CITY OF WEST DES MOINES
CITY COUNCIL MEETING COMMUNICATION

DATE: August 5, 2019

ITEM: Resolution - 2019 Analysis of Impediments to Fair Housing for the Des Moines-West Des Moines Community-Based Statistical Area – City Initiated

FINANCIAL IMPACT: None

BACKGROUND: The City of West Des Moines is an entitlement city and receives federal Community Development Block Grant funds administered by the United State Department of Housing and Urban Development (HUD). Each participating entity undertakes individual consolidated planning efforts, including the upcoming 2020-2024 Consolidated Plan, outlining how each entity will spend entitlement funds over a five-year timeframe. HUD is requiring each entity to complete an Assessment of Fair Housing (AFH) to identify existing housing issues and to implement an Affirmatively Further Fair Housing (AFFH) strategy for each respective federal entitlement fund and consolidated planning efforts. The City of Des Moines, the Des Moines Municipal Housing Agency (DMMHA) and the City of West Des Moines have partnered to conduct one regional assessment as a "Regional Collaboration" of one or more local governments and one or more public housing agencies pursuant to the AFH Instructions issued by HUD. A 28E Agreement was approved previously by the West Des Moines City Council in 2017 for the regional analysis.

A 30-day public review and comment period of the draft Analysis of Impediments began on June 29, 2019 and ends today, August 5, 2019. During this time, the draft Analysis of Impediments was available for review by the public at the following locations: City of West Des Moines website and the West Des Moines Community and Economic Development Department.

No comments have been received.

The Analysis of Impediments includes a Goal Implementation Matrix beginning on page 94. The matrix lists action items each City/entity will work on in regards to fair housing over the next five years.

OUTSTANDING ISSUES (if any): None

RECOMMENDATION: Staff recommends City Council approve the Resolution approving the 2019 Analysis of Impediments to Fair Housing for the Des Moines-West Des Moines Community-Based Statistical Area.

ATTACHMENTS:

Exhibit I	-	Notice of Public Hearing
Exhibit II	-	2019 Analysis of Impediments to Fair Housing for the Des Moines-West Des Moines Community-Based Statistical Area
Exhibit III	-	Resolution – Approval of 2019 Analysis of Impediments to Fair Housing

Lead Staff Member: CAG **Christine Gordon, AICP, Housing Planner**

STAFF REVIEWS

Department Director	Clyde Evans Cbe
Appropriations/Finance	
Legal	
Agenda Acceptance	

PUBLICATION(S) (if applicable)

Published In	Des Moines Register West
Dates(s) Published	June 19, 2019

SUBCOMMITTEE REVIEW (if applicable)

Committee	NA		
Date Reviewed	NA		
Recommendation	Yes	No	Split

EXHIBIT I

NOTICE OF PUBLIC HEARING ON PROPOSED 2019 ANALYSIS OF IMPEDIMENT TO FAIR HOUSING FOR THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT CONSOLIDATED PLAN

The City of Des Moines, City of West Des Moines, and Des Moines Municipal Housing Agency (DMMHA), with input from community partners, has developed the proposed 2019 Analysis of Impediments to Fair Housing for the 2020-2024 U.S. Department of Housing and Urban Development (HUD) Consolidated Plan.

The proposed 2019 Analysis of Impediments to Fair Housing identifies existing fair housing issues in Des Moines, West Des Moines, and the region. It also includes a strategy with goals and measures to address impediments and affirmatively further fair housing.

The City Council of the City of West Des Moines will hold a public hearing on August 5, 2019, at 5:30 pm in the Council Chambers, City Hall, 4200 Mills Civic Parkway, West Des Moines, Iowa for the purpose of obtaining citizen views on the proposed 2019 Analysis of Impediments to Fair Housing.

Persons wishing to comment on the proposed 2019 Analysis of Impediments to Fair Housing may state their views at this hearing.

EXHIBIT II

2019 Analysis of Impediments to Fair Housing for the Des Moines-West Des Moines Community-Based Statistical Area

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Executive Summary

At least once every five years, state and local government entities that receive federal funding from the US Department of Housing and Urban Development (HUD) are required to perform an analysis of fair housing issues and causes of those issues that impact their jurisdiction. Those state and local entities, referred to as program participants, then create goals to address the fair housing issues and causes identified by the analysis.

In 2017, local recipients of HUD funding—including the City of Des Moines, the City of West Des Moines, and the Des Moines Municipal Housing Agency (DMMHA)—agreed to collaborate and create a regional Analysis of Impediments to Fair Housing (AI). Per HUD's requirements, the study area defined for the analysis is the Des Moines-West Des Moines Community-Based Statistical Area (CBSA), which includes the five counties of Dallas, Guthrie, Madison, Polk, and Warren.

Throughout the analysis, several factors were used to determine disparate impact. First, access to opportunity was evaluated. Access to opportunity was measured by HUD-provided data, and the factors considered in evaluating it included exposure to low poverty areas, access to proficient schools, labor market engagement, jobs proximity, transit accessibility, transportation costs, and environmental health.

Next, housing factors such as cost, location, and quality were evaluated to measure resident access to desirable, affordable housing. A significant component of this section also investigated how local government practices and policies affect housing.

Finally, the AI evaluated how these barriers impact different populations protected by fair housing laws. Repeatedly, the data and mapping patterns showed adverse effects, or disparate impacts, affected people of color and low-income populations.

There are higher concentrations, meaning significantly higher percentages compared to the overall local population, of people of color and low-income people who live in neighborhoods surrounding the Downtown Des Moines core. Residents of those neighborhoods are exposed to more poverty, schools with lower proficiency, poorer environmental health, more housing cost burden, and more substandard housing. After reviewing the data and patterns that demonstrate disparate impact, the next goal of the analysis was to understand the main causes of that disparate impact.

Summary of Barriers

"Barriers," "impediments," and "contributing factors" are used interchangeably throughout the Analysis of Impediments, and all terms relate to indirect and direct causes of adverse housing impacts. Several contributing factors have been identified and defined by the HUD. A list of HUD's contributing factors and definitions can be found on Appendix A. Barriers or contributing factors are identified and defined throughout the narrative as well.

The most common contributing factors that create difficulty for certain populations to access housing include:

- Bias and discrimination,
- Availability or location of affordable housing, and
- Access to financial resources.

Bias, especially implicit bias, resulting in discrimination is one of the main factors in disparate impacts. Implicit bias is

> The unconscious attitudes, stereotypes and unintentional actions (positive or negative) towards members of a group merely because of their membership in that group. These associations develop over the course of a lifetime beginning at a very early age through exposure to direct and indirect messages. When people are acting out of their implicit bias, they are not even aware that their actions are biased. In fact, those biases may be in direct conflict with a person's explicit beliefs and values (Anti-Defamation League, 2019).

In this Analysis of Impediments, an example of where bias and discrimination has created barriers to housing include low-income residents of Des Moines returning housing vouchers because they were declined rental housing by landlords based on their source of income or an arrest, not necessarily conviction, record.

Another significant contributing factor is the location and availability of affordable housing. The highest rental and poverty rates in the region generally occur in older neighborhoods surrounding Downtown Des Moines, which are also areas that have less access to opportunity. Areas that have more opportunity access are the suburbs outside Des Moines, but those areas tend to have less housing that would be affordable and accessible to low-income earners.

Finally, access to financial resources is an all-encompassing term that includes several facets. It may include discriminatory lending practices, financial strain as caused by having a low income, or the inability to create personal wealth due to institutional or regulatory barriers.

Summary of Goals

After reviewing some of the barriers that arose from the Analysis of Impediments, a group of local stakeholders reviewed a list of goals that would help the program participants overcome those barriers and contributing factors. There are four major themes and nine goals within those themes. A matrix outlining the themes, selected goals, measurements, responsible entities, and timeframe are included in the last section of this analysis. In summary, the themes and goals are:

- Theme: Advance equity with education.
    1. Encourage fair housing training for elected city officials, government staff, landlords, etc.
    2. Encourage program partners to provide financial literacy and homebuyer education.
- Theme: Promote affordable housing.
    3. Encourage development or preservation of affordable housing units in locations that improve health and quality of life.
    4. Encourage development or preservation of affordable housing units with consideration to the needs of protected classes.
    5. Support more service-enriched housing models.
- Theme: Implement local government policies to encourage social equity and mitigate disparate impacts.
    6. Establish lawful source of income as a locally protected class.
    7. Improve communication and representation in government staff, boards, and commissions to reflect the diversity of the program participants' demographics.
    8. Address zoning and city codes that limit housing choices.
- Theme: Implement other policies and practices that reduce disparate impacts.
    9. Promote current and research new creative financing or ownership tools.

Another major theme--improve access to and availability of transportation—was prevalent throughout the analysis. However, it and its associated goals were not highlighted in this Analysis of Impediments because the

Des Moines Metropolitan Planning Organization (MPO) and Des Moines Area Regional Transit (DART) currently have extensive regional planning and implementation efforts to address equity that do not need to be duplicated in these fair housing goals. These transportation equity efforts and other ongoing supporting efforts are listed at the end of the analysis.

A. Introduction to Fair Housing

The Fair Housing Act was passed in 1968, yet, more than 50 years later, many Americans still experience discrimination when searching for a home. Segregated living patterns exist in the Des Moines-West Des Moines Core-Based Statistical Area (CBSA). Those patterns are a manifestation of direct and indirect discrimination.

This plan identifies barriers to housing choice and opportunities connected to where residents live. Its purpose is also to identify ways to prevent discrimination and reverse segregation by providing choices in the sale, rental, and financing of housing and spearheading community revitalization initiatives to increase quality of life.

Per 24 CFR § 5, fair housing stresses opportunity and choice for all when determining where to live. Fair housing choice encompasses:

1. Actual choice, which means the existence of realistic housing options;
2. Protected choice, which means housing that can be accessed without discrimination; and
3. Enabled choice, which means realistic access to sufficient information regarding options so that any choice is informed.

Everyone should have access to the opportunities they value most. A parent may value living near the best schools to have his children obtain the best education possible. A recent college graduate may want to live close to a job center to offset her entry-level wages with lower transportation costs. Often, the reality is housing choices near the amenities a person values may be limited. For certain groups, housing options are even more limited or completely inaccessible without intervention, which is why the fair housing laws were enacted.

Fair housing laws in Des Moines are based on the Iowa Civil Rights Act of 1965 (216.8A) and the federal Fair Housing Act Title VIII of the Civil Rights Act of 1968 (42 USC § 3601-3619 and 3631). The main purpose is to prevent or eliminate disparate treatment and impacts to a group of persons who share the same characteristic. Federally protected characteristics are race, color, religion, sex, familial status, national origin, having a disability, and having a type of disability (24 CFR § 5.152). The Iowa Civil Rights Act protects those characteristics and adds age, creed, sexual orientation, and gender identity as protected characteristics. The City of Des Moines adds ancestry as a protected class (Des Moines Municipal Code, Chapter 62). The City of West Des Moines adds veteran status to its protected classes (West Des Moines Municipal Code, Section 1-10-9). Although not locally or federally protected, this document will also evaluate the barriers experienced by residents in the region—in particular, tenants, by homeless persons, and by source of income. See the following table for comparisons between the laws.

Table 1: Protected Classes Under Civil Rights Acts

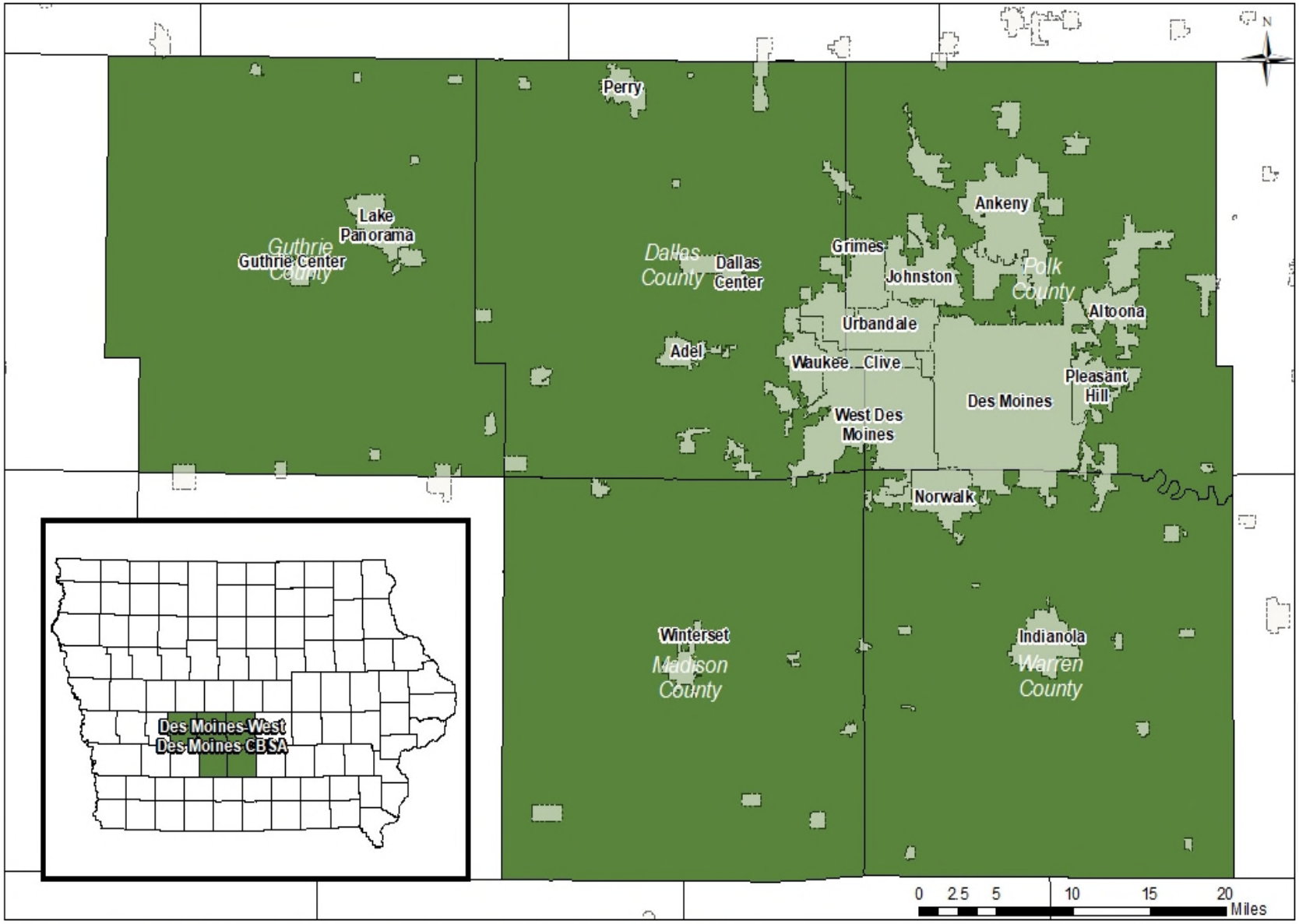
Protected Classes Under Federal, State, and Local Civil Rights Acts													
	Race	**Color**	**Religion**	**Sex**	**Familial Status**	**National Origin**	**Disability**	**Creed**	**Sexual Orient.**	**Gender Identity**	**Age**	**Ancestry**	**Veteran Status**
US Fair Housing Act	X	X	X	X	X	X	X						
Iowa Civil Rights Act	X	X	X	X	X	X	X	X	X	X	X		
Des Moines Municipal Code	X	X	X	X	X	X	X	X	X	X	X	X	
West Des Moines Municipal Code	X	X	X	X	X	X	X	X	X	X	X		X

Program Participants and Analysis of Impediments Requirements

Program participants are entities that receive entitlement funding from the U.S. Department of Housing and Urban Development (HUD). In 2017 the program participants City of West Des Moines, Des Moines Municipal Housing Agency (DMMHA), and the City of Des Moines agreed to complete a joint Assessment of Fair Housing (AFH), which at that time was a requirement of receiving HUD entitlement funding. Due to decisions made at the federal level in 2018, the requirements for the program participants to complete an AFH were postponed, but they were still required to complete an Analysis of Impediments to Fair Housing Choice to furthering fair housing as mentioned in 24 CFR § 5. The Analysis of Impediments relies on the guidance outlined in the HUD Fair Housing Planning Guide (1996) while the AFH relied on the Affirmatively Furthering Fair Housing (AFFH) Guidebook. As a result, the following document is a hybrid of the Assessment of Fair Housing and Analysis of Impediments tools, data, and requirements.

Other organizations that formally collaborated in planning included the Polk County Housing Trust Fund (PCHTF), the Des Moines/Polk County Continuum of Care (CoC), Capital Crossroads, and Des Moines Area Regional Transit (DART). The study area was the Des Moines-West Des Moines CBSA, as defined by the U.S. Department of Commerce Economics and Statistics Administration. See geographic area in the following figure.

Figure 1: Des Moines-West Des Moines CBSA Map



Source: U.S. Department of Commerce Economics and Statistics Administration and U.S. Census Bureau

As of January 1, 2018

B. Methodology

Citizen Participation Plan

The first step in the process was to update the City of Des Moines Citizen Participation Plan in 2017 to comply with 24 CFR Part 91, more specifically, sections 91.100 and 91.105, to include more robust public participation. A public hearing regarding the updates was held on July 24, 2017, and the plan was approved.

Fair Housing Steering Committee

Next, the Fair Housing Steering Committee was established to include representatives from agencies or organizations that regularly interact with the City of Des Moines and City of West Des Moines. Steering committee members included representatives from program participants. Collaborating entities on the steering committee included Des Moines Area Regional Transit Authority (DART), Des Moines Municipal Planning Organization (MPO), Des Moines/Polk County Continuum of Care (CoC), Capital Crossroads, and the Polk County Housing Trust Fund (PCHTF). The steering committee was consulted on the geographic area to be evaluated, organizations to contact for interviews, and expert knowledge on applicable topics within the assessment. This group also read the Analysis of Impediments for accuracy before dissemination to the public. A Fair Housing Outreach Steering Subcommittee was also formed to help with outreach, which is described in more detail below.

Fair Housing Steering Committee Meetings occurred on:

- Wednesday, June 7, 2017, 10:00 AM-11:00 AM
    - This meeting served as an introduction for steering committee members. Topics included determining a geographic area, signing 28E agreements, and discussing the basic content of the analysis.
- Friday, April 27, 2018, 1:00 PM-2:30 PM
    - City of Des Moines staff provided preliminary data findings and draft Assessment of Fair Housing to the steering committee members.
- Thursday, February 21, 2019, 10:00 AM-12:00 PM
    - The ICF consulting team lead discussions about the transition from an Assessment of Fair Housing to Analysis of Impediments. They also facilitated a discussion and exercise that resulted in groups to target for additional outreach for community engagement.
- Wednesday, June 5, 2019, 9:00 AM-11:00 AM
    - The consulting team lead a review of potential goals with the steering committee. They then facilitated a discussion that lead to a consensus on the region's goals for fair housing.

Outreach Subcommittee Meetings occurred on:

- Wednesday, March 13, 2019, 8:30 AM-9:30 AM
    - The subcommittee and consultants discussed interview questions and determined organizations they would contact to fill outreach gaps.
- Monday, April 8, 2019, 8:15 AM-9:00 AM
    - The subcommittee shared summaries from their outreach calls. They also agreed the next steps would be to start a list of goals for the Fair Housing Committee to review at its June meeting.
- Thursday, May 16, 2019, 9:00 AM-10:30 AM

- The subcommittee discussed goals to present to the Fair Housing Steering Committee on June 5, 2019.

Connection to Other Community Outreach Efforts

Some community participation outreach was spearheaded prior to the start of this Analysis of Impediments as separate community development efforts, yet still pertained to fair housing issues in the Des Moines-West Des Moines CBSA. Data and findings from several plans, reports, assessments, and documents from the program participants and other organizations were incorporated throughout the Analysis of Impediments.

By incorporating previous participation and results, the Analysis of Impediments connects these separate efforts in one place. It capitalizes on the momentum that has been generated by other plans, while making more effective use of resources in examining the community outreach gaps in other plans. Additional outreach was then focused on those groups whose voices are not adequately represented.

The Analysis of Impediments methodology also prevented duplicate efforts that may lead to citizen and service provider fatigue and frustration with repeated outreach on the same topics. It tapped into key stakeholders who have already committed to working on specific issues relevant to the Analysis. The Analysis of Impediments also respects the effort other community groups put forth by extracting relevant goals from those plans and aligning its goals to allow for greater accountability and progress tracking.

Plans reviewed are listed below and followed by the most relevant highlights. Data and recommendations from each plan or effort are incorporated throughout the Analysis of Impediments. If applicable, meeting dates and times relevant to certain plans are listed on Appendix B. Plans that were created more than five years ago are not included in this list.

1. Des Moines Civil and Human Rights Commission Bridging the Gap series (2019)
2. PlanDSM: Creating Our Tomorrow (2016)
3. West Des Moines Housing Needs Assessment (2018)
4. One Economy: Building Opportunity for All (2017)
5. Capital Crossroads Downtown Workforce Housing Study (2019)
6. Capital Crossroads 2.0 (2017)
7. Des Moines Neighborhood Revitalization Program Evaluation (2018)
8. Housing Tomorrow (2015)
9. Des Moines Municipal Housing Agency Annual Plan (2018)
10. Des Moines Area Regional Transit (DART) Plan (2016)

Des Moines

Des Moines Civil and Human Rights Commission Bridging the Gap Series

Bridging the Gap is a project championed by Des Moines Mayor Frank Cownie to have solutions-focused discussion with community members across Des Moines. Bridging the Gap started as a means to generate ideas on how Des Moines as a community can reduce violence and strengthen community relations with law enforcement. The ongoing initiative, which started two years ago, implemented three separate projects to seek community input:

1. Safety and Justice Dialogues,
2. Refugee and Immigrant Advisory Subcommittee, and
3. Lesbian Gay Bisexual Transgender Advisory Council.

Bridging the Gap began as small group discussions (of up to 16 people) in Des Moines. The discussion series utilized a discussion packet entitled "Safety and Justice: How Should Communities Reduce Violence?" from the National Issues Forums Institute to guide the discussions. Since 2018, more than 200 city and state government, business leaders, service providers, and community members in the Greater Des Moines Area generated ideas. Those ideas were narrowed down into 3 key areas of focus with 9 accompanying strategies that were presented at four art-gallery-style events. Community members were invited to attend to view what an idea could look like in practice, further discuss the pros and cons of implementing the idea, and finally, cast their vote for the most effective, long-lasting change.

On February 20, 2019, at a joint session, Des Moines Civil & Human Rights Commission presented its recommendations derived from the community dialogues and votes to the Des Moines City Council and the public. Affordable housing and economic revitalization were voted as key agenda items.

These themes are incorporated throughout the Analysis of Impediments goals. The top four themes presented were:

1. Quality, affordable, stable housing;
2. Economic stability;
3. City programs and workforce demographics; and
4. Ongoing mandatory training for all city staff (Des Moines Civil and Human Rights Department, 2018-2019).

PlanDSM: Creating Our Tomorrow

PlanDSM is the City of Des Moines' Comprehensive Plan (2016) for how it will grow into the future. It consists of a vision statement of values the City considers important for the future, goals and policies for eight different Plan elements, a separate element addressing social equity, an implementation chapter describing how the Plan can be realized, and a future land use map.

From fall 2014 through spring 2016, City of Des Moines staff, the PlanDSM steering committee, and students from Iowa State University conducted more than 10 focused outreach meetings and four public meetings across the city. Other outreach efforts included community presentations to groups such as recognized neighborhood associations, students at Drake University and Iowa State University, and the Iowa Planning Association.

PlanDSM dedicated an entire section to social equity goals. Some of the goals included in PlanDSM overlap with other community efforts and have been included in this plan as well.

West Des Moines

West Des Moines Housing Needs Assessment

The 2018 West Des Moines Housing Needs Assessment involved primary research and secondary research. This research was compiled to provide West Des Moines with sufficient data to analyze the current housing situation in the area and the tools to create strategies to meet future needs.

Primary research, the creation and analysis of new data, was conducted for this study. This took the form of two areas of research. First, the 2017 Rental Vacancy Survey (RVS), an exhaustive telephone survey of rental properties, was conducted in West Des Moines. The RVS surveyed a total of 2,416 units. A second survey was conducted to assess the housing needs in West Des Moines. The 2017 Housing and Community Development Needs Survey asked respondents various questions about the perceived housing needs in West Des Moines. The West Des Moines Housing Needs Assessment also included a New Resident Survey that asked new residents to

West Des Moines about their demographic and housing information. An Employer Survey reached out to local employers about the impact of housing on their workforce. Examples of some survey questions from the study are included in Appendix C.

Secondary research included the collection and analysis of previously gathered data. This existing data includes 2000 and 2010 Census data, 2012-2016 American Community Survey (ACS) data, 2012 Comprehensive Housing Affordability Strategy (CHAS) data, Bureau of Labor Statistics (BLS) data, and Bureau of Economic Analysis (BLS) data. In addition, this plan utilizes U.S. Geological Survey (USGS) data and various other data provided by the City of West Des Moines or pertaining to the area. This data was compiled by Western Economic Services (Western Economic Services, LLC, 2018).

Although the assessment was not specifically related to Fair Housing, many of the issues and solutions are connected to protected classes and the housing barriers they face. The most relevant strategies incorporated into this Analysis of Impediments are government practices to include more low- and moderate-income housing.

Region

One Economy: Building Opportunity for All

The purpose of the One Economy report is to understand the financial stability and well-being of African Americans living in Polk County; Polk County includes almost three-quarters, or 75 percent, of the total population in the Des Moines-West Des Moines CBSA. Per the report, research included 61 focus groups, small group meetings, or individual meetings with 244 people.

Guided discussion questions assisted in understanding community members' lived experiences and perceptions about issues related to the financial well-being of African Americans, African immigrants, and resettled international refugees living in Polk County. Discussion group participants included educators, nonprofit and business owners, state employees, high schoolers in the Des Moines Public School system, African refugees, faith community members, single parents, former offenders, and other members of the African American community in Polk County. The State Public Policy Group (SPPG) developed the methodology and led the discussions.

Research reviewed during this process included government data from the US Census Bureau and other national, state, and local sources; historical research from the State Archives of Iowa; recent city and county plans by various local planning initiatives; and individual interviews with local data experts (The Directors Council and State Public Policy Group, April 2017).

Understanding Polk County's African American and Black population's barriers to financial stability helped guide identification of contributing factors for the Analysis of Impediments. This then influenced the development of goals as well.

Fair Housing Subcommittee Outreach

After extracting relevant information from the previous planning processes to incorporate into the Analysis of Impediments, the steering committee then identified public outreach gaps in an exercise facilitated by the consultants. The steering committee identified the following resident groups where more information should be gathered:

1. Disabled residents,
2. Tenants,
3. Elderly residents,

4. Female heads of household, and
5. Homeless population.

A subcommittee addressed those gaps through interviews with providers at service organizations. See Appendix D for questions asked in interviews.

In February 2019, community engagement calls were made to Cynthia Latcham with Anawim Housing, Teree Caldwell-Johnson with Oakridge and Des Moines Board of Education, and Chelsea Lepley with Polk County Housing Trust Fund and a neighborhood activist. In March 2019, community engagement calls were made to Disability Rights Iowa, Amanda Murphy with Primary Health Care, the Evelyn K. Davis Center, and a local senior center.

Interview results, which include discussion of barriers to fair housing, are included throughout the analysis. Highlights from the calls regarding common barriers include:

- NIMBYism for affordable housing projects, especially for projects that will support the homeless;
- Long wait lists of those trying to obtain affordable housing;
- Many rental units are substandard, and there is not enough staff to enforce higher standards;
- Discrimination often happens due to lack of understanding about tenants' fair housing rights; and
- A lack in the number of affordable units.

Other miscellaneous presentations or events to raise awareness about the Analysis of Impediments included:

- Equal Opportunity Advisory Committee
    - Thursday, April 5, 2018, 1 PM
    - Staff presented fair housing data to the Equal Opportunity Advisory Committee, a committee of the City of Des Moines Human Resources Department.
- Fuse DSM
    - Wednesday, November 14, 2018, 8:00 AM
    - Staff presented fair housing and civil rights data to Fuse DSM, a non-profit arm of the Des Moines east and south side Chambers of Commerce.
- Civil Rights Symposium
    - Wednesday, March 20, 2019
    - A fair housing poster was on display at the Civil Rights Symposium held at Des Moines University. Attendees had the opportunity to vote on any fair housing issues they have personally encountered in their housing search. See Appendix E for a copy of the poster.
- Polk County Housing Trust Fund Affordable Housing Week
    - Monday, April 15-18, 2019
    - The same fair housing poster with a voting opportunity was on display during educational events about affordable housing week hosted by the Polk County Housing Trust Fund.

After receiving feedback from the steering committee on Analysis of Impediments first draft, the final draft was published for public input. Public notice for a 30-day comment period was published in the Des Moines Register newspaper on June 28, 2019. Notice was also published on the City of Des Moines web site (dmgov.org). Copies were made available at all Des Moines and West Des Moines public library locations, city halls, and web sites. See Appendix F for the publisher's affidavit.

Public hearings were set by the City of Des Moines and the City of West Des Moines. The dates and summary of comments received from the public hearings are below.

Table 2: Public Hearings

Program Participant	**Date, Time of Hearing**	**Location of Hearing**	**Summary of Comments Received**
City of Des Moines and Des Moines Municipal Housing Agency (DMMHA)	8/5/19, 5:00 PM	Des Moines City Hall, Council Chambers	
City of West Des Moines	8/5/19, 5:30 PM	West Des Moines City Hall, Council Chambers	

C. Assessment of Past Goals

To create new goals that are specific, measurable, achievable, realistic, and timebound (SMART), it is important to understand past goals the region has taken on and the progress made towards them. Below is a summary of past 2014 goals. The new 2019 goals are in the final section of this document in *H. Fair Housing Goals and Priorities*.

In the 2014 *Greater Des Moines Regional Analysis of Impediments to Fair Housing Choice*, nine areas and subsequent goals were identified. Although many goals were identified, the goals did not have timeframes or designated responsible agencies or organizations accountable for implementing those goals. Below are the 2014 goals and an update on each.

Goal 1. Address affordability

a. Promote a regional approach to provision of affordable housing
b. Create incentives for local jurisdictions to increase affordable housing options
c. Increase choice of affordable rental units
d. Increase the number and diversity of possible developers, managers, and funding sources for affordable housing to include more organizations such as non-profits, faith based organizations, corporations, manufacturing plants employing a large number of low-wage workers, pension funds, community benefits agreements and others
e. Increase the provision of affordable housing around job centers
f. Increase public transportation options, to increased lines and also increased frequency, lines to run late in the evenings
g. Create incentives for private developers to invest in developing and rehabilitating affordable housing. This can be done by creating programs that provide flexibility in meeting code compliance requirements while ensuring health and safety of its residents.
h. Education and technical resources for low skilled individuals
i. Educational resources on how to maintain and keep homes
j. More programs for emergency services when households are at risk of losing housing
k. Consider new forms of affordable rental units, such as co-op options that can help reduce the rent-burden for individual households
l. Promote the use of universal design in new construction to increase housing options for seniors and people with disabilities
m. Educational resources towards financial management of household income
n. Educational resources on how to buy and maintain a house

There are several programs that have helped create more affordable units. Those programs include the Low Income Housing Tax Credit (LIHTC), Tax Increment Financing (TIF) districts, and federal funding such as Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) program.

Since 2015, 789 rental housing units designated for low-income tenants have been constructed in the Des Moines-West Des Moines Community-Based Statistical Area (CBSA) through the LIHTC program administered by the Iowa Finance Authority (IFA). Of those 789 units, 619 were built in Des Moines; 0 were built in West Des Moines with the LIHTC program. Around Des Moines, 55 affordable units were built in Pleasant Hill, and 43 units were built in Ankeny. Across the region, 66 LIHTC units were built in Perry in Dallas County. Six units were built in Winterset in Madison County (Iowa Finance Authority, 2019).

The City of West Des Moines and City of Des Moines utilize Tax Increment Financing (TIF) districts generating funds to increase affordable housing. TIF is an economic development tool that is used in designated urban

renewal areas (Iowa Code 2019, Section 403.19, Urban Renewal, 2018). The City of West Des Moines has the Woodland Hills TIF, where a portion of tax revenues from future increases must be spent on affordable housing. In Des Moines, the Office of Economic Development has started to implement a percentage of affordable units in projects utilizing TIF incentives. Since starting this practice, 51 affordable units in Downtown Des Moines have been included in developing projects. All are still under construction.

In the last five years, CDBG funding related to flooding disasters also helped to boost the construction of affordable rental units in Des Moines and West Des Moines. Under the CDBG-DR program administered by the Iowa Economic Development Authority (IEDA), 138 units reserved for low-income tenants were constructed in Downtown Des Moines; 69 units reserved for low-income tenants were constructed in West Des Moines. With HOME program funding, the City anticipates approximately 20 new rental units reserved for low-income persons will be completed between 2015 and 2020, and approximately 40 new single-family homes will have been sold to low-income homebuyers by 2020 (City of Des Moines, 2019).

Goal 2. Changing demographics

a. Promote regional approaches to affordable housing
b. Spread the location of affordable housing units throughout the region
c. Identify de-concentration opportunities
d. Increase availability of affordable rental units in the region
e. Leverage private dollars and work with not for profit, faith based organizations and private agencies to provide the required subsidies for rental housing

One regional effort to address housing is through Capital Crossroads. Capital Crossroads is a visioning initiative created by regional leaders to work together across several efforts such as neighborhood development, local business, education, health, culture, infrastructure, and environment.

Capital Crossroads' initiatives to increase intergovernmental cooperation include the Local Government Collaboration (LGC) Project and the Central Iowa Code Consortium (CICC). The LGC Project was established in partnership with fifteen cities and three counties in Central Iowa to better collaborate on public services for reducing costs, redundancies, complexity, and time commitments. The process has since been used by public safety, fire, police, parks and recreation, libraries, and human resources departments from metro area governments to identify opportunities for collaboration.

Born out of the work of the LGC, the CICC is a collaborative effort to improve uniformity and consistency in the adoption and enforcement of local building codes in Central Iowa. Consortium volunteers have assessed building code elements to develop a model for a uniform building code for consideration and adoption by local governments (Capital Crossroads, 2019). Despite these intergovernmental initiatives, a regional housing strategy to include more affordable housing in the Greater Des Moines area is still needed.

In IFA's LIHTC program, deconcentrating affordable housing, especially rental, from the center of the urban core is basis for awarding points in the competitive process. The City of Des Moines is also developing a housing strategy to be more inclusionary. The strategy is planned to be available in 2020.

Goal 3. Education of fair housing laws, rights, and processes

a. Increase outreach within the minority and immigrant population groups
b. Partner with faith-based organizations to reach these population groups
c. Provide educational resources of laws and rights, and available housing options

d. Increase community education clarifying myths around public and low-income housing
e. Increase community exposure to various cultures, norms, differences and dissimilarities among population groups
f. Support the creation of a regional minority and ethnic representative taskforce to provide recommendations with housing related issues
g. Partner with existing minority and ethnic groups and encourage links between housing and existing services
h. Investigate options to assist foreign born population groups who may not be eligible for federal assistance.
i. Provide certified and registered translation services to immigrant populations. Provide language services within various city departments

In the City of West Des Moines, the Human Rights Commission educate City staff and community members on race and equity issues. For example, every month, the West Des Moines Community Equity, Diversity, and Multicultural Conversation group meet at the West Des Moines Learning Resource Center. The group invites speakers that address their goals of:

- Promotion of a community that is just, equitable and safe.
- To learn more about ourselves and from each other's experience.
- To sharpen abilities in inclusive dialogue and develop a skill set which will further promote the application of intercultural skillfulness.
- Continuing the process of identifying ourselves as positive change agents.

Des Moines staff perform an average of one training per week regarding difference in treatment in the areas of age, race, color, creed, sex, national origin, ancestry, religion, disability, sexual orientation, and familial status. Target audiences include multi-family property owners, leasing managers, and realtors. The department also coordinates an annual event to raise awareness about civil rights issues, which includes fair housing. This education has led to some landlords adjusting their screening criteria to be more inclusive to groups such as seniors, refugees, disabled people, and low-income individuals.

Another achievement is increasing the amount of translated material. The Des Moines Civil and Human Rights Commission now has fair housing videos in Arabic, Bosnian, French, Lao, Spanish, and Swahili. The commission has partnered with institutions, schools, and other organizations to increase outreach efforts to racial or ethnic minority and immigrant populations, especially refugee communities.

The City of Des Moines Civil and Human Rights Commission is a member of the Government Alliance on Race and Equity (GARE). GARE is a national network of government working to achieve racial equity and advance opportunities for all. GARE membership has helped Des Moines staff start to acknowledge gaps in service through its tools, resources, and trainings. By acknowledging those gaps, some of which are outlined in the Analysis of Impediments, the city can begin to form goals and strategies to help address them.

Translation services are provided by the City of Des Moines through a service called the Language Line. The Language Line is available any time to a resident trying to communicate with staff and provides translation services for more than 240 languages. In addition, a coalition of nonprofit agencies led by the Iowa International Center have created a housing toolkit to assist foreign-born residents. One part of the toolkit is the housing hotline, which is free and available 24 hours a day, seven days a week, to provide translation assistance between local landlords and non-English speaking tenants (Polk County Housing Trust Fund, 2019).

Another initiative the City of Des Moines plans to implement in 2020 are translated web pages. The City's web site will be revamped to allow easier access and readability for residents. For residents who speak a foreign language, there will be a drop-down option to choose a language and the web page will translate to that language. However, the drop-down menu is still in English, so it assumes a person will know how to read the English translation of the language they need.

Goal 4. Geographic concentration of subsidized and affordable housing

a. Increased outreach region-wide
b. Identify and partner with grassroots, citizen groups, minority groups, faith based organizations, merchant association, and minority and immigrant lending organizations. Faith based organizations can play an important role in this effort.
c. Partner with Institutions and schools to increase outreach and seek volunteers to seek most vulnerable population groups.
d. Increase resources for existing human rights commissions

The Housing Choice Voucher (HCV) program is the primary tool to reduce concentration of subsidized or affordable housing. Public housing staff provide information to recipients on housing opportunities available through the region which will enable the participant the opportunity to be closer to work or school; provide for economic, cultural, racial and ethnic diversity with lower poverty rates, high school drop-out rates and/or greater access to essential goods and services; and how to access such opportunities through support organizations in the area. Staff provides HCV participants information and explanation on the advantages of moving to an area that does not have a high concentration of poverty.

Goal 5. Landlord Requirements

a. Increased education of fair housing laws and rights for landlords, property owners and developers
b. Increased education of fair housing laws, rights and responsibilities for tenants
c. Work with landlords and property owners to create a tenant reentry program that allows individuals and families available housing if they meet certain criteria to establish credibility as a tenant
d. Work with landlords and property managers/owners to look at tenants on a case by case basis and be flexible with the tenant screening requirements

One of the biggest proponents of educating landlords is the Polk County Housing Trust Funds (PCHTF). Every year, PCHTF provides multiple no-cost opportunities to learn more about the need for safe, stable and affordable housing in the community. Themes change year to year, and in 2019, the theme was housing equity. Free events included a landlord forum titled "Bias Basics for Better Housing," an event taking a historical perspective on housing equity in Des Moines, and an affordable housing design challenge for high school design students.

The Des Moines Civil and Human Rights Department is evaluating potential for required landlord classes. Currently landlord classes are offered in partnership with the City of Des Moines fire and police departments. The classes address safety and crime-free practices. Property managers who attend these courses and pass them receive a certification that is posted for applicants and tenants. The commission would like to implement additional classes, especially for repeat offenders, that would address cultural sensitivity, discrimination, and human rights.

Another achievement is the creation of a housing navigator position at Primary Health Care. Primary Health Care is a nonprofit community health center dedicated to serving the medically insured, uninsured and underinsured

with their health care needs. It also serves as the coordinated intake center for homeless individuals. The housing navigator establishes relationships with local landlords who may not be familiar with the needs of those transitioning from homelessness. The housing navigator helps bridge housing opportunities with landlords who may not have otherwise housed certain populations.

Goal 6. Support services for homeowners

a. Create partnerships with non-governmental service providers and private sector partners
b. Create or expand programs to provide supportive services to low income, senior, and disabled home owners

Two of the main services providers promoting homeownership are Greater Des Moines Habitat for Humanity and Housing Opportunities Made Easy, Inc. (HOME, Inc.). Local and state governments provide regular funding support to these nonprofits to produce affordable homeownership opportunities. In addition, both agencies provide well-rounded homebuyer and financial education to their clients.

Iowa Finance Authority (IFA) also has selected mortgage companies as Participating Lenders. IFA works with a network of hundreds of lenders and real estate professionals to offer its programs that assist low-income homebuyers and homeowners. While all Participating Lenders listed are committed to serving Iowa home buyers, the professionals designated as IFA Preferred Partners have assisted many home buyers with IFA programs, have received additional training and have been deemed IFA homeownership super stars. In the five-county region, 236 homebuyers were assisted by homebuyer assistance, 390 homebuyers were assisted with mortgage programs, and 170 service members were assisted through the military homeownership program (Iowa Finance Authority, 2019).

Both the City of Des Moines and the City of West Des Moines have owner-occupied repair programs. With assistance from other community partners such as the Polk County Housing Trust Fund or Neighborhood Finance Corporation, the cities facilitate vital homes repairs, such as roofs or sewer repairs, to help low-income homeowners maintain their properties.

Goal 7. Zoning

a. Implement inclusionary zoning for municipalities within the region or on a case by case basis for new Planned Unit Development projects
b. Increase zoning areas that allow the development of multifamily developments
c. Create an affordable housing overlay to minimize barriers to affordable housing within local zoning codes

Des Moines regularly utilizes Planned Unit Development overlays to implement inclusionary zoning. The City of Des Moines is revising its zoning code to be a hybrid that will increase the areas or types of units to be available for affordable housing. However, there are no plans to create an affordable housing overlay as the State of Iowa does not allow mandatory inclusionary zoning requirements because they are viewed as impact fees. The City of Des Moines is considering an inclusionary housing policy as well as other affordable housing strategies in its neighborhood revitalization program. The strategies should be available in 2020. The City of West Des Moines is in the process of updating its comprehensive plan, which may include proposed zoning strategies to address affordable housing, to be adopted by the end of calendar year 2019.

Goal 8. Homelessness

a. Add more emergency shelter beds in more locations across the region to the current homeless sheltering system
b. Create additional transitional housing options for each homeless subgroup
c. Expand the mandate of the Homeless Coordinating Council to include coordination with regional planning efforts

Since 2015, the number of beds for the area has remained stable. The number between 2015 and 2018 hovered between 406 and 410. In the 2018 Housing Inventory Count, Iowa Homeless Youth Center added 9 beds for youth in Polk County, and an emergency shelter project called HEAL House opened in Indianola. In 2018, the HEAL House reported a physical location with 11 beds. In 2019, its staff reported no longer having a physical location, but were instead a voucher-based program paying for hotels. On the night of the 2019 Point in Time, its staff reported serving 28 people (4 families, 17 individuals, 1 minor) (Schacherer, 2019).

One facility, Central Iowa Shelter & Services (CISS) is looking to expand its facility to include an additional 24 permanent supportive housing units. This project is dependent on receiving a National Housing Trust Fund award, administered by IFA. Des Moines has several other facilities that house homeless families and individuals. Most shelters require that homeless persons are assessed and access services through the centralized intake system at Primary Health Care.

Under its Family Unification Program, DMMHA reserves 100 housing vouchers to assist families who are separated from their children due to homelessness. The program also helps young adults, ages 18 through 24, transition from foster care who may be vulnerable to homelessness.

Goal 9. Transportation

a. Provide flexible bus services in areas where there is a high concentration of racial or ethnic minorities to supplement the existing fixed route service
b. Adopt policies that require affordable housing to be located along existing public transportation corridors

Transit services are provided by Des Moines Area Regional Transit (DART). As of September 2017, this includes 18 local bus routes concentrated in Des Moines, 3 flex routes located in the suburbs, and 7 express routes that go from the suburbs to downtown Des Moines. DART has a fleet of 150 buses, 112 Rideshare vans, and 1780 bus stops (Des Moines Area Regional Transit Authority, 2017).

This is a positive change from 2014 where there were 14 local bus routes and 2 flex routes. In its fleet, DART had 150 buses, 108 Rideshare vans, and 1474 bus stops. Although a new flex route (74) has since been added to the system, it operates in the suburbs. Local bus lines are still focused in higher density areas, which consequently, tend to also be areas of higher concentrations of racial or ethnic minorities.

DART offers several programs that reduce fares. For example, DART offers a Half Fare program for adults 65 and older, persons with disabilities, refugees, and students to ride for about half the cost of regular bus fare. Acceptance in the program is good for life and does not expire except in cases of a temporary disability, refugees, or students. Polk County Veterans Affairs provides free rides on DART to veterans.

Other programs support employment or those searching for employment. For instance, Opportunities Thru Transit (OTT) allows income-eligible people to ride the bus at a reduced rate when going to work, looking for a job, or traveling to adult educational and training programs. The bus pass gives unlimited use of DART buses for

the calendar month. Some employers have signed up to offer free or reduced bus passes for employees. This transit benefit provides buses passes at a reduced cost to the employees along with tax incentives for the company. The transit commuter benefit allows employers to give their employees as much as $130 per month to cover transit or vanpool commuting costs as a tax-free benefit.

Finally, DART Paratransit service is provided for senior citizens and low-income persons with disabilities living in Polk County who are functionally unable to independently use the regular DART bus service all the time, temporarily, or only under certain circumstances. Paratransit service is door-to-door, wheelchair accessible, and free of charge.

In addition, the City of West Des Moines provides 250 transit passes per year for the DART system through its CDBG funds. To receive a pass, the person must qualify as low-income and be a resident of West Des Moines. The pass works on all regular bus routes throughout the metro. Also, West Des Moines Human Services offers transportation for seniors, disabled and low-income residents of the community. Transportation is available for necessary medical appointments.

Summary

Positive and meaningful steps have been taken over the last five years to address fair housing issues. Des Moines, West Des Moines, and Central Iowa continue to make nationally ranked lists for great places to live, work, and play such as one of the top 10 best cities to live and work, one of the best cities for jobs, one of the top 10 places with the most job opportunities per capita, and the number one city for economic strength (Greater Des Moines Partnership, 2019). Yet, the data demonstrates there continues to be disparities in opportunity. As a result, more fair housing education and enforcement are necessary.

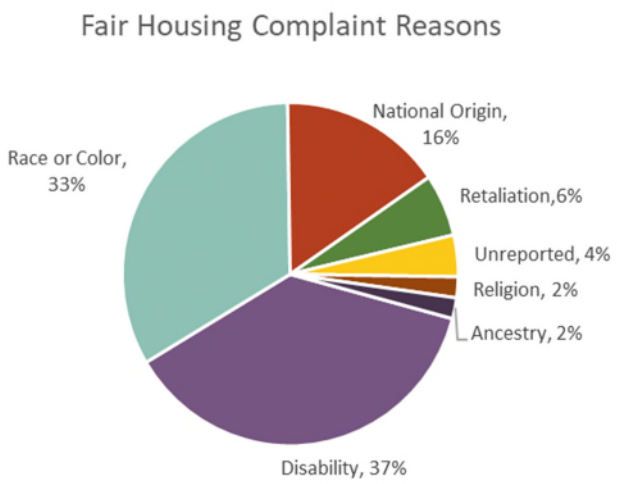
D. Fair Housing Education and Enforcement

Fair housing education and enforcement is addressed by the City of Des Moines Civil & Human Rights Department, the City of West Des Moines Human Rights Commission, and the Iowa Civil Rights Commission. The Des Moines and Iowa Commissions are staffed. The West Des Moines Commission is not staffed, and it refers cases and investigations to the Iowa Commission. The three agencies act independently of one another; however, the Des Moines and West Des Moines Civil Rights Commissions are planning to convene on September 17, 2019 to determine how the cities can address regional equity issues together.

Des Moines Civil and Human Rights Commission

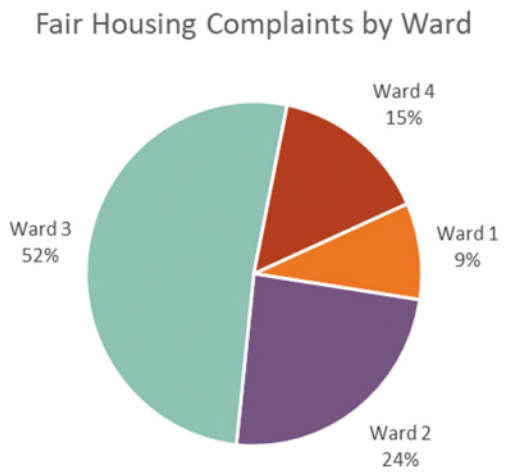
In Des Moines, six employees in the Civil and Human Rights Department facilitate trainings, seek out vulnerable groups, and track and investigate fair housing violation claims. The Des Moines Civil and Human Rights Commission's board has seven seats that serve three-year terms.

Figure 2: Fair Housing Complaints



Source: Des Moines Civil & Human Rights Commission, 2017

Figure 3: Fair Housing Complaints by Ward



Source: Des Moines Civil & Human Rights Commission, 2017

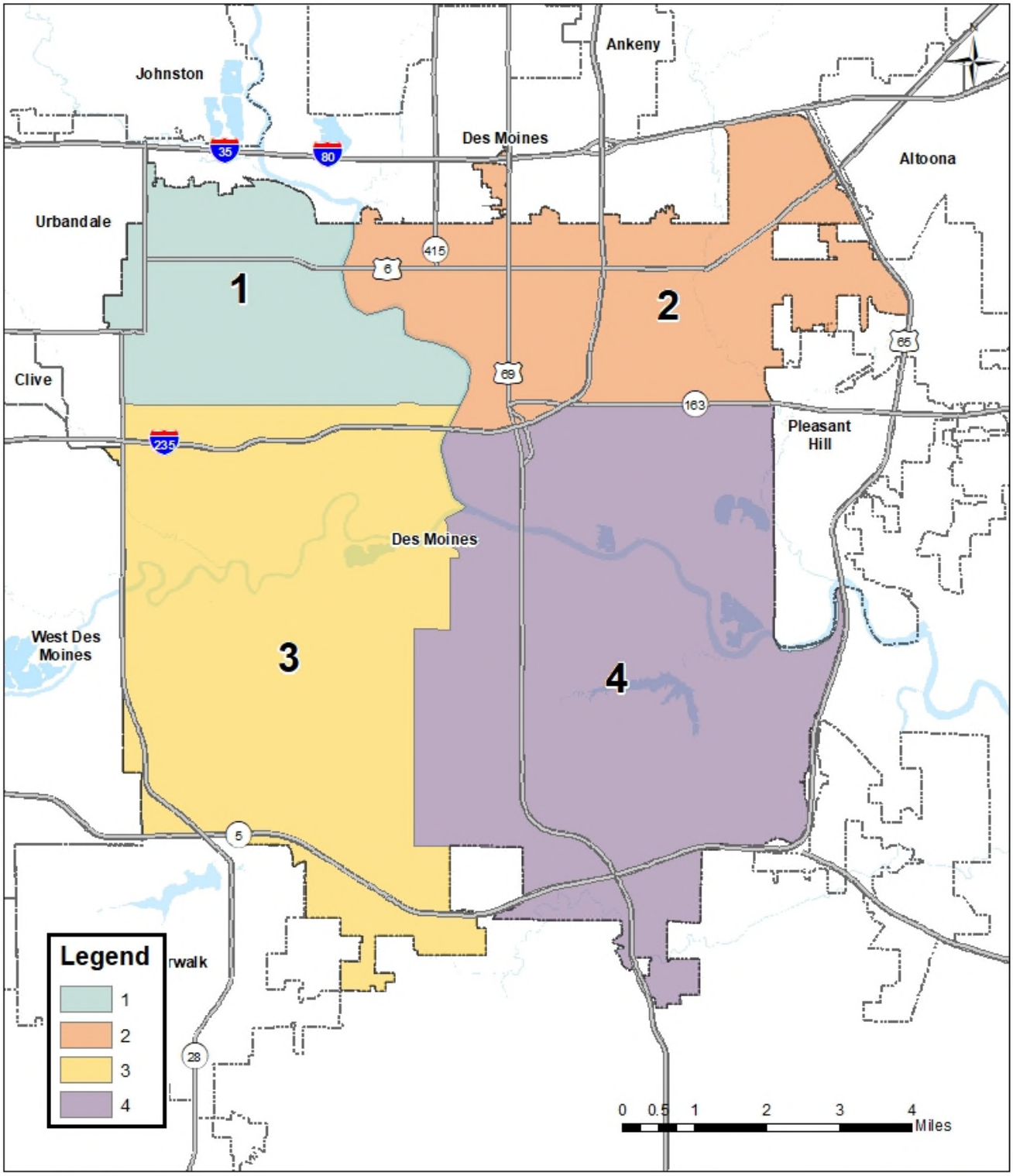
The most common fair housing complaint received is based on disability. The next most common complaint is discrimination based on race or color. See breakdown of fair housing complaints to the left. In 2017, White residents made the majority, or 50 percent, of complaints while Black or African American residents were the next highest percentage with 38 percent of complaints. This is disproportionate according to racial population data, which shows that only 10 percent of Des Moines' population identifies as Black.

When evaluating fair housing complaints in Des Moines by City Council ward, Ward 3 experienced twice as many fair housing complaints than any other ward. See the map on the next page of the four wards.

One concern has been the need to increase capacity and resources to the Civil and Human Rights Commission. The City of Des Moines increased the Commission's budget, and the Commission planned to add two more staff to help with their increased scope of responsibility.

Most recently, an equity coordinator was hired to evaluate the internal and external factors that challenge equity in the city. Some of the outcomes for the role include building relationships with marginalized community groups, promoting equitable delivery of city services, and connect community members and partners with information and resources.

Figure 4: Des Moines Ward Boundaries



Source: City of Des Moines *As of June 1, 2019*

West Des Moines Civil and Human Rights Commission

Established in 1998, the City of West Des Moines Civil and Human Rights Commission educates against discriminatory actions in the areas of employment, housing, public accommodations, education, and lending. It is composed of five residents of the City of West Des Moines who are appointed by the mayor for a three-year term. Unlike the Des Moines and Iowa Commissions, the City of West Des Moines does not have a staffed department or division to address complaints. Complaints are referred to the Iowa Commission.

As mentioned above, a successful education method has been the West Des Moines Community Equity, Diversity, and Multicultural Conversation monthly event. The group invites speakers that address their goals of:

- Promotion of a community that is just, equitable and safe.
- To learn more about ourselves and from each other's experience.
- To sharpen its abilities in inclusive dialogue and develop a skill set which will further promote the application of intercultural skillfulness.
- Continuing the process of identifying ourselves as positive change agents.

Regional (Iowa) Civil and Human Rights Commission

Regional complaints are handled by the Iowa Human Rights Commission with the exception of complaints occurring in Des Moines proper, which are addressed by the City of Des Moines Civil and Human Rights Commission. The mission of the Iowa Civil Rights Commission (ICRC) is to end discrimination within the state of Iowa. The Commission's primary duty is to enforce state and federal laws that prohibit discrimination in employment, public accommodations, housing, education and credit by investigating and litigating civil rights complaints. The Commission also provides conflict resolution services including mediation and conciliation for civil rights matters. In addition to its role as a law enforcement agency, the Commission works to prevent discrimination by providing training and education to the public.

In 2018, of 1,167 total complaints, 163 were related to housing. Approximately 30 percent of the state's complaints, which includes all complaints and not only fair housing, came from the Des Moines-West Des Moines CBSA; 27 percent were from Polk County alone (Iowa Civil Rights Commission Annual Report Fiscal Year 2018, 2019).

E. Access to Opportunity

Access to decent affordable housing without discrimination is important and the focus of this analysis. Just as significant is the location of housing in relationship to what a household values such as education, employment, or health. Housing disparities that affect protected classes are often compounded with disparities in education, employment, health, and other areas. This section reviews the disparities in access to various opportunities that are entwined with where one lives.

Opportunity is measured by HUD-provided indices. There are seven opportunity indices used to evaluate neighborhood opportunity. They include:

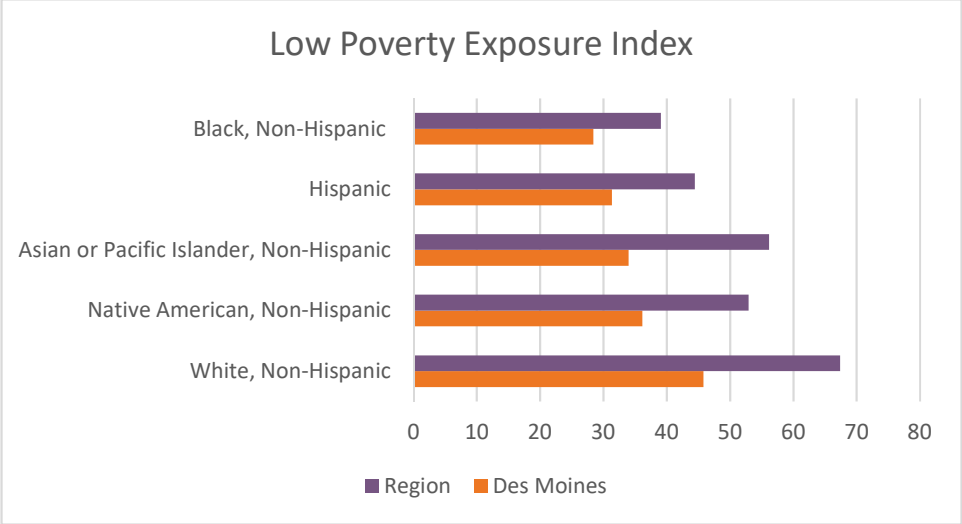
1. Low poverty exposure index,
2. School proficiency index,
3. Labor market index and jobs proximity index
4. Low transportation index and transit index, and
5. Environmental health index.

The definition of each index is included in the introduction of each topic. Indices are broken down by Des Moines jurisdiction and the region. Opportunity index data was not available for West Des Moines alone.

1. Low poverty exposure index

The low poverty index measures poverty by neighborhood. In effect, a higher value on this index indicates a higher likelihood that a family may live in a low poverty neighborhood. A lower value on the Index indicates that households in the group have a higher likelihood of living in a neighborhood with higher concentrations of poverty.

Figure 5: Low Poverty Exposure Index Scores



Source: American Community Survey (ACS), 2009-2013, per HUD AFFH Tool, version 0004

Des Moines data

Across all demographic categories, Des Moines residents are more likely to live in neighborhoods affected by poverty. Black, non-Hispanic residents have the lowest low poverty exposure index score, which indicates Black residents in Des Moines are the demographic group most likely to live in poverty.

Regional data

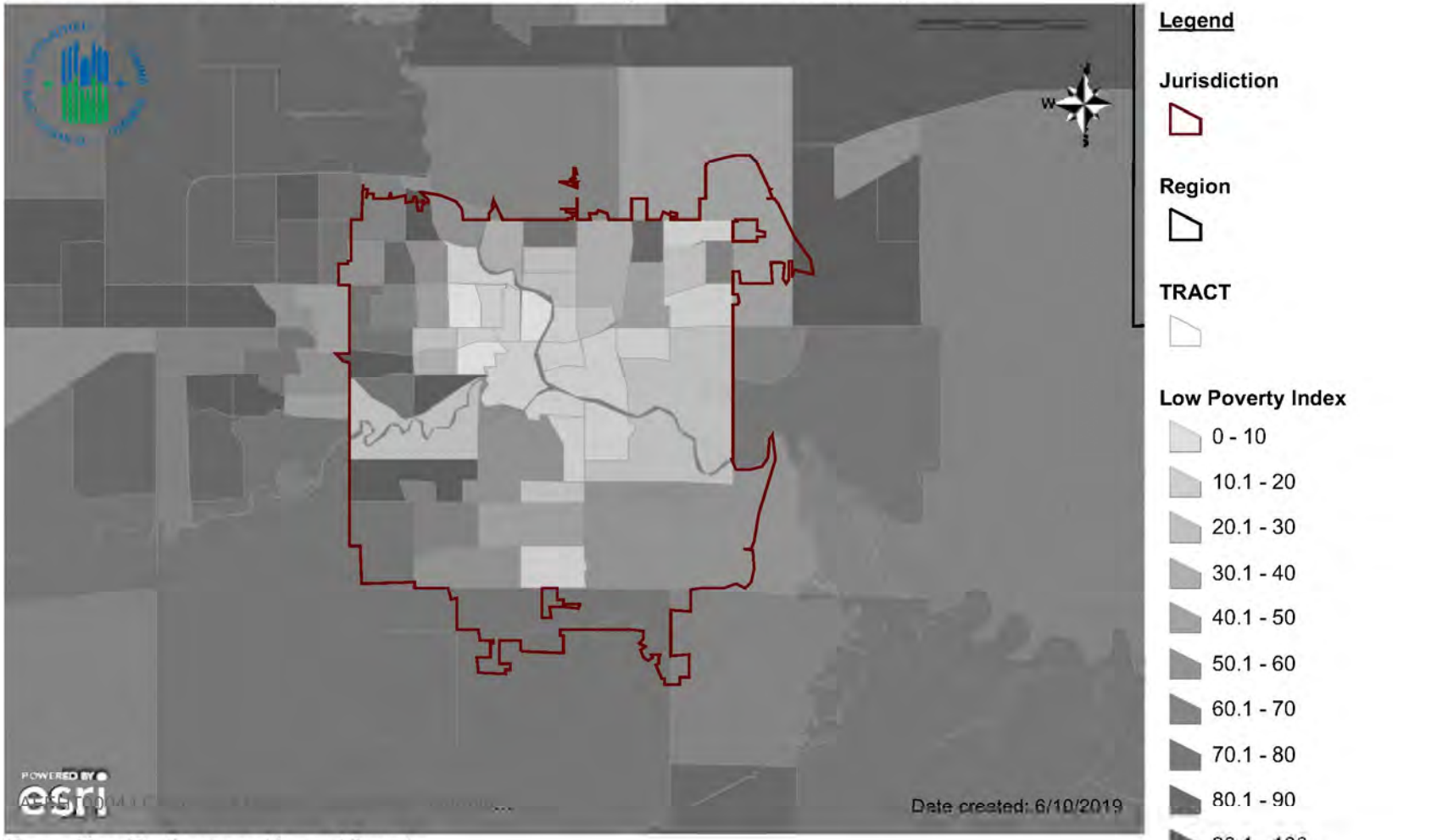
Regionally, White residents are the least likely to live in neighborhoods affected by poverty. Although people of color are more likely to live in neighborhoods with poverty in the region, all demographic groups within the region score at least 10 index points higher than their Des Moines counterparts.

See the following pages for maps showing low poverty index data for Des Moines and the region. Areas that are lighter in color have higher poverty rates. Larger versions of these maps are also available on the map supplement document.

Please note, maps from HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool have slight differences in their boundaries than the City of Des Moines' legal and most recently updated boundaries. Although there are slight discrepancies, the HUD maps reveal accurate data and patterns useful to this analysis.

Figure 6: Low Poverty Index Map for Des Moines

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 12 - Demographics and Poverty

Description: Low Poverty Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Des Moines (CDBG, HOME, ESG)

Region: Des Moines-West Des Moines, IA

HUD-Provided Data Version: AFFHT0004

Figure 7: Low Poverty Index Map for Region

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Name: Map 12 - Demographics and Poverty

Description: Low Poverty Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Des Moines (CDBG, HOME, ESG)

Region: Des Moines-West Des Moines, IA

HUD-Provided Data Version: AFFHT0004

Barriers and Solutions

Barriers to living in low poverty areas include:

- Lack of regional cooperation,
- Location and type of affordable housing units,
- Private discrimination or bias against source of income, and
- Lending practices or access to financial services.

Lack of regional cooperation

Barriers: Regional cooperation refers to formal networks or coalitions of organizations, people, and entities working together to plan for regional development. Cooperation in regional planning can be a useful approach to coordinate responses to identified fair housing issues and contributing factors because fair housing issues and contributing factors not only cross multiple sectors—including housing, education, transportation, and commercial and economic development—but these issues are often not constrained by political-geographic boundaries. When there are regional patterns in segregation, access to opportunity, disproportionate housing needs, or the concentration of affordable housing, there may be a lack of regional cooperation and fair housing choice may be restricted (US Department of Housing and Urban Development, 2019).

There are seven communities that directly border Des Moines, and there are 16 communities that participate as voting members for the Des Moines Area Metropolitan Planning Organization (MPO) (Des Moines Area Metropolitan Planning Organization, 2019). Although a regional network is made available through the MPO is available, its focus has been primarily transportation. A regional approach to transportation rather than housing is easier to reach consensus on because roads connect to one another throughout the region. People can travel freely between jurisdictions. However, housing is static and more isolated in that residents from different communities may not need to visit, or specifically avoid, a lower income neighborhood that may have less desirable housing. Because housing feels more as an individual choice rather than a large-scale public need, the benefits of regional cooperation in creating affordable housing are not as obvious as regional cooperation for transportation.

Solutions: Regional cooperation to support affordable housing needs to be strengthened. One tool that may be helpful in promoting regional fair housing is for the **City of West Des Moines to explore a HOME Investment Partnerships Program (HOME) Consortium**. The purpose of HOME funds is intended to help local governments strengthen public-private partnerships and to expand the supply of decent, safe, sanitary, and affordable housing for very low-income and low-income families (24 CFR Part 92, 2019). Forming a consortium is a way for local governments that would not otherwise qualify for funding to join with other contiguous units of local government, such as West Des Moines, to directly participate in the HOME program. Such a partnership would encourage a more regional, collaborative approach to meeting affordable housing needs. If a HOME Consortium does not formed, local governments can apply for State of Iowa HOME funds.

Location and type of affordable housing and private discrimination against source of income

Barriers: Lack of regional cooperation also leads to a concentration of affordable housing in specific areas. Affordable housing concentration may also indicate patterns of racial or ethnic segregation or poverty concentration. Upcoming sections will examine how concentration and segregation reflect disparity across most opportunity indices such as school proficiency and environmental health.

The Des Moines Municipal Housing Agency (DMMHA) promotes the Housing Choice Voucher (HCV) as a tool to deconcentrate affordable housing in low poverty areas. DMMHA staff provide clients with information about the

household advantages of moving to areas with high opportunity and low poverty (Des Moines Municipal Housing Agency, 2019).

Bias against voucher holders or other sources of income, such as Social Security Disability income, is another barrier to housing in low poverty areas despite positive correlations for low-income children living in low poverty areas, such as potential to earn higher wages or increased likelihood to attend college. DMMHA consistently has a wait list for housing vouchers. Moreover, approximately 20 percent of the 3,000 vouchers that are issued in Polk County are returned because landlords do not accept them (Des Moines Register, 2019).

Solutions: One solution to deconcentrate affordable housing is **to establish lawful source of income as a locally protected class**. It will ensure voucher holders trying to move to low poverty areas are not denied based on their method of payment (Des Moines Civil and Human Rights Department, 2018-2019).

Access to financial services

Barriers: The term "financial services" refers to economic services provided by a range of quality organizations that manage money, including credit unions, banks, credit card companies, and insurance companies. These services also include access to credit financing for mortgages, home equity, and home repair loans. Access to these services includes physical access, which is often dictated by the location of banks or other physical infrastructure, as well as the ability to obtain credit, insurance, or other key financial services. Access may also include equitable treatment in receiving financial services, including equal provision of information and equal access to mortgage modifications.

As indicated in upcoming sections, residents who are protected under the Fair Housing Act tend to have lower incomes and less opportunity to access financial tools that would help them build wealth. An example would be disproportionate loan approvals in mortgage lending practices. In 2017, more than 24,000 mortgage applications for loans to be used for either home purchase, home improvement, or refinancing were made in the five-county CBSA region. Of those, 17,484 were approved or originated.

When looking at who was approved, White, non-Hispanic residents had the highest amount of loan origination at 80.7 percent. Hispanic and Black, non-Hispanic residents had the most disproportional origination rate when compared to their population in the region. Approximately 7.2 percent of the regional population is Hispanic compared to only 3.8 percent of Hispanic applicants were approved for mortgages in 2017. Similarly, 4.9 percent of the regional population is Black, non-Hispanic. Less than 2.0 percent of mortgages were approved for Black, non-Hispanic residents in 2017 (Consumer Financial Protection Bureau, 2019).

Solutions: Financial literacy and homebuyer education would provide a foundation for many residents to start building wealth. Program participants should encourage non-profit partners to continue current educational programs and look for ways to expand them (City of Des Moines Community Development Department, 2016; The Directors Council and State Public Policy Group, April 2017). Education is currently required for homebuyers when federal funds are used on the homes they intend to purchase.

Summary

Proposed solutions to barriers of living in low poverty areas include:

- Exploring the potential of a HOME Consortium to encourage a regional affordable housing strategy;
- Enhance housing choice, especially for low-income tenants, by adding lawful source of income as a locally protected class; and
- Encourage financial literacy and homebuyer education.

2. School proficiency index

Educational opportunities were evaluated based on the school proficiency index. The school proficiency index is the performance of elementary schools within an area based on test scores. Values are percentile ranked and range from 0 to 100. The higher the score, the higher the elementary school performance. School proficiency index scores are below.

Des Moines data

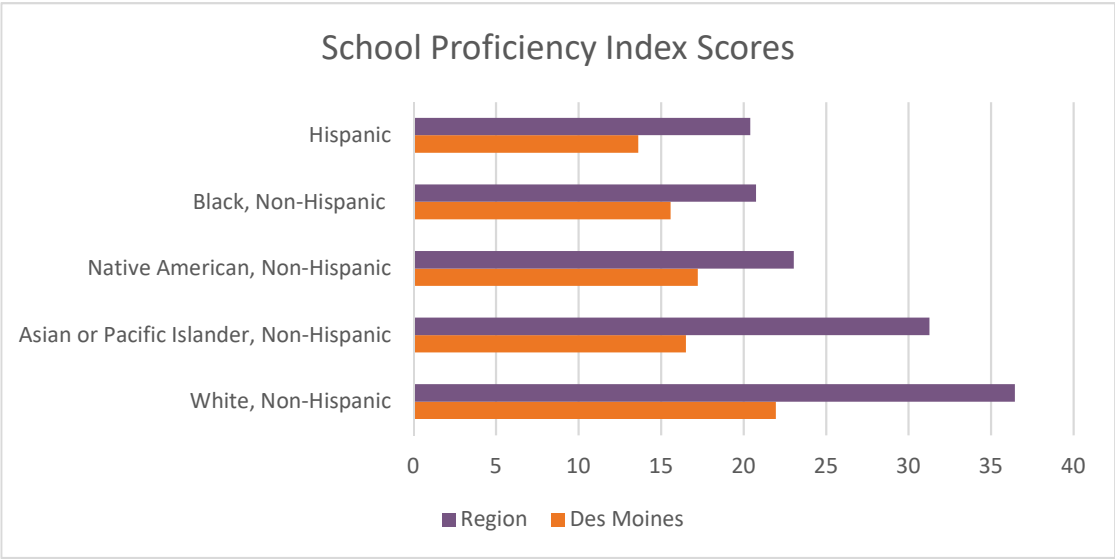
In the Des Moines jurisdiction, school proficiency indices range from a low of 13.62 for Hispanic students to 21.96 for White students, meaning a Hispanic student may have the least access to a high performing school of all racial and ethnic groups. Students who live in poverty have even lower index scores. For example, a White child in Des Moines has a school proficiency index score of 21.96, whereas a White child in Des Moines living in poverty has school proficiency index score of 17.26. The school proficiency index shows Hispanic children in Des Moines have the most disproportionate educational opportunities compared to Black (15.59 index score), Asian (16.51), Native American (17.24), and White (21.96) children.

Regional data

The gap in education becomes more apparent when looking regionally. In the region covering Dallas, Guthrie, Madison, Polk, and Warren counties, school proficiency indices range from 26.93 (Black) to 54.44 (White). Although it is apparent there is still inequity for educational access based on race or ethnicity, educational inequity based on geography is more apparent. Simply, Des Moines public school students, no matter what race or ethnicity, show lower performance than regional students. See graph below with the proficiency indices by group and the average by geography.

See the following pages for maps showing school proficiency index data for Des Moines and the region. Areas that are lighter have lower school proficiency rates. Larger versions of the maps are also available on the map supplement document.

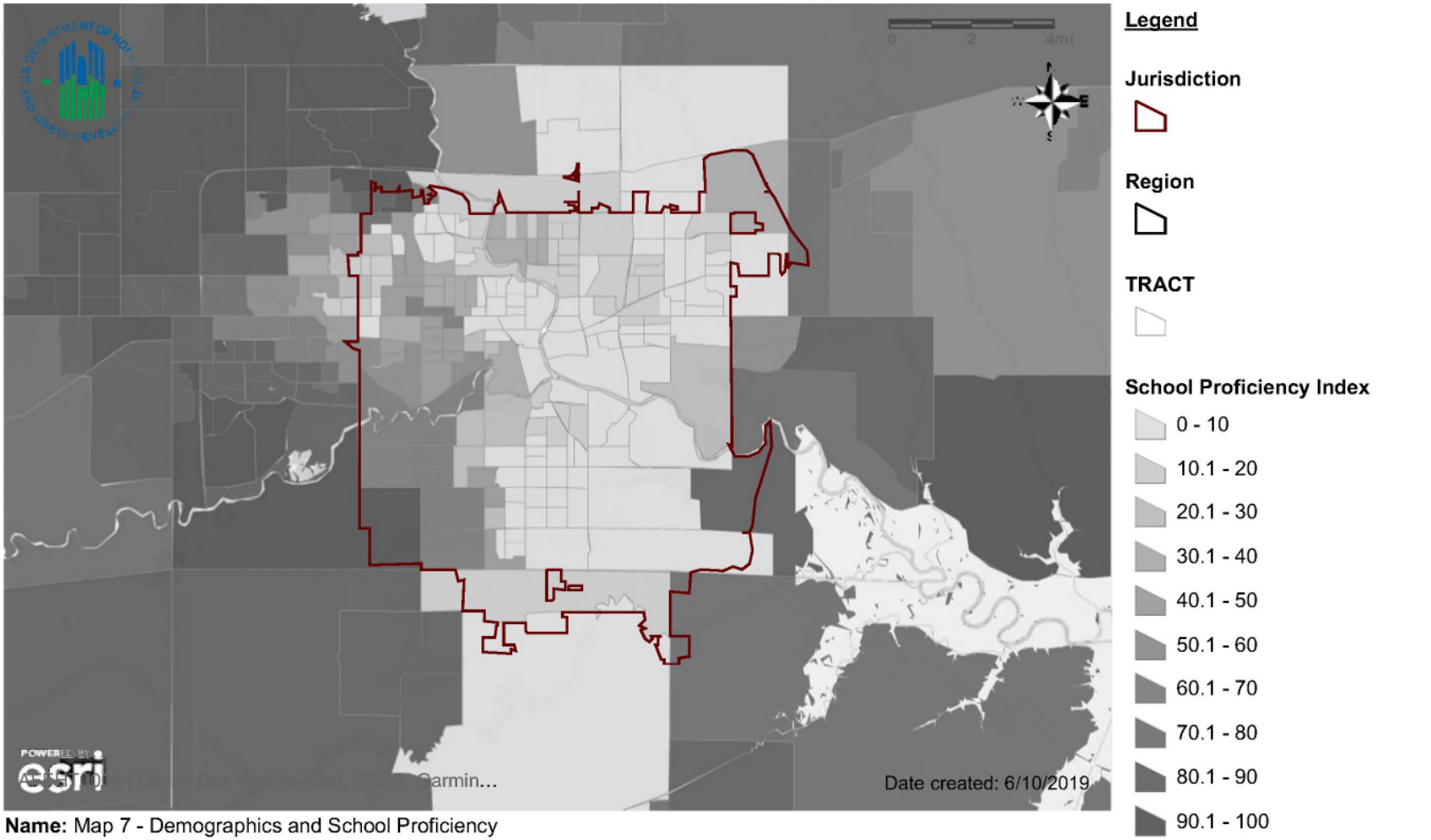
Figure 8: School Proficiency Index Scores



Source: Great Schools (proficiency data), 2013-14; Common Core of Data (4th grade enrollment and school addresses), 2013-14; Maponics School Attendance Zone database, 2016 per HUD AFFH Tool, version 0004

Figure 9: School Proficiency Index Map for Des Moines

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 7 - Demographics and School Proficiency

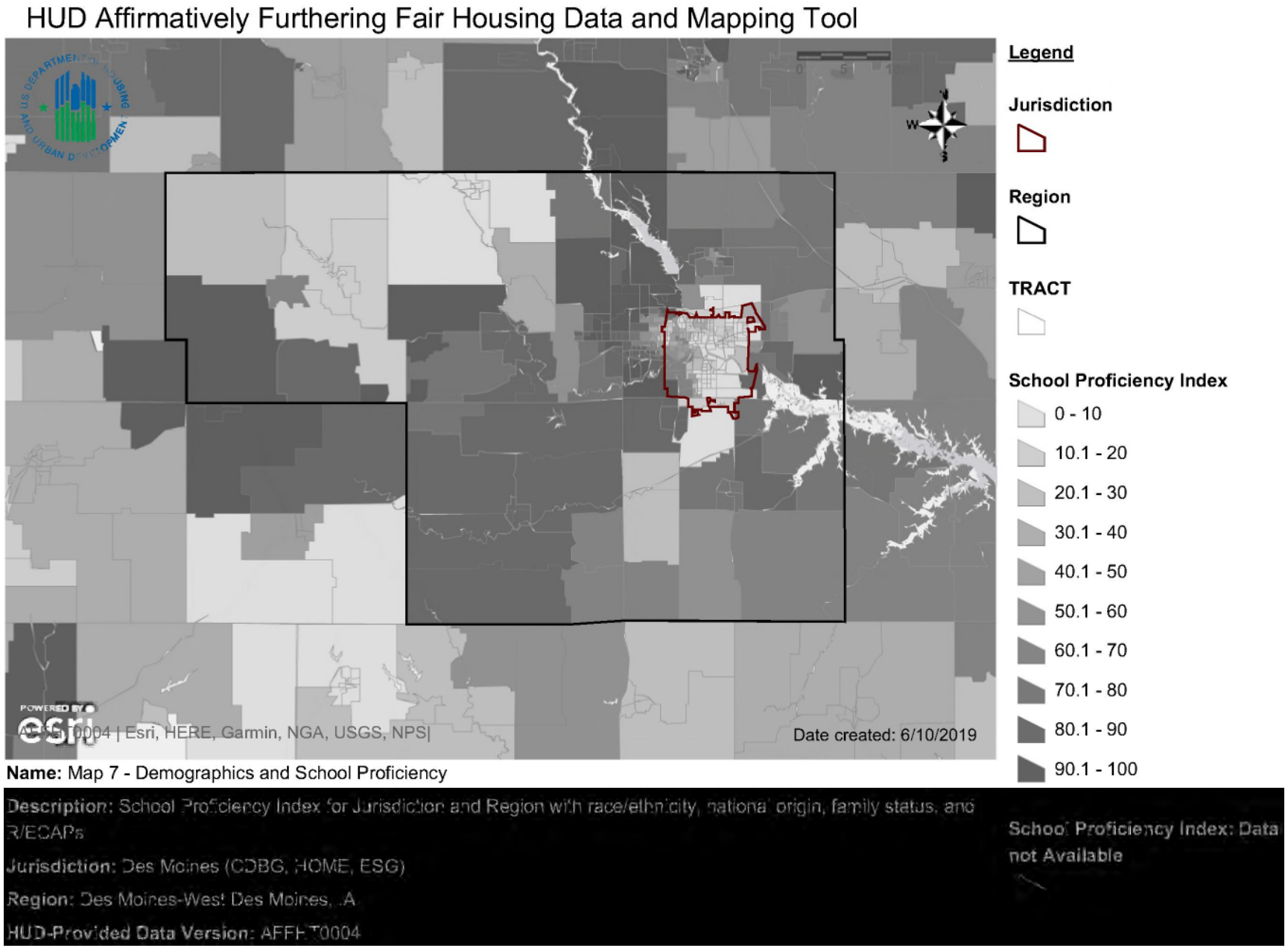
Description: School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and R/ECAPs

Jurisdiction: Des Moines (CDBG, HOME, ESG)

Region: Des Moines-West Des Moines, IA

HUD-Provided Data Version: AFFHT0004

Figure 10: School Proficiency Index Map for Region



Barriers and Solutions

Barriers to achieving high proficiency scores include:

- Transience,
- Access,
- Location of proficient schools, and
- Disciplinary impacts.

Transience

Barriers: One of the biggest issues in the school system related to fair housing issues is transience (Caldwell-Johnson, 2019). Transience, or high levels of student mobility, includes any time a student changes schools, usually within the same school year. Student mobility is often caused by housing changes of the family, such as becoming homeless or moving for a job, and financial instability. Additionally, highly mobile students are disproportionately poor or Black (Sparks, 2016).

High mobility can make it difficult for students to maintain stability in their education. Transience, especially multiple moves, is associated with lower school engagement, poorer grades, and a higher risk of dropping out or having behavioral issues (Sparks, 2016).

On a larger scope, there is also transience among immigrant or refugee families. See upcoming section F.2 for more information about housing challenges for refugees and immigrants. One article states:

> War, migration, lack of education facilities, cultural dictates, and economic circumstances can all interrupt a student's formal education. Because some students enter a U.S. school with limited or even nonexistent schooling, they may lack understanding of basic concepts, content knowledge, and critical-thinking skills. They may not even read or write in their home language. Nevertheless, they will be expected to develop higher-order thinking skills and prepare for high-stakes tests while mastering basic literacy and math skills in a language other than their own (DeCapua, Smathers, & Tang, 2007).

Solutions: One possible solution to help students that may be subject to high mobility is **to support more service-enriched housing models** throughout the City of Des Moines, facilitated by close proximity between housing, social services, and clients. One example of this model is the Oakridge Neighborhood, which serves many immigrants and refugees representing 25 countries and 18 languages (Caldwell-Johnson, 2019). In this model, housing facilities may be able to promote social and emotional enrichment programs to help students, especially those with limited-English speaking parents.

Another solution is **to continue fair housing education efforts at all levels**—tenants, landlords, city staff, etc. Nonprofit initiatives, like language translation services and educational programs, and support from the City of Des Moines and West Des Moines Civil and Human Rights Commissions can prevent evictions caused by miscommunication or misunderstanding. This, in turn, leads to less housing instability for those families.

Access issues due to transportation barriers and location of proficient schools and school assignment policies

Barriers: Access to school means either basic transportation access or access to higher performing schools. More than half of the Des Moines population is low-income, and almost one-fifth lives in poverty (US Census Bureau, 2019). With housing and transportation as the largest household expenses per HUD's Office of Economic Resiliency, households that live in poverty or are low-income may have to sacrifice reliable transportation for other necessities.

Additionally, the school system's busing operations have limitations. In Des Moines, free transportation is offered to elementary students who live more than 1.5 miles away, middle school students must live more than 2 miles away, and high school students who live more than 3 miles away from the school designated for attendance (Des Moines Public School Transportation Resource Guide, 2019). Transit services through Des Moines Area Regional Transit (DART) are also offered, but have their limitations as mentioned in the upcoming transit section.

Access to higher performing schools is also a barrier. Even if transportation was not an issue for a student, school districts have the authority to determine which school the child will attend if they wanted to open enroll at a higher performing school.

Solutions: Transportation challenges may be addressed **by increasing areas that DART bus lines serve**. It may also be addressed by a strategy that incorporates multiple modes of transportation as mentioned in the upcoming transportation opportunity section.

Open enrollment is one way that students can access better educational opportunities. In Iowa, parents can request a transfer to a school outside of their residential school district. As mentioned above, this is a practical solution for students who do not have transportation constraints.

Disciplinary impacts

Barriers: High suspension and expulsion rates disproportionately affect minority students, especially African American or Black young men. Students who have been suspended or expelled are also more likely to have lower grades and end up in the criminal justice system (Thompson, 2016).

Solutions: Recognizing zero tolerance policies disproportionately affect young men of color, the Des Moines Board of Education has adjusted its student code of conduct to be a tiered level of discipline that mitigates suspension and does not expel students. There has not been an expulsion hearing in the last three years (Caldwell-Johnson, 2019).

Summary

Proposed solutions to barriers of accessing schools with higher proficiency include:

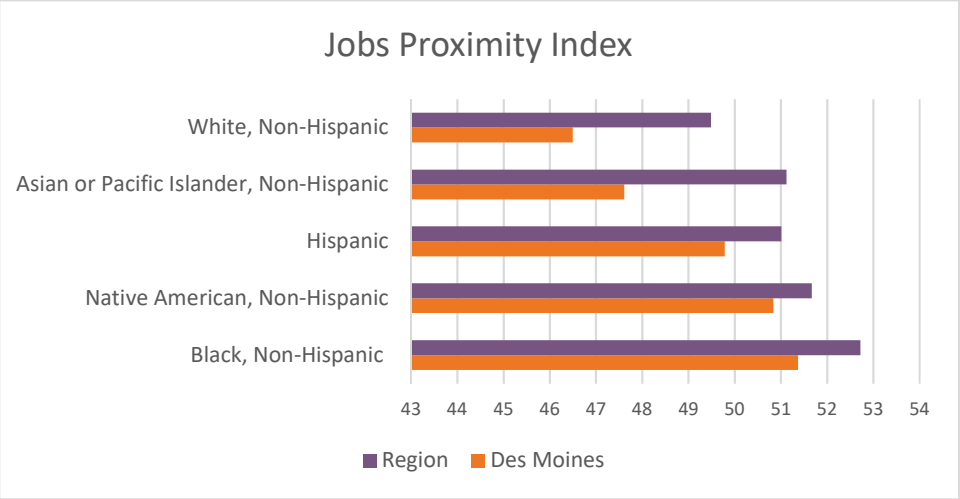
- Support service-enriched housing models,
- Continue fair housing education to landlords and tenants to minimize housing instability,
- Increased transportation options,
- Open enrollment, and
- Continuing to find disciplinary alternatives to zero tolerance policies that disproportionately affect young men of color.

3. Employment: Jobs proximity index and labor market engagement index

Employment opportunities were evaluated on the jobs proximity index and labor market index provided by HUD. The jobs proximity index measures the physical distances between a block group and employment centers. The labor market engagement index provides "a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract." (US Department of Housing and Urban Development, 2019)

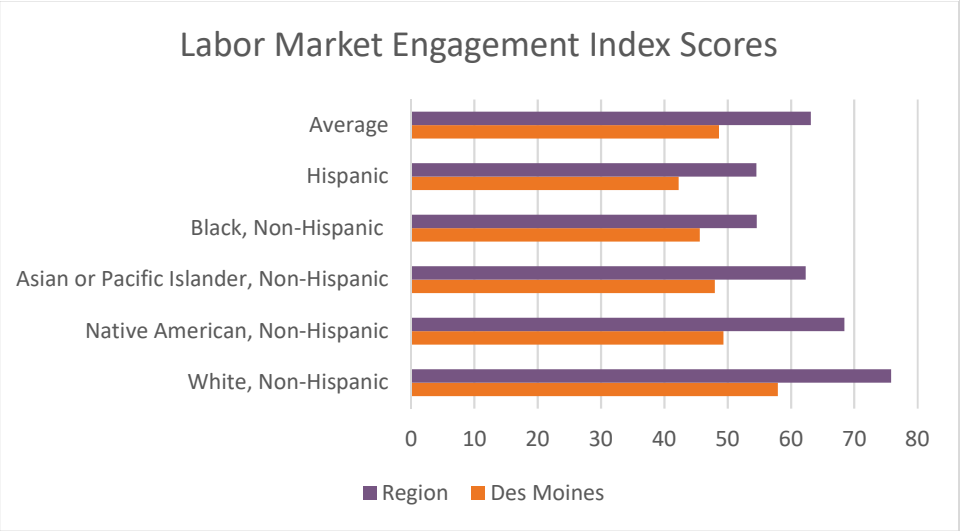
Values are percentile ranked and range from 0 to 100. The higher the jobs proximity index value, the better the access to employment opportunities for residents in a neighborhood. The higher the labor market index value, the higher the labor force participation and human capital in a neighborhood.

Figure 11: Jobs Proximity Index



Source: Longitudinal Employer-Household Dynamics (LEHD), 2014, per HUD AFFH Tool, version 0004

Figure 12: Labor Market Engagement Index Scores



Source: American Community Survey (ACS), 2009-2013, per HUD AFFH Tool, version 0004

Des Moines data

The physical distances between residence and jobs are relatively equitable across race and ethnicity with little range. In Des Moines, jobs proximity index values range from the low 46.44 for White residents to 51.33 for Black residents. Likewise, across the region the index values range 49.49 for White residents to 52.72 for Black residents. The indices are lower for those living in poverty, but the index values are still between 40.00 and 55.00, meaning that overall, all residents—despite race, ethnicity, or income level—have moderate geographic access to jobs.

In Des Moines, labor index engagement values range from the low of 42.27 for the Hispanic population to high of 57.97 for Whites. Compared to the region, all demographic groups have lower labor market engagement index scores in Des Moines, meaning regional workers participate more in the labor force than

Des Moines residents. The index also incorporates the number of bachelors or higher degrees, meaning a lower number could also be influenced by a lower number of degree holders in Des Moines versus the region.

Regional data

Despite geographic access to jobs, there are disparities in labor force participation. In the region, the index values range from 54.54 for Black residents to 75.85 for White residents. Like the other indices, those living in poverty have even lower labor market engagement index scores.

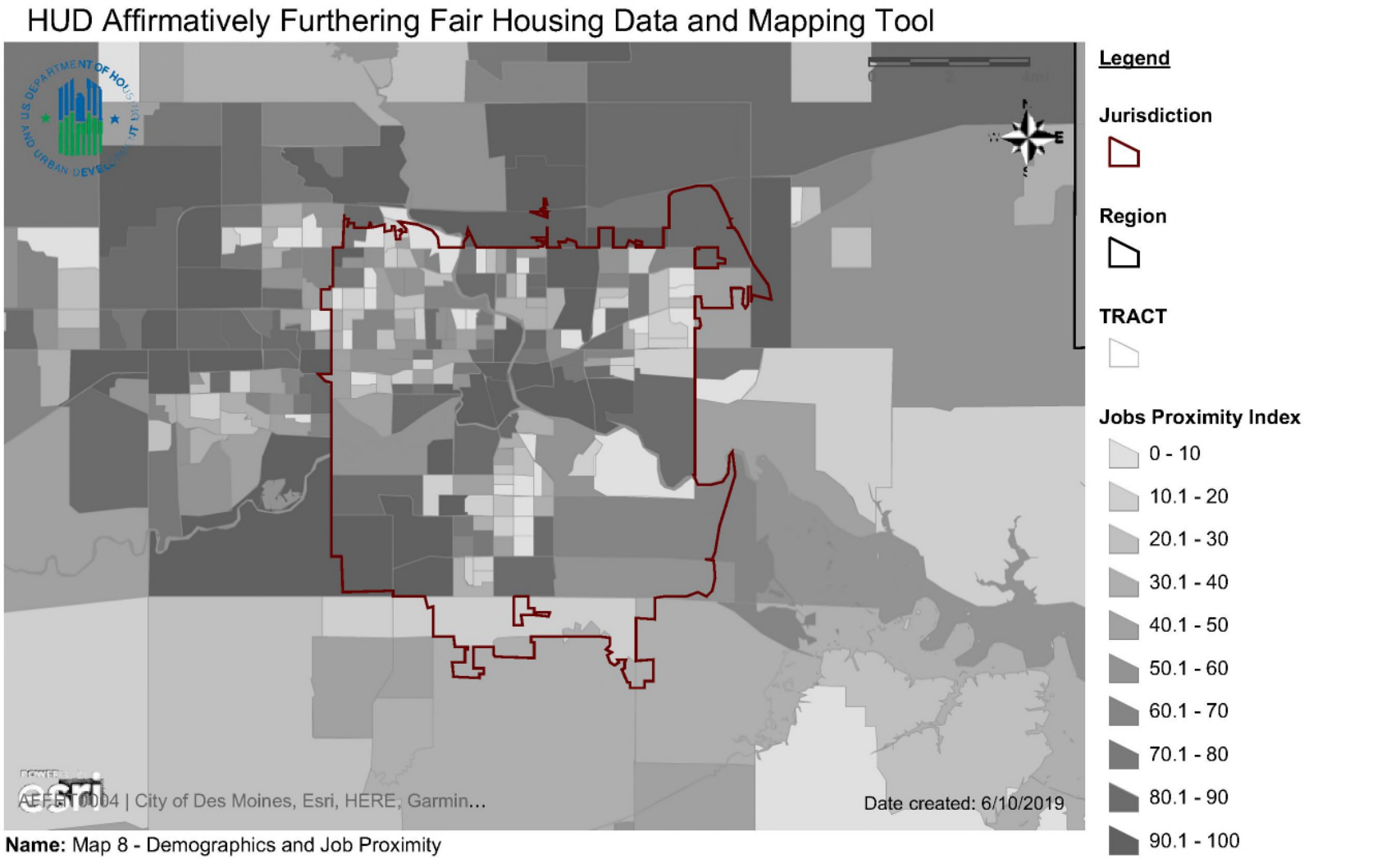
The December 2017 unemployment rate shows that Polk County is tied with Madison County for the highest unemployment rates at 2.7 percent in the Des Moines-West Des Moines CBSA study area. Guthrie County is next with 2.6 percent; Warren County has a 2.3 percent unemployment rate. Dallas County has the lowest unemployment rate at 1.8 percent. All counties in the CBSA study area are lower than Iowa's unemployment rate of 2.8 percent, which is the fifth lowest unemployment rate in the nation (US Bureau of Labor Statistics, 2018)

Approximately 5.6 percent of the population in the Greater Des Moines Regional Laborshed, which extends outside the CBSA boundary, are underemployed. According to the Iowa Workforce Development, underemployed individuals are one of the following:

- Working fewer than 35 hours per work but desire more hours;
- Working in positions that do not meet their skill or education level, or have worked for higher wages at previous employment; or
- Working at wages equal to or less than the national poverty level and are working 35 or more hours per week (Iowa Workforce Development Labor Market Information Division, 2018).

See the following pages for maps showing employment index data for Des Moines and the region. Larger versions of the maps are also available on the map supplement document.

Figure 13: Jobs Proximity Index Map for Des Moines



Name: Map 8 - Demographics and Job Proximity

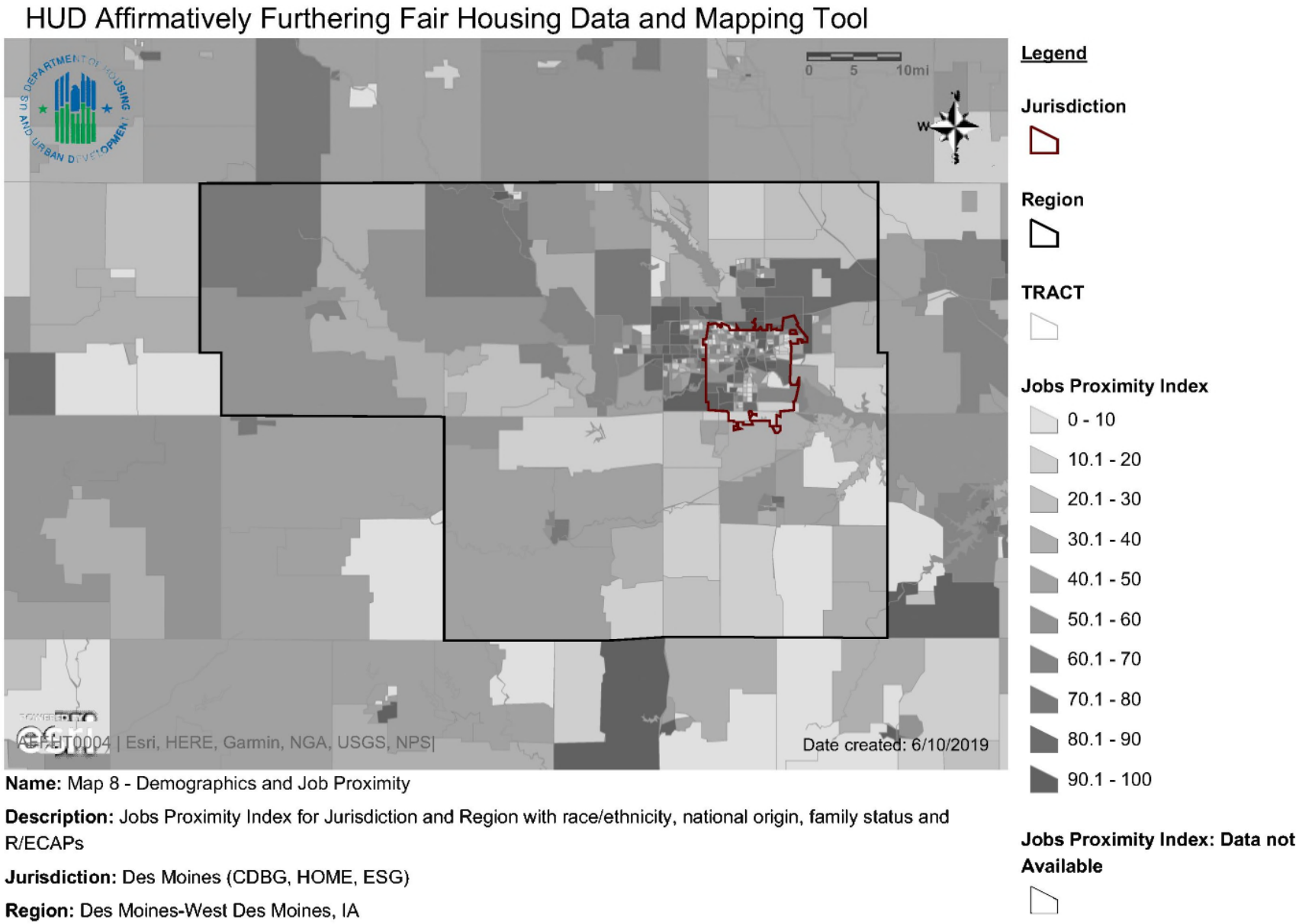
Description: Jobs Proximity Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Des Moines (CDBG, HOME, ESG)

Region: Des Moines-West Des Moines, IA

HUD-Provided Data Version: AFFHT0004

Figure 14: Jobs Proximity Index Map for Region



Name: Map 8 - Demographics and Job Proximity

Description: Jobs Proximity Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

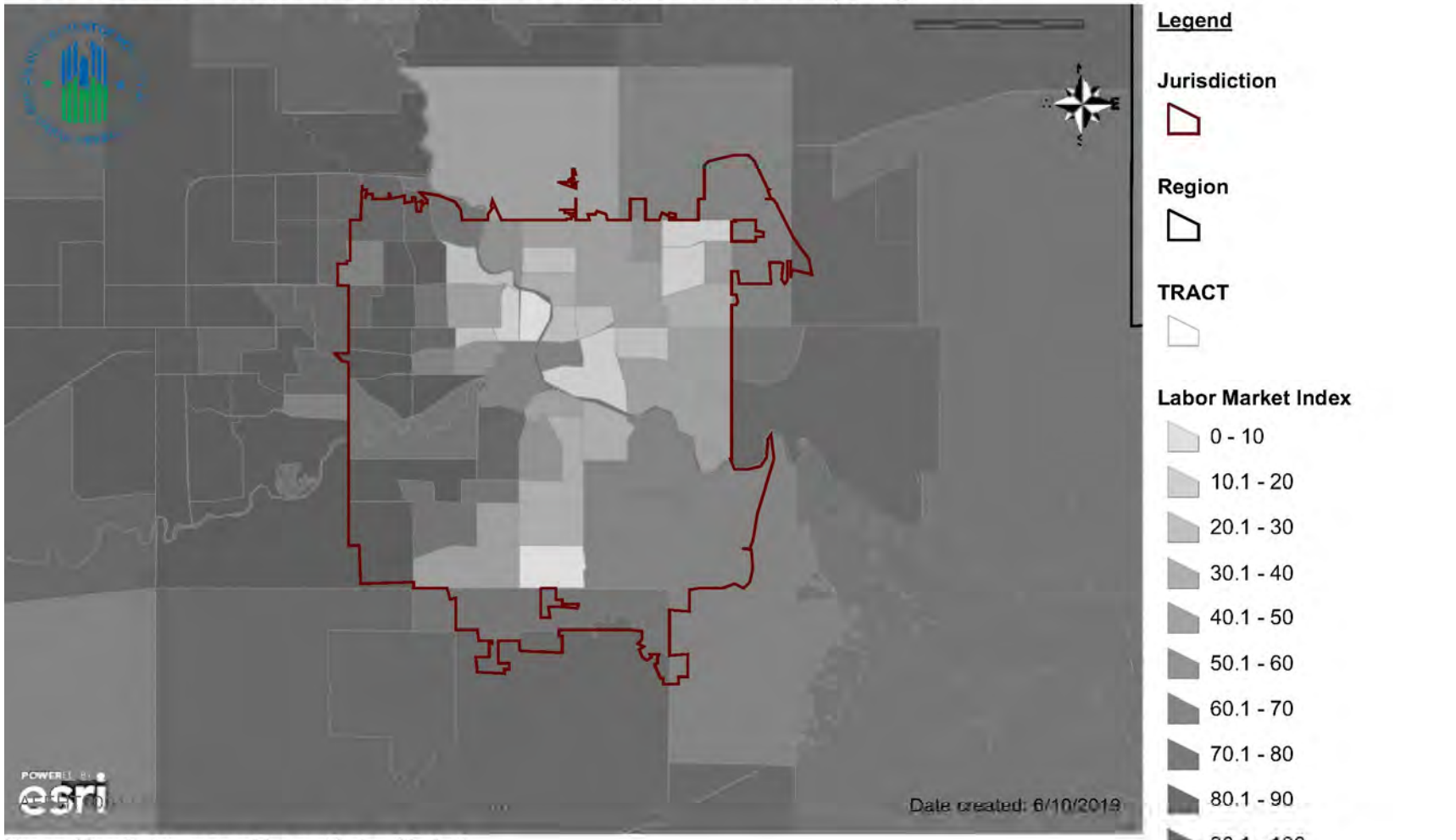
Jurisdiction: Des Moines (CDBG, HOME, ESG)

Region: Des Moines-West Des Moines, IA

HUD-Provided Data Version: AFFHT0004

Figure 15: Labor Engagement Index Map for Des Moines

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 9 - Demographics and Labor Market

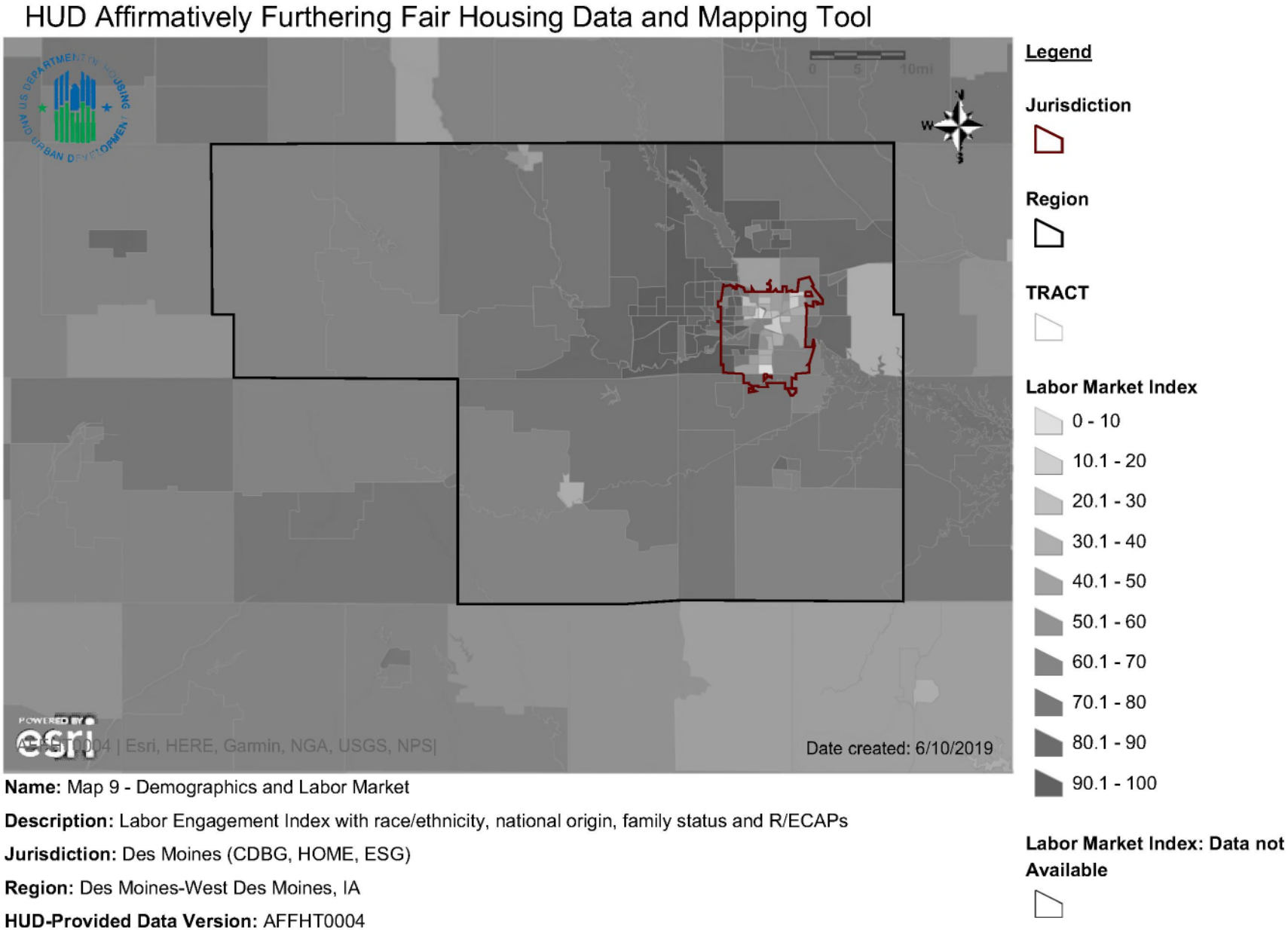
Description: Labor Engagement Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Des Moines (CDBG, HOME, ESG)

Region: Des Moines-West Des Moines, IA

HUD-Provided Data Version: AFFHT0004

Figure 16: Labor Engagement Index Map for Region



Name: Map 9 - Demographics and Labor Market

Description: Labor Engagement Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Des Moines (CDBG, HOME, ESG)

Region: Des Moines-West Des Moines, IA

HUD-Provided Data Version: AFFHT0004

Barriers and Solutions

The most common barriers to unemployment or under employment in the Greater Des Moines area include:

- Mismatch of skills and
- Transportation.

Mismatch of skills

Barriers: In the recent Greater Des Moines Regional Laborshed Study, when employers reported what skills applicants lacked, the top three were:

1. motivation (43.8 percent),
2. dependability (40.1 percent), and
3. communication skills (34.8 percent).

Overall, soft skills were the most challenging type of skills in applicants. When evaluating other types, written communication was the most lacked for basic skills (23.6 percent), and critical or analytical thinking was most lacked for hard skills (29.4 percent) (Iowa Workforce Development Labor Market Information Division, 2018).

Solutions: **Service-enriched housing models that connect service providers with clients in housing programs may be one solution to labor issues**. Several housing facilities or programs, especially homelessness service providers, have already created the link to employment and income growth. For example, Central Iowa Shelter & Services (CISS) promotes PROMISE JOBS, which provides work and training services to families who receive cash assistance under the Temporary Assistance for Needy Families (TANF). PROMISE JOBS activities include job readiness, skills training, and basic education (PROMISE JOBS, 2019).

Transportation

Barriers: Although the jobs proximity index scores reveal less disparity than other opportunity index scores, transportation from home to work is a barrier. DART's market analysis revealed "many employers, especially those without direct access to transit service, report difficulty recruiting and retaining employees because there is a large disconnect between the location of jobs and housing." (Des Moines Area Regional Transit, 2016)

Transit services are only located in Polk County and parts of Dallas County, and services are focused in higher density areas with mixed land uses and walkable streets. These areas have high ridership. Consequently, transit is sparser and less successful in suburbs.

Solutions: To reach more of the outlying population, **DART and the Des Moines Metropolitan Planning Organization plan to provide more transportation choices.** Examples may be to increase the number of transit hubs, which would allow more crosstown trips and facilitate regional travel. DART may consider other mobility options such as bike sharing, car sharing, and ridesharing to promote multi-modal transportation throughout the region.

Another solution is to continue reduced fare or transit passes for certain populations. Currently, DART offers reduced fare for several protected classes or populations presumed to be on a fixed or low income. Reduced fares are offered through the Persons with Disabilities Program, Senior Citizen Program, Student Program, and Refugee Program. West Des Moines should continue to provide 250 transit passes per year for the DART system through its CDBG funds.

Summary

Proposed solutions to barriers to employment, which was based on the jobs proximity and labor market engagement indexes, include:

- Service-enriched housing models and
- Increased transportation options.

4. Transportation: Low transportation cost index and transit index

Transportation opportunity was measured by the low transportation cost index and transit index. Both indices are based on families that are a 3-person, single-parent family with income at 50 percent of the median income for renters in the region.

Values are percentile ranked, with values ranging from 0 to 100. The higher the index, the lower the cost of transportation in that neighborhood. Transportation costs may be low for a range of reasons, including greater access to public transportation and the density of homes, services, and jobs in the neighborhood and surrounding community. For transit, the higher the index, the more likely residents in that neighborhood utilize public transit. The index controls for income such that a higher index value will often reflect better access to public transit.

Des Moines data

In Des Moines, the Black, non-Hispanic population has the lowest transportation costs with an index score of 75.01. The White population has the highest transportation costs with an index score of 70.62. However, there is little range between the scores, meaning that transportation costs have less variance across all racial or ethnic groups living in Des Moines.

Transit index scores are lowest for Whites and higher for people of color in Des Moines. For White residents, the index score Is 49.41; Black residents have a score of 53.74. This indicates White residents are less likely to use transit, and Black residents are the most frequent transit users. Neighborhoods with the highest number of transit users, between 10 and 13 percent of the population, include Drake, North of Grand, King Irving, River Bend, Martin Luther King, Jr. Park, and Somerset (US Department of Housing and Urban Development, 2019).

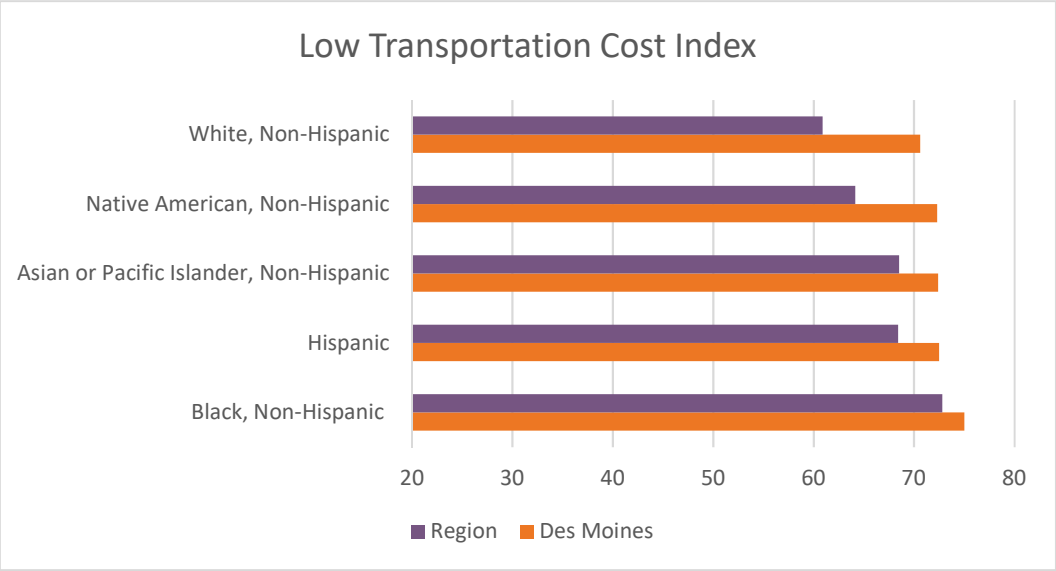
Regional data

In the region, Black, non-Hispanic residents have the lowest transportation costs among all demographic groups. The White population has the highest transportation costs in the region, reflected by the lowest low transportation cost index of 60.92.

Similar to Des Moines, Black residents are most likely to use public transit in the region as well. The index score for Black, non-Hispanic residents in the region is 50.21. The regional White population transit index number is 36.84. For those in poverty, index scores were 1.66 higher on average in Des Moines and 3.08 higher on average in the region, showing that households below poverty line are slightly more likely to use public transit. The area with the highest number of transit riders in the region is census tract 111.13, which is the area southeast of the Interstate 80 and Interstate 35 Mixmaster in West Des Moines (US Department of Housing and Urban Development, 2019).

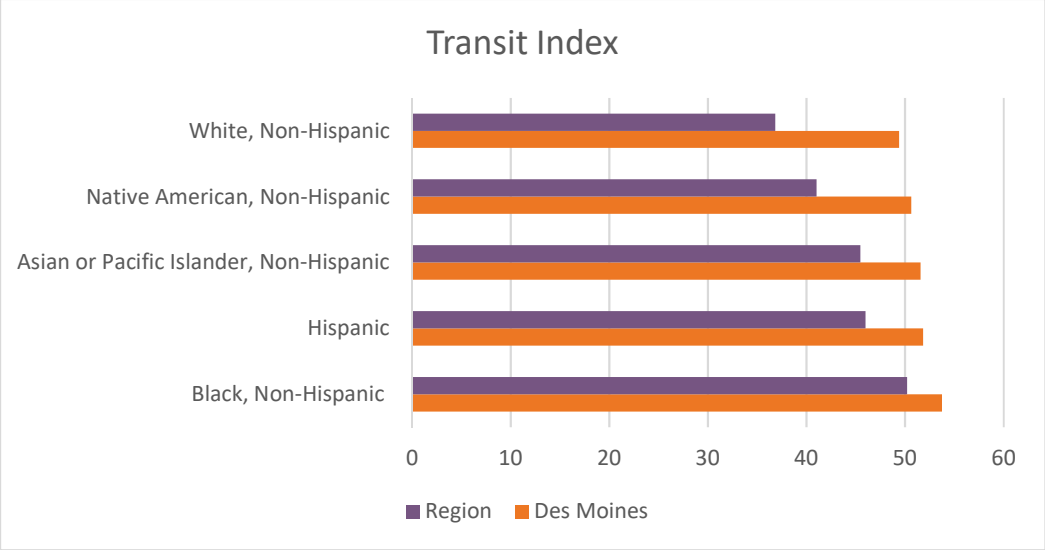
See the following pages for maps showing transportation index data for Des Moines and the region. Larger versions of the maps are also available on the map supplement document.

Figure 17: Low Transportation Cost Index Scores



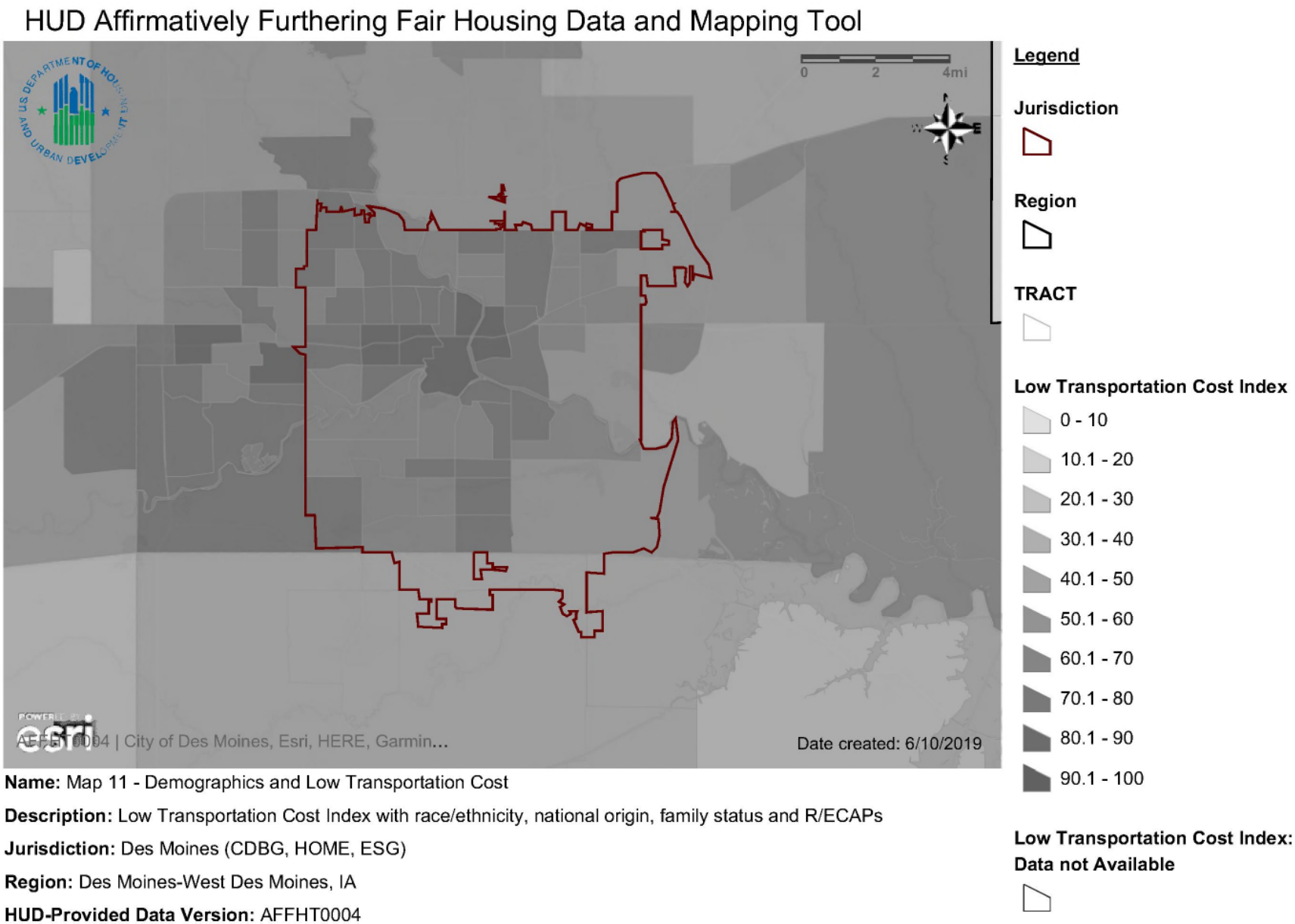
Source: Location Affordability Index (LAI) data, 2008-2012, per HUD AFFH Tool, version 0004

Figure 18: Transit Index Scores



Source: Location Affordability Index (LAI) data, 2008-2012, per HUD AFFH Tool, version 0004

Figure 19: Low Transportation Cost Index for Des Moines



Name: Map 11 - Demographics and Low Transportation Cost

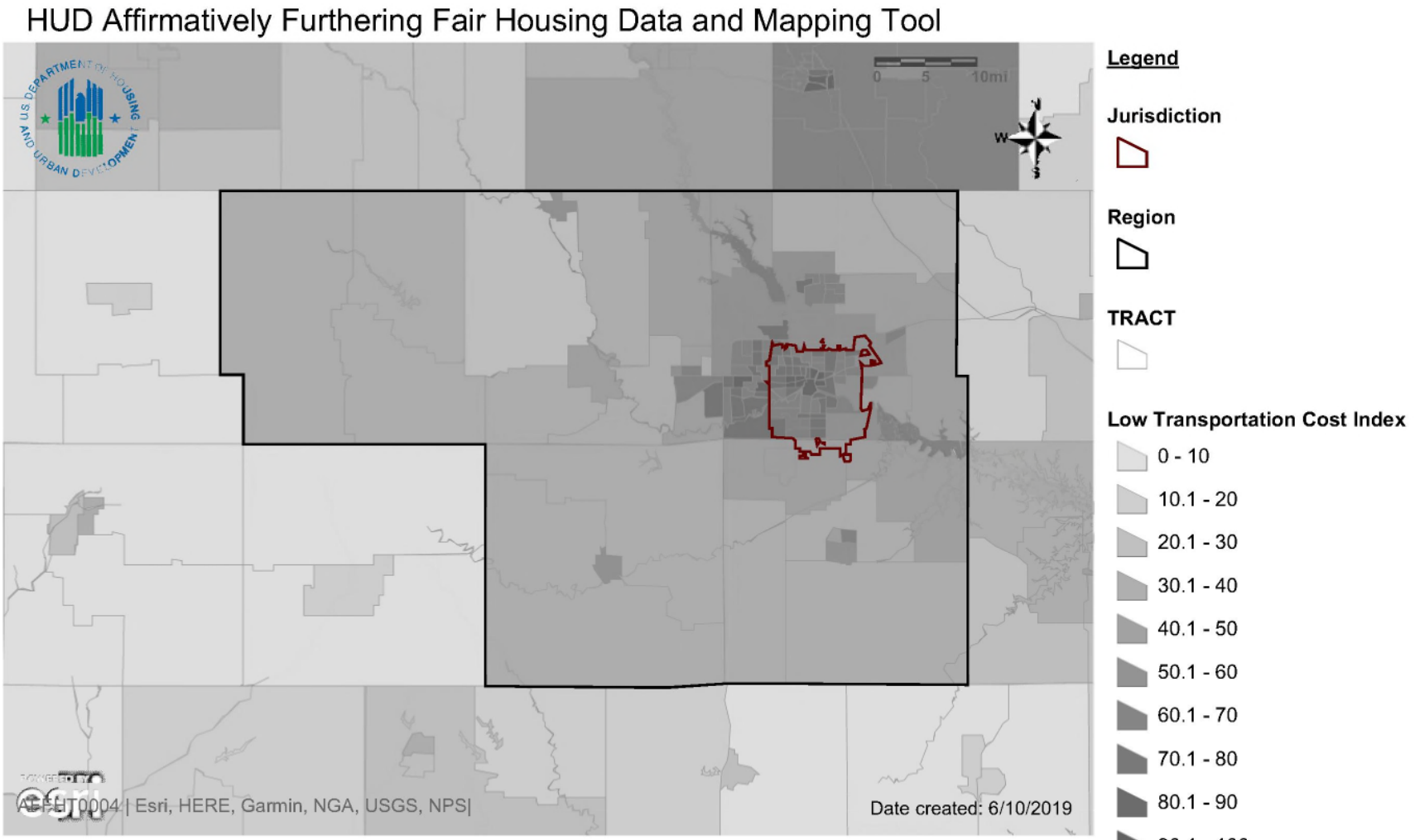
Description: Low Transportation Cost Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Des Moines (CDBG, HOME, ESG)

Region: Des Moines-West Des Moines, IA

HUD-Provided Data Version: AFFHT0004

Figure 20: Low Transportation Cost Index for Region



Name: Map 11 - Demographics and Low Transportation Cost

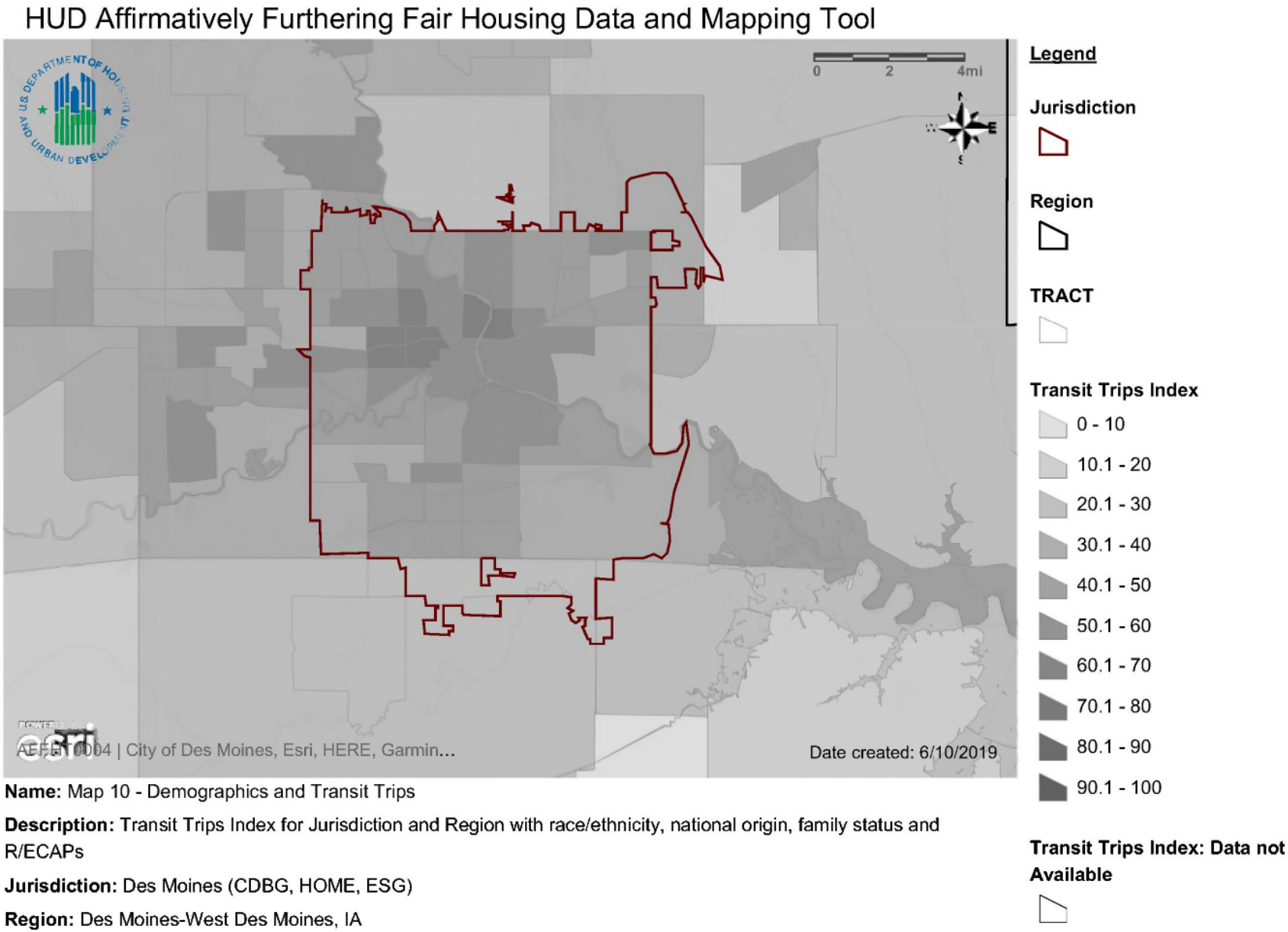
Description: Low Transportation Cost Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Des Moines (CDBG, HOME, ESG)

Region: Des Moines-West Des Moines, IA

HUD-Provided Data Version: AFFHT0004

Figure 21: Transit Trips Index for Des Moines



Name: Map 10 - Demographics and Transit Trips

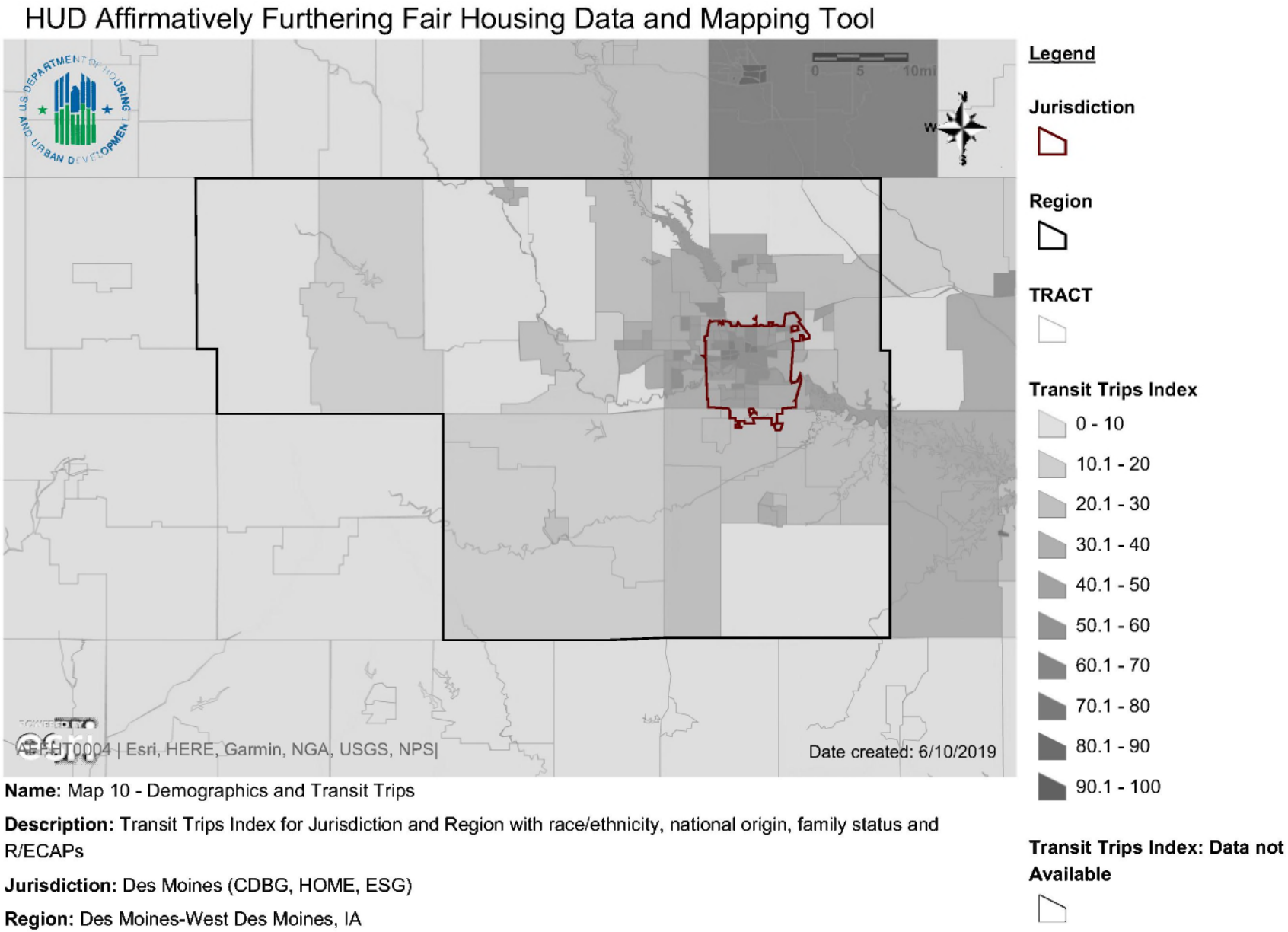
Description: Transit Trips Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Des Moines (CDBG, HOME, ESG)

Region: Des Moines-West Des Moines, IA

HUD-Provided Data Version: AFFHT0004

Figure 22: Transit Trips Index for Region



Name: Map 10 - Demographics and Transit Trips

Description: Transit Trips Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Des Moines (CDBG, HOME, ESG)

Region: Des Moines-West Des Moines, IA

HUD-Provided Data Version: AFFHT0004

Barriers and Solutions

Barriers to low transportation costs and transit use include:

- Limited options,
- Cost of transportation, and
- Accessibility and availability.

Limited options

Barriers: Central Iowa is generally considered easy to navigate with little congestion and reasonable travel time when compared to larger metropolitan areas across the United States. A study from 2010 showed nearly three-fourths of the roads in Greater Des Moines operated with free-flowing traffic. "Even without roadway capacity additions, projections for the year 2050 do not show any significant deterioration in commute times or increased congestion around Greater Des Moines." (Des Moines Metropolitan Planning Organization, 2013)

Central Iowa's road and surface infrastructure has been built to accommodate single-occupancy vehicle travel, which benefits those who are able to drive and can afford to maintain a vehicle, but it limits transportation opportunities for the rest of the population.

Solutions: More transportation options other than single-occupancy vehicles are needed for those who cannot drive or afford to maintain a reliable vehicle (Des Moines Metropolitan Planning Organization, 2013). Multimodal projects should be prioritized in transportation improvement programs (US Department of Housing and Urban Development Office of Economic Resilience, 2019).

For transit services, DART proposes integrating community mobility hubs, which incorporates features to facilitate several modes of a trip. Mobility hubs would include transit service, bike storage, bikeshare stations, parking for car sharing services, parking for taxis, parking for private vans or shuttles, and electric car charging stations (Des Moines Area Regional Transit, 2016).

Cost of transportation

Barriers: "Housing and transportation constitutes the largest single expense for the majority of American households." (US Department of Housing and Urban Development Office of Economic Resilience, 2019) The average auto ownership costs per year in the CBSA range between approximately $4,500 and $9,500 per year depending on household type and assumptions. The average transit costs per year for regular users in the CBSA range between approximately $0 and $120 per year depending on household type and assumptions (US Department of Housing and Urban Development, 2019). See the following table.

Table 3: Estimated Transportation Costs by Household Type

Household Profile	Income Level Assumption	Household Size	Number of Commuters	Average Auto Owner Costs	Average Transit Costs
1. Median-Income Family	MHHI	4	2	$ 8,746	$ 120
2. Very Low-Income Individual	Nat'l poverty line	1	1	$ 4,451	$ 44
3. Working Individual	50% of MHHI	1	1	$ 5,556	$ 31
4. Single Professional	135% of MHHI	1	1	$ 7,035	$ 20
5. Retired Couple	80% of MHHI	2	0	$ 5,283	$ -
6. Single-Parent Family	50% of MHHI	3	1	$ 6,184	$ 68
7. Moderate-Income Family	80% of MHHI	3	1	$ 6,920	$ 61
8. Dual-Professional Family	150% of MHHI	4	2	$ 9,541	$ 109

Source: Location Affordability Index (LAI) data (v.3), 2012-2016

Solutions: Providing more multimodal transportation options, especially non-motorized transportation, will also help reduce transportation costs. The MPO plans to increase alternative travel options such as on-street bicycle lanes, sidewalks, off-street trails, bike share programs, and bicycle parking in nodes and corridors. For transit options, DART should continue to use incentive programs to encourage ridership while reducing costs for riders with fixed or low incomes.

Accessibility and availability

Barriers: Accessibility and availability refer to the physical or geographic access to transportation and the time of day transportation is available. Transportation options are limited on weekends and after hours, which is difficult for those who may work anything other than an 8 AM to 5 PM job. Another disadvantage for households who depend on transit services is advance scheduling for on-demand transit services. Finally, sprawling suburban development, which may be cheaper for developers or homebuyers because of low land costs, becomes another stressor to transportation and transit infrastructure (Crudden, 2015).

Transit services are often located in high density, highly traveled areas for operational efficiency. Highly traveled corridors can pose safety issues when accessing transit. Safety issues include lack of sidewalk connectivity, old sidewalks that may pose tripping hazards or be inaccessible for residents with mobility issues, or sidewalks that line busy roads without buffers between pedestrians and automobiles (Crudden, 2015).

Solutions: To increase public transportation availability, **DART will begin collaborating with other transportation providers for on-demand services.** DART is proposing a pilot project for Mobility on Demand (MoD) to begin in the fall of 2019 that would partner with Uber, Lyft, and local taxis. Coordinating with other providers will help reduce the time needed between reservations and travel, and the services will be able to access a greater geographic area (Des Moines Area Regional Transit, 2016). Accessibility and availability will also be improved by extending hours on weekdays and weekends (Des Moines Area Regional Transit, 2016).

Accessibility to transportation would be improved by encouraging transit-oriented development and preserving affordable housing near transit (US Department of Housing and Urban Development Office of Economic Resilience, 2019). One way proposed to encourage transit-oriented development is a Design Node Assistance (DNA) grant program to shape more "resilient and community-oriented nodes and corridors" across the region (Des Moines Metropolitan Planning Organization, 2013).

Summary

Proposed solutions to transportation barriers include:

- Prioritizing multimodal transportation options,
- Integrating mobility hubs,
- Provide more on-demand services, and
- Encourage transit-oriented development (Des Moines Metropolitan Planning Organization, 2013; Des Moines Area Regional Transit, 2016).

5. Environmental health index

The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The index is a linear combination of standardized EPA estimates of air quality carcinogenic, respiratory, and neurological hazards.

Values are inverted and then percentile ranked nationally. Values range from 0 to 100. The higher the index value, the less exposure to toxins harmful to human health. Therefore, the higher the value, the better the environmental quality of a neighborhood.

Des Moines data

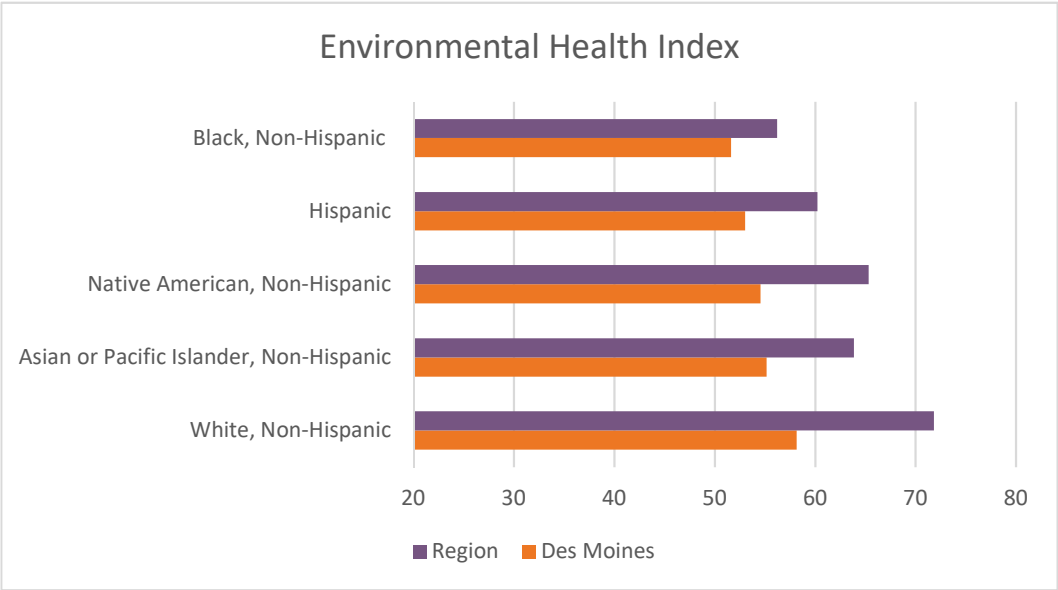
The Des Moines average environmental health index, 28.17, is lower than the regional average of 40.38. Des Moines residents environmental index scores range from 24.47 for the Black population to 31.31 for the White population. Some of this may be due to the age of Des Moines and its historical land use patterns. Older areas in Des Moines have or had more industrial uses or environmental issues. Those also happen to be many of the areas where the higher concentrations of people of color live. See maps on the upcoming page.

Regional data

Regionally, the Black population has the lowest index score among all demographic groups at 29.45; the White population has the highest score of 51.22. There is a large gap of 20 index points between the White and Black populations, meaning the suburban White population are the least exposed to environmental toxins than any other group.

See the following pages for maps showing environmental index data for Des Moines and the region. Larger versions of the maps are also available on the map supplement document.

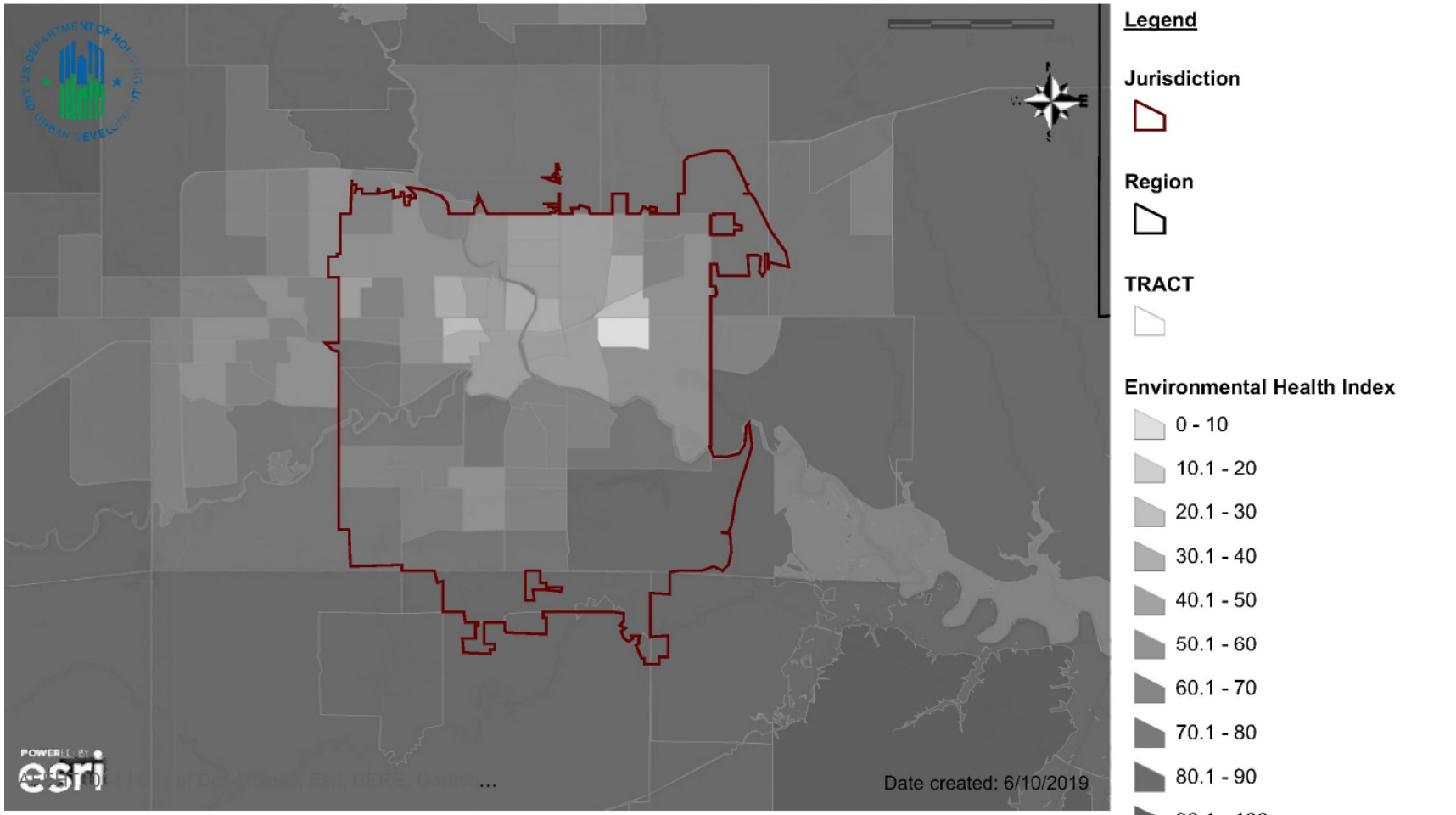
Figure 23: Environmental Health Index Scores



Source: National Air Toxics Assessment (NATA) data, 2011, per HUD AFFH Tool, version 0004

Figure 24: Environmental Health Index for Des Moines

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 13 - Demographics and Environmental Health

Description: Environmental Health Index with race/ethnicity, national origin, family status and R/ECAPs

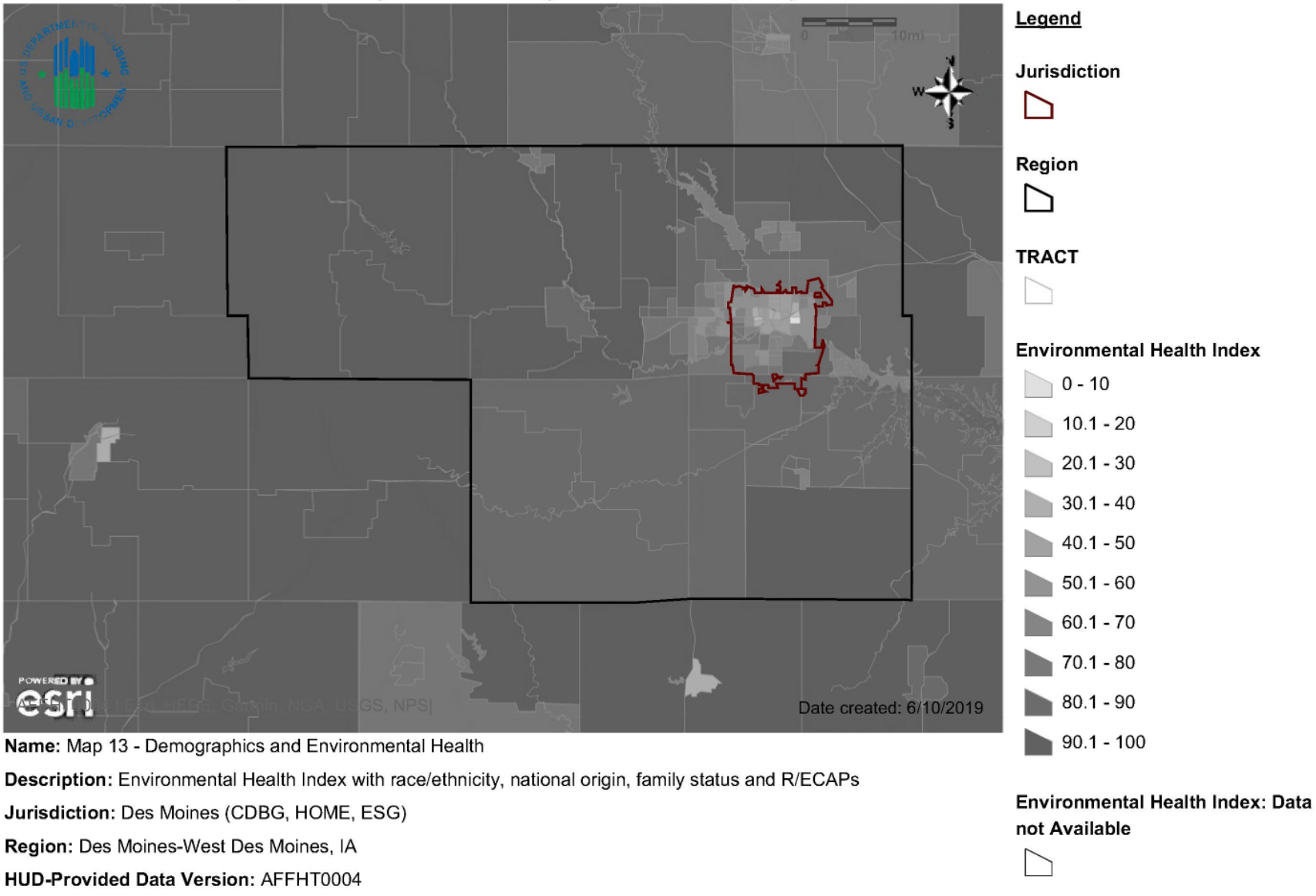
Jurisdiction: Des Moines (CDBG, HOME, ESG)

Region: Des Moines-West Des Moines, IA

HUD-Provided Data Version: AFFHT0004

Figure 25: Environmental Health Index for Region

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 13 - Demographics and Environmental Health

Description: Environmental Health Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Des Moines (CDBG, HOME, ESG)

Region: Des Moines-West Des Moines, IA

HUD-Provided Data Version: AFFHT0004

Barriers and Solutions

Barriers to environmental health include:

- Interior environmental hazards,
- Exterior environmental hazards, and
- Quality of life threats.

Internal hazards

Barriers: An older housing stock indicates a higher potential for internal, immediate environmental hazards. The oldest neighborhoods surrounding the north side of Downtown Des Moines have some of the oldest housing stock in the region. These neighborhoods also tend to be where more people of color live compared to the rest of the CBSA. See the following table for median year of the structures built.

Table 4: Median Year Structures Were Built

Median Year Structure Built		
Des Moines	**West Des Moines**	**Region**
1958	1991	1976
Source: American Community Survey, 2013-2017		

Housing hazards in older housing that affect human health include lead, asbestos, and maintenance issues. Additionally, radon, mold, and pests are hazards that can exist regardless of when a structure was built.

Lead is a concern because elevated levels of lead in a child's bloodstream can lead to lead poisoning. Lead poisoning can cause learning disabilities, behavioral problems, and, at very high levels, seizures, coma, and death (Iowa Department of Public Health, 2019). Lead poisoning disproportionately affects more low-income and minority children (Maantay, 2002). Common sources of lead exposure are drinking water as well as lead-based paint. Lead may be present in piping and plumbing fixtures; buildings constructed before 1950 may be served by a lead water service line and copper pipe installed before 1985 may have been installed using lead-containing solder. Lead-based paint exposure is most common in buildings constructed before 1978.

Asbestos is a mineral fiber that can be found in many older household materials including insulation, vinyl flooring, roofing, and pipe coating. When asbestos is disturbed by construction or demolition, fibers may be released into the air and inhaled. Major health effects associated with asbestos exposure are lung cancer; mesothelioma, a rare form of cancer that is found in the thin lining of the lung, chest and the abdomen and heart; and asbestosis, a serious progressive, long-term, non-cancer disease of the lungs (US Environmental Protection Agency, 2019)

Another internal housing hazard associated with an older housing stock is deferred maintenance that produces problems in structural, mechanical, electrical, or plumbing systems. Functioning mechanical systems, such as an air conditioner, can offset heat stress, respiratory issues, and illness in vulnerable populations such as children and the elderly. Non-functioning home systems can lead to carbon monoxide poisoning, electrical fires, pests, or mold.

Radon is a naturally-occurring, odorless radioactive gas that can be in a home regardless of age or condition. Iowa naturally has the highest radon levels in the US because of high radium in its soil deposited in the past by glaciers. It becomes an exposure hazard for lung cancer when there are cracks in the foundation of buildings (University of Iowa Hospitals & Clinics, 2019). Radon is the number one cause of lung cancer among non-smokers (US Environmental Protection Agency, 2019)

Solutions: Program participants, housing developers, and other housing partners should promote interior health of a housing unit. Examples include lead-based paint remediation in housing rehabilitation projects, asbestos testing and removal, and radon testing and mitigation. Program participants and housing partners should continue to implement any housing rehabilitation programs, especially those targeted to assisting low-income households who may have trouble, whether financially or physically, maintaining their homes. Program participants should seek additional funding sources to help healthy home initiatives such as HUD's Lead-Based Paint and Lead Hazard Reduction Grant Programs.

Des Moines Water Works provides free testing for some residents. Those who don't qualify pay a fee of $18. Iowa has a Childhood Lead Poisoning Prevention Program (CLPPP) and encourages the use of Lead Poisoning: How to Protect Iowa Families, which is a comprehensive brochure on lead poisoning prevention that can be used by parents, tenants, homeowners, contractors, and for real estate transactions (Iowa Department of Public Health, 2019).

External hazards

Barriers: External hazards include climate change or natural disasters and hazardous facilities. Climate change increases the likelihood and magnitude of natural disasters. Moreover, "Those with pre-existing health problems (e.g., asthma, cardiovascular disease), limited resources, and located in areas of greater risk (e.g., flood zones) are most at risk to climate-related impacts." (Iowa Department of Public Health, 2019) The most common hazards are those associated with severe weather, including heavy rains and flooding, tornadoes and high winds, ice storms, blizzards, and heavy snow. Iowa has experienced 44 presidentially-declared disasters from 1990 to 2019, and 62 declarations total (Iowa Homeland Security & Emergency Management, 2019).

Solutions: Although natural disasters are unavoidable, program participants can mitigate potential loss by planning better. **Program participants should not locate housing program recipients or participants in the 100-year flood plain. They should avoid locating housing of vulnerable populations, such as the elderly or small children, in the 500-year flood plain.**

Another possible solution is campaigning to promote awareness on the importance of homeowner's insurance with sufficient coverage (Iowa Insurance Division, 2019). The Iowa Fair Plan Association in West Des Moines helps owners who are unable to find coverage in the voluntary market (Iowa Fair Plan Association, 2019). Proper insurance coverage will allow a quicker ability to rebuild and return to units.

Quality of life

Barriers: Environmental health is also exhibited by quality of life indicators—for example, proximity to amenities, food access, life expectancy, and healthcare access.

Housing location impacts access to amenities such as parks, trails, rivers, lakes, and recreation. Access to passive and active recreation opportunities improve health. In the City of Des Moines LiveDSM plan, which is the City of Des Moines Parks and Recreation Comprehensive Plan, areas in Des Moines that have the highest health needs are the central neighborhoods north of Downtown Des Moines (City of Des Moines Parks and Recreation

Department, 2019). These are also the areas that have the lowest index scores across most of the other categories and have the highest populations of people of color.

Life expectancy may also be another measure of quality of life. Per the Centers for Disease Control (CDC), life expectancy rates are lowest in the center of Des Moines and higher across the region (Center for Disease Control and Prevention (CDC), as provided by PolicyMap, 2019).

Solutions: One main goal in LiveDSM is to deliver equitable parks and recreation facilities and programs. One method to achieve equity is by **expanding the trail system to align with complete streets policy and fill in trail or sidewalk access gaps.** The department also plans on **reevaluating current parks programs to address inequity and accessibility**, especially for areas with higher poverty rates. The department will continue to offer lower costs for low-income participants in youth sports programs.

Another plan that promotes social equity in quality of life issues is Central Iowa Bicycle and Pedestrian Action Plan (CONNECT). CONNECT promotes the expansion and improvement of bicycle and pedestrian friendly facilities as a strategy to address social equity (Des Moines Area Metropolitan Planning Organization, 2009)

Many local programs are also already incorporating quality of life as an arm in their supportive services. For example, organizations like Anawim Housing or Greater Des Moines Habitat for Humanity supplies move-in baskets to families. Anawim also has the Family Wellness Program, which helps families to participate in social, cultural, or educational activities (Latcham, 2019).

Summary

Proposed solutions to environmental and health threats include:

- Housing rehabilitation to address interior environmental issues;
- Avoiding housing development, especially projects housing vulnerable populations, in flood plains;
- Expanding the trail system and sidewalk connections to better access amenities that enhance quality of life; and
- Assess current parks and recreation programs to identify equity gaps.

Access to Opportunity Conclusions

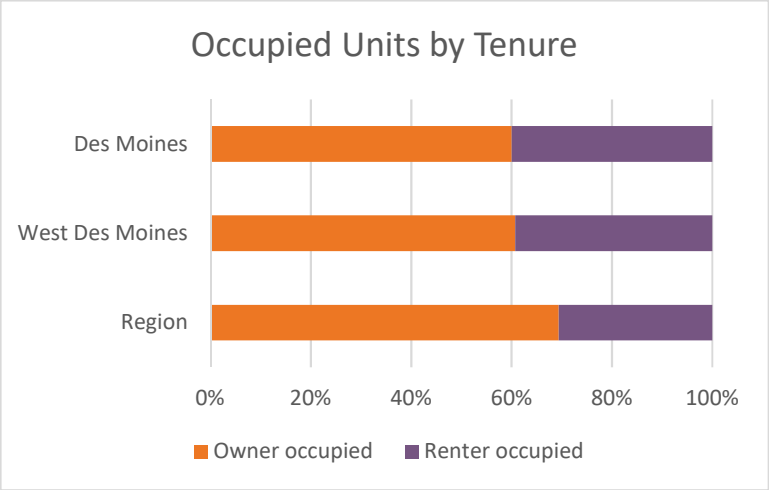
Throughout the analysis, Black or African American and Hispanic or Latino populations have less access to opportunity. They had the worst opportunity index scores for low poverty, school proficiency, labor market index, and environmental health indexes.

The index scores match visible patterns of segregation. The densest populations for communities of color are in the neighborhoods on the northern border Downtown Des Moines. They are segregated, high poverty areas compared to the region. Except for the low transportation cost index, regional residents, especially White residents who are not living in poverty, have access to the most opportunity.

F. Housing Types, Occupants, and Location

Housing is arguably the most important aspect of a community because its availability and accessibility is connected to all other indicators of a healthy community. Housing affects residents' emotional, social, environmental, and economic wellbeing.

Figure 26: Occupied Units by Tenure



Source: 2013-2017 American Community Survey

Many Central Iowans face housing problems such as cost burden or overcrowding. A household spending 30 percent or more of income on housing is considered cost-burdened. Those who spend more than 50 percent of their income toward housing are considered severely cost burdened. Overcrowding is defined as more than 1 person per room in a housing unit.

The location of housing may also be an issue. Housing patterns reflect similar opportunity access trends in the previous section. Areas of lower opportunity in most categories align with concentrations of poverty, substandard housing conditions, and segregation.

Des Moines data

According to the 2013-2017 American Community Survey 5-Year Estimates, there are 91,420 housing units in Des Moines. Of those, approximately 7,504, or 8.2 percent, are vacant, and more than 83,000 units are occupied. More than half, or 61.5 percent, are owner-occupied, and 38.5 percent are occupied by renters.

The highest homeownership rates in Des Moines occur in the outer ring of neighborhoods in Des Moines. Rental rates are highest in the center of Des Moines in the Downtown and adjacent neighborhoods (Esri, HERE, Garmin, NGA, USGS, NPS, 2019). The areas with the highest rental tenure are also the areas with higher percentages of people of color. Conversely, higher rates of homeownership occur where there are significantly fewer people of color compared to the overall demographic representation.

More than one-third of Des Moines households experience housing problems, the most prevalent being cost burden. Almost one-third of homeowners and renters, or 29.2 percent, are severely cost-burdened (US Census Bureau, as presented by US Dept. of Housing and Urban Development, 2018).

As shown in the chart below regarding disproportionate housing needs, those most affected by housing problems in Des Moines are people of color. In Des Moines, approximately half of Black or African American, Hispanic, Native American, or other races or ethnicities experience housing problems compared to 31.1 percent of White households.

Public Housing

The Des Moines Municipal Housing Agency (DMMHA) administers public housing programs in Des Moines and Polk County, which includes some of West Des Moines. The most used public housing type is the Section 8 Housing Choice Voucher (HCV) program. It is the most widely used program both in Des Moines and in the region among all racial and ethnic groups. Within the HCV program, DMMHA, or another public housing agency if outside

Polk County, pays rental assistance to a private rental property owner on behalf of an HCV participant. Participants' rent portion is at least 30 percent of their household income.

More than half, or 64 percent, of participants in public housing programs use the HCV program. As of July 31, 2018, DMMHA's HCV program had 3,054 units under lease and a total allocation of 3,568 vouchers in Polk County. Approximately 20 percent of DMMHA's voucher holders live outside Des Moines, with the highest amount, or 6.4 percent, in West Des Moines. The areas in Polk County with the next highest amount of voucher holders include Altoona (3.6 percent, Johnston (3.5 percent), and Ankeny (3.3 percent) (Des Moines Municipal Housing Agency, 2018).

Most participants are "regular" housing choice vouchers. This means that the housing voucher is not under a special category. For example, targeted programs where housing choice vouchers are reserved include:

- Family Unification Program (100 vouchers);
- Project-Based (50 vouchers);
- Non-Elderly Disabled (53 vouchers); and
- Veterans Administration Supportive Housing (165 vouchers).

In addition to HCV, DMMHA has more than 400 public housing units owned and managed by DMMHA in Des Moines. Public housing units are at Royal View Manor, East View Manor, South View Manor, Highland Park Manor, and Oak Park Manor as well as some scattered single-family homes in Des Moines (Des Moines Municipal Housing Agency, 2019).

Another program administered by DMMHA is project-based vouchers (PBV), which provide rental assistance for eligible families and individuals who live in specific housing developments or units within Polk County. As of June 2019, DMMHA has 50 PBV units—38 at Central Iowa Shelter and Services (CISS) and 12 at the Young Men's Christian Association (YMCA).

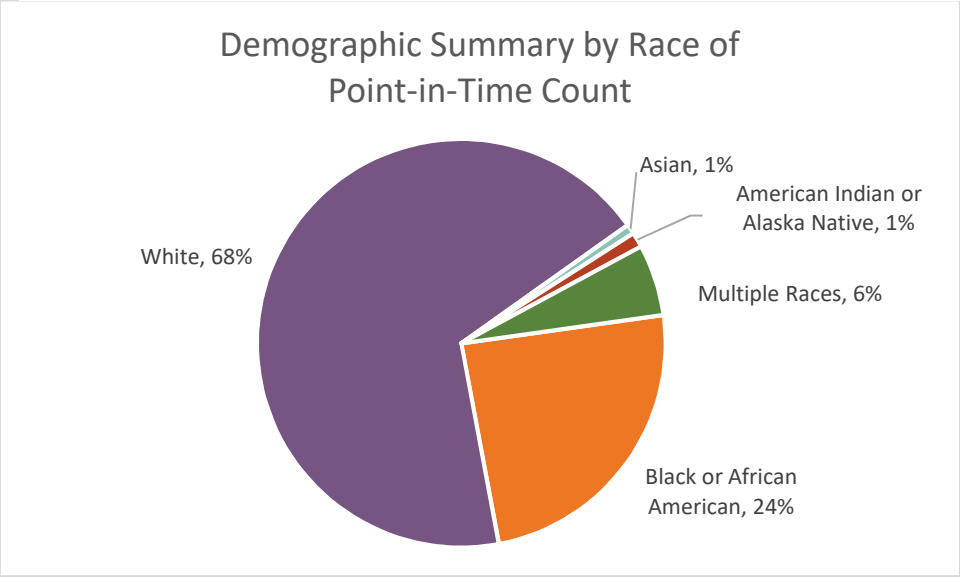
Under the PBV program, DMMHA enters into a housing assistance payment contract with a private owner for specified rental units, for a specified term up to fifteen years, subject to funding availability. Rental assistance or subsidy is provided while eligible families occupy the rental housing units and the units meet other program standards. To fill vacant project-based units, DMMHA will refer families from the PBV waiting list to the project owner. Households or families in a PBV unit can remain on the HCV waiting list. Moreover, if the household lives in the PBV unit for one year, they can request to be transferred to a regular HCV and use it somewhere else.

DMMHA subsidy standards determine the appropriate unit size based on the family size and composition for the PBV program. The family pays a property owner between 30 and 40 percent of their adjusted monthly income for their portion of the rent. DMMHA then pays the property owner the difference between the actual contract rent charged and what the family can afford on behalf of the participant.

Homelessness needs

In 2018, there were 764 homeless individuals, which comprised 648 homeless households, counted in Des Moines. Nearly 71 percent of the households were persons over the age of 24 without children. Most of those counted, or 68 percent, were White. The next largest group counted were Black or African American, which comprised 24 percent of the homeless population (US Department of Housing and Urban Development, 2018). See the demographic summary of the point-in-time on the adjacent chart.

Figure 27: Demographic Summary by Race of Point-in-Time Count



Source: 2018 Point-in-Time Count, US Department of Housing and Urban Development

Homelessness is mostly addressed within the City of Des Moines for the entire region. Des Moines agencies provide homelessness outreach, emergency shelter, temporary shelter, and permanent supportive housing. Many of these agencies participate in the Polk County Continuum of Care (CoC) and the centralized intake system.

The centralized intake system is facilitated by Primary Health Care. It acts as a single-entry point for homeless persons. Centralized intake staff evaluate clients' health and housing needs based on the Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT). Clients are then placed in housing that best matches their needs based on their VI-SPDAT score; those who are considered the most vulnerable or with the highest need are given priority according to the Housing First model. The centralized intake system allows better tracking of people, which allows service providers to recognize patterns and intervene when necessary.

West Des Moines data

Some Comprehensive Housing Affordability Strategy (CHAS) data for West Des Moines was unavailable or unreliable. Consequently, there is less housing data analysis for West Des Moines than Des Moines and the region.

In West Des Moines, there are 28,948 housing units, of which 1,634, or 5.6 percent are vacant. Approximately 65.8 percent live in owner-occupied housing, and 34.2 percent of the population live in rental housing. More than 6,000 households have a cost burden or severe cost burden, representing 23.2 percent of the population. Renters are even more strongly hit, with 34.3 percent experiencing a cost burden (Western Economic Services, LLC, 2018).

Public Housing

In West Des Moines, public housing is split among DMMHA, which serves Polk County, and Central Iowa Regional Housing Authority (CIRHA), which serves Dallas and Madison Counties in the Des Moines-West Des Moines CBSA. CIRHA provides more than 100 Housing Choice Vouchers in West Des Moines in addition to any provided by DMMHA in Polk County (Central Iowa Regional Housing Authority, 2017). DMMHA provides at least another 150 vouchers on average for West Des Moines residents who are in Polk County (Des Moines Municipal Housing Agency, 2019).

Homelessness needs

In West Des Moines, homelessness is addressed by the West Des Moines Human Services Housing Solutions Program. The Human Services Department complies with the Polk County CoC centralized intake and Housing First model, which means it houses individuals and families directly referred from Primary Health Care after the client's

evaluation using the VI-SPDAT. West Des Moines Human Services serves an average of 12 families or households per year.

Regional data

In the Des Moines-West Des Moines CBSA, which includes the five counties of Dallas, Guthrie, Madison, Polk, and Warren, there are 259,271 housing units. Regionally, 72.6 percent of the population live in owner-occupied units, and 27.4 percent live in rental housing (US Census Bureau, 2019).

Homeownership and rental tenure in the region follow a similar donut pattern as Des Moines. Homeownership rates are highest in the suburban areas, and the highest rental rates occur in central Des Moines (Esri, HERE, Garmin, NGA, USGS, NPS, 2019). The areas with the highest rental tenure are also the areas with higher percentages of people of color. Conversely, higher rates of homeownership occur where there are significantly fewer people of color compared to the overall demographic representation.

According to a 2019 study about workforce housing needs, nearly 58,000 households in the Des Moines-West Des Moines region are cost-burdened, spending more than 30 percent of their income on housing. Nineteen percent of homeowners with mortgages, or nearly 25,000 households, are cost burdened. Ten percent of owners without a mortgage, more than 5,000 households, are cost burdened.

Forty percent of renters, or 29,000 households, pay more than 30 percent of their income toward housing. Nearly half of these cost-burdened renters, 14,000 households, were severely cost-burdened, paying more than 50 percent of their income for rent and utilities (The Virginia Center for Housing Research at Virginia Tech, 2019).

More than 41,000 workers cannot afford to rent a unit in the MSA without sharing costs with another earner, even when they earn in the 90th percentile for their occupation. Just over 89,000 workers earning the median wage for their occupation cannot afford median owner costs, even when sharing the cost with another worker earning an equal annual wage (The Virginia Center for Housing Research at Virginia Tech, 2019). In the Des Moines-West Des Moines CBSA region, the group with the highest rate of severe cost-burden are Black or African American residents. Overall, all races and ethnicities, except the White and Asian population, experience housing problems at a disproportionately higher rate.

Public Housing

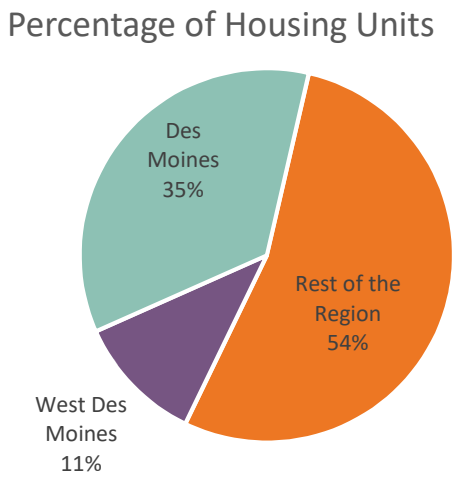
Housing choice vouchers (HCV) are the most used public housing assistance in the region. Outside of DMMHA's jurisdiction, there are an additional 300 voucher holders in the region (Central Iowa Regional Housing Authority, 2017; Region XII Regional Housing Authority, 2017; Warren County Housing Authority, 2017). More than one-third of rural voucher holders are elderly and/or disabled. Regionally, project-based Section 8 assistance is the second highest used program for all races and ethnicities in the region (US Census Bureau, as presented by US Dept. of Housing and Urban Development, 2018).

Homelessness needs

Regional homelessness is addressed by the Polk County CoC and the Iowa Balance of State CoC. The Balance of State CoC covers 96 Iowa counties. However, the region's largest homelessness agencies are either in Des Moines or West Des Moines.

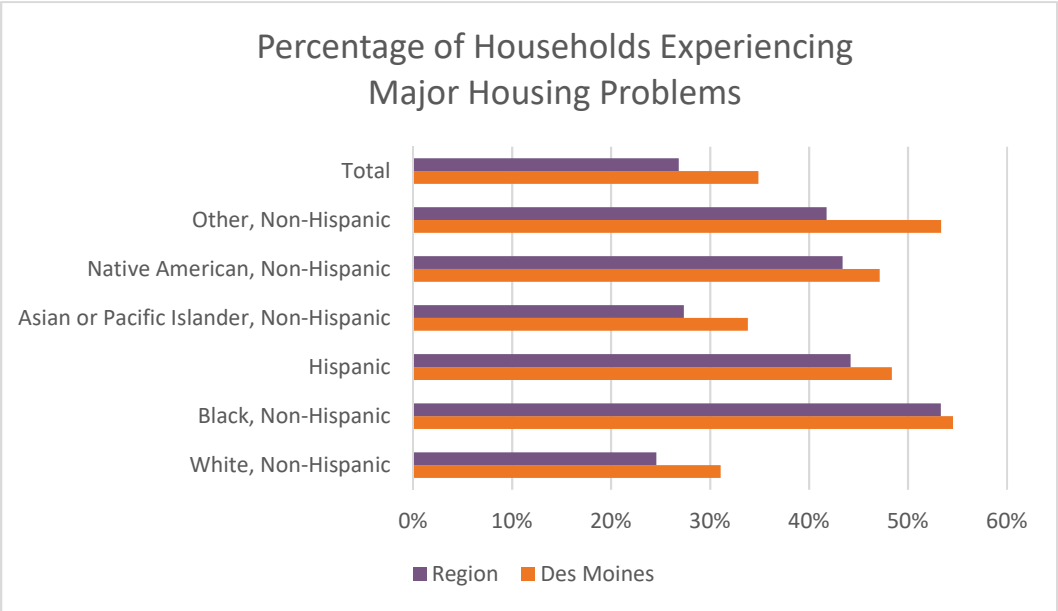
See the following pages for maps showing housing tenue by census tract for Des Moines and the region. Larger versions of the maps are also available on the map supplement document.

Figure 28: Percentage of Housing Units by Area



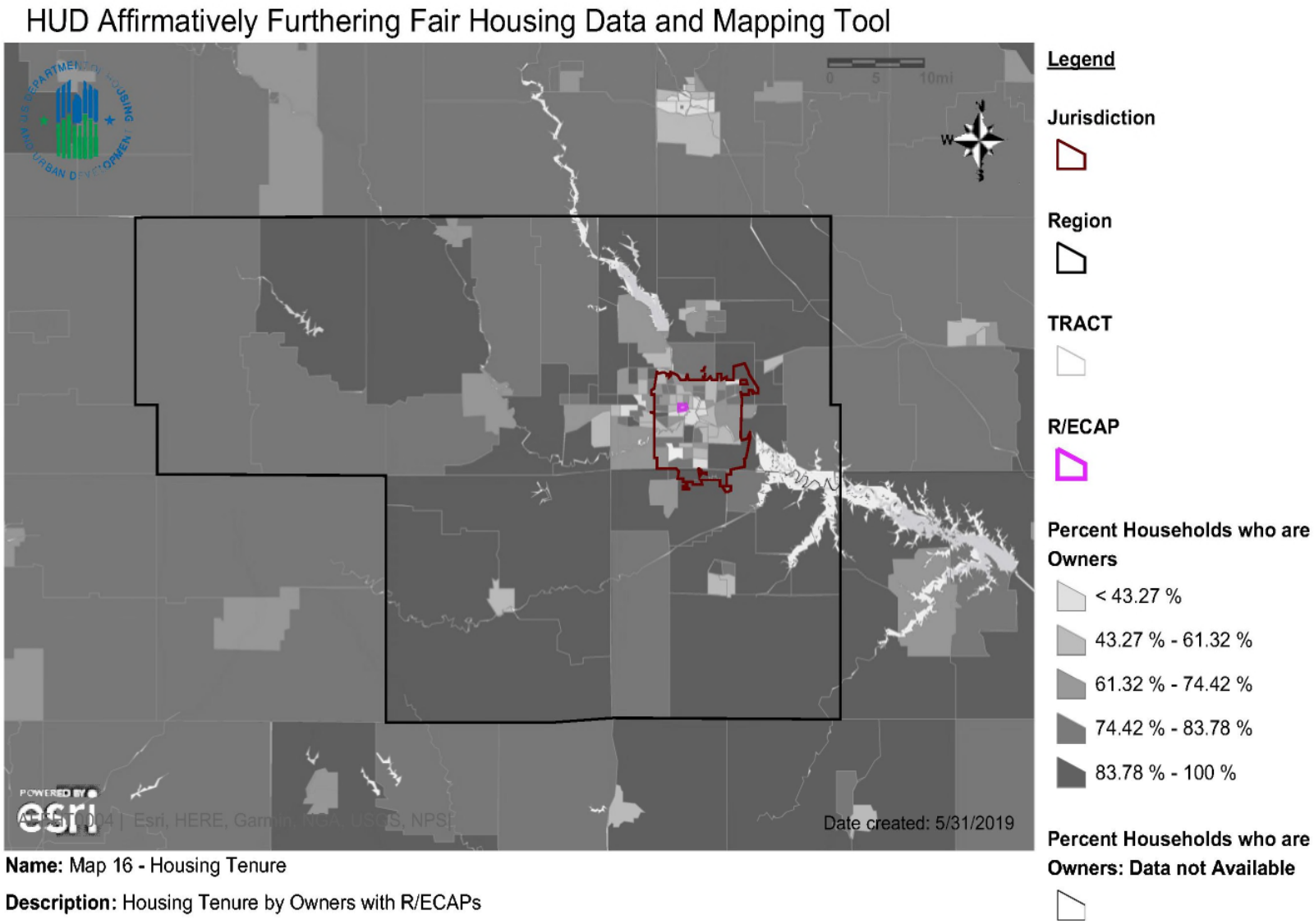
Source: 2013-2017 American Community Survey

Figure 29: Percentage of Households Experiencing Major Housing Problems



Source: Comprehensive Housing Affordability Strategy (CHAS), 2009-2013; per HUD AFFH Tool, version 0004

Figure 30: Housing Tenure by Owners Map



Name: Map 16 - Housing Tenure

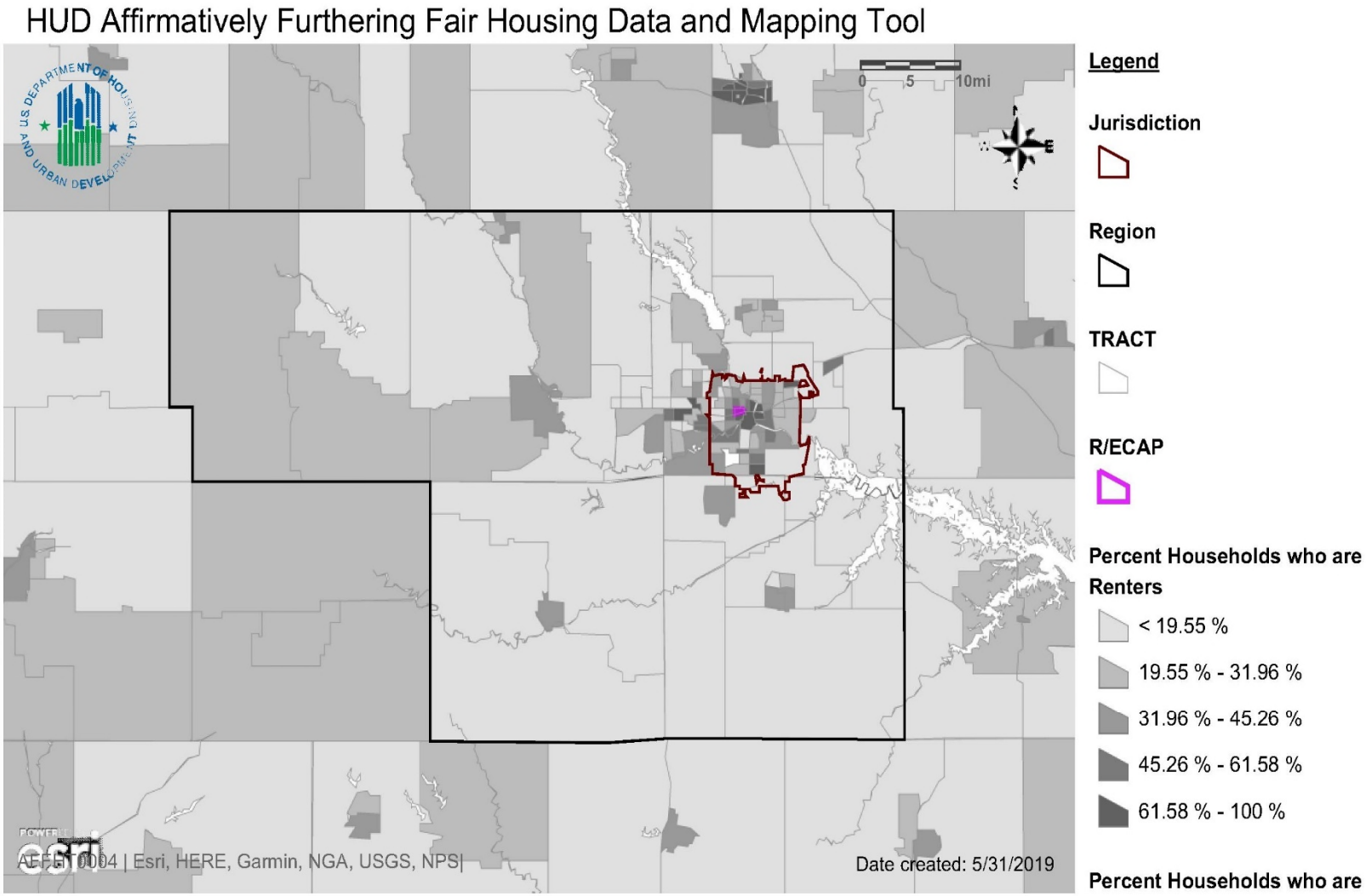
Description: Housing Tenure by Owners with R/ECAPs

Jurisdiction: Des Moines (CDBG, HOME, ESG)

Region: Des Moines-West Des Moines, IA

HUD-Provided Data Version: AFFHT0004

Figure 31: Housing Tenure by Renters Map



Name: Map 16 - Housing Tenure

Description: Housing Tenure by Renters with R/ECAPs

Jurisdiction: Des Moines (CDBG, HOME, ESG)

Region: Des Moines-West Des Moines, IA

HUD-Provided Data Version: AFFHT0004

Barriers and Solutions

Barriers to housing include:

- Economic challenges,
- Lack of affordable units, and
- Local government practices.

Economic challenges

Barriers: Economic challenges include being low income and addressing healthcare costs, transportation, childcare, and housing. As mentioned above, anywhere between 30 and 40 percent of households, depending on the area, are cost-burdened by their housing expenses. Low-income persons are disproportionately cost burdened because they have less expendable income for additional expenses such as childcare or transportation, but are often expected to pay the same amount as higher income residents. Those who are financially strained may obtain housing vouchers to help offset their cost burden. However, approximately 20 percent of housing vouchers are returned because they are declined by landlords (Des Moines Municipal Housing Agency, 2018).

Solutions: One solution to economic challenges **is establishing lawful source of income as a locally protected class** to ensure income generated from Disability, Social Security, Section 8, Veterans, and other government-funding benefits are legally accepted for rent payments (Des Moines Civil and Human Rights Department, 2018-2019). By legally protecting residents who may need government assistance to pay for housing costs, program participants have one more tool to fight discrimination. As a law, discrimination against someone based on their legal source of income can be more clearly enforced, and thereby reduces some disparate impacts.

Lack of affordable units

Barriers: To complicate the economic challenges a low-income person may already be facing, Des Moines, West Des Moines, and the region have a lack of units, especially units affordable to lower income groups. A lack of affordable units creates competition for those units, and often those with the lowest incomes become cost-burdened by settling for housing units they may not be able to afford.

In West Des Moines, more than 300 low- and moderate-income households are expected by 2025, and 1,500 new low- and moderate-income households are expected by 2050. West Des Moines is expected to have an additional 2,000 renter households and 3,000 owner households total by 2050. (Western Economic Services, LLC, 2018).

In the Virginia Center for Housing Research's 2019 workforce housing study, it is estimated Polk County will need to add 57,170 net new housing units over the next 20 years to accommodate net new workers. Of the new units, 33,592 should be new owner-occupied units, and 23,577 should be new rental units.

Using the employment-driven housing demand forecast, there will be an increase in the demand for single-family rental housing in the future. Between 2018 and 2038, about 35 percent of the new housing needed in Polk County is forecasted to be attached units or multifamily (i.e. townhomes, apartments and condominiums). More than three quarters (77.5 percent of all rental units, or 18,264 units) will need to have rents below $1,250 (The Virginia Center for Housing Research at Virginia Tech, 2019).

Solutions: Program participants should incentivize more one- to four-unit rental development. Other considerations should include proximity to transit and transportation access while being affordable to those under 50 percent area median income.

To address homelessness needs, increased funding is needed locally for rapid rehousing and permanent supportive housing. According to the National Alliance to End Homelessness, "Permanent housing is what ends homelessness. It is the platform from which people can continue to grow and thrive in their communities." There are a variety of permanent housing options, but additional housing that is at least partially subsidized to make it affordable to very-low income households, including people who are homeless, are needed in our communities.

Short term subsidies like rapid rehousing are beneficial to people who have few barriers to housing. However, permanent supportive housing with indefinite leasing and supportive services is critical in helping people with multiple barriers—such as disabilities, mental health issues, and substance use—sustain housing.

Permitting and approval process, zoning

Barriers: One barrier to development is a lengthy permitting and approval process in the City of Des Moines. Currently, projects are reviewed by at least two city boards and city council, which can take up to 90 days—a timeline that has deterred some developers from infill (Norvell, 2019). Permits are hard costs incurred to the projects, but in addition, a lengthy permitting and approval process may lead to additional holding or soft costs on a project. For some developers, the permitting and approval process may be complex and confusing as well (US Department of Housing and Urban Development Policy Design & Research, 2018).

Solutions: One of the solutions the City of Des Moines is already working on to improve local government **practices is updating its zoning code to be more form-based** in an effort to protect neighborhood values and eliminate barriers for developers. A new zoning code was identified as a top priority in the City's comprehensive plan, PlanDSM (City of Des Moines Community Development Department, 2016). The City's existing zoning code has not been comprehensively updated since 1965, and it has been cumbersome for developers and neighborhoods to navigate.

One benefit of the proposed zoning code includes more administrative authority for by-right development, potentially saving a developer approximately two months in approval time. If a developer brings forward a project that fits the zoning and design features as written in the code, projects can be approved internally by staff, who would have 30 days to approve a project. By-right development may also reduce Not in My Back Yard (NIMBY) opposition because projects that meet the code's standards would be approved administratively without being subjected to biased community input (US Department of Housing and Urban Development Policy Design & Research, 2018).

The focus to be a more form-based zoning code is also intended to promote affordable housing. By focusing on how a building fits into the neighborhood character rather than focusing on its use, form-based code should allow a wider range of housing types rather than assuming single-family housing should be the prominent housing style in a neighborhood. The proposed code also allows for accessory dwelling units, which would allow more affordable housing units. A form-based zoning code may also allow for higher density and housing along corridors, which should improve access to several transit routes.

Another benefit to the zoning code is a focus on higher quality construction, especially for single-family homes, which is likely to preserve or increase neighborhood values. Proposed requirements would include minimum house sizes, garages, and basements. The code would also specify details such as building materials, windows, façade layout, roof types, and general home types based on what fits the character and scale of a neighborhood. Although the intent is promoting better construction quality, the requirements may be burdensome to affordable housing developers (Norvell, 2019).

Barriers: As mentioned above, the zoning code is intended to be an improvement in local government practice, but it may have some negative impacts for affordable housing development by driving up construction costs. The City of Des Moines' new zoning code proposes requirements with minimum size requirements and construction materials. These requirements would increase construction costs for nonprofit affordable housing developers by approximately $75,000, for a total development cost of at least $225,000 per home. To afford a home at this cost, a household would need to earn between $60,000 and $70,000 a year to qualify for a 30-year mortgage (Norvell, 2019).

Solutions: There are several neighborhoods that continue to decline, reflected by poor physical conditions of the housing stock and weak real estate demand in the City of Des Moines core neighborhoods (czbLLC, 2018). Due to that decline, property owners in certain neighborhoods may not be able to build wealth that comes from stable or increasing property values. Yet, pricing out new homebuyers who need affordable housing by requiring more expensive construction materials or housing designs is inequitable.

A solution may be to provide **more down payment or construction assistance, especially through federally funded grant programs such as HOME, to nonprofit housing developers and their clients that would offset costs from higher building standards.** Staff should seek out funding opportunities from other local and state sources as well such as the State Housing Trust Fund, the National Housing Trust Fund, and other funding options available through the State of Iowa, Iowa Finance Authority, or Federal Home Loan Bank of Des Moines.

In Downtown Des Moines, the City's Office of Economic Development has started implementing affordable housing restrictions in new development. In Downtown projects that include housing and where a developer receives financial incentives or benefits, such as Tax Increment Financing (TIF), those developments will be required to provide a certain number of affordable housing units.

Lack of regional cooperation

Barriers: Lack of regional cooperation refers to formal networks or coalitions of organizations, people, and entities working together to plan for regional development. This concept was mentioned as a contributing factor to low poverty exposure in a previous section; it is linked to the affordable housing patterns and where lower income residents live in Des Moines, West Des Moines, and the region. The areas that have higher rates of low-income residents or people living in poverty are the areas with the highest number of renters and poorer housing conditions. Most of these areas are the neighborhoods immediately surrounding Downtown Des Moines. Housing becomes less dense and more expensive with more homeownership when looking at the neighborhoods and suburbs moving further out from the Downtown core.

Solutions: All local governments in the region should create a single Affordable Housing Development Plan. The Plan should be developed based on housing needs without regard to jurisdictional boundaries. Plans for development of new affordable units should be based on multiple considerations such as adjacency to low wage job centers, services regularly accessed by low-income households and transportation options. Strong preference should be given to new affordable housing development in areas commonly referred to as "High Opportunity." Minimum considerations for this category should be above average performance of the school district, above average income of surrounding neighborhoods and above average value of neighborhood housing. In addition, location of new development should be determined by convenient access to those places or services commonly associated with the region's high quality of life such as parks, trails and cultural attractions.

G. Protected Classes and Other Populations Vulnerable to Discrimination

The following data is specific to protected classes, or those addressed in federal, state, and local fair housing laws. They include race, color, religion, sex, familial status, national origin, disability status, creed, sexual orientation, gender identity, and ancestry.

1. Racial or Ethnic Minorities

Des Moines data

Since 1990, the population in Des Moines has grown by 11.2 percent from 193,187 to an estimated 214,778. Des Moines' population makes up approximately one-third of the total population in the Des Moines-West Des Moines CBSA. See growth percentage chart below.

Per the 2013-2017 American Community Survey, 5-year estimates, 66.5 percent of Des Moines residents are White, non-Hispanic. The next largest group are Hispanic or Latino, which comprises 13.1 percent of the population. The third largest population are Black or African American, non-Hispanic at approximately 10.7 percent. Asians make up 5.9 percent of the population (US Census Bureau, 2019). When comparing percentages, Des Moines has a Hispanic and Black population almost double that of West Des Moines and the region. See comparisons below.

West Des Moines data

Since 1990, the population in West Des Moines has doubled from 31,702 to an estimated 62,999. The western suburbs of Des Moines, including West Des Moines, have been some of the fastest growing areas in the State of Iowa.

Eighty-two percent of the West Des Moines population is White, non-Hispanic. The next largest group is Hispanic, which comprises 5.5 percent of the population. West Des Moines third largest population group is Asian at 7.1 percent, and the fourth largest group is Black, non-Hispanic at 3.7 percent.

Regional data

Since 1990, the region's population has increased 49.7 percent from 416,346 to an estimated 623,113. See chart below for a comparison between Des Moines, West Des Moines, and the region's increase in population. Some local leaders attribute the growth to a strong job market (Aschbrenner, 2017), and other theories include access to affordable housing, cultural amenities, or to feel a sense of community (Hogan, 2018).

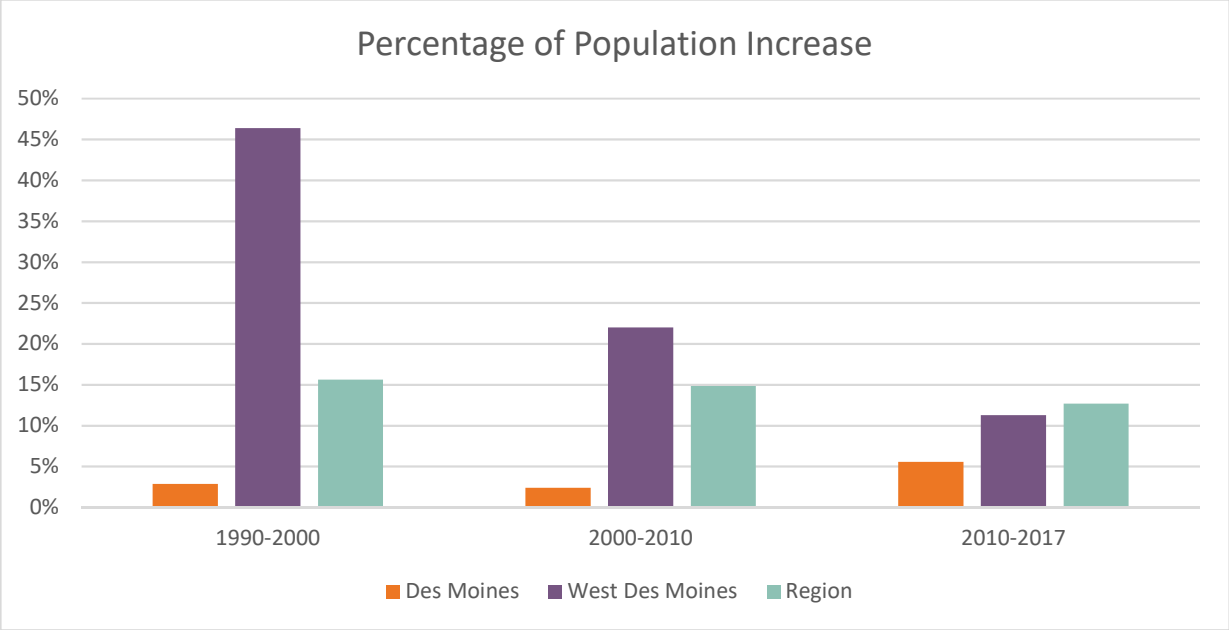
The groups ranked from highest population to lowest population in the region are White, non-Hispanic; Hispanic; Black or African American, non-Hispanic; Asian, non-Hispanic; and Native American, non-Hispanic. The White population is 81.5 percent, and Hispanic or Latino residents are 7.2 percent of the population. Black or African American residents are 4.9 percent, and Asians are 3.9 percent of the regional population.

See the following pages for maps showing racial and ethnic dot density maps for Des Moines and the region. Larger versions of the maps are also available on the map supplement document.

Table 5: Racial and Ethnic Composition

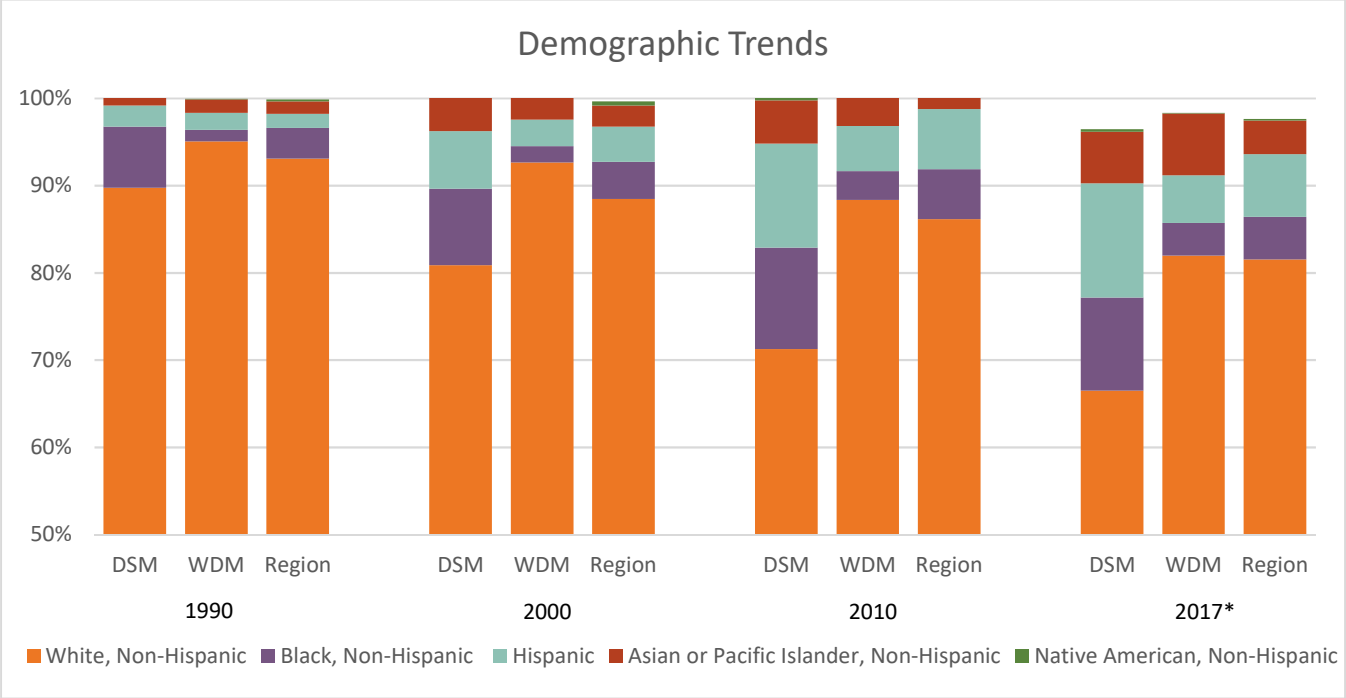
Racial and Ethnic Demographic Composition						
Race or Ethnicity	**Des Moines**		**West Des Moines**		**Region**	
White, Non-Hispanic	142,831	66.5%	51,640	82.0%	507,986	81.5%
Hispanic	28,085	13.1%	3,458	5.5%	44,687	7.2%
Black, Non-Hispanic	22,948	10.7%	2,355	3.7%	30,569	4.9%
Asian or Pacific Islander, Non-Hispanic	12,717	5.9%	4,445	7.1%	24,042	3.9%
Native American, Non-Hispanic	609	0.3%	60	0.1%	1,040	0.2%
Source: 2013-2017 American Community Survey 5-year estimates						

Figure 32: Percentage of Population Increase



Source: 1990 Decennial Census; 2000 Decennial Census; 2006-2010 American Community Survey 5-year estimates; 2013-2017 American Community Survey 5-year estimates

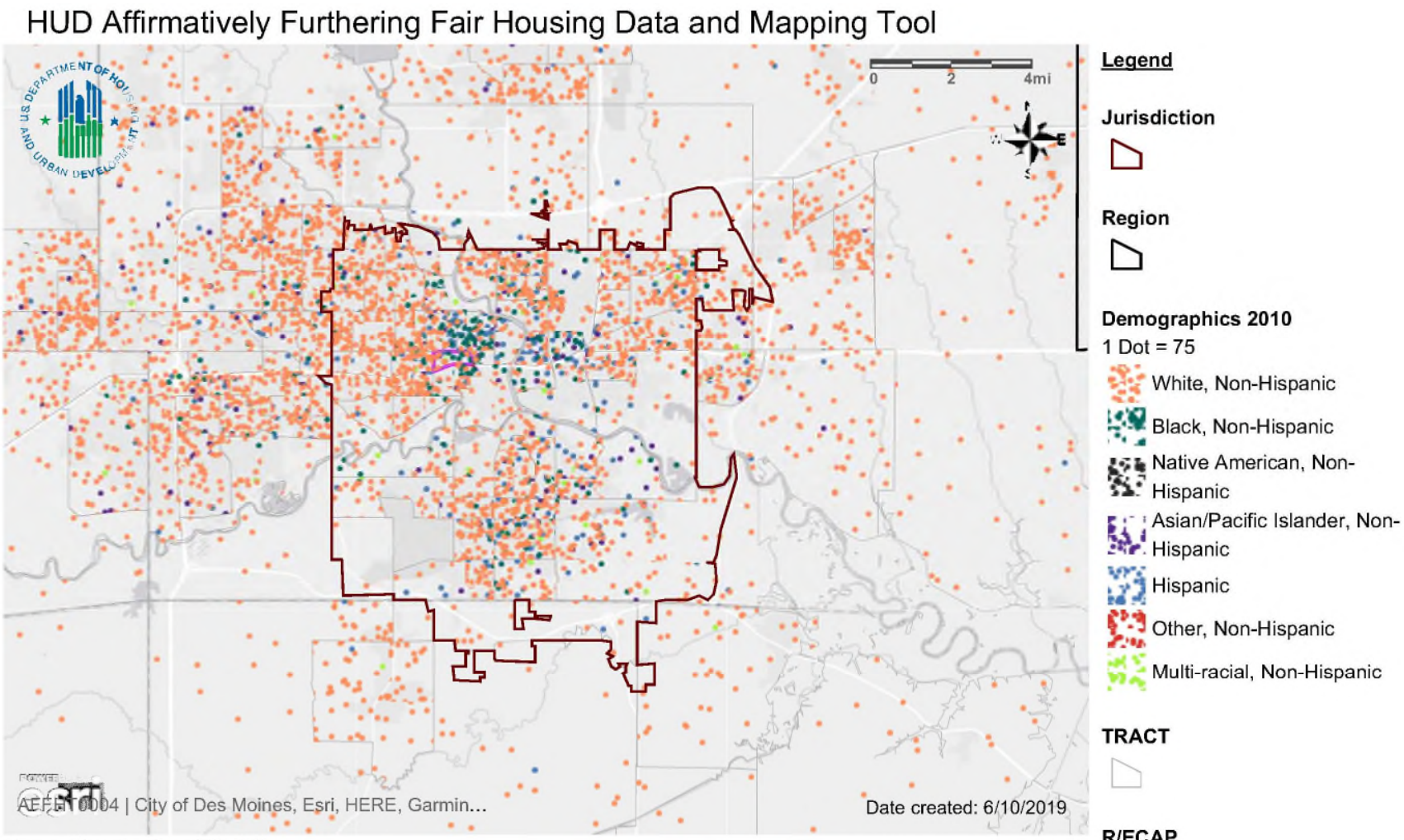
Figure 33: Demographic Trends Since 1990



Source: 1990 Decennial Census; 2000 Decennial Census; 2006-2010 American Community Survey 5-year estimates; 2013-2017 American Community Survey 5-year estimates

**The 2017 bars do not reach 100% because additional groups, such as "two or more races," are not included in the comparison.*

Figure 34: Race and Ethnicity Dot Density for Des Moines



Name: Map 1 - Race/Ethnicity

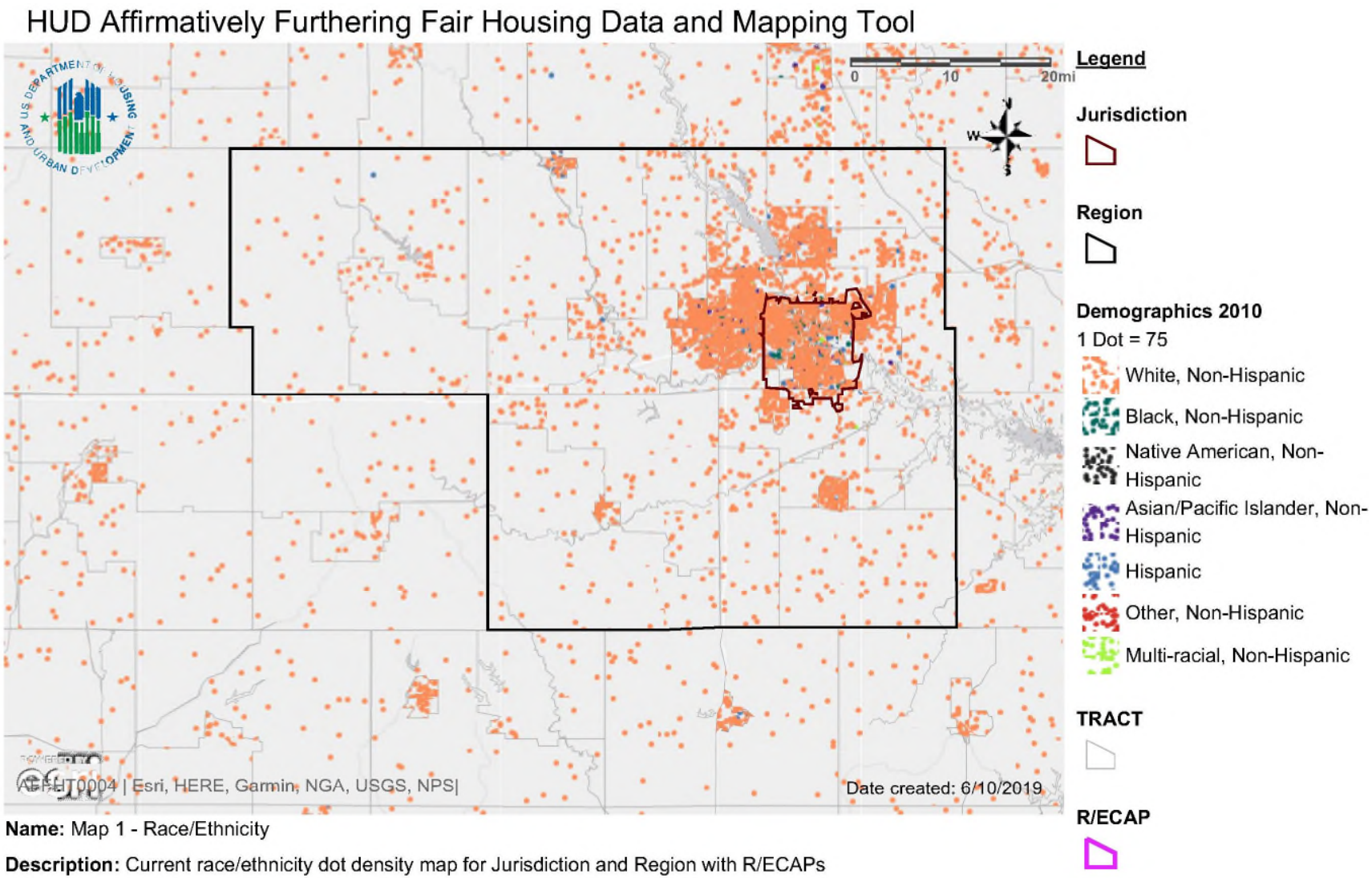
Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Des Moines (CDBG, HOME, ESG)

Region: Des Moines-West Des Moines, IA

HUD-Provided Data Version: AFFHT0004

Figure 35: Race and Ethnicity Dot Density Map for Region



Name: Map 1 - Race/Ethnicity

Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Des Moines (CDBG, HOME, ESG)

Region: Des Moines-West Des Moines, IA

HUD-Provided Data Version: AFFHT0004

Barriers and Solutions

Barriers to racial or ethnic minorities include:

- Bias or private discrimination,
- Segregation and concentration,
- Low income, and
- Mortgage lending practices.

Bias or private discrimination

Barriers: While Des Moines is the most diverse city in the State of Iowa, it and Central Iowa are not immune to a history of tension and inequities that exist between White residents and people of color or ethnic minorities. Historic and structural barriers continue to threaten housing opportunities for people of color and ethnic minorities. Examples of racial bias are portrayed throughout the One Economy Report from the Directors Council. Past actions from the City of Des Moines include:

- Dismantling properties on Center Street in the 1960s to make way for Interstate 235, displacing African American or Black families and businesses;
- Buying out homes from Black residents for below market value, forcing those families to move into rental properties and removing the potential to build wealth through homeownership; and
- Intentionally excluding people of color in efforts to improve residential neighborhoods with a significant Black population.

Des Moines was also subject to redlining in the first half of the twentieth century. Redlining involved racially-restrictive covenants for entire subdivisions, private racial steering, government-supported redlining, and a host of other practices that promoted racial segregation in metropolitan areas. Redlining not only caused racial segregation in Des Moines, it was also a form of resource hoarding. Government and financial institutions were advised not to lend or invest in redlined areas. The historical lack of concerted, thoughtful investment in redlined areas hindered neighborhoods' health, which is an effect that can still be seen today. See redline map on upcoming pages.

Although the most overt forms of racism or discrimination have been outlawed in some capacity, "racialized patterns in policies and practices permeate the political, economic, and sociocultural structures of America in ways that generate differences in well-being between people of color and Whites." (The Aspen Institute, 2004, as quoted by The Directors Council and State Public Policy Group, April 2017)

Solutions: Institutional bias that produces disparate patterns can be minimized **by more representation from minorities in decision making capacities**. Program participants should increase the diversity of staff, boards, commissions, and other groups to be more proportionate to the actual population.

Another solution to addressing bias is continuing education of current elected leaders, landlords, and citizens. By recognizing that implicit and explicit bias exist in every person, regardless of their skin tone or heritage, residents can at least raise personal awareness. Personal awareness of bias through education then begins to influence the actions that cause disparate impacts (Tom Newkirk, as presented by Polk County Housing Trust Fund, 2019).

Segregation and concentration

Barriers: Segregated living patterns reveal areas of disparate impact. Segregation by race or ethnicity compounded with poverty or low income correlates to disparities in housing, health, education, employment,

environment, and criminal justice. Moreover, in segregated neighborhoods with low home values, minority residents are deprived of "the opportunity to buy homes that yield a significant profit when sold" (Person, 2015).

In this analysis, segregation was measured by using HUD-provided dissimilarity index data, which was based on decennial census data in 1990, 2000, and 2010 (US Census Bureau, as presented by US Dept. of Housing and Urban Development, 2018). The highest level of segregation occurs between Black and White residents in Des Moines and in the region. Hispanic and White residents are the next most segregated racial or ethnic groups in Des Moines and in the region.

Segregation is further demonstrated by racially and ethnically concentrated areas of poverty (R/ECAPs), or areas where there is a disproportionately higher percentage of non-White population combined with a significant number of people living in poverty. There is one R/ECAP in the region. It is census block 26, which is northwest of Downtown Des Moines and split among the Good Park and Woodland Heights Neighborhoods. Census tract 26 is bound by Interstate 235 on the south, University Avenue on the north, Keosauqua Way on the east, and 28th Street on the west. Although census tract 26 is the only HUD-designated R/ECAP, concentrations of people of color and lower incomes are prevalent in other parts of Des Moines. See R/ECAP map on the next page.

Solutions: Like addressing bias, segregation would also be addressed by **more proportional and diverse representation on boards and commissions**. Increasing political power to underrepresented groups will bring to the forefront segregated living patterns that prevent some households from accessing opportunity.

Another possible solution is making source of income a protected class. As noted in the previous section regarding housing barriers and the 20 percent of returned public housing vouchers, this local law would protect tenants from being declined housing based on their use of government-based subsidies such as public housing vouchers (Des Moines Civil and Human Rights Department, 2018-2019). The idea is this protection would allow voucher holders more choice to live across Polk County in higher opportunity areas.

Low income

Like many of the protected classes in the Fair Housing Act, people of color are more likely to be low income or live in poverty than White residents in Des Moines, West Des Moines, and across the region. According to the Pew Research Center, households headed by a black person "earn on average little more than half of what the average white households earns." (Pew Research Center, 2016) African American or Black residents also have higher unemployment rates in the region—some of the worst in the United States—while the Des Moines-West Des Moines CBSA touts some of the lowest overall unemployment rates in the country. The unemployment rate for African Americans in Iowa is 14.8 percent, compared to the statewide unemployment rate of 3.9 percent (The Directors Council and State Public Policy Group, April 2017).

Having a lower income also decreases a household's ability to prepare a financial foundation for long-term stability. In terms of median net worth, "White households are about 13 times as wealthy as black households – a gap that has grown wider since the Great Recession." (Pew Research Center, 2016) Less than six percent of Black households have assets that earn interest or dividends compared to 19.4 percent of total Polk County households, and 10.8 percent of Black households have retirement income compared to 14.5 percent of total Polk County households (The Directors Council and State Public Policy Group, April 2017).

Solutions: Program participants should continue to encourage its partners **to implement financial literacy and homebuyer education when developers use government funding. They should also establish lawful source of income as a locally protected class** to ensure income generated from Disability, Social Security, Section 8,

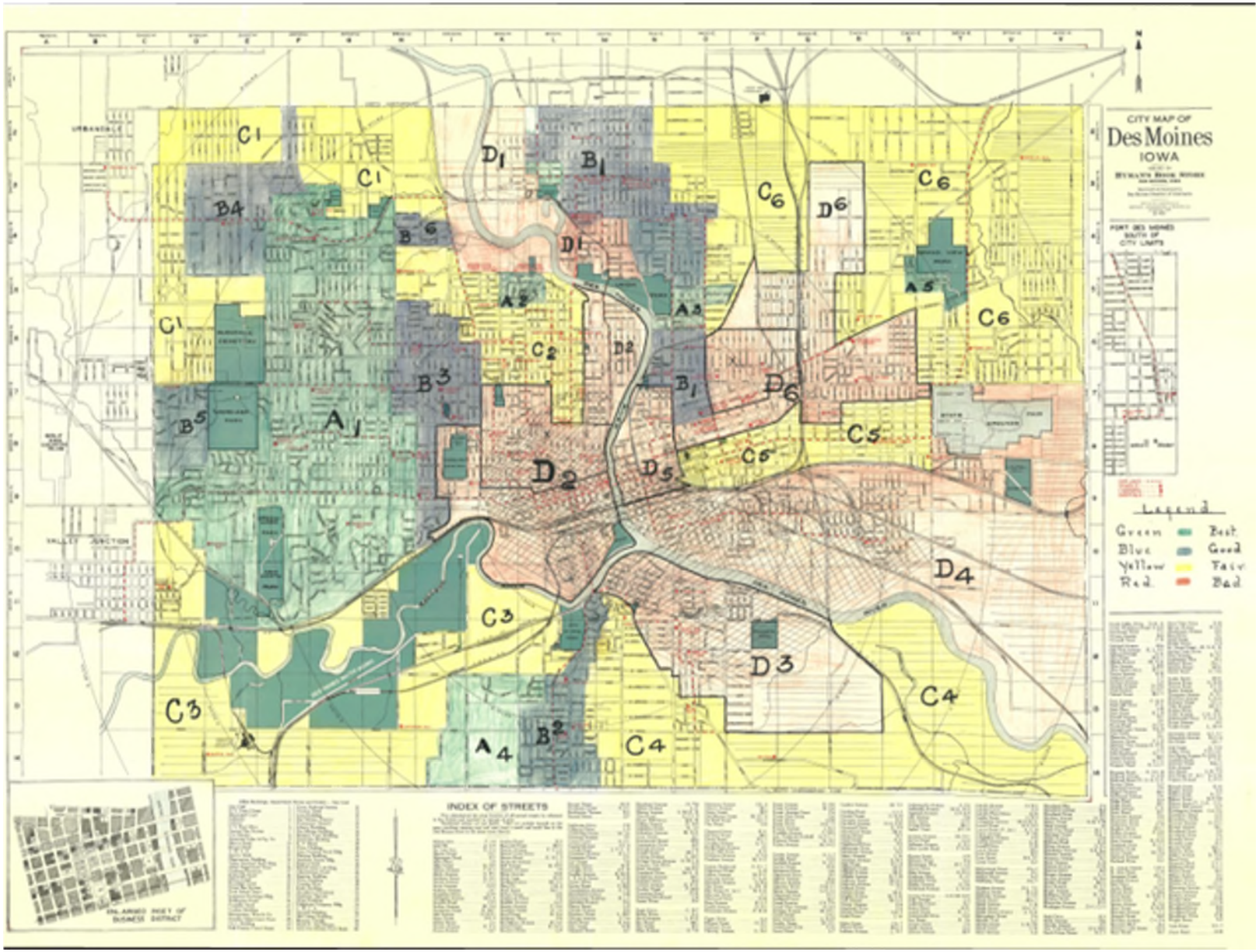
Veterans, and other government-funding benefits are legally accepted for rent payments (Des Moines Civil and Human Rights Department, 2018-2019).

Mortgage lending practices

Barriers: Between 2010 and 2014, only 1.4 percent of all home mortgages in the Des Moines-West Des Moines area were made to African Americans. In 2014, African Americans applied for 552 total mortgage, refinancing, or home improvement loans in the Des Moines-West Des Moines area. Of that number, more than a quarter of those applications were denied (The Directors Council and State Public Policy Group, April 2017). Another solution may be to conduct a review of the reasons for the denials and create programs that build capacity in the areas that most frequently lead to denial.

Solutions: Like above, program participants should continue to encourage its partners **to implement financial literacy, homebuyer education, and lawful source of income protection. Another strategy to counteract the institutional barriers that have disproportionately affected people or color are to research creative financing or ownership solutions**, such as reparative land trusts, as tools to include in affordable housing implementation.

Figure 36: Redline Map



2. Foreign-born: Refugees and Immigrants, Limited-English speaking

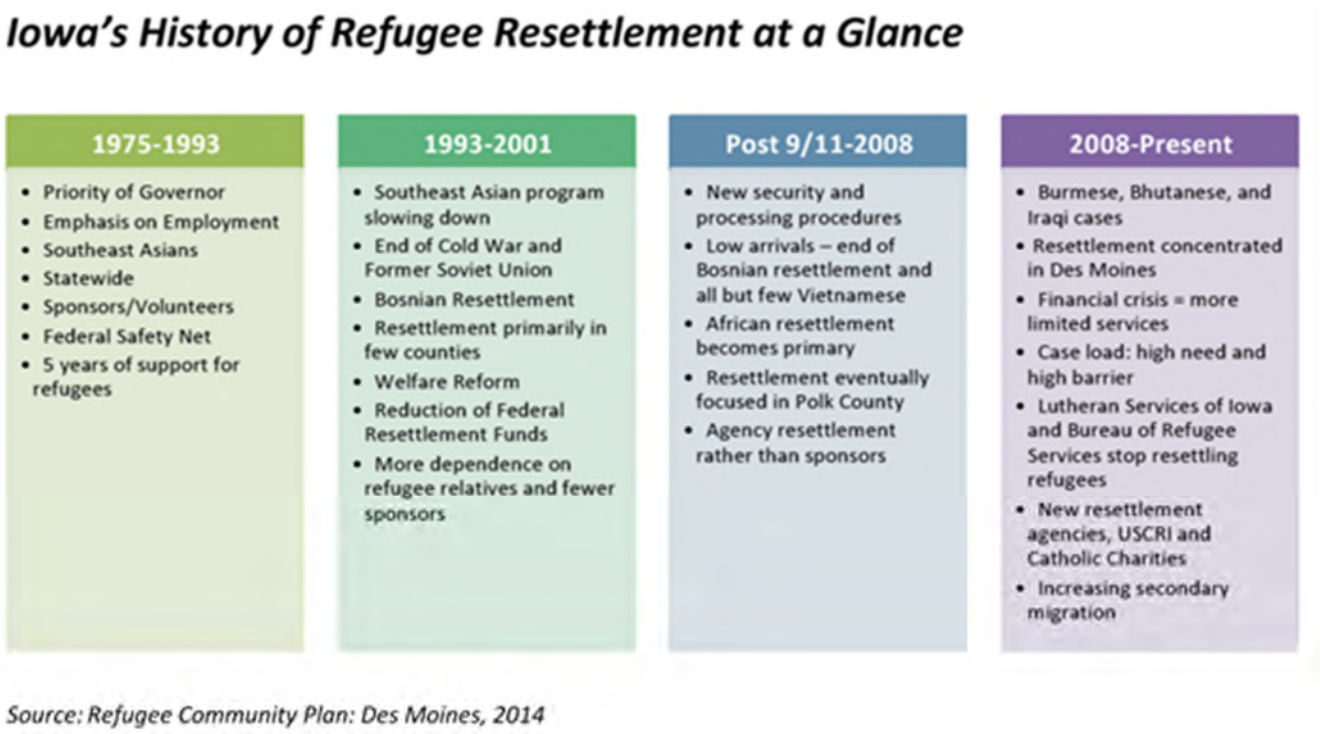
The foreign-born population includes anyone who is not a U.S. citizen at birth. This population includes naturalized citizens, lawful permanent residents, certain legal nonimmigrants (e.g., persons on student or work visas), those admitted under refugee or asylee status, and persons illegally residing in the United States.

Everyone else constitutes the native-born population, composed of anyone who is a U.S. citizen at birth, including people born in the United States, in Puerto Rico, in a U.S. Island Area (American Samoa, Guam, the Commonwealth of the Northern Mariana Islands, and the U.S. Virgin Islands), or abroad to a U.S. citizen parent or parents.

A refugee is a person who flees his or her home country based on a "well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group or political opinion" (Office of the United Nations High Commissioner for Refugees, 1951, 1967). According to the UNHCR, in 2018 there were nearly 25.4 million refugees worldwide, over half of whom are under the age of 18.

Iowa's history of resettling refugees follows the general United States history of events. The first major organized initiative in refugee resettlement in Iowa followed the Vietnam War. In 1975, Iowa Governor Robert Ray established the Governor's Task Force for Indochinese Resettlement. This was a statewide effort to create a safety net for southeast Asian refugees in response to the establishment of communist governments in Vietnam, Cambodia, and Laos (Community Foundation of Greater Des Moines, Refugee Community Planning Group, 2014).

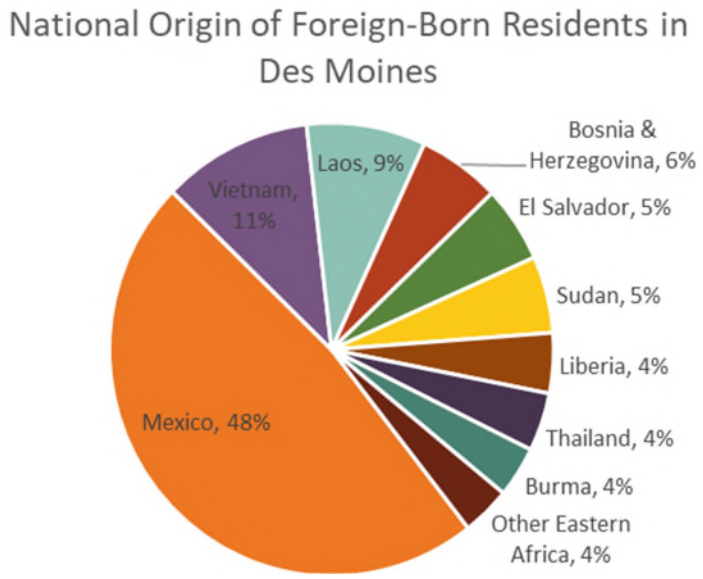
Figure 37: Iowa's History of Refugee Resettlement



Source: Refugee Community Plan: Des Moines, 2014

Another prominent refugee group in Iowa is the Bosnian population. Bosnian resettlement in Iowa started in the 1990s due to Bosnian Serbs targeting Bosnian Muslims for ethnic cleansing in their homeland.

Figure 38: National Origin of Foreign-born Residents in Des Moines



Source: Decennial Census, 2010; per HUD AFFH Tool, version 0004

Des Moines data

Since 1990, the number of foreign-born residents has almost quadrupled in Des Moines. In 1990, 6,042, or 3.1 percent, of the population of Des Moines were foreign-born. That amount doubled in 2000 to 15,717, or 7.1 percent. The current number of foreign-born citizens is estimated at 22,797, or 11.1 percent, of the Des Moines population. Correspondingly, the number of people with limited English proficiency has also increased from 4,614 in 1990 to 15,730 people currently (US Census Bureau, as presented by US Dept. of Housing and Urban Development, 2018).

The largest foreign-born or immigrant group in Des Moines and the region is the Mexican population. Approximately 8,164, or 4.3 percent, of Des Moines residents indicate their national origin is Mexico.

The next largest group of immigrants is from the adjacent Asian countries of Vietnam and Laos. Together, this population equals 3,345 residents, or 1.77 percent of the total population, in Des Moines. Most of the Des Moines residents who identify Vietnam or Laos as their national origin arrived in Iowa in the 1970s and 1980s.

The third largest immigrant population identifies their national origin as Bosnia and Herzegovina. There are 1,023 residents in Des Moines.

The remaining immigrant groups in Des Moines—Salvadorans, Sudanese, Liberians, Thai, and Burmese—have less than 1,000 immigrants from each group settled in Des Moines. In the last decade, most refugees who have resettled in Des Moines are from eastern Africa. Between 2015 and 2016, 3 refugees arrived from Burundi, 109 from the Democratic Republic of the Congo, 14 from Eritrea, 6 from Ethiopia, and 39 from Somalia (The Directors Council and State Public Policy Group, April 2017).

West Des Moines data

Data of the foreign-born population from the 2010 Census was not available for West Des Moines separately from the region. More recent data had some reliability concerns due to the sample size of the population. As a result, it is not included in the analysis.

Regional data

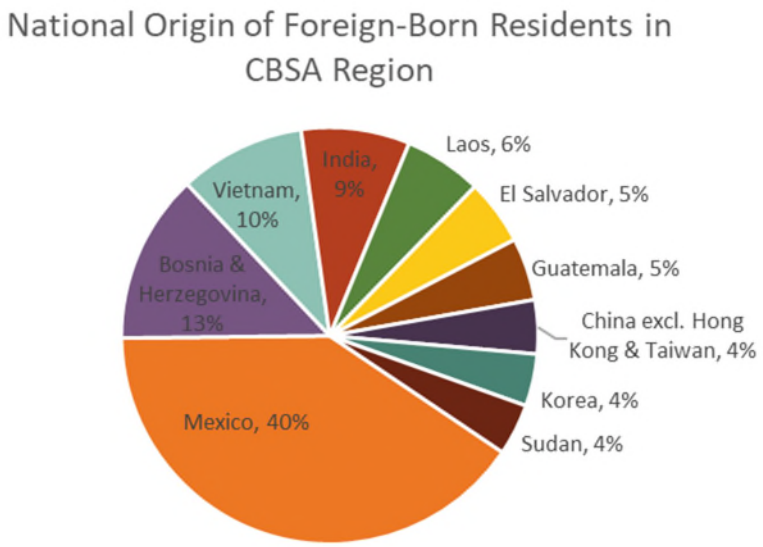
The region experienced a steady increase in foreign-born residents in the last 25 years. The foreign-born population increased from 2.0 percent, or 8,433, in 1990 to 7.5 percent, or 42,916, currently (US Census Bureau, as presented by US Dept. of Housing and Urban Development, 2018).

Similar to Des Moines, the region's top three foreign-born residents include those from the areas of Mexico, Bosnia or Herzegovina, and southeast Asia. In contrast, the region has a significant Indian population, more than 2,300 residents, as well.

Polk County has double the population of Mexican immigrants than any other county in Iowa. Polk County has approximately 9,800 Mexicans, whereas the next highest is in Woodbury County where Sioux City is located with 4,900. (Zong, 2018)

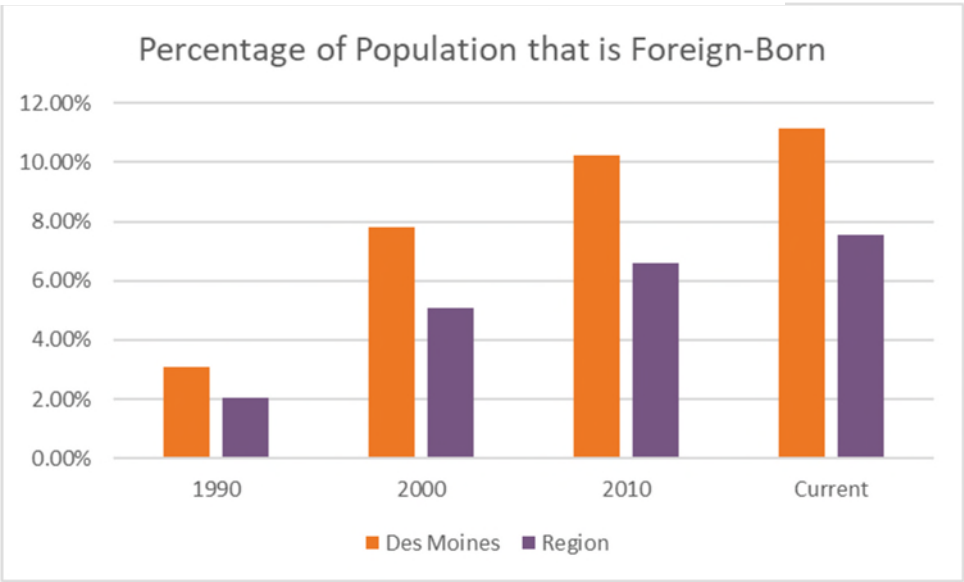
Although the five-county CBSA region has a higher number of foreign-born population (42,916) compared to Des Moines (22,797), the chart below shows Des Moines has a higher proportion of foreign-born residents when comparing percentages. See maps on next page for foreign-born and limited-English speaking populations.

Figure 39: National Origin of Foreign-born Residents in CBSA



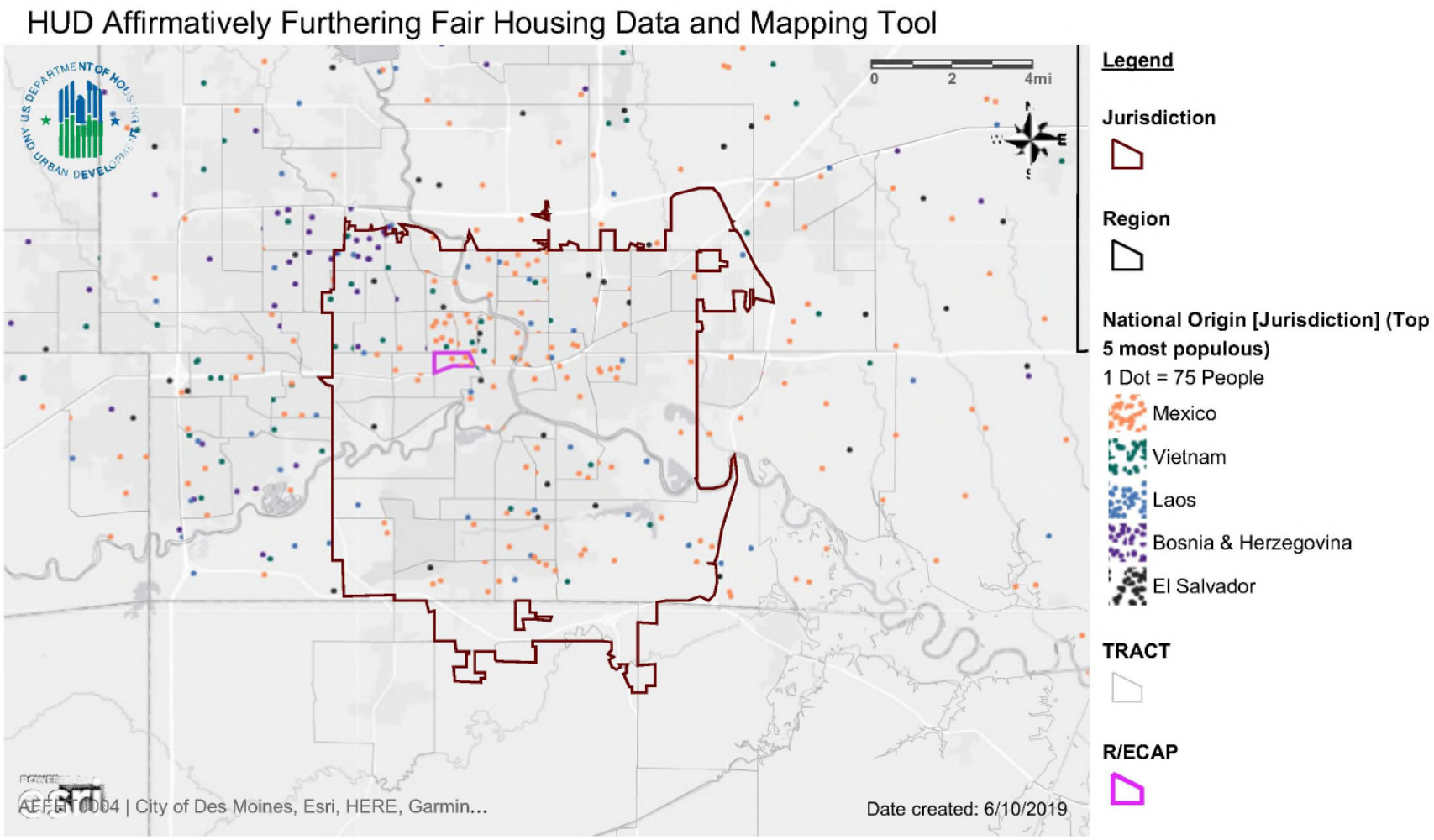
Source: Decennial Census, 2010; per HUD AFFH Tool, version 0004

Figure 40: Percentage of Population that is Foreign-born



Source: Decennial Census, 1990, 2000, & 2010; per HUD AFFH Tool, version 0004

Figure 41: National Origin Map for Des Moines



Name: Map 3 - National Origin

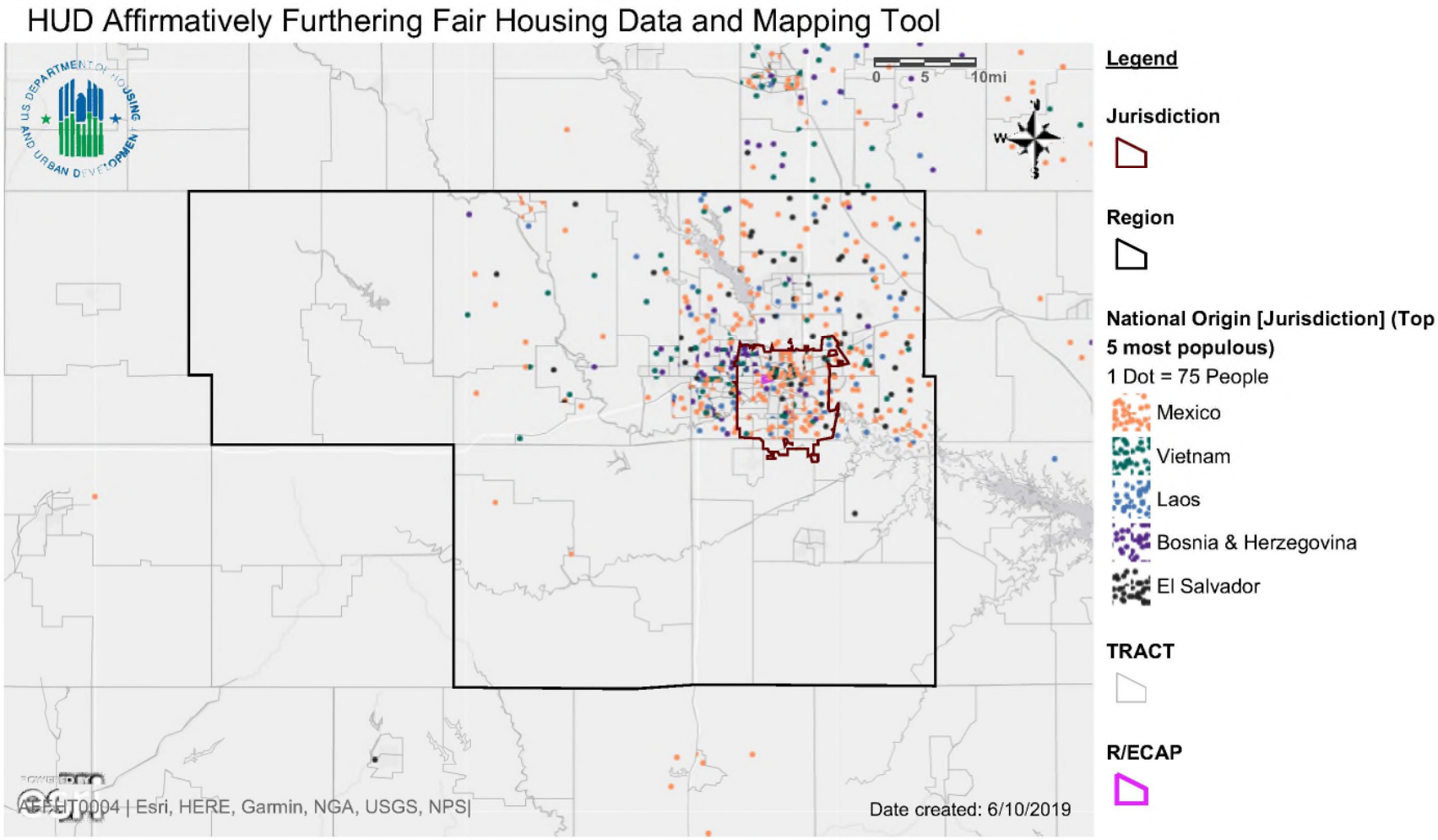
Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Des Moines (CDBG, HOME, ESG)

Region: Des Moines-West Des Moines, IA

HUD-Provided Data Version: AFFHT0004

Figure 42: National Origin Map for Region



Name: Map 3 - National Origin

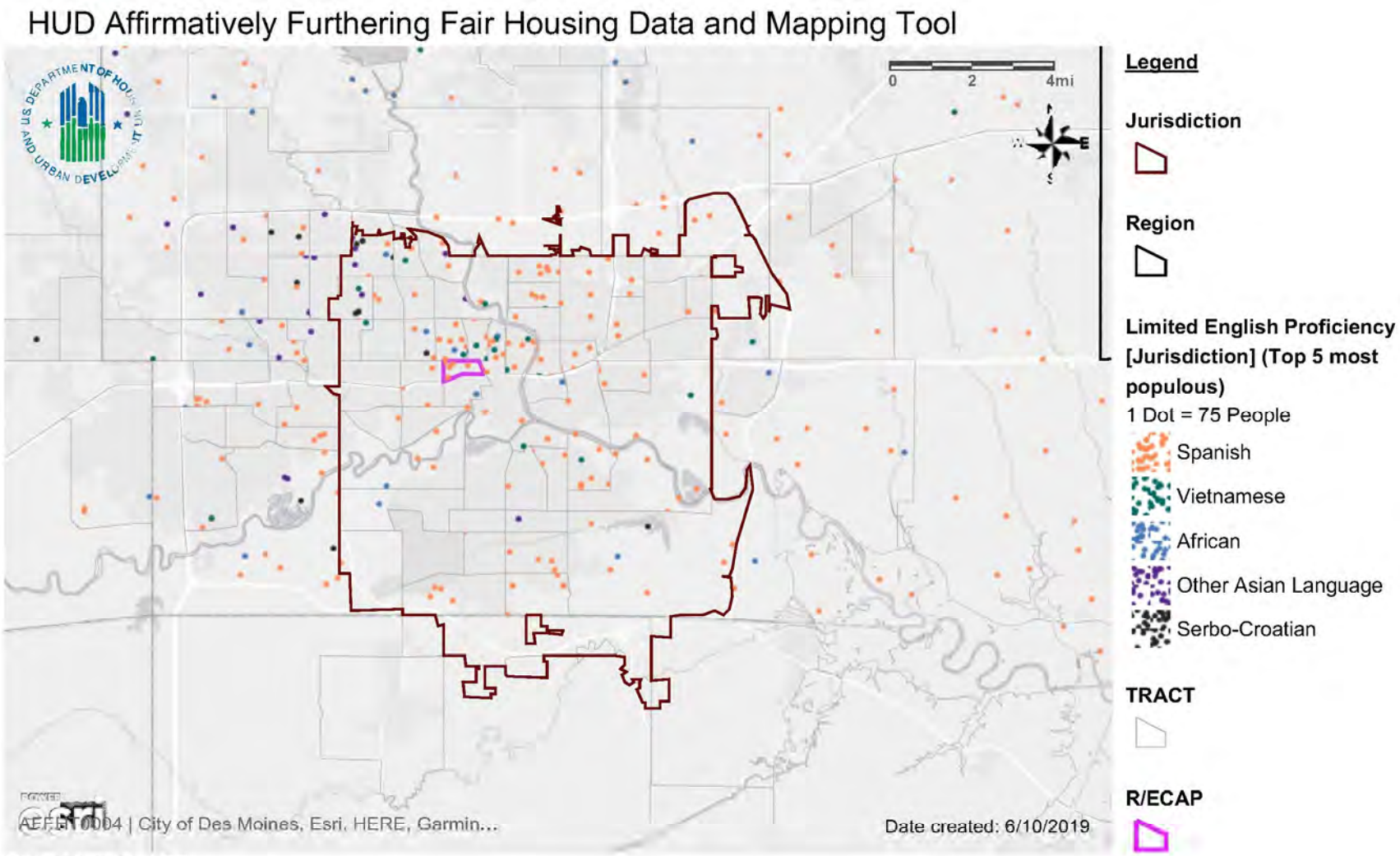
Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Des Moines (CDBG, HOME, ESG)

Region: Des Moines-West Des Moines, IA

HUD-Provided Data Version: AFFHT0004

Figure 43: Limited-English Proficiency Map for Des Moines



Name: Map 4 - LEP

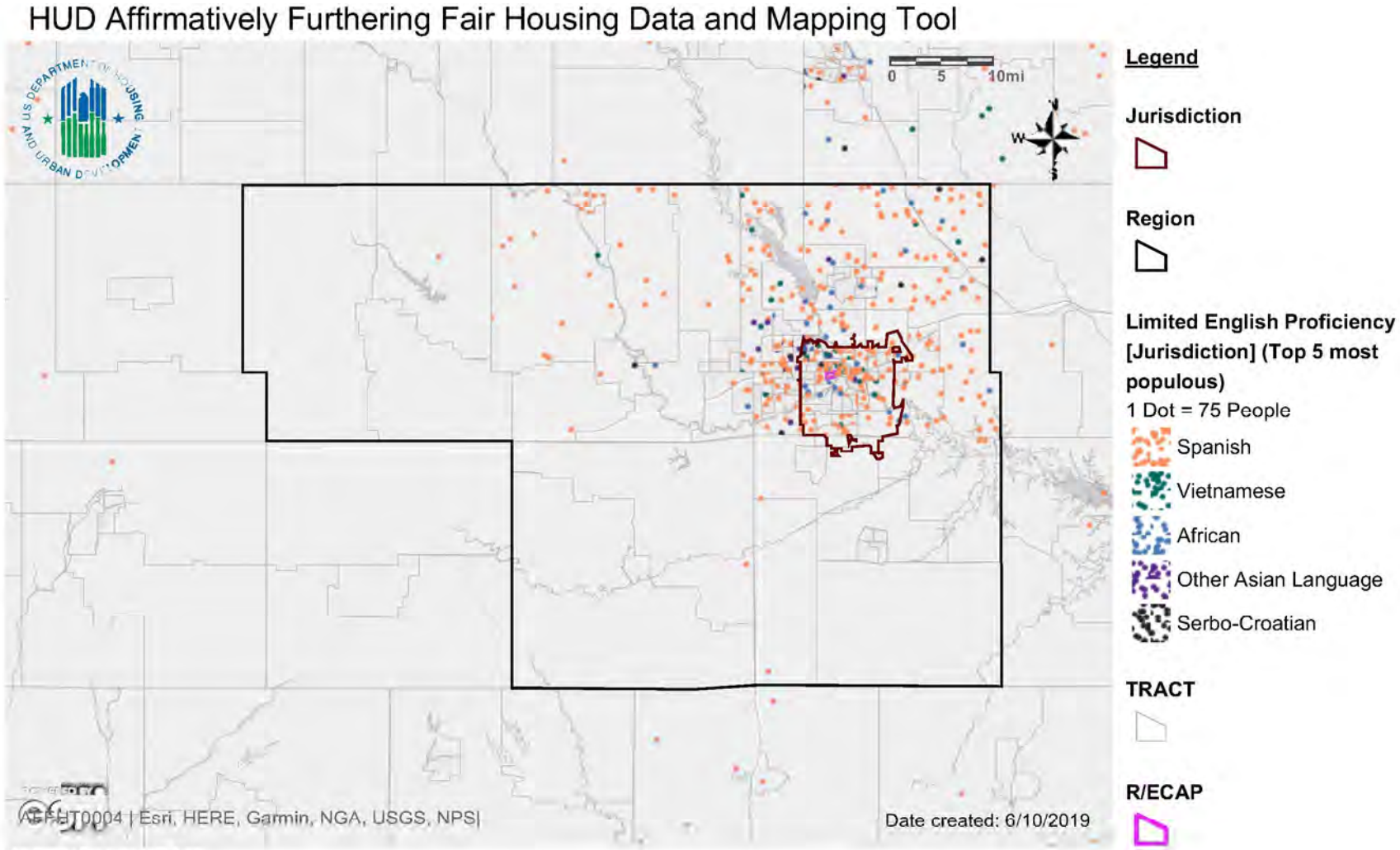
Description: LEP persons (5 most commonly used languages) for Jurisdiction and Region with R/ECAPs

Jurisdiction: Des Moines (CDBG, HOME, ESG)

Region: Des Moines-West Des Moines, IA

HUD-Provided Data Version: AFFHT0004

Figure 44: Limited-English Proficiency Map for Region



Name: Map 4 - LEP

Description: LEP persons (5 most commonly used languages) for Jurisdiction and Region with R/ECAPs

Jurisdiction: Des Moines (CDBG, HOME, ESG)

Region: Des Moines-West Des Moines, IA

HUD-Provided Data Version: AFFHT0004

Barriers and Solutions

Barriers identified for foreign-born residents and those with limited-English proficiency include:

- Unfamiliarity of cultural norms, especially between landlords and tenants,
- Lack of translation services causing inaccessibility of government services, and
- Economic challenges.

Unfamiliarity of cultural norms, especially between landlords and tenants

Barriers: Cultural differences occur at a micro-level, with changing norms from household to household. Those differences also exist on a more expansive level when foreign-born and native residents interact and live near each other. Native residents have lifestyle practices that have been learned and developed over the course of their entire lives. When foreign-born residents bring their lifestyle practices from areas across the world, they do not always easily align Central Iowa, Midwestern, or American habits. When foreign-born residents establish their family in Central Iowa, they are expected to first understand the cultural differences, drop their life-learned practices to adapt to their new home, often learn a new language, and then find housing and a job, often within a three- to six-month period before any assistance expires in the case of refugees.

Being aware of local cultural norms is often a system of trial and error for foreign-born residents. In housing, lack of cultural knowledge, whether from the tenant or landlord perspective, can lead to escalated results, such as eviction, when simpler solutions may have been available with a little cultural sensitivity.

For example, appliances may function differently and have different maintenance requirements than what a new resident to Iowa may be used to. In their previous home, they may not have encountered or needed certain appliances or housing systems, such as how to turn off a water supply, that require knowledge many first-time homeowners may not understand, whether they are or are not native and English speaking. Different methods of food storage may also cause pest problems in an apartment in Des Moines that would have been acceptable in another context. Nonverbal methods of communication, such as how close someone stands while talking, may have different meanings from one culture to another.

Solutions: Education is the best method to combat misunderstanding. Program participants and their community partners--such as US Committee for Refugees and Immigrants, Catholic Charities, Refugee Alliance of Central Iowa, civil and human rights commissions—should continue **to produce educational materials in multiple languages to foreign-born about their rights as tenants, especially more graphical flyers**. The Polk County Housing Trust Fund should continue to hold landlord education forums.

Lack of translation services causing inaccessibility of government services

Barriers: Another issue that may unnecessarily escalate a housing issue is speaking different languages, a lack of paid translators, and inefficient translation services. It is estimated that between 30 and 50 languages spoken in Central Iowa. Within some languages are different dialects that may make translation more challenging. Acclimating to a completely new country, which may be due a life-threatening reason, is stressful. Not being able to fully understand the language adds another layer of stress.

Solutions: Program participants should continue to explore methods that allow for easier communication between limited- or non-English speakers and English speakers. When possible, **forms and program participant material should be translated into multiple languages.** Additionally, the Language Line posters or information should be easily accessible and known by program participant staff. On the City of Des Moines web site, the

language options for the web site should already be translated rather than the English versions of the language option or have an icon indicating the flag of the country where the language is prominent.

3. Disabled, Physically or Mentally; Older Adults

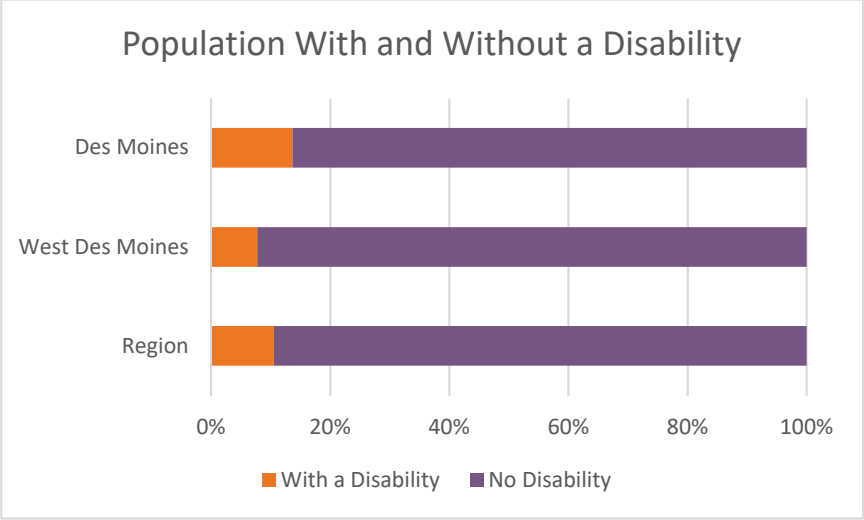
This section will analyze disabled individuals' access to appropriate housing. The term "disability" means:

1. A physical or mental impairment that substantially limits one or more major life activities of such individual;
2. A record of such an impairment; or
3. Being regarded as having such an impairment.

Disability types included with this analysis are ambulatory disability, self-care disability, independent living disability. Also considered are hearing, vision, and cognitive disabilities.

The Fair Housing Act, Section 504 of the 1973 Rehabilitation Act, and the Americans with Disabilities Act contain mandates related to integrated settings for persons with disabilities. Integrated settings are those that enable individuals with disabilities to live and interact with individuals without disabilities to the greatest extent possible and receive the healthcare and supportive services from the provider of their choice.

Figure 45: Population with and without a Disability



Source: 2013-2017 American Community Survey

Des Moines data

According to the US Census Bureau's 2013-2017 American Community Survey, 13.7 percent of Des Moines residents have a disability. The most common disability is ambulatory, meaning difficulty moving around or walking. Almost one-half, or 48.6 percent, of those who are disabled have an ambulatory disability. The next most frequent is a cognitive disability affecting 42.3 percent.

West Des Moines data

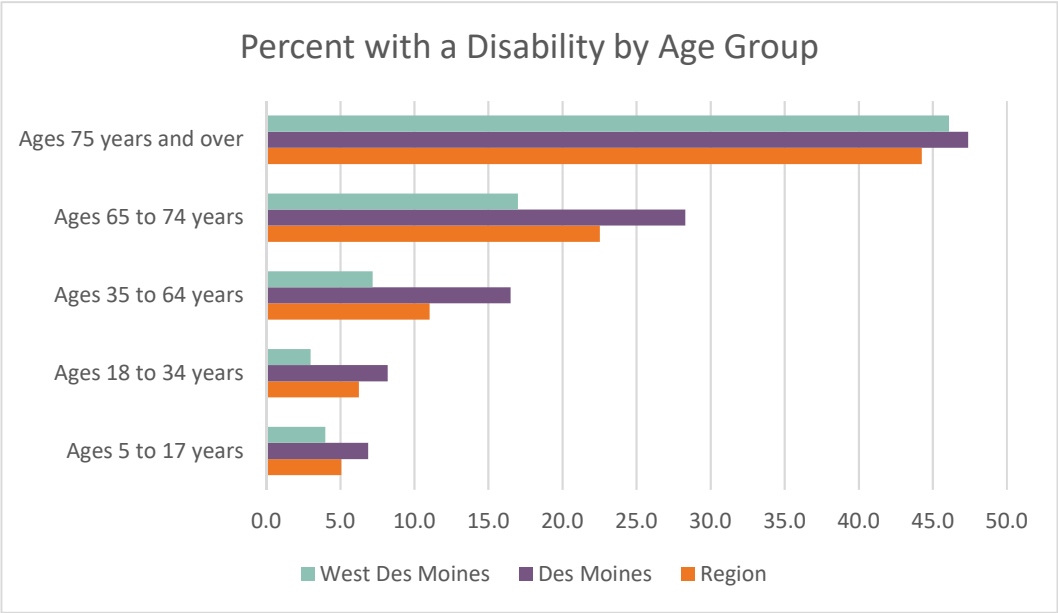
West Des Moines has almost half the amount of disabled as Des Moines—approximately 7.8 percent of the residents have a disability. The most common disability, which affects 47.4 percent of the disabled population, in West Des Moines is ambulatory. The next most common is a cognitive disability and affects 35.8 percent of the disabled population.

Regional data

In the five-county region, 10.5 percent of residents have a disability. Similar to Des Moines and West Des Moines, the most common disability is ambulatory at 47.0 percent, and the second most is cognitive affecting 37.8 percent of the population.

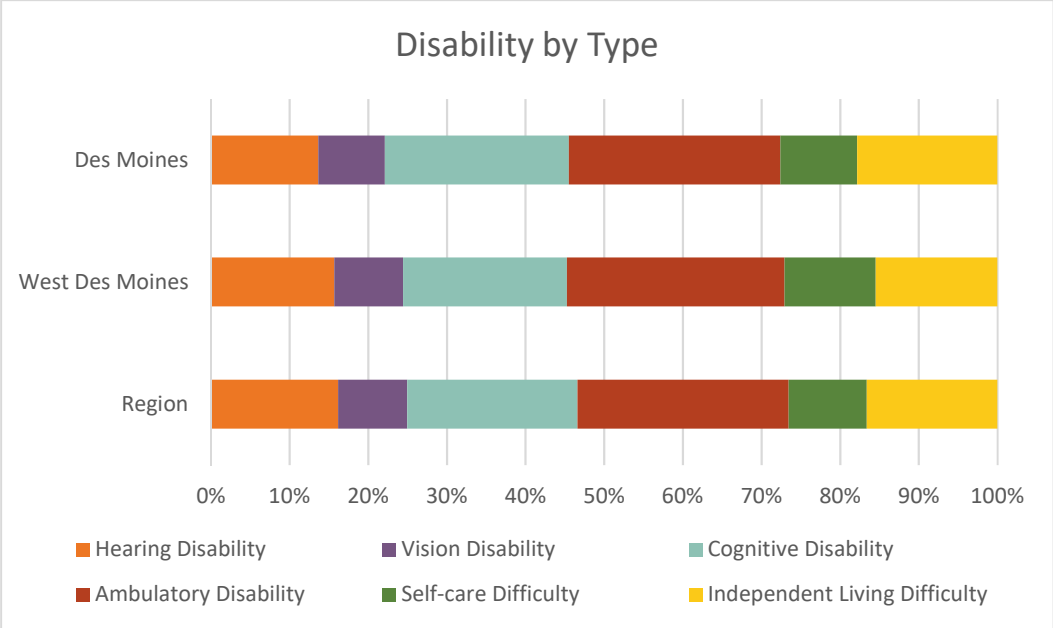
In all areas—Des Moines, West Des Moines, and the region—the age group most likely to have a disability are those 75 years and older. Almost half of residents in any area who are 75 and older have a disability. See charts for breakdown of primary disability types and percent of those with a disability by age group.

Figure 46: Disability by Age Group



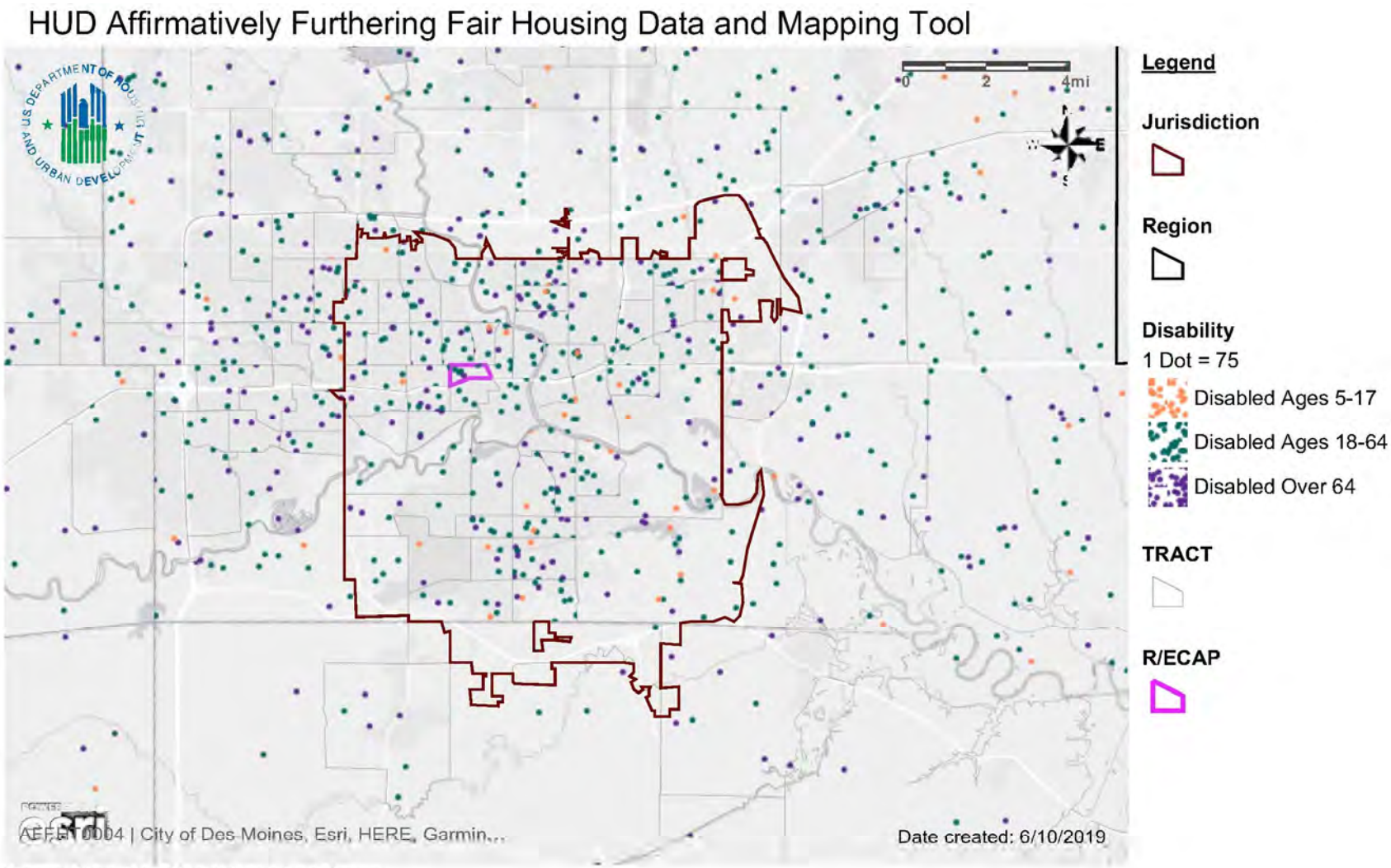
Source: 2013-2017 American Community Survey

Figure 47: Disability by Type



Source: 2013-2017 American Community Survey

Figure 48: Disability by Age for Des Moines



Name: Map 15 - Disability by Age Group

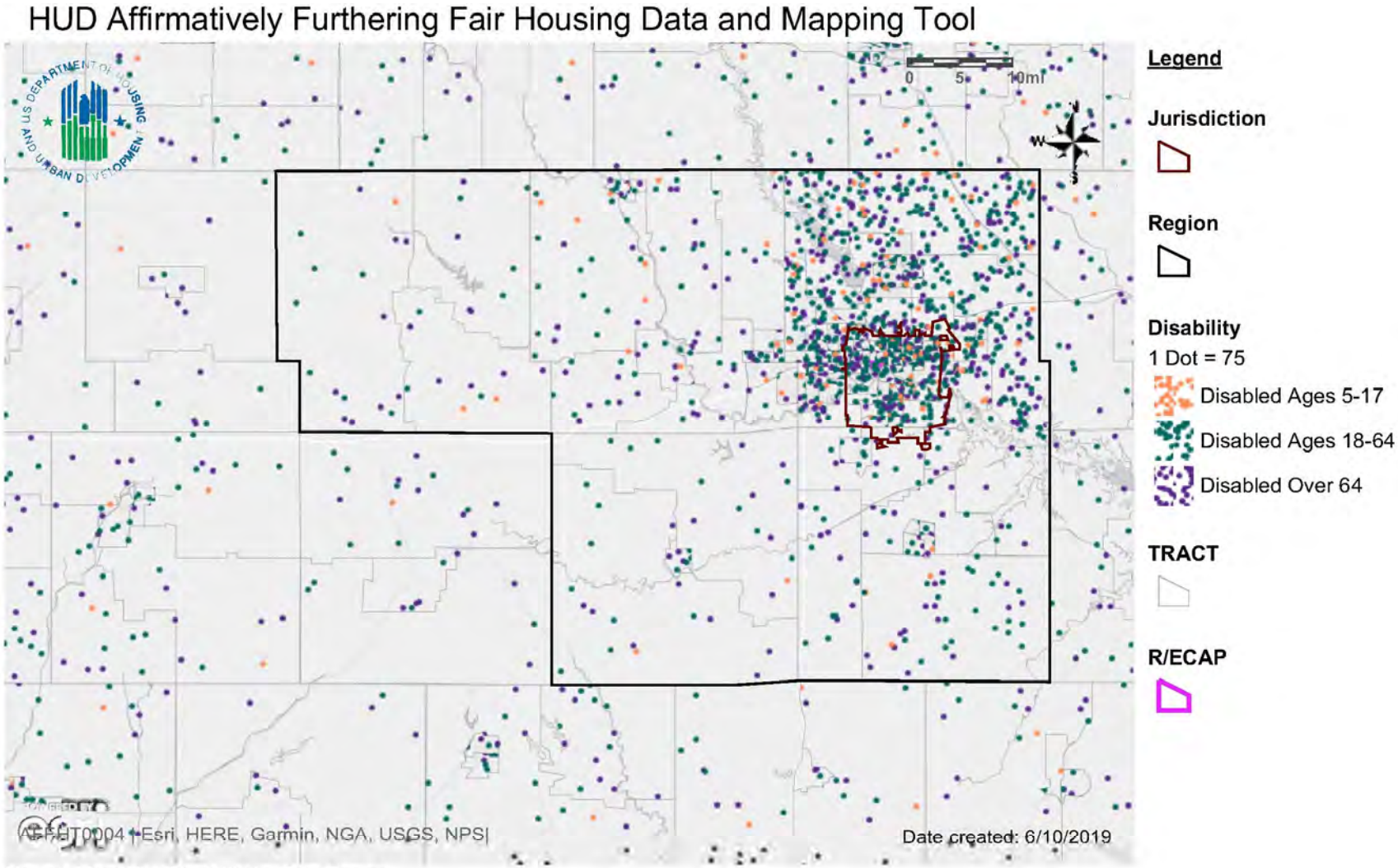
Description: All persons with disabilities by age range (5-17)(18-64)(65+) with R/ECAPs

Jurisdiction: Des Moines (CDBG, HOME, ESG)

Region: Des Moines-West Des Moines, IA

HUD-Provided Data Version: AFFHT0004

Figure 49: Disability by Age for Region



Name: Map 15 - Disability by Age Group

Description: All persons with disabilities by age range (5-17)(18-64)(65+) with R/ECAPs

Jurisdiction: Des Moines (CDBG, HOME, ESG)

Region: Des Moines-West Des Moines, IA

HUD-Provided Data Version: AFFHT0004

Barriers and Solutions

Barriers for disabled individuals include:

- Low incomes,
- Lack of affordable, accessible units, and
- Knowledge of fair housing rights when housing disabled individuals.

Low income

Barriers: The median earnings in 2015 for Iowans age 16 and over with disabilities was $20,687, compared to the median earning for Iowans age 16 and over without disabilities was $33,565 (State Data Center: Publications, 2019). This means the average disabled person receives $1,724 a month. If housing is affordable at 30 percent or less of income, then a person would need to pay $517 or less per month, or less than $6,206 per year, toward housing expenses including utilities. In 2015, fair market rent (FMR) for one-bedroom in the Des Moines-West Des Moines Metropolitan Statistical Area (MSA) was $630, which includes utilities and rent.

Solutions: One solution to overcome income challenges is **to establish lawful source of income as a locally protected class** to ensure income generated from Disability, Social Security, Section 8, Veterans, and other government-funded benefits are required to be accepted for rent payments by law (Des Moines Civil and Human Rights Department, 2018-2019).

Lack of affordable, accessible units

Barriers: Disabled residents, especially those with ambulatory difficulty, have challenges finding housing that meets their physical needs. Examples include larger doorways or zero-entry thresholds that allow for easier wheelchair access (Blumgart, 2018). Altering design to accommodate different needs is often perceived as more expensive and catering to a subset of the population.

> In truth, we're already designing for a subset of the population—people of average height and reach (often male), and the highest sensory abilities. Everyone else has to adapt. …designing with all users in mind minimizes the need for accessible design (Greenhouse, February 2018).

As mentioned previously, a person with disabilities is more likely to have a lower income that may not be enough to obtain most housing. The barriers to housing that occur when being low income are compounded by the lack of accessible and affordable units in the Des Moines-West Des Moines CBSA. Lack of housing choices that fit physical needs and are affordable to fixed incomes is especially difficult to find for those who are disabled and not seniors (under 62 years of age) (Murphy, 2019).

Solutions: To promote more accessible, affordable units, funding organizations and the program participants may want to **give incentives through local competitive grant programs where developers incorporate universal design or accessibility principles in housing projects**. Program participants should evaluate whether to increase the minimum five percent ADA-accessible units in federally funded multi-family projects.

Knowledge of fair housing rights

Barriers: Persons with disabilities are arguably the most inadvertently discriminated against because landlords do not fully understand the rights of the disabled. Some examples of more overt discrimination have included landlords making informal agreements with service providers, creating rules for exiting the building in certain amount of time and then timing a possible tenant, or threatening eviction for having a documented service animal (Disability Rights of Iowa, 2019).

Solutions: To address education, one solution is to require all landlords to participate in **fair housing training as part of the crime-free curriculum every three years as a part of the rental recertification process** in their respective jurisdictions. The Civil and Human Rights Commission, Polk County Housing Trust Fund, Disability Rights Iowa, and other groups should continue to offer training and resource materials to landlords to increase awareness and understanding.

4. Female Head of Household

Des Moines data

The largest household type in Des Moines are non-family households, which are defined by the US Census Bureau as households consisting of a householder living alone (a one-person household) or where the householder shares the home only with people to whom he or she is not related (e.g., a roommate). Forty-two percent of Des Moines households identify as non-family. The next largest household type in Des Moines are married couples, and the third largest type is female head of household. Approximately 28.6 percent of all households have their own children under the age of 18 years old living in the household.

Des Moines has the highest percentage of female heads of household compared to West Des Moines and the region. Approximately 14.7 percent, or 12,375 households, are female head of household with no husband or married partner present. Of those households, 64.4 percent, or 7,979, have children under the age of 18 years old. See Households and Families chart below the regional data in this section (US Census Bureau, as presented by US Dept. of Housing and Urban Development, 2018).

West Des Moines data

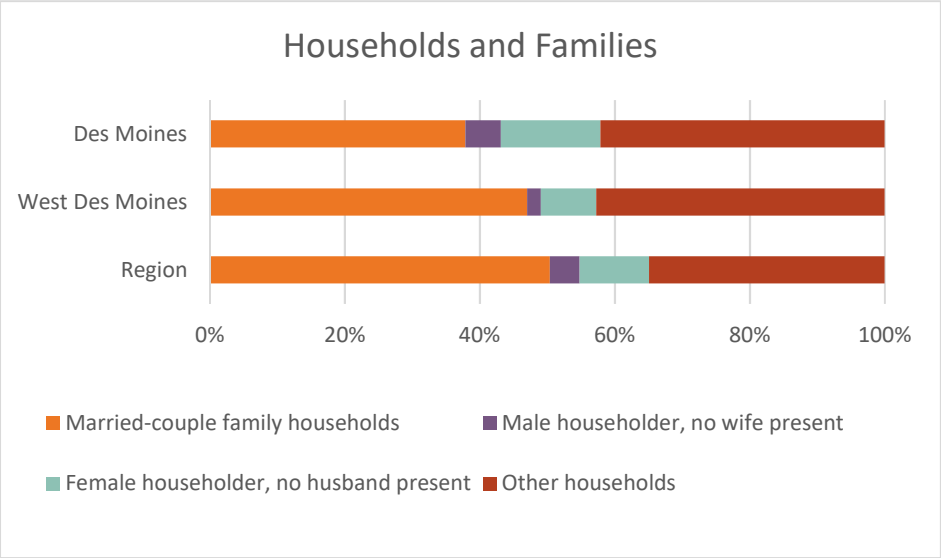
The largest percentage of households in West Des Moines are married couples. Almost half, 46.8 percent of married households have children under 18 years of age. Of all the total households in West Des Moines, 28.8 percent, or 7,879, have their own children under the age of 18 years old living in the household.

Approximately 8.2 percent, or 2,239 households, in West Des Moines are female head of households with no husband or married partner present. The majority, 69.2 percent, have their own children under the age of 18 years old living in the household (US Census Bureau, 2019).

Regional data

The largest household type in the region is married couples, which accounts for 50.4 percent of the total households. The next largest group are non-family households, which comprise 34.9 percent of the total households. Approximately one-third, or 32.2 percent, of regional households have their own children under the age of 18 years old living in the household.

Figure 50: Households and Family Types



Source: 2013-2017 American Community Survey

Ten percent, or just under 24,860, of the region's households are female head of household (US Census Bureau, 2019). More than 28 percent of Polk County's African American and African households are headed by a single female. In comparison, just over 11 percent of Polk County's total households are headed by a single female (The Directors Council and State Public Policy Group, April 2017).

Barriers and Solutions

Prominent housing barriers to female head of households include:

- Financial strain,
- Eviction history,
- Transportation, and
- Lack of resources, especially for mothers over 25 years old.

Financial strain

Barriers: Financial strain, either caused by having a single-income household or additional expenses from having children, was a reoccurring theme when evaluating housing barriers for female head of households. Families typically need larger units with more than two bedrooms. As demonstrated in multiple reports, Des Moines, West Des Moines, and Central Iowa have a shortage of affordable housing. The affordable housing problem is further exacerbated for people who have a single earner and need larger units. Often, a female head of household may not have enough income to obtain a unit because landlords expect a deposit that is 2 to 3 times the monthly rent (Murphy, 2019).

Adding to a household's financial strain is "the cliff effect" for childcare and other assistance programs. Many government programs, including the Child Care Assistance program, have clear income thresholds as to who does and does not qualify for the program. Most government subsidy program do not have smooth transitions between incremental income levels; they are more of a binary "eligible" or "not eligible."

In instances where a parent may receive a modest raise or promotion, the small increase in income may make them ineligible for a program such as Child Care Assistance, but the income increase is not proportionate to the new expenses to a household when exiting an assistance program. Hence, the household experiences a drop or "cliff" in its expendable income. The income eligibility threshold "creates a huge disincentive for parents to advance toward jobs that pay a financially self-sufficient wage." (United Way DSM, 2019) For example, a single mother who works full-time up to $11.10 per hour and has one child is eligible for as much as $5,245 per year in Child Care Assistance; however, if she earns just a nickel an hour more, she would lose her eligibility altogether.

Solutions: Program participants should encourage **development of larger affordable units with three or more bedrooms** when providing government subsidy or financial assistance to projects. Building larger units should be

done in combination with adding lawful source of income as a locally protected class so that there are more larger units available and families are able to access them.

Eviction history and credit

Barriers: Within the same vein of the financial strain barrier is eviction history and its effect on credit when trying to obtain housing. Evictions caused by an inability to pay rent are a main barrier for female householders. Evictions often spiral to cause more hardship; a past eviction makes housing difficult to find, which forces families to accept whatever housing they can get. Those housing conditions are often substandard and poorly maintained (Murphy, 2019).

Solutions: There should be better resources for mothers of all ages, especially those above 25 years old. Many resources are targeted to younger mothers, which is important, but neglect mothers older than 25 years old. Resources to help with children, such as removing the childcare assistance cliff or access to childcare, would help female head of households maintain stability, employment and income, and as a result, housing. Resources to maintain income during maternity leave would also be helpful.

Transportation

Barriers: As mentioned above, female head of households often need larger units. Many turn to renting single-family homes that are usually larger and allow more flexibility in living space than multi-family units. However, in exchange for size and flexibility, they often sacrifice other amenities, such as access to transportation. Most single-family homes are within subdivisions and lower density residential neighborhoods. Transit lines are placed in areas with high ridership, which are usually denser commercial corridors. Because larger housing units are located within residential neighborhoods, the units that accommodate larger families are not near bus lines.

Solutions: When developing housing units, **program participants should consider proximity to transit lines and other mobility options.** This would help to increase accessibility and reduce transportation costs for large households.

5. Lesbian, Gay, Bisexual, Transgender, or Queer/Questioning (LGBTQ)

Reliable data broken down by cities or counties for the LGBTQ community was unavailable at the time of this analysis.

Data

Approximately 3.6 percent of Iowans identify as LGBTQ. Across the United States, 4.5 percent of people identify as LGBTQ, and compared to other states, Iowa is in the lowest quartile for LGBTQ population by percentage. Twenty-seven percent of the LGBTQ community in Iowa have children (UCLA School of Law Williams Institute, 2019).

Barriers and Solutions

Bias

Barriers: The Iowa Supreme Court granted marriage equality on April 3, 2009; however, bias against the LGBTQ community can be found across the United States and Iowa. Research from the UCLA School of Law Williams Institute has shown that LGBT people are subject to more prejudice and discrimination in areas such as employment, education, housing, and public accommodations more than heterosexual people. For example, 41 percent of LGB people said they were often bullied before age 18, compared to 14 percent of heterosexual people.

More specifically related to fair housing, approximately 16 percent of LGBTQ in Des Moines and Polk County have been evicted from housing (Polk County Housing Trust Fund, 2019). Nationally, 15 percent of LGB people are prevented from moving into or buying a house or apartment compared to approximately 6 percent of cisgender heterosexuals are prevented from moving into or buying a house or apartment (Meyer, 2019).

Solutions: One solution is to **continue to educate landlords and tenants about their rights**. For the training related to the LGBTQ community, this includes inclusivity training and education, especially about not making assumptions and to model clients language about their identity and sexual preferences.

Fear of reporting and lack of reliable data

Barriers: Gender identity and sexual preference are extremely personal concepts. Even though there may be some data available about how many people identify under the LGBTQ term, many may choose to refrain from public identification of these terms due to fear of discrimination or violence. In listening sessions conducted by the Des Moines Civil and Human Rights Department, residents indicated they were "distrustful of city and its intentions" and desired more visible support. Many LGBTQ residents are reluctant to file complaints due to staff's lack of knowledge about these issues or a fear of impact on their personal lives (Des Moines Civil and Human Rights Department, 2018-2019). As a result, data or information about the LGBTQ community that would help shape policy decisions may be incomplete.

Solutions: The program participants and partners should **continue to be openly supportive of the LGBTQ community**. Open support from public groups such as local governments may help reduce bias and fear or prejudice. As a result, this may empower more LGBTQ people to be more publicly open about their identity, which would help with more reliable to data and informing policy.

One example of support was establishing the Lesbian, Gay, Bisexual, Transgender Advisory Council (LGBTAC), which is a subcommittee of the City of Des Moines Civil and Human Rights Department, in 2017. The council raises awareness, educates, and advocates for the civil rights of lesbian, gay, bisexual, transgender, and queer residents and visitors of Des Moines to ensure the city's department and services are fair and inclusive. Their focus includes housing, employment, city services, and public accommodations. The LGBTAC recommendations have included

LGBTQ-specific promotional materials for the Des Moines Civil and Human Rights Commission, LGBTQ inclusivity trainings for staff, and modify building codes to require single-stall restrooms be gender-inclusive (Des Moines Civil and Human Rights Department, 2018-2019).

6. Formerly Incarcerated

Reliable data broken down by cities and counties for the formerly incarcerated was unavailable at the time of this analysis.

Data

For Dallas, Guthrie, Madison, and Polk Counties, incarcerated Black and Latino populations are disproportionately higher than White representation. Reliable data for racial or ethnic disparities was unavailable for Warren County. The counties range 1.5 to 7.8 to 1 ratio of over-representation between incarcerated Blacks or Latinos and Blacks or Latinos in the surrounding county, meaning that the portion of the prison that is Black or Latino is at least 1.5 to 7.8 times larger than the portion of the surrounding county that is Black or Latino (Kopf, 2015).

Barriers and Solutions

Barriers: Nearly one-third of US adults have a criminal record of some degree, and the United States has the largest prison population in the world. Ninety-five percent of US inmates will be released at some point, and they will need to access housing. Yet, due to having a criminal record, and in some cases, just having an arrest that did not result in a conviction, the criminal record is a barrier to obtaining housing. Across the United States, African Americans and Hispanics are arrested, convicted, and incarcerated at disproportionate rates compared to the general population, which means they are also more likely to experience disparate housing impacts because of having a criminal background (US Department of Housing and Urban Development Office of General Counsel Guidance, 2016).

Solutions: One solution is to **continue to educate landlords and tenants about tenant rights**. Regarding the formerly incarcerated, landlords should know that an arrest record is not a reason to deny housing because an arrest does not establish criminal conduct occurred. Landlords should also know blanket policies prohibiting anyone with a criminal record violates fair housing law.

A blanket policy related to criminal backgrounds should be replaced with tailored policy or practice that only excludes individuals with certain types of convictions that indicate risk to resident safety. The policy should consider how much time has passed since the criminal activity as well. Another tool that may help educate landlords and reduce fair housing issues for the formerly incarcerated is to **provide landlords with sample or template language for their policy during the crime-free multi-housing program curriculum** taught by the City of Des Moines and City of West Des Moines.

One community effort already underway is under United Way of Central Iowa. United Way has created a Re-entry Task Force focused on a coordinated system to help returning citizens transition back to the community. The group hosts re-entry simulations to educate the community about barriers to housing and other basic life needs. The group is also working on a strategic plan to continue to educate the public and find opportunities to help the formerly incarcerated enter back into everyday life with fewer barriers (United Way of Central Iowa, 2019). Additionally, the Evelyn K. Davis Center and United Way are creating a list of landlords who accept formerly incarcerated trying to access housing.

H. Fair Housing Goals and Priorities

Goal Setting

After reviewing available data, reading previous plans, and engaging in community conversations, staff and volunteers on the Fair Housing Outreach Subcommittee created a list of potential goals. Those goals came directly from identified solutions to barriers in the Analysis of Impediments narrative. The Subcommittee members also aligned the barriers mentioned in the narrative to match HUD's language and definitions of contributing factors in the goal matrix on the following pages.

The Subcommittee presented its proposed list of goals to the larger Fair Housing Steering Committee on June 5, 2019. The Steering Committee was tasked with narrowing down the proposed list and pinpointing the most relevant goals and priorities.

Facilitated by ICF consultants, the Steering Committee discussed a list of proposed goals. The goals were discussed one-by-one as a group to determine whether each one was relevant, achievable, measurable, realistic, and manageable. From there, the language and metrics were polished or more defined where possible.

There are nine goals total, and within each goal are several milestones that help measure the goal. All goals and milestones occur over five years, between now and December 31, 2024.

Several goals, although relevant to fair housing and equity issues, were removed from the program participants' responsibilities because they were deemed unmanageable by the program participants. This means either the program participants will have no direct oversight or governance of a goal or task, the goal may be too difficult to measure, or a goal is better suited to be executed by a community partner such as a nonprofit. Examples include goals related to transportation and transit; transportation or transit was a reoccurring concern throughout the Analysis of Impediments. The Des Moines Metropolitan Planning Organization (MPO) and Des Moines Area Regional Transit Authority (DART) have extensive regional planning and implementation efforts to address equity that were not highlighted in this Analysis of Impediments' fair housing goals to avoid duplication. Goals such as these are still considered necessary and included later in this section as "supporting efforts."

Fair Housing Goal Implementation Matrix

The next four pages contain the fair housing goals. The Fair Housing Outreach Subcommittee looked for patterns in the proposed goals, and they decided on four major themes. The themes include:

1. Advance equity with education,
2. Preserve and promote affordable housing,
3. Implement local government policies and practices to encourage social equity and mitigate disparate impacts, and
4. Implement other policies and practices that address disparate impacts.

Each goal has a milestone or metric, and next to each milestone or metric are contributing factors to be addressed by the action. Most of the contributing factors listed are directly identified and defined by HUD. Those definitions can be found in Appendix A and throughout the Analysis of Impediments narrative.

The program participants—City of Des Moines, City of West Des Moines, and Des Moines Municipal Housing Agency (DMMHA)—who are responsible for the goals, are listed at the top of the table. Additional responsible entity details are in an adjacent column for instances where specific departments or community partners may lead an action.

Fair Housing Goal	Metrics or Milestones	Contributing Factors to be Addressed by Goal	Responsible Entity					Timeframe for Achievement
			DSM	WDM	DMMHA	Other	RE Details (if applicable)	
Theme: Advance equity with education								
Goal 1: Encourage fair housing training for elected officials, staff, landlords, etc.[1,2]								
A	Present on lawful source of income as a protected class to leaders from at least five neighboring cities within the Metropolitan Statistical Area (MSA) at a cross-governmental meeting.	●Lack of state or local fair housing laws ●Admissions and occupancy policies and procedures, including preferences in publicly supported housing ●Community opposition	X	X	X	X	●Civil & Human Rights Commissions ●Metropolitan Planning Organization (MPO) Policy Committee ●Mid-Iowa Association of Local Governments (MIALG) ●Metro Advisory Council (MAC)	By June 2020
B	Attach an informational fair housing flyer about tenant rights and landlords resources with 100% of rental recertifications.	●Lack of local private fair housing outreach and enforcement ●Private discrimination	X	X			●Civil & Human Rights Commissions ●Neighborhood Inspections (DSM) ●Building (WDM) divisions	By June 2020
C	Attach an informational, graphical fair housing flyer about tenant rights to 100 tenants.	●Lack of local private fair housing outreach and enforcement ●Private discrimination			X		●Civil & Human Rights Commissions ●Central Iowa Regional Housing Authority (CIRHA) ●Home Opportunities Made Easy, Inc. (HOME, Inc.) ●Iowa Legal Aid	By June 2020
D	Add at least 90 minutes of fair housing training as part of crime-free multi-housing program curriculum for landlords.	●Lack of local private fair housing outreach and enforcement ●Private discrimination	X	X			●Civil & Human Rights Commissions ●Neighborhood Inspections (DSM) ●Building (WDM) divisions	By December 2021
E	Require fair housing training as part of crime-free multi-housing program curriculum for rental certifications.	●Lack of local private fair housing outreach and enforcement ●Private discrimination	X	X			●Civil & Human Rights Commissions ●Neighborhood Inspections (DSM) ●Building (WDM) divisions	By December 2024
Goal 2: Encourage program partners to provide financial literacy and homebuyer education.[2,3]								
A	Certify 15 families or households per year in a HUD-approved homebuyer education and counseling program.	●Lending discrimination	X		X	X	●HOME, Inc. ●GDM Habitat for Humanity	January 1, 2020-December 31, 2024

Fair Housing Goal	Metrics or Milestones	Contributing Factors to be Addressed by Goal	Responsible Entity					Timeframe for Achievement
			DSM	WDM	DMMHA	Other	RE Details (if applicable)	
Theme: Preserve and promote affordable housing								
Goal 3: Encourage development or preservation of affordable housing units in locations that improve health and quality of life.								
A	Review zoning codes to ensure they do not allow housing for vulnerable populations, such as those with physical disabilities or households with small children, in 100-year flood plains and limit similar development in 500-year flood plains.	●Land use and zoning laws ●Location of environmental health hazards ●Deteriorated or abandoned properties	X	X				DSM: December 2019 WDM: June 2021
B	Promote home health initiatives with housing rehabilitation assistance to 500 owner-occupied and 100 rental units per year in Des Moines, West Des Moines, and Polk County.	●Land use and zoning laws ●Location of environmental health hazards ●Deteriorated or abandoned properties ●Lack of private investment in specific neighborhoods	X	X		X	●Polk County Housing Trust Fund (PCHTF) ●Neighborhood Finance Corporation (NFC) ●HOME, Inc. ●Habitat for Humanity ●Polk County Health Services	January 1, 2020-December 31, 2024
C	Discuss potential for a HOME Investment Partnerships Program (HOME) Consortium with other local governments in the region to promote affordable housing in high opportunity areas.	●Lack of regional cooperation ●Community opposition ●Location and type of affordable housing ●Lending practices or access to financial services ●Location of proficient schools		X		X	●Surrounding contiguous local governments such as City of Johnston, Grimes, Urbandale, Clive, Waukee, or Windsor Heights	By December 2024
Goal 4: Encourage development or preservation of affordable housing units with consideration to the needs of protected classes.								
A	Give funding preference to developments with larger affordable units (3 or more bedrooms) to accommodate larger families, such as in female headed households or foreign-born populations.	●Availability of affordable units in a range of sizes ●Location and type of affordable housing	X	X	X			By June 2023
B	Incentivize more 1-4 unit development for households below 60% AMI, with a goal of developing 10 homeownership and 10 rental units per year across Des Moines.	●Availability of affordable units in a range of sizes ●Location and type of affordable housing	X	X				By June 2023
C	Promote universal design and accessibility principles in housing projects by giving funding preference to projects that have accessible units above HUD-funding regulatory threshold.	●Lack of assistance for housing accessibility modifications ●Lack of affordable, accessible housing in a range of unit sizes	X	X	X			By June 2023

Fair Housing Goal	Metrics or Milestones	Contributing Factors to be Addressed by Goal	Responsible Entity					Timeframe for Achievement
			DSM	WDM	DMMHA	Other	RE Details (if applicable)	
Goal 5: Support more service-enriched housing models.								
A	Increase the number of permanent housing units with supportive services for the chronically homeless, those with episodic homelessness, and those at risk.[2]	●Lack of affordable, integrated housing for individuals who need supportive services ●Lack of assistance for transitioning from institutional settings to integrated housing				X	Polk County Continuum of Care (CoC)	January 1, 2020-December 31, 2024
Theme: Implement local government policies and practices to encourage social equity and mitigate disparate impacts								
Goal 6: Establish lawful source of income as a locally protected class.[1]								
A	Approve adding lawful source of income as a locally protected class at City Council meeting.	●Access to financial services ●Admissions and occupancy policies and procedures, including preferences in publicly supported housing ●Community opposition ●Lack of state or local fair housing laws		X			●Civil & Human Rights Commissions ●Community Development Departments	DSM: Completed June 2019 WDM: August 2021
B	Reduce Housing Choice Voucher (HCV) return rate to 10 percent each year.	●Admissions and occupancy policies and procedures, including preferences in publicly supported housing ●Community opposition			X	X	●CIRHA	DSM: August 2019 WDM: August 2021
Goal 7: Improve communication and representation in government staff, boards, and commissions to reflect the diversity of the program participants' demographics.[1,2,3]								
A	Review current staffing and volunteer recruiting practices to identify opportunities that would increase representation.	●Community opposition ●Private discrimination ●Political reluctance ●Inaccessible government facilities or services	X	X	X			Fall 2019
B	Present recommendations or policy changes that advance opportunities for diverse representation on staff, boards, and commissions.	●Community opposition ●Private discrimination ●Political reluctance ●Inaccessible government facilities or services	X	X	X			Summer 2020
C	Assess by city department at least two common documents that should be translated into additional languages and determine the languages most likely to be needed.	●Inaccessible government facilities or services	X	X	X			Fall 2020

Fair Housing Goal	Metrics or Milestones	Contributing Factors to be Addressed by Goal	Responsible Entity					Timeframe for Achievement
			DSM	WDM	DMMHA	Other	RE Details (if applicable)	
D	Per the assessment results mentioned above, translate at least two documents from each department into the appropriate languages.	●Inaccessible government facilities or services	X	X	X			Fall 2021
Goal 8: Address zoning and city codes that limit housing choices.[2]								
A	Review occupancy restrictions to be more flexible for those needing supportive care and assistance.	●Occupancy codes and restrictions ●Regulatory barriers to providing housing and supportive services for persons with disabilities ●Land use and zoning laws ●Location of accessible housing	X	X				DSM: April 2020 WDM: June 2021
B	Draft an inclusionary housing policy and invite other surrounding areas adopt.	●Occupancy codes and restrictions ●Regulatory barriers to providing housing and supportive services for persons with disabilities ●Land use and zoning laws ●Lack of regional cooperation	X	X				DSM: Spring 2020 WDM: Summer 2021 Regional: Summer 2021
Theme: Implement other policies and practices that address disparate impacts								
Goal 9: Promote current and research new creative financing or ownership tools.								
A	Support promotion of non-traditional homeownership programs that work with people to improve their financial base while moving toward homeownership on fair housing information to tenants.	●Access to financial services ●Private discrimination ●Quality of affordable housing information program ●Lending discrimination				X	●HOME, Inc. ●Habitat for Humanity	January 1, 2020-December 31, 2024
B	Research new creative financing or ownership tools to determine at least two tools that can be incorporated into local government practices. Report and present on the potential tools to cross-governmental entities.	●Access to financial services ●Private discrimination ●Quality of affordable housing information program ●Lending discrimination				X	●PCHTF	Fall 2021

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2. City of Des Moines Community Development Department. (2016). PlanDSM, Creating Our Tomorrow: City of Des Moines Comprehensive Plan.
3. The Directors Council and State Public Policy Group. (April 2017). One Economy: Building Opportunity for All.

Supporting Efforts

As previously mentioned, there were more solutions and goals proposed throughout the Analysis of Impediments than appear on the goal implementation matrix. From the narrative and larger list, the Fair Housing Outreach Subcommittee and Steering Committee narrowed their scope to nine goals that were the most relevant, achievable, measurable, realistic, and manageable by the program participants and collaborating partners.

Many of the solutions or goals that were not incorporated into the nine goals outlined in the previous goal implementation matrix are still relevant to fair housing and equity issues, but may be difficult to implement. Implementation challenges may be either because 1) the program participants will have no direct oversight or governance of the goal, 2) the goal may be too difficult to measure or set a metric, or 3) a goal is better suited to be executed by a community partner, such as a nonprofit, rather than local government.

Because these goals are important, they are included here as supporting efforts. Supporting efforts will not be directly tracked or monitored by the City of Des Moines, City of West Des Moines, or Des Moines Municipal Housing Agency, but the program participants may be able to influence or help with the initiatives.

Supporting Efforts	Contributing Factors to be Addressed	Responsible Entity					Timeframe for Achievement
		DSM	WDM	DMMHA	Other	RE Details (if applicable)	
Theme: Advance equity with education							
Supporting effort 1: Encourage other community partners to provide financial literacy; educate more than 100 families, households, or young adults per year.	●Lending discrimination				X	●Financial Capability Network ●Evelyn K Davis Center for Working Families ●NAACP Economic Development Committee	Ongoing
Supporting effort 2: Provide better resources, such as financial literacy and independence, for non-teen mothers, especially those over 25 years old.	●Access to financial services ●Private discrimination ●Quality of affordable housing information program ●Lending discrimination				X	●Non-profit partners	Ongoing
Theme: Implement other policies and practices that address disparate impacts							
Supporting effort 3: Offer incentives to 10 landlords in a pilot program to use more flexibility when reviewing background or credit checks, especially for groups who may have no credit and bad credit such as formerly incarcerated, refugee, young mothers above 25 years of age.	●Private discrimination ●Community opposition	X			X	●Des Moines Civil and Human Rights Commission and partnerships with local landlords	Ongoing
Theme: Improve access to and availability of transportation[1,2,3]							
Supporting effort 4: Encourage multi-modal transportation options.	●Location of accessible housing ●Location of employers ●Inaccessible buildings, sidewalks, pedestrian crossings, or other infrastructure ●Impediments to mobility ●The availability, type, frequency, and reliability of public transpiration ●Access to transportation for persons with disabilities	X	X		X	●MPO ●DART	Ongoing

Supporting Efforts	Contributing Factors to be Addressed	Responsible Entity					Timeframe for Achievement
		DSM	WDM	DMMHA	Other	RE Details (if applicable)	
Supporting effort 6: Encourage transit-oriented development and preserve affordable housing near transit lines.	•Location of accessible housing •Location of employers •Inaccessible buildings, sidewalks, pedestrian crossings, or other infrastructure •Impediments to mobility •The availability, type, frequency, and reliability of public transpiration •Access to transportation for persons with disabilities	X	X		X	•MPO •DART	Ongoing
Supporting effort 7: Increase DART/transit lines, stops, and hubs.	•Location of accessible housing •Location of employers •Inaccessible buildings, sidewalks, pedestrian crossings, or other infrastructure •Impediments to mobility •The availability, type, frequency, and reliability of public transpiration •Access to transportation for persons with disabilities	X	X		X	•MPO •DART	Ongoing
Supporting effort 8: Reduced transit fare for groups with transportation challenges.	•Access to transportation for persons with disabilities •Impediments to mobility •The availability, type, frequency, and reliability of public transpiration	X	X	X	X	•MPO •DART	Ongoing
Supporting effort 9: Expand availability of bicycle and pedestrian friendly facilities,[1] especially those that link to bigger networks like the trails system, in affordable housing developments.	•Lack of private investment in specific neighborhoods •Impediments to mobility	X	X		X	•Affordable housing funders	Ongoing

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2. Des Moines Metropolitan Planning Organization. (2013). The Tomorrow Plan: Partnering for a Greener Greater Des Moines.
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I. Conclusion

The Greater Des Moines Area has many awards and positive rankings to be proud of. Such rankings have included:

- Top 7 Most Recession-Proof Cities in the US — Livability, 2019
- #4 Best Place to Live — US News & World Report, 2018
- #7 Best Place for Business and Careers — Forbes, 2018
- Top 10 Best City for Quality of Life — NerdWallet, 2017
- "World Festival and Event City" — International Festivals and Events Association, 2017
- #1 Minor League Sports Market — SportsBusiness Journal, 2017
- #3 Best Affordable Place to Live in the US -- US News & World Report, 2019
- #8 Best Job Market for 2018 – ZipRecruiter, 2018 (Greater Des Moines Partnership, 2019)

Despite the accolades and awards, there are many residents struggling with inadequate housing, especially as a result of unfair treatment based on biases.

Those who are most impacted by inadequate housing—whether due to excessive costs, substandard conditions, or discriminatory practices that led to unsuitable housing—are people of color and low-income people who live in neighborhoods surrounding the Downtown Des Moines core. Residents of those neighborhoods also have less exposure to opportunity.

After an exhaustive process of interpreting HUD and local data, holding community conversations, obtaining survey responses, and reviewing mapped patterns, the Fair Housing Steering Committee, consisting of program participants City of Des Moines, City of West Des Moines, and Des Moines Municipal Housing Agency in collaboration with the Des Moines Metropolitan Planning Organization, Des Moines Area Regional Transit Authority, Capital Crossroads, Polk County Housing Trust Fund, and the Polk County Continuum of Care came to a consensus about fair housing goals that could be executed in Central Iowa. They included four major themes that include more education, more affordable housing, government practices or other local practices that consider equity issues.

The balance to achieve fair housing choice and access to opportunity has been improving over the last 50 years, but it has not been fully achieved. Although the goals listed previously will not remove all barriers to fair housing, the City of Des Moines, City of West Des Moines, and the Des Moines Municipal Housing Agency with its collaborating partners will unravel some of the longstanding practices that have negatively impacted residents, especially those who are protected classes under fair housing law.

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Appendices

Appendix A: Contributing Factors Definitions from the US Department of Housing and Urban Development

Access to financial services

The term "financial services" refers here to economic services provided by a range of quality organizations that manage money, including credit unions, banks, credit card companies, and insurance companies. These services would also include access to credit financing for mortgages, home equity, and home repair loans. Access to these services includes physical access - often dictated by the location of banks or other physical infrastructure - as well as the ability to obtain credit, insurance or other key financial services. Access may also include equitable treatment in receiving financial services, including equal provision of information and equal access to mortgage modifications. For purposes of this contributing factor, financial services do not include predatory lending including predatory foreclosure practices, storefront check cashing, payday loan services, and similar services. Gaps in banking services can make residents vulnerable to these types of predatory lending practices, and lack of access to quality banking and financial services may jeopardize an individual's credit and the overall sustainability of homeownership and wealth accumulation.

Access to proficient schools for persons with disabilities

Individuals with disabilities may face unique barriers to accessing proficient schools. In some jurisdictions, some school facilities may not be accessible or may only be partially accessible to individuals with different types of disabilities (often these are schools built before the enactment of the ADA or the Rehabilitation Act of 1973). In general, a fully accessible building is a building that complies with all of the ADA's requirements and has no barriers to entry for persons with mobility impairments. It enables students and parents with physical or sensory disabilities to access and use all areas of the building and facilities to the same extent as students and parents without disabilities, enabling students with disabilities to attend classes and interact with students without disabilities to the fullest extent. In contrast, a partially accessible building allows for persons with mobility impairments to enter and exit the building, access all relevant programs, and have use of at least one restroom, but the entire building is not accessible and students or parents with disabilities may not access areas of the facility to the same extent as students and parents without disabilities. In addition, in some instances school policies steer individuals with certain types of disabilities to certain facilities or certain programs or certain programs do not accommodate the disability-related needs of certain students.

Access to publicly supported housing for persons with disabilities

The lack of a sufficient number of accessible units or lack of access to key programs and services poses barriers to individuals with disabilities seeking to live in publicly supported housing. For purposes of this assessment, publicly supported housing refers to housing units that are subsidized by federal, state, or local entities. "Accessible housing" refers to housing that accords individuals with disabilities equal opportunity to use and enjoy a dwelling. The concept of "access" here includes physical access for individuals with different types of disabilities (for example, ramps and other accessibility features for individuals with mobility impairments, visual alarms and signals for individuals who are deaf or hard of hearing, and audio signals, accessible signage, and other accessibility features for individuals who are blind or have low vision), as well as the provision of auxiliary aids and services to provide effective communication for individuals who are deaf or hard of hearing, are blind or have low vision, or individuals who have speech impairments. The concept of "access" here also includes programmatic access, which implicates such policies as application procedures, waitlist procedures, transfer procedures and reasonable accommodation procedures.

Access to transportation for persons with disabilities

Individuals with disabilities may face unique barriers to accessing transportation, including both public and private transportation, such as buses, rail services, taxis, and para-transit. The term "access" in this context includes physical accessibility, policies, physical proximity, cost, safety, reliability, etc. It includes the lack of accessible bus stops, the failure to make audio announcements for persons who are blind or have low vision, and the denial of access to persons with service animals. The absence of or clustering of accessible transportation and other transportation barriers may limit the housing choice of individuals with disabilities.

Admissions and occupancy policies and procedures, including preferences in publicly supported housing

The term "admissions and occupancy policies and procedures" refers here to the policies and procedures used by publicly supported housing providers that affect who lives in the housing, including policies and procedures related to marketing, advertising vacancies, applications, tenant selection, assignment, and maintained or terminated occupancy. Procedures that may relate to fair housing include, but are not limited to:

- Admissions preferences (e.g. residency preference, preferences for local workforce, etc.)
- Application, admissions, and waitlist policies (e.g. in-person application requirements, rules regarding applicant acceptance or rejection of units, waitlist time limitations, first come first serve, waitlist maintenance, etc.)
- Income thresholds for new admissions or for continued eligibility
- Designations of housing developments (or portions of developments) for the elderly and/or persons with disabilities
- Occupancy limits
- Housing providers' policies for processing reasonable accommodations and modifications requests
- Credit or criminal record policies
- Eviction policies and procedures.

The availability of affordable units in a range of sizes

The provision of affordable housing is often important to individuals with certain protected characteristics because groups are disproportionately represented among those who would benefit from low-cost housing. What is "affordable" varies by circumstance, but an often used rule of thumb is that a low- or moderate-income family can afford to rent or buy a decent-quality dwelling without spending more than 30 percent of its income. This contributing factor refers to the availability of units that a low- or moderate-income family could rent or buy, including one bedroom units and multi-bedroom units for larger families. When considering availability, consider transportation costs, school quality, and other important factors in housing choice. Whether affordable units are available with a greater number of bedrooms and in a range of different geographic locations may be a particular barrier facing families with children.

The availability, type, frequency, and reliability of public transportation

Public transportation is shared passenger transport service available for use by the general public, including buses, light rail, and rapid transit. Public transportation includes paratransit services for persons with disabilities. The

availability, type, frequency, and reliability of public transportation affect which households are connected to community assets and economic opportunities. Transportation policies that are premised upon the use of a personal vehicle may impact public transportation. “Availability” as used here includes geographic proximity, cost, safety and accessibility, as well as whether the transportation connects individuals to places they need to go such as jobs, schools, retail establishments, and healthcare. “Type” refers to method of transportation such as bus or rail. “Frequency” refers to the interval at which the transportation runs. “Reliability” includes such factors as an assessment of how often trips are late or delayed, the frequency of outages, and whether the transportation functions in inclement weather.

Community opposition

The opposition of community members to proposed or existing developments—including housing developments, affordable housing, publicly supported housing (including use of housing choice vouchers), multifamily housing, or housing for persons with disabilities—is often referred to as “Not in my Backyard,” or NIMBY-ism. This opposition is often expressed in protests, challenges to land-use requests or zoning waivers or variances, lobbying of decision-making bodies, or even harassment and intimidation. Community opposition can be based on factual concerns (concerns are concrete and not speculative, based on rational, demonstrable evidence, focused on measurable impact on a neighborhood) or can be based on biases (concerns are focused on stereotypes, prejudice, and anxiety about the new residents or the units in which they will live). Community opposition, when successful at blocking housing options, may limit or deny housing choice for individuals with certain protected characteristics.

Deteriorated and abandoned properties

The term “deteriorated and abandoned properties” refers here to residential and commercial properties unoccupied by an owner or a tenant, which are in disrepair, unsafe, or in arrears on real property taxes. Deteriorated and abandoned properties may be signs of a community’s distress and disinvestment and are often associated with crime, increased risk to health and welfare, plunging decreasing property values, and municipal costs. The presence of multiple unused or abandoned properties in a particular neighborhood may have resulted from mortgage or property tax foreclosures. The presence of such properties can raise serious health and safety concerns and may also affect the ability of homeowners with protected characteristics to access opportunity through the accumulation of home equity. Demolition without strategic revitalization and investment can result in further deterioration of already damaged neighborhoods.

Displacement of residents due to economic pressures

The term “displacement” refers here to a resident’s undesired departure from a place where an individual has been living. “Economic pressures” may include, but are not limited to, rising rents, rising property taxes related to home prices, rehabilitation of existing structures, demolition of subsidized housing, loss of affordability restrictions, and public and private investments in neighborhoods. Such pressures can lead to loss of existing affordable housing in areas experiencing rapid economic growth and a resulting loss of access to opportunity assets for lower income families that previously lived there. Where displacement disproportionately affects persons with certain protected characteristic, the displacement of residents due to economic pressures may exacerbate patterns of residential segregation.

Impediments to mobility

The term “impediments to mobility” refers here to barriers faced by individuals and families when attempting to move to a neighborhood or area of their choice, especially integrated areas and areas of opportunity. This refers

to both Housing Choice Vouchers and other public and private housing options. Many factors may impede mobility, including, but not limited to:

- Lack of quality mobility counseling. Mobility counseling is designed to assist families in moving from high-poverty to low-poverty neighborhoods that have greater access to opportunity assets appropriate for each family (e.g. proficient schools for families with children or effective public transportation.). Mobility counseling can include a range of options including, assistance for families for "second moves" after they have accessed stable housing, and ongoing post-move support for families.

- Lack of appropriate payment standards, including exception payment standards to the standard fair market rent (FMR). Because FMRs are generally set at the 40th percentile of the metropolitan-wide rent distribution, some of the most desirable neighborhoods do not have a significant number of units available in the FMR range. Exception payment standards are separate payment standard amounts within the basic range for a designated part of an FMR area. Small areas FMRs, which vary by zip code, may be used in the determination of potential exception payment standard levels to support a greater range of payment standards.

- Jurisdictional fragmentation among multiple providers of publicly supported housing that serve single metropolitan areas and lack of regional cooperation mechanisms, including PHA jurisdictional limitations.

- HCV portability issues that prevent a household from using a housing assistance voucher issued in one jurisdiction when moving to another jurisdiction where the program is administered by a different local PHA.

- Lack of a consolidated waitlist for all assisted housing available in the metropolitan area.

- Discrimination based on source of income, including SSDI, Housing Choice Vouchers, or other tenant-based rental assistance.

Inaccessible buildings, sidewalks, pedestrian crossings, or other infrastructure

Many public buildings, sidewalks, pedestrian crossings, or other infrastructure components are inaccessible to individuals with disabilities including persons with mobility impairments, individuals who are deaf or hard of hearing, and persons who are blind or have low vision. These accessibility issues can limit realistic housing choice for individuals with disabilities. Inaccessibility is often manifest by the lack of curb cuts, lack of ramps, and the lack of audible pedestrian signals. While the Americans with Disabilities Act and related civil rights laws establish accessibility requirements for infrastructure, these laws do not apply everywhere and/or may be inadequately enforced.

Inaccessible government facilities or services

Inaccessible government facilities and services may pose a barrier to fair housing choice for individuals with disabilities by limiting access to important community assets such as public meetings, social services, libraries, and recreational facilities. Note that the concept of accessibility includes both physical access (including to websites and other forms of communication) as well as policies and procedures. While the Americans with Disabilities Act and related civil rights laws require that newly constructed and altered government facilities, as well as programs and services, be accessible to individuals with disabilities, these laws may not apply in all circumstances and/or may be inadequately enforced.

Lack of affordable, accessible housing in a range of unit sizes

What is "affordable" varies by circumstance, but an often used rule of thumb is that a low- or moderate-income family can afford to rent or buy a decent-quality dwelling without spending more than 30 percent of its income. For purposes of this assessment, "accessible housing" refers to housing that accords individuals with disabilities equal opportunity to use and enjoy a dwelling. Characteristics that affect accessibility may include physical accessibility of units and public and common use areas of housing, as well as application procedures, such as first come first serve waitlists, inaccessible websites or other technology, denial of access to individuals with assistance animals, or lack of information about affordable accessible housing. The clustering of affordable, accessible housing with a range of unit sizes may also limit fair housing choice for individuals with disabilities.

Lack of affordable in-home or community-based supportive services

The term "in-home or community-based supportive services" refers here to medical and other supportive services available for targeted populations, such as individuals with mental illnesses, cognitive or developmental disabilities, and/or physical disabilities in their own home or community (as opposed to in institutional settings). Such services include personal care, assistance with housekeeping, transportation, in-home meal service, integrated adult day services and other services (including, but not limited to, medical, social, education, transportation, housing, nutritional, therapeutic, behavioral, psychiatric, nursing, personal care, and respite). They also include assistance with activities of daily living such as bathing, dressing, eating, and using the toilet, shopping, managing money or medications, and various household management activities, such as doing laundry. Public entities must provide services to individuals with disabilities in community settings rather than institutions when: 1) such services are appropriate to the needs of the individual; 2) the affected persons do not oppose community-based treatment; and 3) community-based services can be reasonably accommodated, taking into account the resources available to the public entity and the needs of others who are receiving disability-related services from the entity. Assessing the cost and availability of these services is also an important consideration, including the role of state Medicaid agencies. The outreach of government entities around the availability of community supports to persons with disabilities in institutions may impact these individuals' knowledge of such supports and their ability to transition to community-based settings.

Lack of affordable, integrated housing for individuals who need supportive services

What is "affordable" varies by the circumstances affecting the individual, and includes the cost of housing and services taken together. Integrated housing is housing where individuals with disabilities can live and interact with persons without disabilities to the fullest extent possible. In its 1991 rulemaking implementing Title II of the ADA, the U.S. Department of Justice defined "the most integrated setting appropriate to the needs of qualified individuals with disabilities" as "a setting that enables individuals with disabilities to interact with nondisabled persons to the fullest extent possible." By contrast, segregated settings are occupied exclusively or primarily by individuals with disabilities. Segregated settings sometimes have qualities of an institutional nature, including, but not limited to, regimentation in daily activities, lack of privacy or autonomy, policies limiting visitors, limits on individuals' ability to engage freely in community activities and manage their own activities of daily living, or daytime activities primarily with other individuals with disabilities. For purposes of this tool "supportive services" means medical and other voluntary supportive services available for targeted populations groups, such as individuals with mental illnesses, intellectual or developmental disabilities, and/or physical disabilities, in their own home or community (as opposed to institutional settings). Such services may include personal care, assistance with housekeeping, transportation, in-home meal service, integrated adult day services and other services. They also include assistance with activities of daily living such as bathing, dressing, and using the toilet, shopping, managing money or medications, and various household management activities, such as doing laundry.

Lack of assistance for housing accessibility modifications

The term "housing accessibility modification" refers here to structural changes made to existing premises, occupied or to be occupied by a person with a disability, in order to afford such person full enjoyment and use of the premises. Housing accessibility modifications can include structural changes to interiors and exteriors of dwellings and to common and public use areas. Under the Fair Housing Act, landlords are required by fair housing laws to permit certain reasonable modifications to a housing unit, but are not required to pay for the modification unless the housing provider is a recipient of Federal financial assistance and therefore subject to Section 504 of the Rehabilitation Act or is covered by the Americans with Disabilities Act (in such cases the recipient must pay for the structural modification as a reasonable accommodation for an individual with disabilities). However, the cost of these modifications can be prohibitively expensive. Jurisdictions may consider establishing a modification fund to assist individuals with disabilities in paying for modifications or providing assistance to individuals applying for grants to pay for modifications.

Lack of assistance for transitioning from institutional settings to integrated housing

The integration mandate of the ADA and *Olmstead v. L.C.*, 527 U.S. 581 (1999) (*Olmstead*) compels states to offer community-based health care services and long-term services and supports for individuals with disabilities who can live successfully in housing with access to those services and supports. In practical terms, this means that states must find housing that enables them to assist individuals with disabilities to transition out of institutions and other segregated settings and into the most integrated setting appropriate to the needs of each individual with a disability. A critical consideration in each state is the range of housing options available in the community for individuals with disabilities and whether those options are largely limited to living with other individuals with disabilities, or whether those options include substantial opportunities for individuals with disabilities to live and interact with individuals without disabilities. For further information on the obligation to provide integrated housing opportunities, please refer to HUD's Statement on the Role of Housing in Accomplishing the Goals of *Olmstead*, the U.S. Department of Justice's Statement on *Olmstead* Enforcement, as well as the U.S. Department of Health and Human Services' Centers for Medicare and Medicaid Services final rule and regulations regarding Home and Community-Based Setting requirements. Policies that perpetuate segregation may include: inadequate community-based services; reimbursement and other policies that make needed services unavailable to support individuals with disabilities in mainstream housing; conditioning access to housing on willingness to receive supportive services; incentivizing the development or rehabilitation of segregated settings. Policies or practices that promote community integration may include: the administration of long-term State or locally-funded tenant-based rental assistance programs; applying for funds under the Section 811 Project Rental Assistance Demonstration; implementing special population preferences in the HCV and other programs; incentivizing the development of integrated supportive housing through the LIHTC program; ordinances banning housing discrimination of the basis of source of income; coordination between housing and disability services agencies; increasing the availability of accessible public transportation.

Lack of community revitalization strategies

The term "community revitalization strategies" refers here to realistic planned activities to improve the quality of life in areas that lack public and private investment, services and amenities, have significant deteriorated and abandoned properties, or other indicators of community distress. Revitalization can include a range of activities such as improving housing, attracting private investment, creating jobs, and expanding educational opportunities or providing links to other community assets. Strategies may include such actions as rehabilitating housing; offering economic incentives for housing developers/sponsors, businesses (for commercial and employment opportunities), bankers, and other interested entities that assist in the revitalization effort; and securing financial

resources (public, for-profit, and nonprofit) from sources inside and outside the jurisdiction to fund housing improvements, community facilities and services, and business opportunities in neighborhoods in need of revitalization. When a community is being revitalized, the preservation of affordable housing units can be a strategy to promote integration.

Lack of local private fair housing outreach and enforcement

The term "local private fair housing outreach and enforcement" refers to outreach and enforcement actions by private individuals and organizations, including such actions as fair housing education, conducting testing, bring lawsuits, arranging and implementing settlement agreements. A lack of private enforcement is often the result of a lack of resources or a lack of awareness about rights under fair housing and civil rights laws, which can lead to under-reporting of discrimination, failure to take advantage of remedies under the law, and the continuation of discriminatory practices. Activities to raise awareness may include technical training for housing industry representatives and organizations, education and outreach activities geared to the general public, advocacy campaigns, fair housing testing and enforcement.

Lack of local public fair housing enforcement

The term "local public fair housing enforcement" refers here to enforcement actions by State and local agencies or non-profits charged with enforcing fair housing laws, including testing, lawsuits, settlements, and fair housing audits. A lack of enforcement is a failure to enforce existing requirements under state or local fair housing laws. This may be assessed by reference to the nature, extent, and disposition of housing discrimination complaints filed in the jurisdiction.

Lack of private investment in specific neighborhoods

The term "private investment" refers here to investment by non-governmental entities, such as corporations, financial institutions, individuals, philanthropies, and non-profits, in housing and community development infrastructure. Private investment can be used as a tool to advance fair housing, through innovative strategies such as mixed-use developments, targeted investment, and public-private partnerships. Private investments may include, but are not limited to: housing construction or rehabilitation; investment in businesses; the creation of community amenities, such as recreational facilities and providing social services; and economic development of the neighborhoods that creates jobs and increase access to amenities such as grocery stores, pharmacies, and banks. It should be noted that investment solely in housing construction or rehabilitation in areas that lack other types of investment may perpetuate fair housing issues. While "private investment" may include many types of investment, to achieve fair housing outcomes such investments should be strategic and part of a comprehensive community development strategy.

Lack of public investment in specific neighborhoods, including services or amenities

The term "public investment" refers here to the money government spends on housing and community development, including public facilities, infrastructure, services. Services and amenities refer to services and amenities provided by local or state governments. These services often include sanitation, water, streets, schools, emergency services, social services, parks and transportation. Lack of or disparities in the provision of municipal and state services and amenities have an impact on housing choice and the quality of communities. Inequalities can include, but are not limited to disparity in physical infrastructure (such as whether or not roads are paved or sidewalks are provided and kept up); differences in access to water or sewer lines, trash pickup, or snow plowing. Amenities can include, but are not limited to recreational facilities, libraries, and parks. Variance in the comparative quality and array of municipal and state services across neighborhoods impacts fair housing choice.

Lack of regional cooperation

The term "regional cooperation" refers here to formal networks or coalitions of organizations, people, and entities working together to plan for regional development. Cooperation in regional planning can be a useful approach to coordinate responses to identified fair housing issues and contributing factors because fair housing issues and contributing factors not only cross multiple sectors—including housing, education, transportation, and commercial and economic development—but these issues are often not constrained by political-geographic boundaries. When there are regional patterns in segregation or R/ECAP, access to opportunity, disproportionate housing needs, or the concentration of affordable housing there may be a lack of regional cooperation and fair housing choice may be restricted.

Lack of resources for fair housing agencies and organizations

A lack of resources refers to insufficient resources for public or private organizations to conduct fair housing activities including testing, enforcement, coordination, advocacy, and awareness-raising. Fair housing testing has been particularly effective in advancing fair housing, but is rarely used today because of costs. Testing refers to the use of individuals who, without any bona fide intent to rent or purchase a home, apartment, or other dwelling, pose as prospective buyers or renters of real estate for the purpose of gathering information which may indicate whether a housing provider is complying with fair housing laws. "Resources" as used in this factor can be either public or private funding or other resources. Consider also coordination mechanisms between different enforcement actors.

Lack of state or local fair housing laws

State and local fair housing laws are important to fair housing outcomes. Consider laws that are comparable or "substantially equivalent" to the Fair Housing Act or other relevant federal laws affecting fair housing laws, as well as those that include additional protections. Examples of state and local laws affecting fair housing include legislation banning source of income discrimination, protections for individuals based on sexual orientation, age, survivors of domestic violence, or other characteristics, mandates to construct affordable housing, and site selection policies. Also consider changes to existing State or local fair housing laws, including the proposed repeal or dilution of such legislation.

Land use and zoning laws

The term "land use and zoning laws" generally refers to regulation by State or local government of the use of land and buildings, including regulation of the types of activities that may be conducted, the density at which those activities may be performed, and the size, shape and location of buildings and other structures or amenities. Zoning and land use laws affect housing choice by determining where housing is built, what type of housing is built, who can live in that housing, and the cost and accessibility of the housing. Examples of such laws and policies include, but are not limited to:

- Limits on multi-unit developments, which may include outright bans on multi-unit developments or indirect limits such as height limits and minimum parking requirements.
- Minimum lot sizes, which require residences to be located on a certain minimum sized area of land.
- Occupancy restrictions, which regulate how many persons may occupy a property and, sometimes, the relationship between those persons (refer also to occupancy codes and restrictions for further information).
- Inclusionary zoning practices that mandate or incentivize the creation of affordable units.

- Requirements for special use permits for all multifamily properties or multifamily properties serving individuals with disabilities.

- Growth management ordinances.

Lending Discrimination

The term "lending discrimination" refers here to unequal treatment based on protected class in the receipt of financial services and in residential real estate related transactions. These services and transactions encompass a broad range of transactions, including but not limited to: the making or purchasing of loans or other financial assistance for purchasing, constructing, improving, repairing, or maintaining a dwelling, as well as the selling, brokering, or appraising or residential real estate property. Discrimination in these transaction includes, but is not limited to: refusal to make a mortgage loan or refinance a mortgage loan; refusal to provide information regarding loans or providing unequal information; imposing different terms or conditions on a loan, such as different interest rates, points, or fees; discriminating in appraising property; refusal to purchase a loan or set different terms or conditions for purchasing a loan; discrimination in providing other financial assistance for purchasing, constructing, improving, repairing, or maintaining a dwelling or other financial assistance secured by residential real estate; and discrimination in foreclosures and the maintenance of real estate owned properties.

Location of accessible housing

The location of accessible housing can limit fair housing choice for individuals with disabilities. For purposes of this assessment, accessible housing refers to housing opportunities in which individuals with disabilities have equal opportunity to use and enjoy a dwelling. Characteristics that affect accessibility may include physical accessibility of units and public and common use areas of housing, as well as application procedures, such as first come first serve waitlists, inaccessible websites or other technology, denial of access to individuals with assistance animals, or lack of information about affordable accessible housing. Federal, state, and local laws apply different accessibility requirements to housing. Generally speaking, multifamily housing built in 1991 or later must have accessibility features in units and in public and common use areas for persons with disabilities in accordance with the requirements of the Fair Housing Act. Housing built by recipients of Federal financial assistance or by, on behalf of, or through programs of public entities must have accessibility features in units and in public and common use areas, but the level of accessibility required may differ depending on when the housing was constructed or altered. Single family housing is generally not required to be accessible by Federal law, except accessibility requirements typically apply to housing constructed or operated by a recipient of Federal financial assistance or a public entity. State and local laws differ regarding accessibility requirements. An approximation that may be useful in this assessment is that buildings built before 1992 tend not to be accessible.

Location of employers

The geographic relationship of job centers and large employers to housing, and the linkages between the two (including, in particular, public transportation) are important components of fair housing choice. Include consideration of the type of jobs available, variety of jobs available, job training opportunities, benefits and other key aspects that affect job access.

Location of environmental health hazards

The geographic relationship of environmental health hazards to housing is an important component of fair housing choice. When environmental health hazards are concentrated in particular areas, neighborhood health and safety may be compromised and patterns of segregation entrenched. Relevant factors to consider include the type and number of hazards, the degree of concentration or dispersion, and health effects such as asthma, cancer

clusters, obesity, etc. Additionally, industrial siting policies and incentives for the location of housing may be relevant to this factor.

Location of proficient schools and school assignment policies

The geographic relationship of proficient schools to housing, and the policies that govern attendance, are important components of fair housing choice. The quality of schools is often a major factor in deciding where to live and school quality is also a key component of economic mobility. Relevant factors to consider include whether proficient schools are clustered in a portion of the jurisdiction or region, the range of housing opportunities close to proficient schools, and whether the jurisdiction has policies that enable students to attend a school of choice regardless of place of residence. Policies to consider include, but are not limited to: inter-district transfer programs, limits on how many students from other areas a particular school will accept, and enrollment lotteries that do not provide access for the majority of children.

Location and type of affordable housing

Affordable housing includes, but is not limited to publicly supported housing; however each category of publicly supported housing often serves different income-eligible populations at different levels of affordability. What is "affordable" varies by circumstance, but an often used rule of thumb is that a low- or moderate-income family can afford to rent or buy a decent-quality dwelling without spending more than 30 percent of its income. The location of housing encompasses the current location as well as past siting decisions. The location of affordable housing can limit fair housing choice, especially if the housing is located in segregated areas, R/ECAPs, or areas that lack access to opportunity. The type of housing (whether the housing primarily serves families with children, elderly persons, or persons with disabilities) can also limit housing choice, especially if certain types of affordable housing are located in segregated areas, R/ECAPs, or areas that lack access to opportunity, while other types of affordable housing are not. The provision of affordable housing is often important to individuals with protected characteristics because they are disproportionately represented among those that would benefit from low-cost housing.

Occupancy codes and restrictions

The term "occupancy codes and restrictions" refers here to State and local laws, ordinances, and regulations that regulate who may occupy a property and, sometimes, the relationship between those persons. Standards for occupancy of dwellings and the implication of those standards for persons with certain protected characteristics may affect fair housing choice. Occupancy codes and restrictions include, but are not limited to:

- Occupancy codes with "persons per square foot" standards.
- Occupancy codes with "bedrooms per persons" standards.
- Restrictions on number of unrelated individuals in a definition of "family."
- Restrictions on occupancy to one family in single family housing along with a restricted definition of "family."
- Restrictions that directly or indirectly affect occupancy based on national origin, religion, or any other protected characteristic.
- Restrictions on where voucher holders can live.

Private Discrimination

The term "private discrimination" refers here to discrimination in the private housing market that is illegal under the Fair Housing Act or related civil rights statutes. This may include, but is not limited to, discrimination by landlords, property managers, home sellers, real estate agents, lenders, homeowners' associations, and condominium boards. Some examples of private discrimination include:

- Refusal of housing providers to rent to individuals because of a protected characteristic.
- The provision of disparate terms, conditions, or information related to the sale or rental of a dwelling to individuals with protected characteristics.
- Steering of individuals with protected characteristics by a real estate agent to a particular neighborhood or area at the exclusion of other areas.
- Failure to grant a reasonable accommodation or modification to persons with disabilities.
- Prohibitions, restrictions, or limitations on the presence or activities of children within or around a dwelling.

Useful references for the extent of private discrimination may be number and nature of complaints filed against housing providers in the jurisdiction, testing evidence, and unresolved violations of fair housing and civil rights laws.

Quality of affordable housing information programs

The term "affordable housing information programs" refers here to the provision of information related to affordable housing to potential tenants and organizations that serve potential tenants, including the maintenance, updating, and distribution of the information . This information includes, but is not limited to, listings of affordable housing opportunities or local landlords who accept Housing Choice Vouchers; mobility counseling programs; and community outreach to potential beneficiaries. The quality of such information relates to, but is not limited to:

- How comprehensive the information is (e.g. that the information provided includes a variety of neighborhoods, including those with access to opportunity indicators)
- How up-to-date the information is (e.g. that the publicly supported housing entity is taking active steps to maintain, update and improve the information).
- Pro-active outreach to widen the pool of participating rental housing providers, including both owners of individual residences and larger rental management companies.

Regulatory barriers to providing housing and supportive services for persons with disabilities

Some local governments require special use permits for or place other restrictions on housing and supportive services for persons with disabilities, as opposed to allowing these uses as of right. These requirements sometimes apply to all groups of unrelated individuals living together or to some subset of unrelated individuals. Such restrictions may include, but are not limited to, dispersion requirements or limits on the number of individuals residing together. Because special use permits require specific approval by local bodies, they can enable community opposition to housing for persons with disabilities and lead to difficulty constructing this type of units in areas of opportunity or anywhere at all. Other restrictions that limit fair housing choice include

requirements that life-safety features appropriate for large institutional settings be installed in housing where supportive services are provided to one or more individuals with disabilities. Note that the Fair Housing Act makes it unlawful to utilize land use policies or actions that treat groups of persons with disabilities less favorably than groups of persons without disabilities, to take action against, or deny a permit, for a home because of the disability of individuals who live or would live there, or to refuse to make reasonable accommodations in land use and zoning policies and procedures where such accommodations may be necessary to afford persons or groups of persons with disabilities an equal opportunity to use and enjoy housing.

Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs

The term "siting selection" refers here to the placement of new publicly supported housing developments. Placement of new housing refers to new construction or acquisition with rehabilitation of previously unsubsidized housing. State and local policies, practices, and decisions can significantly affect the location of new publicly supported housing. Local policies, practices, and decisions that may influence where developments are sited include, but are not limited to, local funding approval processes, zoning and land use laws, local approval of LIHTC applications, and donations of land and other municipal contributions. For example, for LIHTC developments, the priorities and requirements set out in the governing Qualified Allocation Plan (QAP) influence where developments are located through significant provisions in QAPs such as local veto or support requirements and criteria and points awarded for project location.

Source of income discrimination

The term "source of income discrimination" refers here to the refusal by a housing provider to accept tenants based on type of income. This type of discrimination often occurs against individuals receiving assistance payments such as Supplemental Security Income (SSI) or other disability income, social security or other retirement income, or tenant-based rental assistance, including Housing Choice Vouchers. Source of income discrimination may significantly limit fair housing choice for individuals with certain protected characteristics. The elimination of source of income discrimination and the acceptance of payment for housing, regardless of source or type of income, increases fair housing choice and access to opportunity.

State or local laws, policies, or practices that discourage individuals with disabilities from being placed in or living in apartments, family homes, and other integrated settings

State and local laws, policies, or practices may discourage individuals with disabilities from moving to or being placed in integrated settings. Such laws, policies, or practices may include medical assistance or social service programs that require individuals to reside in institutional or other segregated settings in order to receive services, a lack of supportive services or affordable, accessible housing, or a lack of access to transportation, education, or jobs that would enable persons with disabilities to live in integrated, community-based settings.

Unresolved violations of fair housing or civil rights law

Unresolved violations of fair housing and civil rights laws include determinations or adjudications of a violation or relevant laws that have not been settled or remedied. This includes determinations of housing discrimination by an agency, court, or Administrative Law Judge; findings of noncompliance by HUD or state or local agencies; and noncompliance with fair housing settlement agreements.

Appendix B: Meetings Dates and Times

Bridging the Gap meetings occurred on:

- Tuesday, May 1, 2018
- Thursday, May 3, 2018
- Friday, May 4, 2018
- Thursday, May 10, 2018
- Monday, May 14, 2018
- Wednesday, May 16, 2018
- Friday, May 18, 2018
- Wednesday, February 20, 2019, 5:15 PM-6:45 PM

PlanDSM meetings occurred on:

- Tuesday, May 5, 2015, 6:00 PM
- Wednesday, May 6, 2015, 11:30 AM
- Tuesday, May 12, 2015, 2:30 PM
- Wednesday, May 13, 2015, 9:00 AM
- Thursday, May 14, 2015, 9:25 AM
- Thursday, May 14, 2015, 6:00 PM
- Friday, May 15, 2015, 7:40 AM
- Tuesday, May 19, 2015 5:30 PM
- Wednesday, May 20, 2015, 4:00 PM
- Thursday, May 21, 2015, 6:00 PM
- Tuesday, May 26, 2015, 6:30 PM
- Thursday, September 24, 2015, 5:30 PM
- Tuesday, September 29, 2015, 5:30 PM
- Wednesday, September 30, 2015, 5:30 PM
- Tuesday, October 6, 2015, 5:30 PM

Appendix C: West Des Moines Housing Needs Survey Questions

Housing and Community Development Survey Questions

1. What is your primary role in the housing industry?
2. [What] items act as barriers to the development or preservation of housing?
3. For any of the barriers you selected above, please describe the barrier and the best way you think we can overcome it.
4. Please share any comments you have about housing needs or barriers.
5. What are ways your area can better address housing challenges?

Employer Survey Questions

1. Please share any comments you have about your employees housing needs.
2. What are the ways the CITY can better address the housing challenges of YOUR employees?

Stakeholder Questions

1. Is there a type of housing the City of West Des Moines is lacking or does not have enough of? Renter or Owner? Price range?
2. Is there a type of housing the City of West Des Moines has too much off? Renter or Owner? Price range?
3. Do you feel any city policies and/or ordinances are hindrances to housing development?
4. Are their policies and/or ordinances the City should adopt to facilitate housing development?
5. What is your definition of affordable housing?
6. What do you think are the City's biggest challenges to meeting the housing demands of its citizens?
7. What do you believe is people's biggest challenge to buying a home?

Developer Questions

1. If you could receive a 25% density bonus for affordable housing, would that be something that would appeal to you? Range is 6.1 – 12.0 – anything over 12.0 dwelling units per acre would have to be affordable up to 15 dwelling units per acre.
2. Is there a type of housing the City of West Des Moines is lacking or does not have enough of? Renter or Owner? Price range?
3. Is there a type of housing the City of West Des Moines Has too much off? Renter or Owner? Price range?
4. Do you feel any city policies and/or ordinances are hindrances to housing development?
5. Are their policies and/or ordinances the City should adopt to facilitate housing development?
6. What is your definition of affordable housing?
7. What do you think are the City's biggest challenges to meeting the housing demands of its citizens?
8. What do you believe is people's biggest challenge to buying a home?

9. Developer – If you could receive a 25% density bonus for affordable housing, would that be something that would appeal to you? Range is 6.1 – 12.0 – anything over 12.0 dwelling units per acre would have to be affordable up to 15 dwelling units per acre.
10. If you had $5 million to put towards affordable housing, what would you do?

Appendix D: Fair Housing Subcommittee Interview Questions

1. Where in Des Moines is your organization located? What areas or neighborhoods do you serve?
2. What specific community (or subpopulation) do you serve?
3. What is the role of your organization in the community? Are there any ongoing projects that you are working on with the community? Are there specific short or long-term goals you are assisting your community to achieve? Are these goals part of a larger plan?
4. How do you normally do outreach or request feedback from members of that community? Have you recently had any meetings with them?
5. Are there other similar organizations you partner with?
6. What are the fair housing issues facing your communities served? What are some other issues/obstacles to housing or opportunity that your population faces?
7. What would need to change in Des Moines to ensure equal access to opportunities for the community you serve? (city policy, housing access, etc.)
8. Have there been any recent legislation or other activities that have disproportionately impacted your community?

Appendix E: Fair Housing Poster

Fair Housing in Central Iowa

EQUAL HOUSING OPPORTUNITY

Have you had difficulty finding housing in Des Moines or in Central Iowa? ***We want to hear from you!***

Please vote by placing a sticker next to a barrier you've faced in your housing search OR write it on a piece of paper and submit.

"I have personally had trouble finding housing because:"

- Lack of affordable choices near what I value (e.g. school, work, parks, etc.)
  (place dots/votes here) _____
- Of bias against my physical characteristic (disability, color, race, etc.)
  (place dots here) _____
- My rent payment was a Section 8 voucher and not accepted
  (place dots here) _____
- Lack of credit history
  (place dots here) _____
- Criminal background check
  (place dots here) _____
- Other reasons (you may also write in reasons on the paper provided and submit)
  (place dots here) _____

Who is protected by fair housing laws?

U.S. Fair Housing Act	Iowa Civil Rights Act
Race	Race
Color	Color
Religion	Religion
Sex	Sex
Familial status	Familial status
National origin	National origin
Having a disability, a type of disability	Disability
	Creed
	Sexual orientation
	Gender identity

Central Iowa Demographic Summary

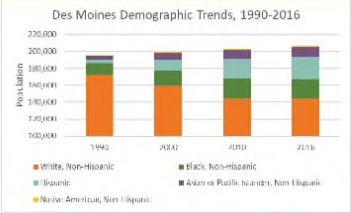
Race or Ethnicity	Des Moines		West Des Moines		Region	
White, Non-Hispanic	146,061	70.8%	50,782	88.3%	476,434	83.6%
Hispanic, all races	24,317	11.8%	3,395	5.5%	38,004	6.7%
Black, Non-Hispanic	20,445	9.9%	2,237	3.6%	26,508	4.7%
Asian or Pacific Islander, Non-Hispanic	9,094	4.4%	4,061	6.6%	17,387	3.0%
Two or More Races, Non-Hispanic	5,223	2.5%	1,183	1.9%	9,476	1.7%
Native American, Non-Hispanic	608	0.3%	73	0.1%	1,131	0.2%
Other, Non-Hispanic	434	0.2%	52	0.1%	693	0.1%

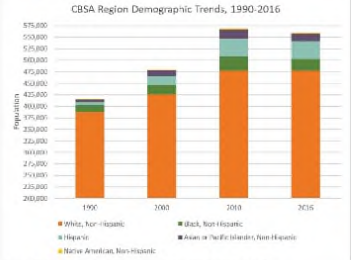
Source: AFFH Tool, version 0002; Decennial Census; American Community Survey, 2012-2016

The Fair Housing Act was passed in 1968, yet, more than two decades later, many Americans still experience discrimination when searching for a home. Segregated living patterns exist in the Des Moines-West Des Moines Core-Based Statistical Area (CBSA). Those patterns are a manifestation of direct and indirect discrimination.

Fair housing stresses opportunity and choice for all when determining where to live. Fair housing choice encompasses:

1. Actual choice, which means the existence of realistic housing options;
2. Protected choice, which means housing that can be accessed without discrimination; and
3. Enabled choice, which means realistic access to sufficient information regarding options so that any choice is informed.





Source: AFFH Tool, version 0002; Decennial Census; American Community Survey, 2012-2016

Data Source: Des Moines Civil & Human Rights Commission, 2017 Complaints

Data Source: Des Moines Civil & Human Rights Commission, 2017 Complaints

Appendix F: Public Notice and Proof of Publications

Des Moines & West Des Moines public notices were published at the end of June and are not available for the public draft for comments. The publisher's affidavits will be in the final draft.

RESOLUTION

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF WEST DES MOINES, APPROVING 2019 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING FOR THE DES MOINES-WEST DES MOINES COMMUNITY-BASED STATISTICAL AREA

WHEREAS, the City of Des Moines, the Des Moines Municipal Housing Agency (DMMHA), and the City of West Des Moines receive federal entitlement funds administered by the United States Department of Housing and Urban Development (HUD), and undertake individual consolidated planning efforts, including the upcoming 2020-2024 Consolidated Plan, outlining how said entities will respectively spend entitlement funds over a five-year timeframe; and

WHEREAS, HUD is requiring the City of Des Moines, the DMMHA, and the City of West Des Moines to each complete an Assessment of Fair Housing (AFH), as regulated under Title 24, Part 5.154 of the Code of Federal Regulations, to identify existing housing issues and to implement an Affirmatively Further Fair Housing (AFFH) strategy for each respective federal entitlement funds and consolidated planning efforts; and

WHEREAS, the City of Des Moines, the DMMHA, and the City of West Des Moines have conducted one regional assessment as a "Regional Collaboration" of one or more local governments and one or more public housing agencies pursuant to the AFH Instructions issued by HUD; and

WHEREAS, the Analysis of Impediments is complete, following a 30-day public review and comment period of the proposed plan from June 29, 2019 to August 5, 2019; and

WHEREAS, the City of West Des Moines agrees to work on the five-year goals established in the Goal Implementation Matrix of the 2019 Analysis of Impediments.

THEREFORE, BE IT RESOLVED that the Council of the City of West Des Moines, Iowa hereby approves the 2019 Analysis of Impediments to Fair Housing for the Des Moines-West Des Moines Community-Based Statistical Area.

PASSED AND ADOPTED on August 5, 2019

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Steven K. Gaer
Mayor

ATTEST:

_____
Ryan Jacobson
City Clerk