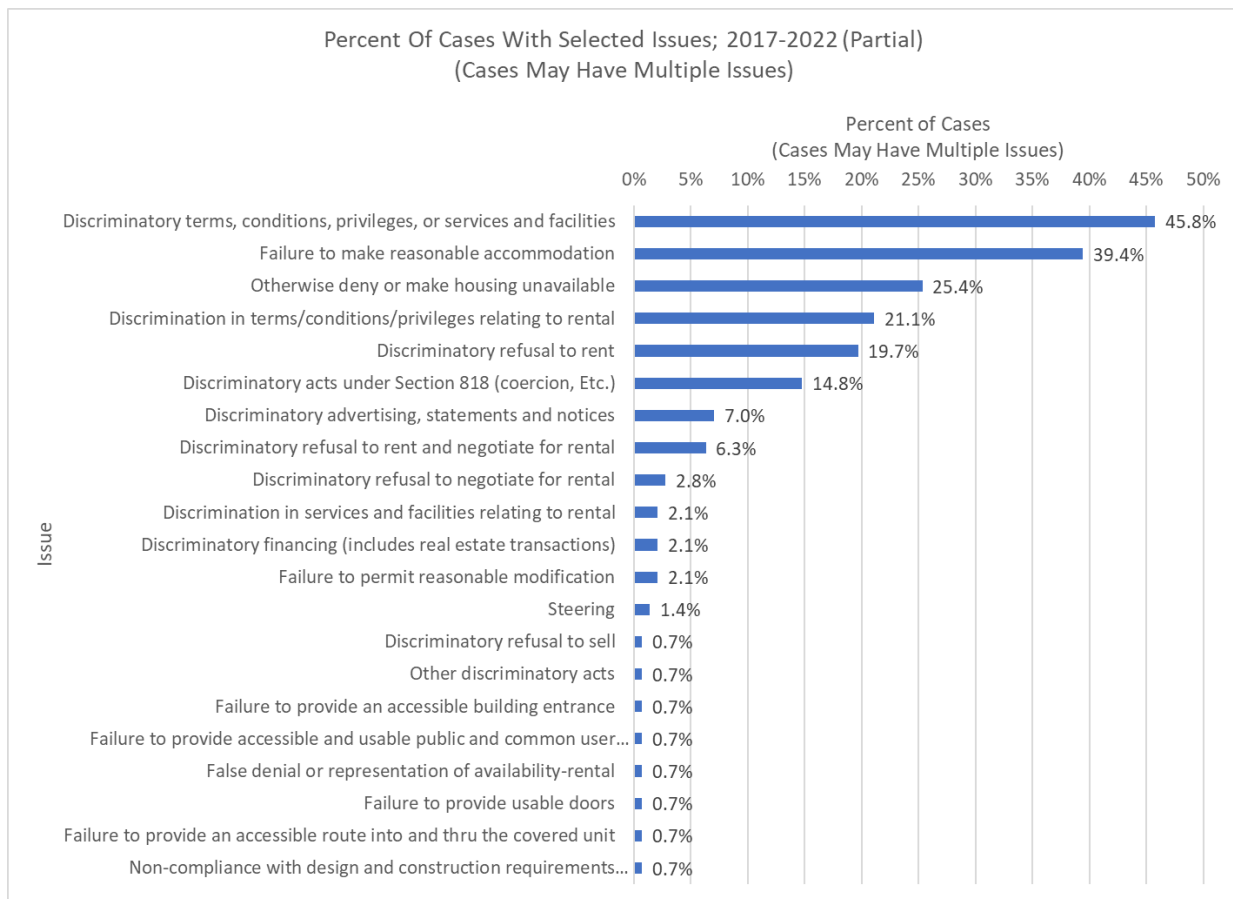
Fair housing cases can be filed under one or more bases. The most frequent basis of discrimination alleged by complainants was disability, occurring in more than 50% of all cases. The second most common basis was race (33%).<sup>9</sup> We note that although much of the data collected and reported in this AFH herein point to discrimination on the basis of race and national origin, formal complaints filed under the Fair Housing Act are heavily skewed to alleged discrimination on the basis of disability.

<sup>9</sup> The National Fair Housing Alliance publishes its Fair Housing Trends report. To a degree, Philadelphia's complaint profile tracks that which is reported for HUD and FHAP complaints for the year 2020. One exception is that Philadelphia's data do show higher percentages of cases citing race (approximately 27% nationally) and national origin (under 9% nationally). NFHA also reports a substantial rise in the number of cases their members receive on the basis of source of income. See: <https://nationalfairhousing.org/wp-content/uploads/2021/10/trends-2021-c.pdf>



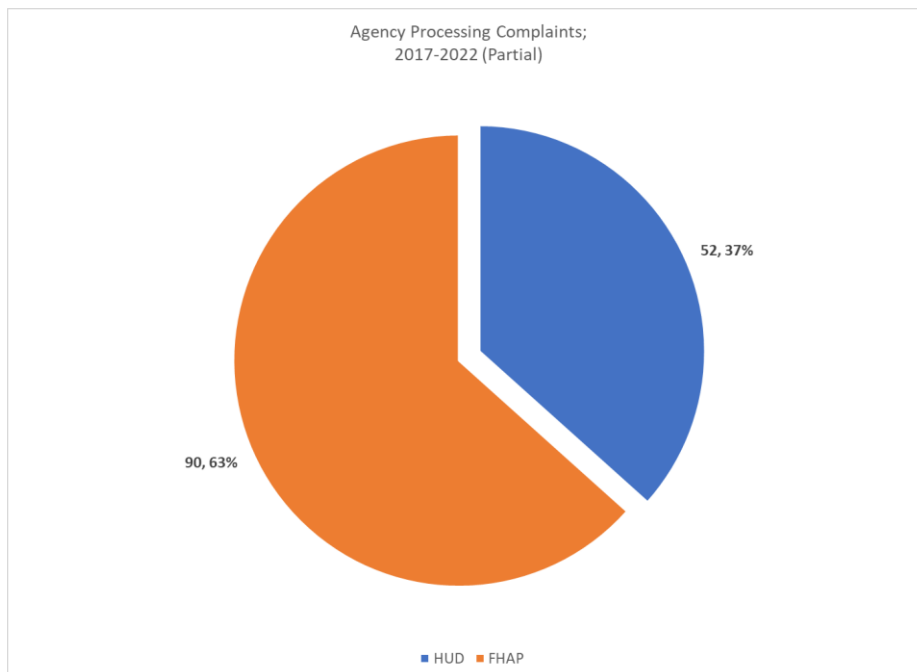
For each filing, complainants must allege an issue (or frequently more than one issue) in their complaint. The most frequent alleged issues were “discriminatory terms, conditions, privileges, or services and facilities” (45.8%) and “failure to make reasonable accommodation” (39.4%). These findings may undercount the extent of discrimination related to disability. We note that if you combine other issues such as “Failure to permit reasonable modification” or others such as “failure to provide an accessible building entrance,” a picture emerges of how common cases alleging discrimination related to disability are in the Fair Housing Act complaint inventory.



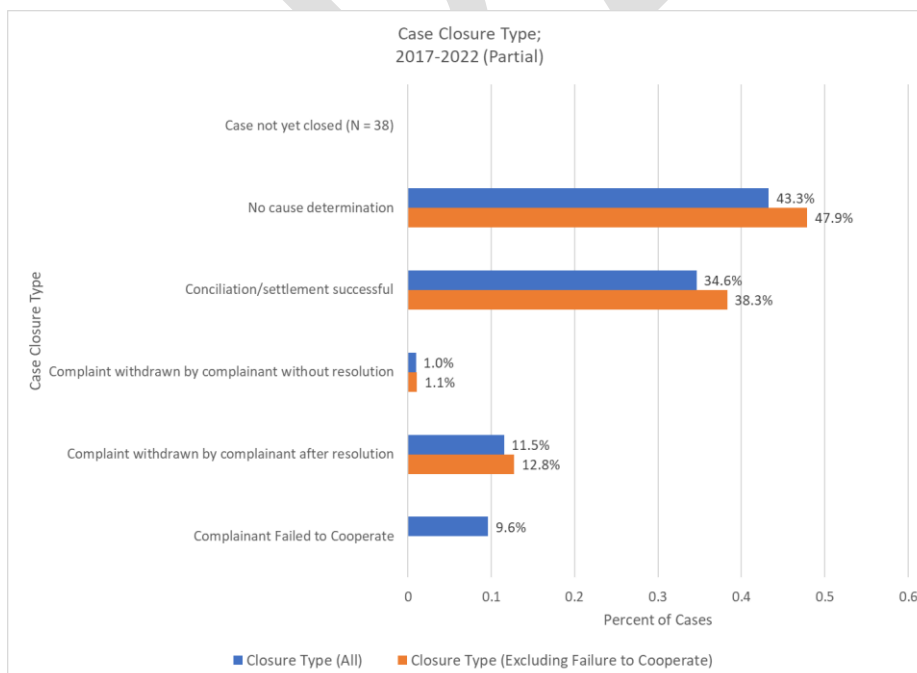


The majority of the cases were deferred to the state's FHAP agency, the Pennsylvania Human Relations Commission for processing.<sup>10</sup>

<sup>10</sup> The state's human relations law has a 180-day statute of limitations. Cases filed (by individual complainants or fair housing organizations) after 180 days are generally not jurisdictional under state law and are therefore processed by HUD, which has a one-year administrative statute of limitations.



Lastly, HUD provided data on case closure types. We note that there are no cases closed with a determination of reasonable cause. However, a substantial number/percent of cases were closed through *conciliation agreements*; another 11% were closed by *withdrawal by the complainant after resolution*. Conciliation agreements are generally understood to be more desirable closure types because they are enforceable by HUD and will typically contain provisions to protect the public interest (which withdrawn cases generally do not).



## Appendix B

### 2022 Assessment of Fair Housing Engagement Summary

4/8/2022

#### Introduction

Community Capacity Builders (CCB) was engaged to involve Philadelphia residents, service providers, and community-based organizations in the 2022 Assessment of Fair Housing (AFH). Understanding residents' housing experiences and policy priorities is critical to developing a set of actions to affirmatively further fair housing. CCB shared preliminary survey results and City fair housing activities with key stakeholders to gather feedback that will inform the recommendations in the 2022 AFH.

#### Approach

Given the limited timeframe provided for outreach and engagement, CCB utilized three (3) methods to share initial findings and gather feedback:

##### *Present at Existing Community Partner Meetings*

CCB reached out to nineteen (19) organizations to request inclusion on their agendas for existing meetings that were scheduled between March 21, 2022 and April 6, 2022. CCB aimed to engage a broad spectrum of community-based organizations, organizers, and service providers who could share insight on the housing and neighborhood experiences of marginalized communities: tenants, Black and Hispanic residents, immigrants, people with disabilities, and low-income residents. The following organizations either included CCB on an existing meeting agenda or scheduled a dedicated meeting to discuss the assessment of fair housing:

##### Mayor's Commission on People with Disabilities (MCOPD)

- The MCOPD advocates for policies and programs to maximize independence and community integration for Philadelphians with disabilities; provides resources to local organizations that support people with disabilities; and educates the community on the Americans with Disabilities Act, the Fair Housing Act, and other laws to protect the civil rights of people with disabilities.
- CCB shared a presentation about the 2022 AFH during the MCOPD monthly meeting, attended by fifty (50) community members. At the end of the presentation, participants were invited to share feedback about the initial survey results and policy priorities using the Community Feedback Form (see below).
- Southeast Asian Mutual Assistance Association Coalition (SEAMAAC) and HIAS Pennsylvania
  - SEAMAAC serves and advocates for refugees, immigrants, and asylees in the Greater Philadelphia area. HIAS Pennsylvania supports low-income immigrants to access housing and social services.
  - CCB met with SEAMAAC and HIAS Pennsylvania staff for a dedicated meeting to discuss fair housing issues and to learn specifically about refugees' experiences finding housing and navigating neighborhood challenges. Three (3) SEAMAAC staff and one (1) HIAS Pennsylvania staff member participated in the discussion.

#### African Cultural Alliance of North America (ACANA)

- ACANA provides social, health, and legal services for the African immigrant and refugee community in Philadelphia.
- CCB shared a presentation about the 2022 AFH during ACANA's bi-weekly Health and Wellness Meeting. Forty-six (46) community members and service providers attended the event and engaged in a brief discussion about housing and neighborhood concerns impacting African and Haitian immigrants in Philadelphia.

#### The Urban League of Philadelphia

- The Urban League's housing counseling program aims to build and retain equity in Philadelphia communities, connect first-time homeowners with resources, and support families facing eviction and foreclosure.
- CCB met with six (6) Urban League Housing Counseling staff for a dedicated discussion about the 2022 AFH.

#### Philadelphia Association of Community Development Corporations (PACDC)

- PACDC provides advocacy, policy development, and technical assistance for community development corporations and other organizations.
- CCB hosted a discussion during PACDC's monthly Housing Committee meeting, attended by thirty-one (31) members who represented affordable housing developers; CDC's from West Philadelphia, North Philadelphia, Germantown, and Chinatown; and housing legal service providers.

### *2. Host Focus Group Discussions with Housing Service Providers*

To understand the housing challenges experienced by Philadelphia residents, CCB hosted three (3) focus group discussions with housing service providers:

- Neighborhood Advisory Committees (NAC's)
  - NAC's are supported by the Philadelphia Division of Housing and Community Development (DCHD) to connect residents to City housing, employment, and benefits programs. CCB collaborated with DHCD's Elhadji Ndiaye to convene NAC Coordinators for a discussion about the 2022 AFH.
  - Thirty-two (32) people participated in the NAC focus group conversation, representing:
    - Brewerytown Sharswood NAC
    - Germantown United CDC
    - Greater Philadelphia Asian Social Service Center
    - HACE CDC
    - Hunting Park Community Revitalization Corporation
    - Mt. Vernon Manor CDC
    - New Kensington CDC
    - Parkside Association
    - People's Emergency Center
    - South Kensington Community Partners
    - Southwest CDC
    - Strawberry Mansion NAC
    - The Enterprise Center

- Tioga United
- Whitman Council
- Housing Counselors
  - City-funded housing counseling agencies offer residents free group and individual counseling on: foreclosure and eviction prevention, first-time homeownership, home repair, and fair housing rights.
  - Four (4) housing counselors participated in the Housing Counselor focus group conversation, representing:
    - Affordable Housing Centers of PA
    - Southwest CDC
    - Tenant Union Rights' Network (TURN)
- Housing Legal Service Providers
  - Housing legal service providers advocate for critical housing policy changes and provide free legal assistance to residents facing a number of housing issues, including evictions, foreclosure, repairs issues, and complaints taken to the Fair Housing Commission.
  - Nine (9) housing lawyers participated in the Legal Service Providers focus group conversation, representing:
    - Community Legal Services
    - Philadelphia Legal Assistance
    - Philadelphia VIP
    - Regional Housing Legal Services
    - SeniorLAW

### 3. *Distribute a Community Feedback Form*

In addition to presenting and facilitating discussions about the 2022 Assessment of Fair Housing, CCB also created a community feedback form that incorporated the presentation materials and discussion questions. This form (provided in English, Spanish, and Chinese), offered another opportunity for community members and meeting participants to share feedback and provide policy recommendations. The link and a graphic (on the right) were shared at the end of each community partner meeting and focus group. The form was also distributed to Philadelphia Registered Community Organizations via social media and an email newsletter. Two (2) people completed the form, one who had attended the ACANA meeting and another who had received the link from the PACDC Housing Committee meeting invitation. One MCOPD participant also followed up over phone to share their concerns about disability access in their home and neighborhood.



The presentations and discussions shared the same basic structure, although they varied by length and content focus based on the audience and meeting type. CCB first asked participants to introduce themselves and respond to the question: “What are 2-3 words that come to mind when you hear the term ‘fair housing’?” The presentation then shared the goals and history of fair housing and information about the assessment process. Following this introduction, CCB engaged participants in a discussion about housing experiences and neighborhood experiences by first sharing initial findings from the

Housing and Neighborhood Survey and then asking participants: “Do these survey results align with your and your communities’ experiences? How have these issues changed since 2016?”. Participants also had an opportunity to share other housing and neighborhood issues that their communities experience. The last discussion topic focused on policies and programs. CCB briefly described the housing policies that had been passed by the City since 2016, and then asked participants to respond to the following three (3) questions: 1) How have these policy changes since 2016 impacted you and your communities? 2) One of the goals of Fair Housing law is to integrate communities. What does that mean to you and what should integration look like? 3) What policies, programs, or action steps are needed to address your communities’ housing and neighborhood issues? Each presentation closed with a description of next steps and contact information.

CCB compiled this [CONTACT SHEET](#) for use when distributing the draft and final Assessment of Fair Housing. CCB recommends offering a public comment period to provide another opportunity for stakeholders to provide feedback. Based on the priorities shared in the AFH, it may be useful to convene these participants again as potential partners to implement the recommendations and policy changes needed to achieve fair housing goals.

### **Key Findings**

Feedback provided by residents, housing service providers, and community-based organizations are organized under five (5) broad topics: 1) defining integration, 2) housing experiences, 3) neighborhood experiences, 4) policies and programs, and 5) AFH survey, analysis, and data-sharing. It is critical to understand these topics in the context of the housing market pressures exacerbated by gentrification and investor speculation as well as the challenges and opportunities created by the COVID-19 pandemic.

A significant number of discussion participants spoke to the increase of investor activity in historically under-resourced Philadelphia neighborhoods. Housing is being purchased by investors, hedge funds, and developers with an interest in redeveloping relatively inexpensive properties to sell or rent for a higher-income market. Stakeholders have observed that many of these investors are not from the neighborhoods where they are purchasing properties and are not as likely to be involved in supporting community issues or providing flexibility as landlords. Existing residents are also experiencing increased housing costs as rents and property taxes skyrocket, creating a housing crisis that has most severely impacted low-income communities of color. In Eastern North Philadelphia, neighborhoods have gentrified and also experienced an influx of migration from Puerto Rico following the hurricanes and as a result of political instability in Central America. In this part of the city, the population has grown, but residents have fewer affordable housing options. Higher housing costs in addition to a continued lack of amenities serving families and children have caused many residents to consider moving out of the city, although many feel “stuck” when faced with the challenges of accessing loans or paying even higher property taxes in the suburbs.

These challenges have been intensified by the economic, social, and health crises created by the COVID-19 pandemic. Community members explained that when schools, senior centers, and libraries were shut down, the social fabric of neighborhoods was negatively impacted, possibly contributing to the public safety issues many residents currently experience. Tenants have also struggled to cover higher rents in recent years as landlords try to make up for the payments they did not receive at the start of the pandemic. In response to these and other housing-related issues, federal, state, and city policymakers



introduced critically needed resident protections and assistance programs. There is an urgent need to build on the current momentum to provide additional resources to address the housing and neighborhood priorities of Philadelphia's most vulnerable community members.

## 1) Defining Integration

When stakeholders were asked - "What does integration mean to you and what should it look like?" - many emphasized that gentrification is not a form of integration. Discussion participants instead described communities that were diverse and where all residents have access to resources and stable housing without the threat of displacement. One participant explained that while integration had historically looked like Black residents moving to predominantly white neighborhoods, this form of integration does not distribute resources across a city, but rather keeps them concentrated in certain areas. High-quality housing and neighborhood amenities should be available in every part of Philadelphia. This would require promoting housing options for low-income people, people of color, and people with disabilities. In addition, language access and culturally appropriate resources should be available in all neighborhoods.

## 2) Housing Experiences

### *For Tenants*

Cost has become the most pressing housing issue, particularly in gentrifying neighborhoods. Between 2016 and 2022, there has been an increase in the development of luxury and high-income housing, which has prompted landlords to increase rents. For example, near Mifflin Square in South Philadelphia, a 3-bedroom apartment in fair condition was rented for \$975/month four years ago. The landlord currently charges \$1,300/month despite having made no changes to the property<sup>11</sup>.

The few affordable options available in the private rental market are often in unsafe and unhealthy condition and may be unlicensed. Tenants struggle with addressing critically needed repairs in their units and must deal with the perceived and real threat of retaliation if they report their landlords. Specifically, if a tenant calls Licenses and Inspection (L&I) for a major repair, the agency might inspect the property but deem it uninhabitable, forcing a tenant to leave within two (2) days. If a tenant does decide to make their own repairs and deduct the cost from their rent, they stand the risk of eviction. Landlords have even filed cases in municipal court against tenants as retaliation for contacting L&I. This has allowed landlords to essentially use the municipal court system as their own collection agency. Ultimately, this situation creates a "revolving door" of tenants who move into a unit, ask for repairs, get evicted, and then get replaced by a new tenant who faces the same repair issues.

Housing counselors and lawyers witness cases of discrimination on the basis of familial status, race, source of income, disability, and immigration. One counselor mentioned they see it most often on the basis of familial status - single-parent households experience more barriers to renting and higher evictions. For all people of color, there is often more demand for all kinds of documentation when applying for housing or loans. Within the Eviction Diversion Program, the majority of clients are Black and other people of color.

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<sup>11</sup> Landlords note that they may need to raise the rent to account for increased operating costs, such as taxes and insurance.

Tenants are also discriminated against for using Section 8 vouchers. Landlords cannot be forced to accept vouchers, and voucher prices are capped by zip code. With rents increasing dramatically, voucher users have a much harder time finding housing. Many voucher users are residents coming out of shelter and report they feel effectively limited to high-crime, low-cost neighborhoods because of the limited supply of housing and the fact that voucher payment standards are often low relative to actual market rents. For people already using vouchers, landlords may increase rent but PHA's ability to approve rent increases is limited by federal regulations and funding levels might, and therefore PHA may refuse a request for a cap increase if a landlord has not made required repairs. In one case, an elderly resident receiving social security had her rent increase from \$750 to \$1,000, but PHA turned down the increase request. To stay in her home, the tenant created a "backdoor" agreement with the landlord, covering the difference between the voucher subsidy and the rent by cutting into her budget for food and utilities. *(PHA notes that, if true, such a "backdoor" agreement is illegal and prohibited under federal regulations and the contract between PHA and the property owner. PHA also notes that it has a formal process to review landlord rent increase requests and is required under federal regulation to determine that the rent is "reasonable" compared to other non-assisted units in the private market).*

In this challenging housing market, some tenants have even started to use AirBnB's as temporary homes as they repair their credit or seek a more permanent location. This could lead a family with children to live in a 1-bedroom, 1-bathroom apartment for \$1,200 - a trend that investors may be picking up on and pricing for. Illegal rooming houses (without proper licensing or zoning) are also increasingly a source of privately-owned affordable housing. Tenants do not have the same protections in these places and are even more reluctant to call L&I for an inspection for fear of a property being shut down. This allows landlords to evict people outside of the legal process or even threaten immigrant tenants with Immigration and Customs Enforcement (ICE) custody.

#### *For Homebuyers*

Many residents and service providers cited the extremely competitive and expensive nature of purchasing a home in the current market. People may be outbid by more than \$100,000 as they try to compete against investors or high-income residents who work in New York City or Washington, DC. In this sellers' market, some homebuyers are even foregoing important parts of the homebuying process (like inspections) so that they can proceed with a purchase. For first-time homebuyers who have been pre-approved for a Federal Housing Administration (FHA) loan, sellers may refuse to accept their offers because of the strict FHA requirements. As a result of the pandemic, housing counselors are also seeing residents penalized by lenders for having an employment history gap or for receiving rental assistance.

#### *Preserving Homeownership*

Low-income residents are struggling to address increased housing and utility costs. This is particularly impacting people on a fixed income (seniors, people with disabilities). In addition, homeowners are pressured by developers and speculators who are offering to purchase properties for significantly under market-value. A developer may offer \$20,000-\$40,000 for a home, which could have sold on the market for \$100,000. Residents struggling to cover costs may sell at these depressed prices. Residents dealing with tangled title or estate planning issues are particularly vulnerable to these tactics. Homeowners grappling with tangled title issues are also unable to access financing or programs to pay for the cost of repairs, increasing the likelihood of displacement.

While city policies like the tax abatement advantage developers, some residents perceive that there is not a corresponding program for existing homeowners, or they may not be able to access the

programs.<sup>12</sup> As the cost of new and redeveloped properties increase, existing residents experience property tax increases. Some homeowners may not meet all the guidelines for the tax freeze. As a result, many seniors with fixed incomes are struggling to pay for all their basic living costs (food, utilities) as housing costs increase.

#### *For People with Disabilities*

While people with disabilities experience many of the housing experiences mentioned above, they also face additional barriers finding accessible housing. Housing lawyers and a wheelchair user affirmed that it is almost impossible to find housing for people who use wheelchairs. When affordable housing is developed by non-profit organizations, properties may include a few accessible units, but those tend to be 1- or 2-bedroom units. There is a chronic shortage of housing for families, and this is especially a challenge for families with a member with a disability. For a project that may have just 2-4 accessible units, there may be over 300 applications. Many people with disabilities are also on a fixed income, and so have even fewer housing options as rents increase. Even for middle-income people with disabilities, advocating for accessibility is a challenge. One wheelchair user is a condo owner but does not have access to their mailroom and has had a request to install a ramp refused by the condo board.

#### *For Immigrants*

Immigrants and refugees in Philadelphia also face additional and unique housing barriers. Besides experiencing explicit racism in predominantly white neighborhoods, immigrants also have difficulty finding landlords who are willing to accept applicants who do not have credit scores or may be undocumented. Hispanic residents in particular face high rates of eviction - many are undocumented, cannot get a lease, and live in unlicensed rental properties.

Having limited documentation and paperwork also poses challenges for accessing loans or capital. Small business owners or workers may have sufficient income. However, if the income is not reported, a bank will refuse to provide a loan.

### 3) Neighborhood Experiences

#### *Services and Resources*

The disparity in public services and resources between communities has persisted. Stakeholders pointed to a lack of adequate trash collection, policing, well-paying jobs, healthy food, trees, green spaces, and educational resources in historically under-resourced neighborhoods. Discussion participants mentioned that schools and school quality are a key reason why Black people and immigrants move out of their neighborhoods.

According to immigrant service providers, the most popular neighborhoods for refugees are South Philly and lower Northeast for job opportunities. As a lot of jobs are shifting to warehouses and manufacturing in the suburbs or New Jersey, residents are experiencing difficulty finding transportation to commute.

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<sup>12</sup> The City has several property tax relief/abatement programs for existing homeowners – Homestead Exemption, LOOP, OOPA See link: <https://www.phila.gov/departments/departments-of-revenue/programs/for-homeowners/#:~:text=The%20Homestead%20Exemption%20offers%20Real,with%20Homestead%20starting%20in%202020>

Immigrant residents tend to stay close to their neighborhoods for resources like hospitals, especially if they are English language learners. Health clinics and hospitals should feel welcoming and culturally-appropriate. Otherwise, people may not utilize important services even when they are sick.

It is also crucial for these resources to be accessible for people with disabilities. The formerly-accessible Fishtown Shopping Center was recently renovated and is now not accessible for wheelchair users. The developer was somehow able to receive permit approvals for a project that removed legally-required accessible features.

### *Public Safety*

Participants agreed that public safety concerns have increased since 2016, particularly in West Philadelphia and North Philadelphia where community members regularly deal with assaults and shootings. Housing counselors mentioned having a number of clients who wished to move out of West and North Philadelphia neighborhoods because of the high rates of shootings. For Asian residents, public safety has been a top concern given the spike in attacks targeting Asian residents since the start of the pandemic.

In New Kensington and other parts of North Philadelphia, community organization staff spoke about the drug trade and associated violence. The response from the City has not been able to adequately address the opioid crisis, which has disproportionately impacted Latino neighborhoods.

Housing lawyers brought up that when public housing tenants reach out to request a transfer to other public housing units due to public safety concerns, PHA will deny their requests.

### *Development Process*

The City has not adequately enforced regulations in the real estate development process, which has caused harm to existing residents. Community organizations cited incidents of developers not notifying residents of upcoming meetings and beginning construction even before meetings or an RCO vote have taken place. Some developers will turn single-family homes into duplexes without getting the proper permits, yet there are no consequences when residents report the issue. There was also a shared sentiment that developers are privileged during the approvals process, with ZBA hearings taking place during weekday mornings and ZBA members responding more positively to developer lawyers compared to lower-capacity RCO's. During the renovation process, dumping is a chronic issue, impacting residents' health and safety. The City has also allowed traffic issues, construction debris, and damaged roads around construction sites. Families have had homes collapse because of negligent developer practices.

The Land Bank disposition process also does not favor residents who may have been stewarding vacant lots for decades. Tax liens are also a big issue for community members who try to preserve community garden spaces or acquire land for other community uses.

## 4) Policies and Programs

### *Impact of Existing Programs*

The **Philadelphia Eviction Protection Program (PEPP)** involved a collaboration among six (6) agencies and provided legal representation for over 7,000 residents, laying the foundation for Right to Counsel. Housing lawyers explained that the most transformative aspect of the tenant protection laws has been a

shift in the city and court's thinking about tenants' power during the eviction process. While tenants had previously been quickly processed through the court, legal representation has now provided them more equal standing in relation to landlords. One lawyer emphasized that PEPP is stronger if tenants are provided more substantive rights. Essentially, tenant protection policies strengthen each other.

**Right to Counsel** has increased the representation rate in two Philadelphia zip codes from 13% to 38%. Legal representation has resulted in better agreements with more time for the tenant, less money owed, and tenants showing up to their cases more frequently.

Further, the **Eviction Diversion Program** has already resulted in almost 100 landlord/tenant agreements since the beginning of 2022. Currently, the program only protects tenants from eviction on month-to-month leases, but the majority of residents have annual leases. There are no protections for tenants against evictions at the end of annual leases.

According to a NAC Coordinator, the **Emergency Rental Assistance Program** was utilized mostly by Black and Hispanic residents, but 70% are still waiting for the payments. In the meantime, some have experienced eviction. While ERAP provided \$300 million, housing lawyers affirm that it was not enough, and the need persists.

**The Philly First Home Grant** was an extremely popular and well-utilized program. About 2,700 people participated and 80% of recipients were Black or Hispanic households. It would be crucial to increase the capacity of housing counseling agencies to continue supporting residents as they navigate the process.

The **Neighborhood Preservation Initiative** funded the Basic Systems Repair Program, and there is a critical need to sustain and expand this resource.

#### *Policies to Protect Tenants*

- When defining "affordable housing", adjust the definition of Area Median Income (AMI) or utilize a different measure to better reflect the incomes of Philadelphia residents. AMI is inflated by the high incomes in the Philadelphia suburbs.
- Provide repair grants to landlords
- Increase capacity for housing counselors especially as new protections and programs are passed
- Create a dedicated repair court similar to New York City's program so that landlords cannot retaliate against tenants in municipal court
- Seal eviction records (requires state action). Even if tenants settle their judgment, their cases are permanently visible and can be looked up by prospective landlords. This disproportionately impacts people of color, single mothers, and people with disabilities.

#### *Policies to Support Homeowners*

- Create a streamlined application process to consolidate the numerous home repair programs
- Ensure home repair programs are linguistically-accessible. This means applications, staff, and contractors should all be linguistically-accessible.
- Combine home repair and workforce development programs. Home repair contract opportunities should be offered to people of color.
- Provide more resources for residents to estate plan and to address tangled title issues so that people can access repair programs and tax exemptions

- Consistently assess properties. As an example of inconsistent and problematic assessment practices, Habitat for Humanity had built 12 identical row houses with restricted retail value, but some were randomly valued at over \$300,000 while others were not.
- With the new assessments, provide adjusted tax exemptions for residents.
- Create an early warning system so that people can avoid becoming tax delinquent and losing their properties.

#### *Policies to Support Neighborhoods*

- Require L&I to ensure accessibility guidelines are followed by developers before providing permits and approving plans
- Allow zoning for Accessible Dwelling Units, which would increase the housing stock and also be a way for immigrant families to continue living in multi-generational households
- Expand inclusionary zoning to more communities and deepen the affordability requirements
- Create a program to support small businesses to own their buildings.
- Better enforce the permitting process for developers
- Regularly share data about resident participation by zip code and service area with community-based organizations. This will allow organizations to better evaluate their work and the impact of new policies.
- Develop comprehensive neighborhood plans that promote equitable development
- Increase the minimum wage so that people with jobs are able to cover increasing costs
- Fund RCO's or other community-based organizations to educate community members about the development process so that housing can be developed equitably
- Create a disposition process for City land-holding agencies that centers long-term residents, the homeless, and community-based organizations. Do not tie revenue generation goals to public land disposition.
- To address the opioid epidemic, provide people experiencing addiction with health resources, treatments, and support to find housing
- Provide resources for community development corporations and community-based organizations to continue supporting residents and neighborhoods

#### 5) AFH Survey, Analysis, and Data-Sharing

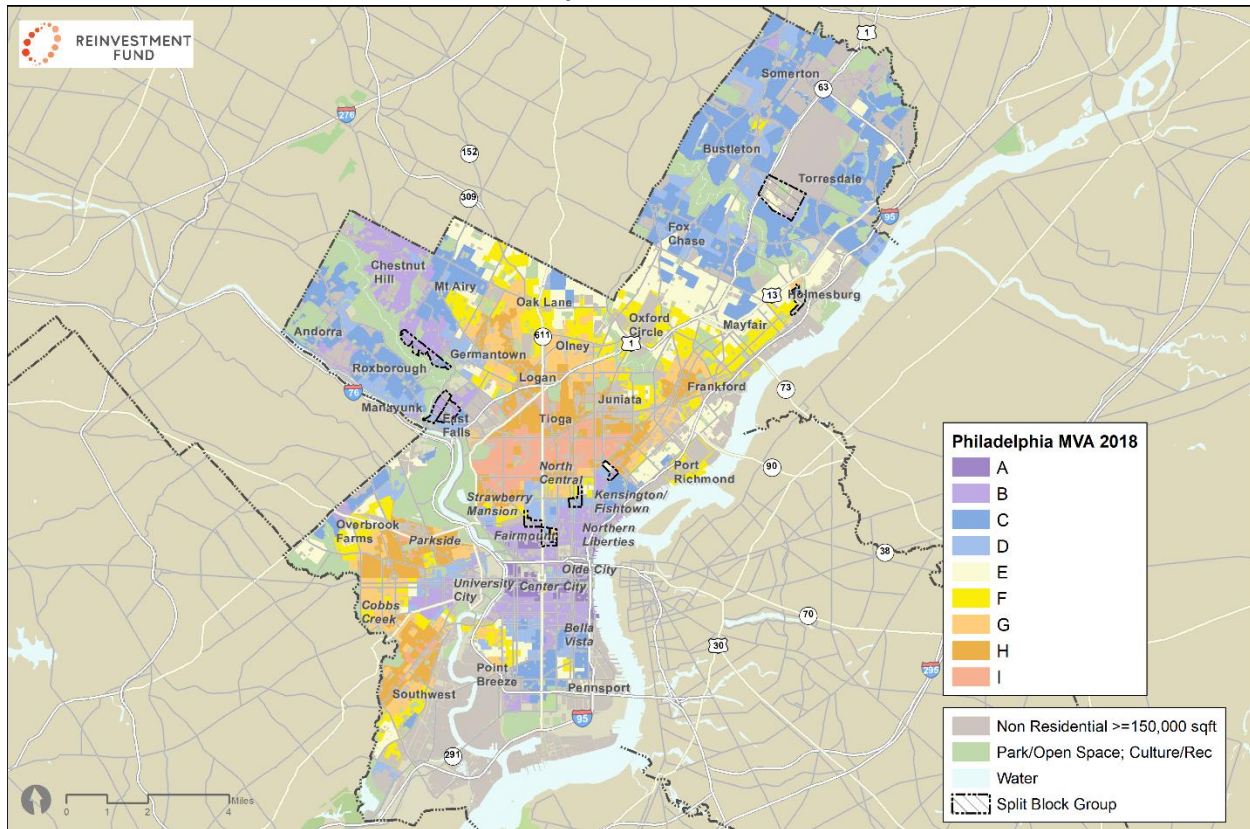
The following comments were shared in discussions regarding the 2022 AFH process and data analysis.

- Provide a plain-language version of the survey for people with intellectual disabilities
- Publish the draft and final AFH in English, Spanish, Chinese, and French
- Provide disaggregated data on the Asian population. It's the most socio-economically diverse population.
- Hispanic is not a race and should not be reported with racial categories
- Provide detailed data to advocates in order to hold the City and PHA accountable to AFH goals. Data should include existing public programs and who's participating as well as access to jobs, schools, etc.



## Appendix C

### Reinvestment Fund's 2018 Market Value Analysis



Count	Median Price Condo Adj*	Variance of Sales Price	Permits	New Construction	Vacant Homes	Foreclosures	Owner Occupancy	Renter Subsidy	Housing Units Per Meter <sup>2</sup>	Share of Condos
A 31	\$960,792	0.77	6.4%	2.69%	0.4%	1.9%	36.1%	1.8%	0.0147	70.4%
B 128	\$432,969	0.48	9.2%	5.19%	3.1%	6.0%	44.2%	7.9%	0.0024	20.11%
C 212	\$217,045	0.35	4.0%	0.7%	1.5%	12.7%	75.0%	2.6%	0.0006	3.08%
D 115	\$205,559	0.47	7.5%	2.17%	7.3%	9.9%	33.4%	12.5%	0.0016	7.31%
E 206	\$128,154	0.38	2.9%	0.11%	2.3%	23.9%	64.5%	8.9%	0.0009	1.49%
F 196	\$79,053	0.56	3.8%	0.11%	5.5%	28.3%	58.8%	17.2%	0.001	1.04%
G 163	\$44,612	0.77	4.3%	0.07%	11.2%	22.4%	51.7%	24.1%	0.0011	0.01%
H 170	\$25,929	0.83	4.5%	0.12%	16.7%	15.5%	44.0%	18.9%	0.0012	0.09%
I 84	\$13,210	1.01	4.6%	0.01%	24.9%	7.8%	46.0%	15.3%	0.0014	0.00%

The simplified MVA categories used in the 2022 AFH are strong (A, B, C), middle (D, E, F), weak (G, H, I).