



FY 2020-2024 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (AI) TOWNSHIP OF ABINGTON, PA



**OCTOBER 1, 2020 to
SEPTEMBER 30, 2025**



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Executive Summary

The Township of Abington, Pennsylvania is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG). In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to "affirmatively further fair housing," each entitlement community must conduct a Fair Housing Analysis which identifies any impediments to fair housing choice.

The HUD Fair Housing and Equal Opportunity (FHEO) Office is now advising Federal entitlement communities to update their Analysis of Impediments (AI) to Fair Housing Choice to coincide with their Five Year Consolidated Plan, and then every five (5) years thereafter. In addition, each year the Township, as part of its Annual Action Plan, must sign certifications that the Township will affirmatively further fair housing. This means that the Township will conduct an Analysis of Impediments (AI) to Fair Housing Choice, take appropriate actions to overcome the effects of any impediments identified through the AI, and maintain records reflecting what analysis and corrective actions were taken.

Under Federal Register Vol. 78, No. 139 dated Friday, July 19, 2013 Proposed Rules, HUD has proposed an improved structure and process to replace the AI. HUD proposes to provide program participants with guidance, data, and an assessment template from which the community would complete an Assessment of Fair Housing (the AFH). This assessment would then link to Consolidated Plans and Annual Action Plans in IDIS and offer communities a robust tool to affirmatively further fair housing. The proposed AFH would focus program participants' analysis on four primary goals: improving integrated living patterns and overcoming historic patterns of segregation; reducing racial and ethnic concentrations of poverty; reducing disparities by race, color, religion, sex, familial status, national origin, or disability in access to community assets such as education, transit access, and employment, as well as exposure to environmental health hazards and other stress factors that harm a person's quality of life; and respond to disproportionate housing needs by a protected class. HUD has not finalized the new AFH requirements as of the submission of this AI. As such, this AI will follow the old AI document requirements but will also incorporate proposed AFH goals as data allows.

The Township of Abington last prepared an update to its Analysis of Impediments to Fair Housing Choice in 2015. The Township has now prepared this update to cover the FY 2020-2024 Five Year Consolidated Plan period. The analysis focuses on the status and interaction of six (6) fundamental conditions within the community:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financial assistance for dwellings;



- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

The Fair Housing Act was originally passed in 1968 to protect buyers and renters from discrimination from sellers and landlords by making it unlawful to refuse the sale or rental of a property to persons included under the category of a protected class. The Fair Housing Act prohibits discrimination against persons based on their **race, color, religion, sex, national origin, disability, or familial status** in the sale, rental, and financing of housing.



The Township has Ordinance 2074, known as the Abington Township Human Relations Ordinance, to address actions of discrimination. The Ordinance defines discriminatory acts as follows:

***DISCRIMINATION:** Any discriminatory act(s) taken by any person, employer, entity, employment agency, or labor organization, with respect to or involving a transaction related to employment, public accommodations or publicly offered commercial property or housing, on the basis of a person's actual or perceived race, color, age, familial status, religious creed, ancestry, sex, national origin, handicap or disability, use of guide or support animals because of blindness, deafness or physical handicap of the user or because the user is a handler or trainer of support or guide animals, or because of an individual's sexual orientation, gender identity or gender expression.*

The methodology employed to undertake this Analysis of Impediments included:

- **Research**
 - A review of the Township's 2015 Analysis of Impediments to Fair Housing Choice, the Township's Zoning Ordinance, and the Comprehensive Plan dated 2007, as well as a review of the FY 2015-



2019 Five Year Consolidated Plan, FY 2019 Annual Action Plan, and the Consolidated Annual Performance Evaluation Reports for FY 2018.

- A review of the Montgomery County Housing Authority's Five Year and Annual PHA Plans.
- The most recent demographic data for the Township was analyzed from the U.S. Census, which included general, demographic, housing, economic, social, and disability characteristics.
- A review of the U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy (HUD-CHAS) data.
- Review of the residential segregation data.
- A review of financial lending institutions through the Home Mortgage Disclosure Act (HMDA) database.
- A review of the area real estate and mortgage practices.
- A review of home mortgage foreclosure data.

- **Interviews & Meetings**

- Meetings and/or interviews were conducted with the various Township Departments; the Township Manager; the Montgomery County Housing Authority; community, social service, and advocacy agencies for the disabled; housing providers; etc.
- Follow up phone calls were made when an organization neither returned a survey nor attended a meeting.

- **Analysis of Data**

- Low- and moderate-income areas were identified and mapped.
- Concentrations of minority populations were identified and mapped.
- Concentrations of owner-occupied and renter-occupied housing units were identified and mapped.
- Fair housing awareness in the community was evaluated.
- Distribution by location of public and assisted housing units were analyzed and mapped.
- The location of CDBG expenditures throughout the Township were analyzed.
- The location of HOME expenditures throughout the Township were analyzed.
- The Township's Five Year Goals and Objectives were reviewed.



- **Potential Impediments**

- Public sector policies that may be viewed as impediments were analyzed.
- Private sector policies that may be viewed as impediments were analyzed.
- The status of previously identified impediments were analyzed.

- **Citizen Participation**

- Electronic copies of a community development and fair housing survey were made available on the Township's website and at www.surveymonkey.com/r/TwnshpofAbington, public meetings were held, and copies were placed on public display to encourage resident input.
- A "Draft Plan" was placed on display at the Office of Community Development, 1176 Old York Road, Abington, PA 19001 from July 13, 2020 until August 12, 2020.
- The Township developed the AI based on the input received at the public hearings, draft plan review comments, and the survey.
- The Township held a Public Hearing on the "draft" 2020 Analysis of Impediments on July 30, 2020.

- **Key Findings**

- The Township is approximately 98% developed; adaptive and creative reuses must be incorporated to increase housing choice.
- The housing stock in the Township is older and in need of rehabilitation.
- There are areas of minority housing concentration that correspond to areas of lower income concentration.
- Communication issues exist for Limited English Proficiency (LEP) persons.
- Households incomes have increased at slower rates than housing costs.
- The cost of housing is not affordable to those that are below moderate-income.
- There is a lack of new housing construction to meet housing demand.



- The supply of accessible housing exceeds the demand for accessible housing.

FY 2020-2024 Analysis of Impediments to Fair Housing Choice has identified the following impediments, goals, and strategies to affirmatively further fair housing.

- **Impediment 1: Fair Housing Education and Outreach**

There is a need to educate persons about their rights and responsibilities under the Fair Housing Act and raise awareness, especially for low-income households, that all residents of Abington Township have a right to fair housing choice.

Goal: Improve the knowledge and awareness of both the public and the local officials of the Fair Housing Act, related laws, regulations, and requirements to affirmatively further fair housing in the community.

The strategies to achieve this goal include:

- **1-A:** Continue to educate and make residents aware of their rights under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- **1-B:** Continue to educate and make realtors, bankers, and housing providers aware of their responsibilities under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- **1-C:** Continue to support Fair Housing organizations and legal advocacy groups to assist persons who may be victims of housing discrimination and/or not aware of how to file a housing complaint.
- **1-D:** Support the continuing efforts of the local fair housing organizations to provide training and technical assistance to the staff of Abington Township, the local Human Relations Commission members, Township Solicitor, affordable housing providers, and other organizations that are concerned with housing and civil rights in Abington.
- **1-E:** Continue to identify Limited English Proficiency (LEP) persons to provide the specific language assistance that is needed.
- **1-F:** Support the Human Relations Commission to become a local coordination, outreach, investigation, and adjudication organization.
- **1-G:** Promote seminars and educational programs for the community in cooperation with local fair housing organizations to increase the knowledge base of all residents, owners, renters, and landlords, concerning their rights and responsibilities under the Fair Housing Act, as well as the Americans with Disabilities Act.



- **Impediment 2: Continuing Need for Affordable Housing**

According to the 2011-2015 ACS, 45.6% of renter households in the Township paid rents that exceeded 30% of their household income and 27.7% of owner households in the Township had housing costs that exceed 30% of their household income.

Goal: Increase the supply of affordable housing by new construction and rehabilitation of various types of housing that is affordable to lower income households.

The strategies to achieve this goal include:

- **2-A:** Continue to support and encourage private developers and non-profit housing providers to create, through construction or rehabilitation, affordable and mixed-income housing that provides access to employment opportunities, transportation, amenities, and services throughout the Township; especially for the Elderly.
- **2-B:** Continue to support and encourage the rehabilitation of existing housing units in the Township to become decent, safe, sound and affordable housing for households below 80% AMI.
- **2-C:** Continue to support homebuyer education and training programs, as well as down-payment assistance and financing to increase low-income homeownership rates.
- **2-D:** Continue to support tenant education and training programs, as well as rental and utility assistance for low-income renter households.
- **2-E:** Provide federal, state and local funding in response to HMDA data discrimination patterns to support a higher loan to value ratio for minority homebuyers.

- **Impediment 3: Continuing Need for Accessible Housing**

There is a lack of accessible housing units in the Township as the supply of accessible housing has not kept pace with the demand of individuals desiring to live independently.

Goal: Increase the supply of accessible housing by new construction and rehabilitation of accessible housing for persons with disabilities.

The strategies to achieve this goal include:

- **3-A:** Continue to promote the need for accessible housing by supporting and encouraging private developers and non-profits to develop,



construct, and/or rehabilitate housing that is accessible to persons with disabilities.

- **3-B:** Continue to provide financial assistance for accessibility improvements to owner-occupied and renter-occupied housing units to enable the elderly and/or persons with disabilities to remain in their existing homes.
- **3-C:** Continue to enforce the ADA and Fair Housing requirements for landlords to make “reasonable accommodations” to their rental properties so they become accessible to tenants with disabilities.

- **Impediment 4: Public Policy**

The Township, in conjunction with the Montgomery County Planning Department, has been working on revising its Zoning Ordinance in accordance with the latest model codes. The Township needs to continue to move forward and complete this major revision to its Zoning Ordinance to bring it into compliance with the Federal Fair Housing Act, Section 504, the Americans with Disabilities Act, etc.

Goal: Complete the work on the revisions to the Township’s Zoning Ordinance to promote and affirmatively further fair housing by revising its purposes, definitions, and land use regulations.

The strategies to achieve this goal include:

- **4-A:** Revise the Zoning Ordinance to include additional definitions, statements, and revisions.
- **4-B:** Adopt a written Reasonable Accommodation Policy for housing developers and the Planning/Zoning Commission to follow when reasonable accommodation requests are made concerning zoning and land use as it applies to protected classes under the Fair Housing Act.
- **4-C:** Develop financial incentives to encourage developers and housing providers to offer more affordable housing options in the Township.
- **4-D:** Encourage LMI, minority, and protected class resident participation in the various Township Boards and Commissions.

- **Impediment 5: Regional Approach to Fair Housing**

There are four (4) Federal Entitlement jurisdictions in Montgomery County: Abington, Lower Merion, Norristown, and Montgomery County. Housing, racial, and socio-economic data from the U.S. Census, as well as the location of subsidized housing illustrates that there is a disproportionate concentration of low- and moderate-income persons, minorities, and Hispanics living in



impacted areas throughout Montgomery County, which demonstrates a lack of housing choice.

Goal: Form a regional cooperative fair housing consortium to affirmatively further fair housing in the area by providing housing and economic opportunities for low- and moderate-income persons and the protected classes to live and work throughout all of Montgomery County, including outside impacted areas.

The strategies to meet this goal include:

- **5-A:** Establish an Affirmatively Furthering Fair Housing (AFFH) Consortium for Montgomery County with representatives from the Township of Abington, Lower Merion Township, the Municipality of Norristown, Montgomery County, U.S. Department of Housing and Urban Development (HUD), the two Fair Housing Councils, and the Montgomery County Housing Authority (MCHA).
- **5-B:** The AFFH Consortium should review the mobility policies and procedures of the Montgomery County Housing Authority to encourage and support low- and moderate-income Housing Choice Voucher holders to move outside racially and economically impacted areas in Montgomery County.
- **5-C:** The AFFH Consortium should coordinate and cooperate in the preparation and implementation of their individual Analysis of Impediments (A.I.) and prepare and adopt a joint countywide fair housing strategic plan.
- **5-D:** The AFFH Consortium should plan and promote regional fair housing activities and projects.
- **5-E:** The AFFH Consortium should work with affordable housing developers/providers to develop affirmative fair marketing plans and encourage the development of affordable housing throughout Montgomery County through deconcentration policies in areas that are not economically or racially impacted.



I. Introduction

The Township of Abington is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD's) Community Development Block Grant Program (CDBG). In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to demonstrate that the entitlement community is "affirmatively furthering fair housing" the community must conduct an Analysis of Impediments to Fair Housing Choice which identifies any impediments to fair housing choice and what steps it will take to affirmatively further fair housing. The HUD Fair Housing and Equal Opportunity (FHEO) Office is now advising Federal entitlement communities to update their Analysis of Impediments to Fair Housing Choice to coincide with the Five Year Consolidated Plan, and then every five (5) years thereafter.

HUD defines "fair housing choice" as:

"The ability of persons, regardless of race, color, religion, sex, national origin, familial status, or handicap, of similar income levels to have available to them the same housing choices."

The Fair Housing Analysis consists of the following six (6) conditions:

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

HUD-FHEO suggests that communities conducting an AI consider the policies surrounding "visitability," the Section 504 Rehabilitation Act, the Americans with



Disabilities Act, and the Fair Housing Act. Housing that is “visitable” has the most basic level of accessibility that enables persons with disabilities to visit the home of a friend, family member, or neighbor. “Visitable” housing has at least one accessible means of ingress/egress, and all interior and bathroom doorways have as a minimum a 32-inch clear opening. Section 504 of the Rehabilitation Act (24 CFR Part 8), known as “Section 504” prohibits discrimination against persons with disabilities in any program receiving Federal funds. The Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, and 225) (ADA) prohibits discrimination against persons with disabilities in all programs and activities sponsored by state and local governments. The Fair Housing Act requires property owners to make reasonable modifications to units and/or public areas in order to allow a disabled tenant to make full use of the unit. Additionally, property owners are required to make reasonable accommodations to rules or procedures to afford a disabled tenant full use of the unit. In regard to local zoning ordinances, the Fair Housing Act prohibits local government from making zoning or land use decisions, or implementing land use policies that exclude or discriminate against persons of a protected class.

The Township of Abington previously prepared an Analysis of Impediments to Fair Housing Choice in 2015. This Analysis of Impediments to Fair Housing Choice will outline progress that has been made since the previous Analysis of Impediments, explore the continuation of these impediments where necessary, and identify any new impediments to fair housing choice. Furthermore, this Analysis of Impediments will bring the Township into sequence with the FY 2020-2024 Five Year Consolidated Plan. The document is designed to act as a planning tool, providing the Township with the necessary framework to strategically reduce any identified impediments to fair housing choice over the next five (5) years, and continue to make modifications based on events and activities in the community during this time period.

In order to affirmatively further fair housing in the Township of Abington, the Township must look beyond its boundaries and coordinate fair housing with Montgomery County and the surrounding region. Fair housing choice is the goal of the AI and the opportunity should be made available to all low-income residents and the members of the protected classes to live anywhere in the surrounding region.



II. Background Data

In order to perform an analysis of fair housing in the Township of Abington, the demographic, housing, economic, and social characteristics of the Township were evaluated as a basis for determining and identifying if there are any existing impediments to fair housing choice.

Abington Township is located in Montgomery County, a suburban county, situated on the northwest border of Philadelphia County in the Commonwealth of Pennsylvania. Abington is one of the oldest communities in Montgomery County with early settlers living in the area prior to 1700. The Township consists of 15.5 square miles and it is estimated that 98% of the area has been developed.

The area that comprises the Township was originally purchased by William Penn from the Lenape, also known as the Delaware Indians, in the 1680's. The Township was later incorporated in 1704. The Township is rich in history and has endeavored to preserve the areas past by protecting important historical landmarks and institutions such as Alverthorpe Manor and Briar Bush Nature Center. The Abington Township High School is listed on the National Register of Historic Places. The Abington School District is remembered for its historical contribution to the "prayer in school debate" with the *Abington School District v. Schempp* (1963) United States Supreme Court decision that declared school-sponsored Bible reading in public schools in the United States to be unconstitutional.

Abington Township is governed by a Board of Commissioners, each of whom is elected from one of the township's fifteen wards. With no elected mayor, the President of the Board of Commissioners serves as the head of government for the Township.

In order to better understand the Township of Abington, data from the 2000 and 2010 U.S. Census was used, as well as the 2007-2011 American Community Survey, which offers recent estimates of general demographics for Abington. This Census data, along with other databases such as the CHAS Data, have been used to evaluate the Township of Abington's demographic and socio-economic characteristics, and other conditions affecting fair housing choice.

Appendix A of this report contains complete U.S. Census data and Appendix B includes full-page maps of the U.S. Census data that is summarized and illustrated in the following sections.



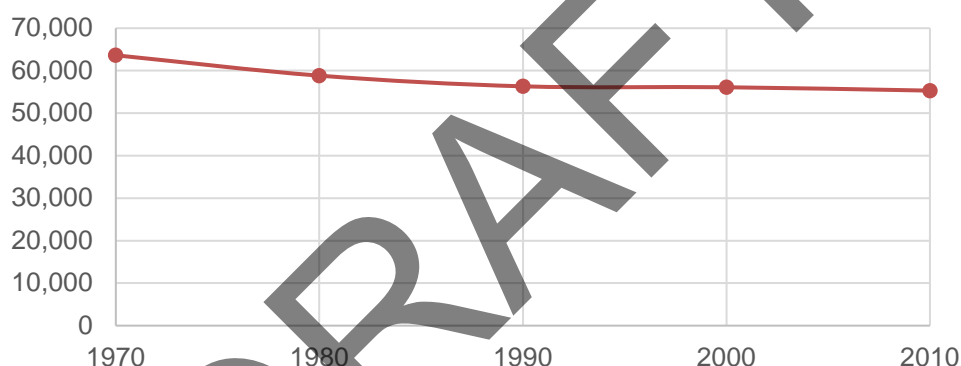
A. Population and Race:

Population -

The total population for the Township of Abington at the time of the 2010 Census was 55,310, and the 2011 estimate was 55,429. In the 2000 Census, the population was 56,103, and at the time of the 1990 Census, the Township of Abington had a population of 56,322. This illustrates a slight population decline.

The U.S. Census Bureau has used the population at the time of the 2010 Census to make annual estimates as to the change in population. The Township's population decreased by an estimated 893 people between 1990 and 2011, or 1.6%.

Population Decline in the Township of Abington, PA



Source: U.S. Census

Race and Hispanic or Latino Population -

The table below illustrates that "White alone" is the largest racial cohort in Abington, although it has decreased in size from 84.12% in 2000 to 77.80% in 2010. "Black or African American alone" remains the largest minority cohort, and has increased from 10.82% in 2000, to 12.11% in 2010. The Hispanic and Asian populations have also slightly increased in the past decade, from 1.57% and 3.27% in 2000, to 3.20% and 4.82%, respectively, in 2010.



Race and Hispanic or Latino Population in the Township of Abington, PA

Race and Hispanic or Latino	2000 U.S. Census		2010 U.S. Census	
	#	%	#	%
Total	56,103	100.00%	55,429	100.00%
One race	55,465	98.86%	54,019	97.46%
White alone	47,194	84.12%	43,122	77.80%
Black or African American alone	6,072	10.82%	6,711	12.11%
American Indian and Alaska Native alone	51	0.09%	40	0.07%
Asian alone	1,832	3.27%	2,673	4.82%
Native Hawaiian and Other Pacific Islander alone	28	0.05%	7	0.01%
Some other race alone	288	0.51%	87	0.16%
Two or More Races	638	1.14%	899	1.62%
Hispanic or Latino	883	1.57%	1,771	3.20%

Source: 2000 U.S. Census & 2010 U.S. Census

The table below outlines comparisons of minority populations in each Census Tract in the Township at the time of the 2000 and 2010 U.S. Census Reports.

Concentrations of Minority Residents from 2000 and 2010

Census Tract	2000 Census			2010 Census		
	Total Population	Minority Population	% Minority Population	Total Population	Minority Population	% Minority Population
2015.01	3,462	291	8.41%	3,294	377	11.45%
2015.02	1,843	80	4.34%	1,846	141	7.64%
2016.03	4,663	2,143	45.96%	4,659	2,241	48.10%
2016.04	3,339	1,061	31.78%	3,384	1,035	30.59%

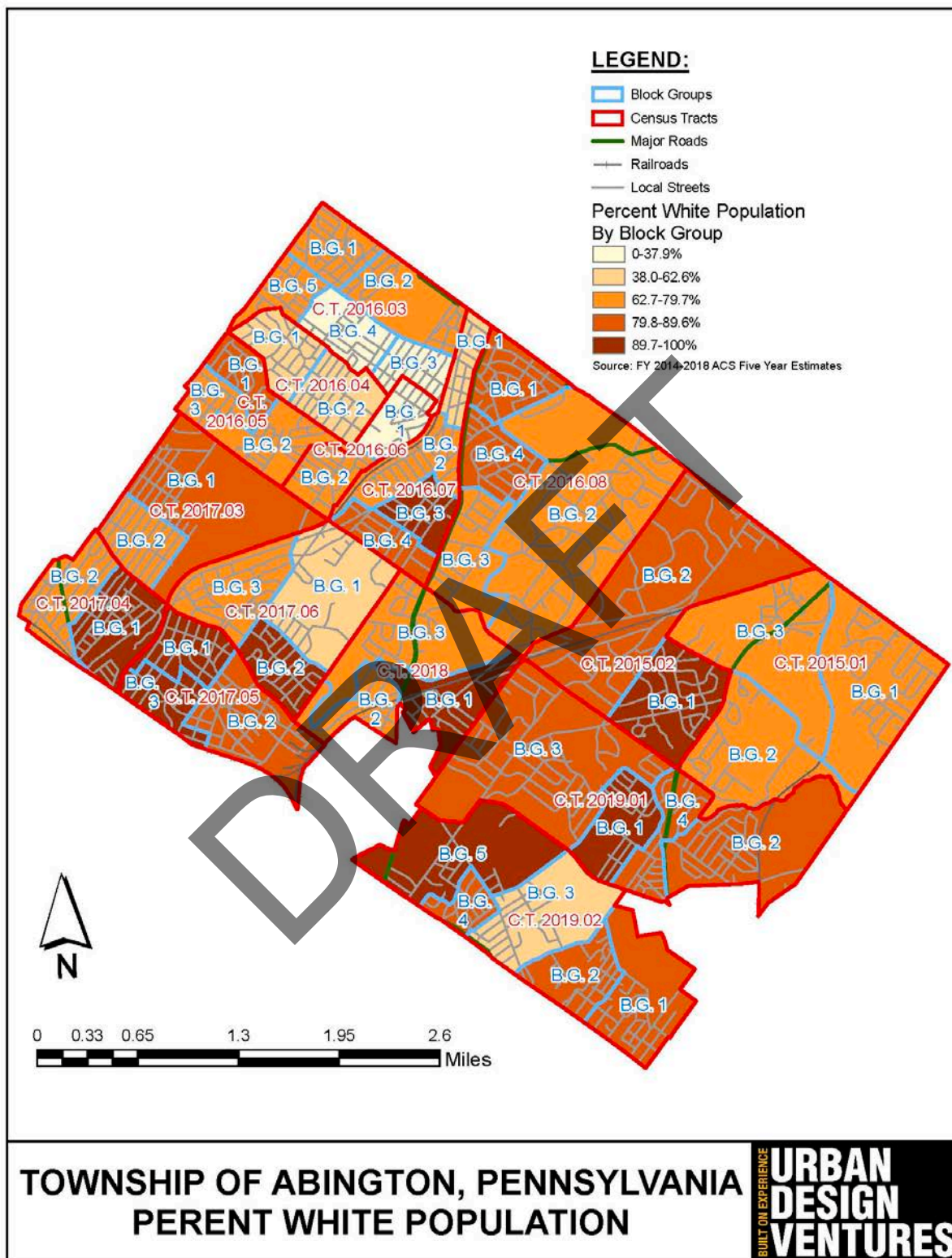


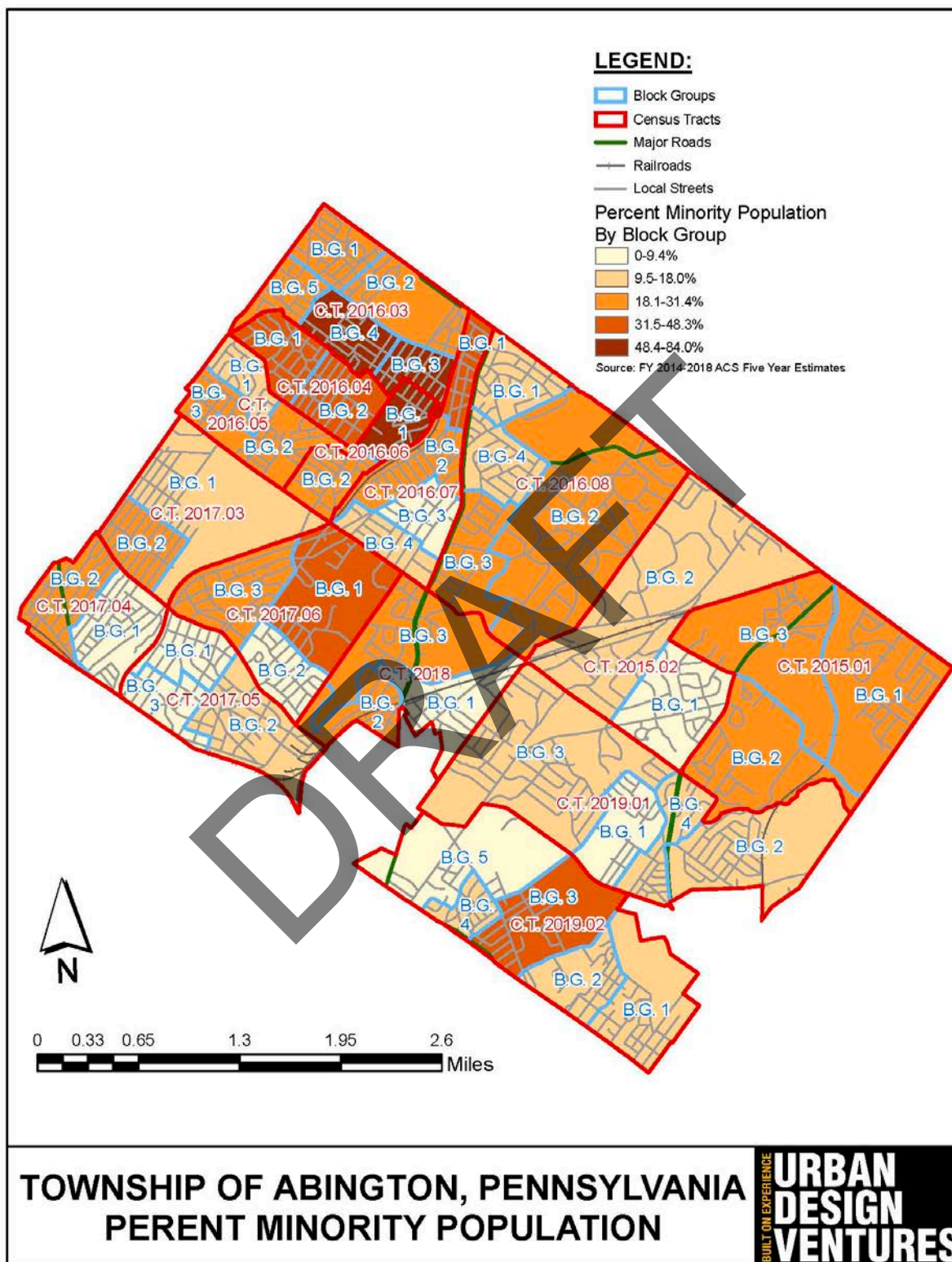
2016.05	3,086	467	15.13%	3,108	707	22.75%
2016.06	2,589	966	37.31%	2,356	953	40.45%
2016.07	3,600	422	11.72%	3,473	708	20.39%
2016.08	4,580	382	8.34%	4,696	605	12.88%
2017.03	3,127	142	4.54%	3,106	473	15.23%
2017.04	3,434	557	16.22%	3,065	507	16.54%
2017.05	4,538	329	7.25%	4,319	544	12.60%
2017.06	4,361	645	14.79%	4,424	727	16.43%
2018	3,127	189	6.04%	2,683	332	12.37%
2019.01	4,546	220	4.84%	4,581	232	5.06%
2019.02	5,808	1,015	17.48%	6,425	2,070	32.22%
Census Tract Totals	56,103	8,909	15.88%	55,419	11,652	21.03%

Source: 2000 and 2010 U.S. Census

Nearly all Census Tracts that remained the same showed an increase in the percentage of minority population between 2000 and 2010. The Township of Abington saw the percentage of minority population increase from 15.88% in 2000 to 21.03% in 2010.

The maps below illustrate the percentages of White and Minority Populations by Block Group in the Township of Abington.







Ethnicity -

The table below highlights the ethnicities of Abington's residents at the time of the 2000 U.S. Census and 2007-2011 ACS.

Population by Ethnicity in the Township of Abington, PA

ANCESTRY	2000 U.S. Census		2007-2011 American Community Survey	
	#	%	#	%
Total population	16,328	-	14,263	-
American	2,283	4.07%	1,990	3.59%
Arab	82	0.15%	197	0.36%
Czech	104	0.19%	147	0.27%
Danish	96	0.17%	52	0.09%
Dutch	514	0.92%	448	0.81%
English	5,538	9.87%	4,867	8.78%
French (except Basque)	762	1.36%	1,082	1.95%
French Canadian	182	0.32%	129	0.23%
German	12,077	21.53%	12,675	22.87%
Greek	186	0.33%	260	0.47%
Hungarian	674	1.20%	422	0.76%
Irish	14,558	25.95%	14,410	26.00%
Italian	7,233	12.89%	7,697	13.89%
Lithuanian	477	0.85%	315	0.57%
Norwegian	236	0.42%	186	0.34%
Polish	2,809	5.01%	4,091	7.38%
Portuguese	111	0.20%	264	0.48%
Russian	2,409	4.29%	2,308	4.16%
Scotch-Irish	988	1.76%	1,036	1.87%
Scottish	1,141	2.03%	913	1.65%
Slovak	211	0.38%	236	0.43%
Sub-Saharan African	166	0.30%	310	0.56%
Swedish	328	0.58%	583	1.05%
Swiss	165	0.29%	176	0.32%
Ukrainian	742	1.32%	912	1.65%
Welsh	736	1.31%	481	0.87%
West Indian (excluding Hispanic origin groups)	374	0.67%	752	1.36%
Other ancestries	11887	21.19%	-	-

Source: 2000 U.S. Census and 2007-2011 American Community Survey.

The largest ethnicities in Abington include German, Irish, and Italian. Between 2000 and 2011, Abington experienced a very slight increase in the percentage of residents identifying themselves as Arab, Czech, French, German, Greek, Irish, Italian, Polish, Portuguese, Scotch-Irish, Slovak, Sub-Saharan African, Swedish, Swiss, Ukrainian, and West Indian. Many



of the other ethnicities experienced slight fluctuations between 2000 and 2011. The 2007-2011 American Community Survey did not include "Other Ancestries" as an option, so this may account for an increase in some of the other categories in the event that survey participants selected an ancestry that most closely described their actual ancestry.

Title VI of the Civil Rights Act of 1964 is the federal law that protects individuals from discrimination on the basis of their race, color, or national origin in programs that receive federal financial assistance. In certain situations, failure to ensure that persons who have Limited English Proficiency (LEP) can effectively participate in, or benefit from, federally assisted programs, may violate Title VI's prohibition against national origin discrimination.

Limited English Proficiency means persons who, as a result of their national origin, do not speak English as their primary language and who have a limited ability to speak, read, write, or understand English. Based on Title VI and LEP Guidance, persons may be entitled to language assistance with respect to a particular service, benefit, or encounter.

According to the 2007-2011 American Community Survey, 10.94% of Township residents speak a language other than English at home. Of those residents, 4.64% report that they speak English less than "very well;" The top three populations of the Township that speaks English less than "very well" are: 924 Korean speakers (1.76%), 322 Spanish speakers (0.61%), and 236 Chinese speakers (0.45%). The Township will utilize interpretation services, referrals to community liaisons proficient in the language of LEP persons, and HUD translated documents found at www.hud.gov/offices/fheo/lep.xml for any LEP persons that the CDBG program will come into contact with.

Language Spoken at Home in the Township of Abington, PA

	Abington Township, Montgomery County, PA	
	Estimate	Percent
Total:	52,443	100%
Speak only English	46,705	89.06%
Spanish or Spanish Creole:	1,136	2.17%
Speak English "very well"	814	1.55%
Speak English less than "very well"	322	0.61%
French (incl. Patois, Cajun):	119	0.23%
Speak English "very well"	109	0.21%
Speak English less than "very well"	10	0.02%



French Creole:	155	0.30%
Speak English "very well"	104	0.20%
Speak English less than "very well"	51	0.10%
Italian:	348	0.66%
Speak English "very well"	229	0.44%
Speak English less than "very well"	119	0.23%
Portuguese or Portuguese Creole:	130	0.25%
Speak English "very well"	68	0.13%
Speak English less than "very well"	62	0.12%
German:	227	0.43%
Speak English "very well"	158	0.30%
Speak English less than "very well"	69	0.13%
Yiddish:	36	0.07%
Speak English "very well"	36	0.07%
Speak English less than "very well"	0	0.00%
Other West Germanic languages:	33	0.06%
Speak English "very well"	33	0.06%
Speak English less than "very well"	0	0.00%
Scandinavian languages:	21	0.04%
Speak English "very well"	21	0.04%
Speak English less than "very well"	0	0.00%
Greek:	100	0.19%
Speak English "very well"	47	0.09%
Speak English less than "very well"	53	0.10%
Russian:	174	0.33%
Speak English "very well"	89	0.17%
Speak English less than "very well"	85	0.16%
Polish:	165	0.31%
Speak English "very well"	146	0.28%
Speak English less than "very well"	19	0.04%
Serbo-Croatian:	16	0.03%
Speak English "very well"	16	0.03%
Speak English less than "very well"	0	0.00%
Other Slavic languages:	263	0.50%
Speak English "very well"	160	0.31%
Speak English less than "very well"	103	0.20%
Armenian:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Persian:	70	0.13%



Speak English "very well"	56	0.11%
Speak English less than "very well"	14	0.03%
Gujarati:	12	0.02%
Speak English "very well"	12	0.02%
Speak English less than "very well"	0	0.00%
Hindi:	66	0.13%
Speak English "very well"	66	0.13%
Speak English less than "very well"	0	0.00%
Urdu:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Other Indic languages:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Other Indo-European languages:	152	0.29%
Speak English "very well"	86	0.16%
Speak English less than "very well"	66	0.13%
Chinese:	518	0.99%
Speak English "very well"	282	0.54%
Speak English less than "very well"	236	0.45%
Japanese:	24	0.05%
Speak English "very well"	6	0.01%
Speak English less than "very well"	18	0.03%
Korean:	1,314	2.51%
Speak English "very well"	390	0.74%
Speak English less than "very well"	924	1.76%
Mon-Khmer, Cambodian:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Hmong:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Thai:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Laotian:	6	0.01%
Speak English "very well"	6	0.01%
Speak English less than "very well"	0	0.00%
Vietnamese:	201	0.38%
Speak English "very well"	44	0.08%



Speak English less than "very well"	157	0.30%
Other Asian languages:	105	0.20%
Speak English "very well"	65	0.12%
Speak English less than "very well"	40	0.08%
Tagalog:	71	0.14%
Speak English "very well"	46	0.09%
Speak English less than "very well"	25	0.05%
Other Pacific Island languages:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Navajo:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Other Native North American languages:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Hungarian:	46	0.09%
Speak English "very well"	24	0.05%
Speak English less than "very well"	22	0.04%
Arabic:	30	0.06%
Speak English "very well"	30	0.06%
Speak English less than "very well"	0	0.00%
Hebrew:	63	0.12%
Speak English "very well"	41	0.08%
Speak English less than "very well"	22	0.04%
African languages:	126	0.24%
Speak English "very well"	126	0.24%
Speak English less than "very well"	0	0.00%
Other and unspecified languages:	11	0.02%
Speak English "very well"	0	0.00%
Speak English less than "very well"	11	0.02%

Source: 2007-2011 American Community Survey

The Township as a CDBG entitlement community is required to develop a plan for persons of different national origins that cannot speak, read, write, or understand English to ensure that LEP persons have meaningful access to CDBG funded programs and services, as well as all Township programs and services. As such, the Township has updated its Four Factor Analysis. The purpose of the Four Factor Analysis is to determine the reasonableness of language assistance for LEP persons based on the following:



1. Number or Proportion of LEP persons in the population to be served. It is estimated that the Township has one non-English speaking populations that exceed the 5% or 1,000 person LEP limit. That non-English speaking population speaks Spanish. There are additional non-English speakers in the Township but in very limited numbers.

2. Frequency with which LEP persons come into contact with the program activity or service. The Township's Department of Community Development uses CDBG funds for activities that directly assist Township residents, such as: housing rehabilitation and public service activities; and for activities that indirectly assist Township residents, such as: public facility and infrastructure activities

3. Importance of the service, information, program, and/or activity. The Township's CDBG housing, public service, public facility and infrastructure improvement activities are critical to the Township's residents for access to decent, safe, sanitary, and affordable housing, as well as necessary in terms of supportive services to maintaining residents' quality of life. The Township, local advocacy groups and organizations, and its subrecipient agencies must be able to outreach and interact with LEP persons to make CDBG programs and services accessible to LEP persons.

4. Resources, financial and human, available to the recipient. Translation and interpretive services are vital for housing and public services activities and would be provided by the Township, either through Township staff or a community liaison, to any beneficiary that requires those services. Additionally, CDBG citizen participation materials and public notices will be published with the statement, "Any non-English speaking person wishing to attend the public hearing should contact the Director of Community Development at least seven (7) calendar days prior to the meeting and a Spanish interpreter will be provided. This document and program materials are available in Spanish upon request." These statements will be translated in Spanish.

The Township does not have a formal written Language Access Plan. Specific to the CDBG Program, its staff and subrecipients, utilize the following language assistance plan to assist LEP persons:

- Engaging advocacy groups to promote services available through the CDBG Program
- Interpretation and translation services by partnering with LEP groups, faith based organizations, and schools
- Referrals to community liaisons proficient in the language of LEP persons
- Notices and training to staff of the availability of LEP services

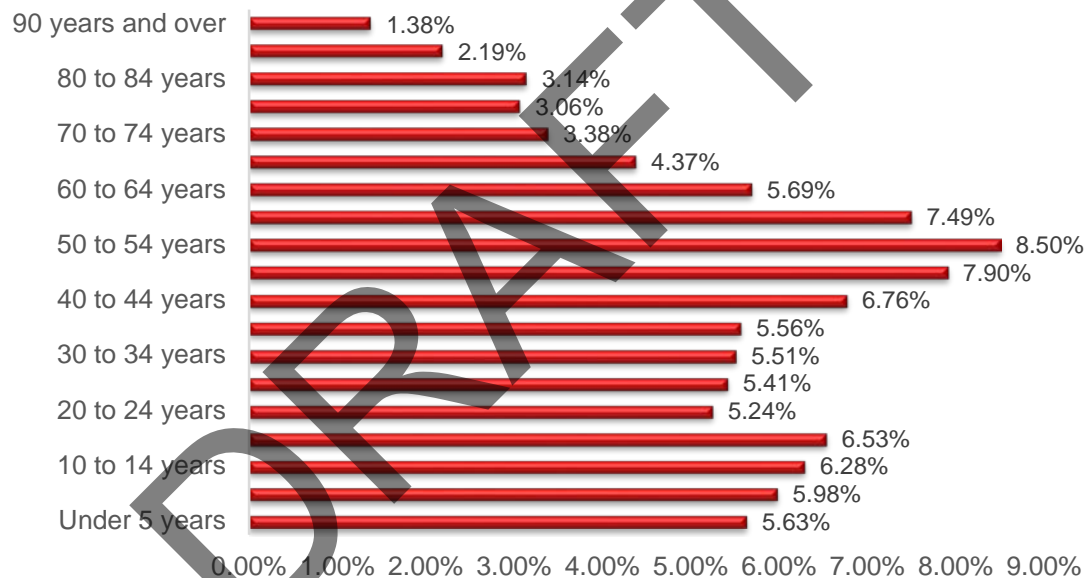


- Advertising language services in outreach documents
- Utilize HUD translated documents found at:
https://www.hud.gov/program_offices/fair_housing_equal_opp/17lep

Age -

The chart below illustrates age distribution within the Township of Abington for 2010. Children under five years of age represent 5.63% of the population; 24.42% of the Township's population was under 20 years of age; and 17.52% were 65 years of age or older.

Age of Population in the Township of Abington, PA



Source: 2010 U.S. Census Data

The median age in the Township of Abington at the time of the 2010 U.S. Census was 42.8 years. The median age in Montgomery County is slightly lower at 40.6 years, and the median age in the Commonwealth of Pennsylvania is similar at 40.1 years.



The map below illustrates the percentage of the Population Age 65 and Over by Block Groups in the Township of Abington.

DRAFT





Religion -

The U.S. Census does not collect data on the religious affiliations of the population in the United States. In an effort to better understand the religious affiliations of the residents of Abington, the Township used the data made available by The Association of Religion Data Archives (ARDA). ARDA surveys the congregation members, their children, and other people who regularly attend church services within counties across the country. Although this data appears to be the most comprehensive data that is available, it is unfortunately not entirely complete as it does not accurately include traditional African American denominations nor does it include non-Christian religions. The total number of regular attendees was adjusted in 2010 (the most recent year for which data is available) to represent the population including historic African American denominations. However, the total value cannot be disaggregated to determine the distribution across denominational groups.

The table below shows the distribution of residents of Montgomery County across various Christian denominational groups, as a percentage of the population which reported affiliation with a church.

Religious Affiliation in Montgomery County

	1980		1990		2000		2010	
	#	%	#	%	#	%	#	%
Evangelical Protestant	19,709	4.95%	32,842	7.28%	29,566	6.16%	54,215	10.66%
Black Protestant	0	0.00%	62	0.01%	0	0.00%	3,190	0.63%
Mainline Protestant	153,849	38.60%	136,205	30.20%	122,417	25.50%	103,475	20.35%
Catholic	209,341	52.53%	235,352	52.18%	263,375	54.86%	301,220	59.23%
Orthodox	0	0.00%	0	0.00%	3,727	0.78%	2,945	0.58%
Other	15,636	3.92%	46,538	10.32%	61,015	12.71%	43,532	8.56%
Total Adherents:	398,535	61.92%	450,999	66.51%	480,100	64.01%	508,577	63.58%
Unclaimed (% of total population)	245,086	38.08%	227,112	33.49%	269,997	35.99%	291,297	36.42%
Total Population:	643,621	100.00%	678,111	100.00%	750,097	100.00%	799,874	100.00%

Source: The Association of Religion Data Archives; <http://www.thearda.com/>

Between 1980 and 2010, Montgomery County experienced a decrease in people identifying themselves as "Mainline Protestants," while there was an overall increase in the portion of the religious population identifying itself as

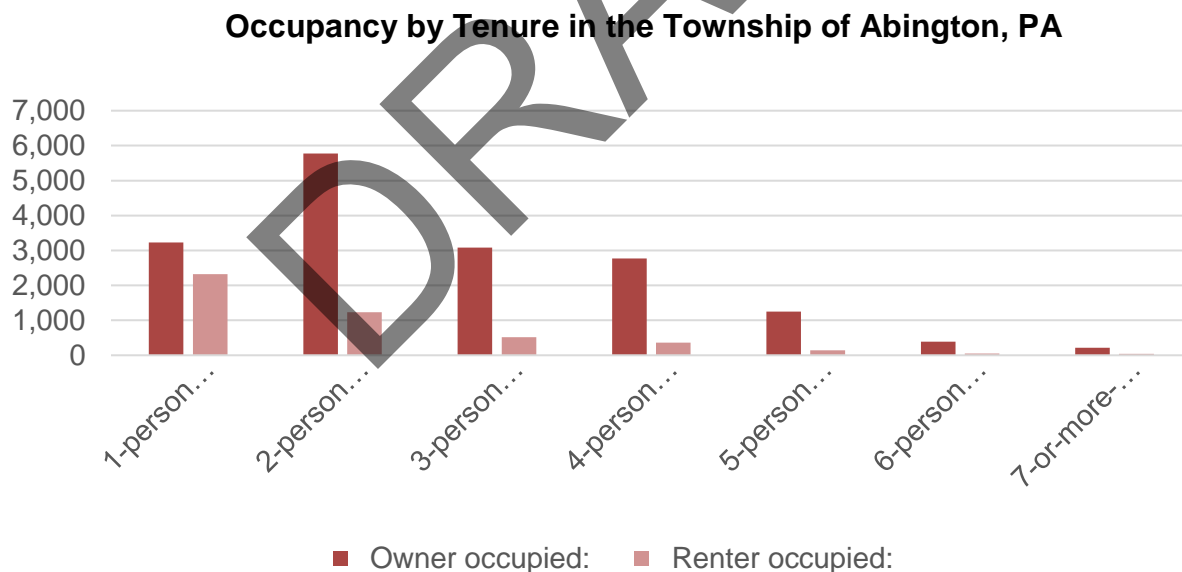


“Evangelical Protestants,” and identifying as Catholic. Between 1980 and 2010, Montgomery County saw an overall increase in the number of people identifying with religious traditions. The percentage of total adherents increased between 1980 and 1990, but then experienced a slight decline in 2000 and 2010.

B. Households:

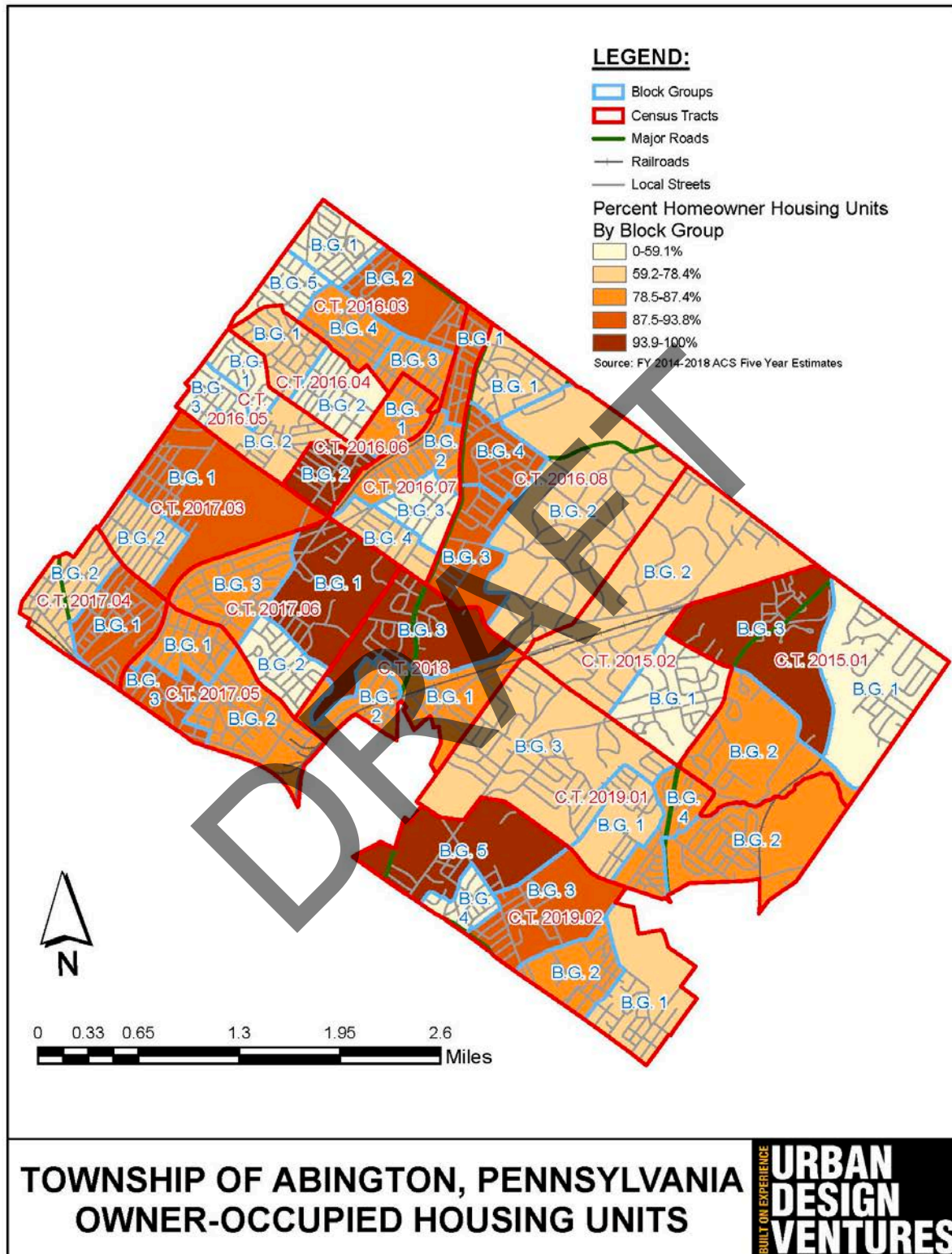
According to the U.S. Census for 2010, there were 22,369 housing units in the Township of Abington. This is a very slight increase compared to the 2000 Census, when there were 22,367 households in the Township of Abington. Of the households in 2010, 78.2% were owners and 21.8% were renters, whereas in 2000, 79.3% were owner-occupied and 20.7% were renter-occupied. This shows that there was a slight decrease in homeownership in the past decade. However, the 2007-2011 American Community Survey shows an increase in homeownership to 78.5%

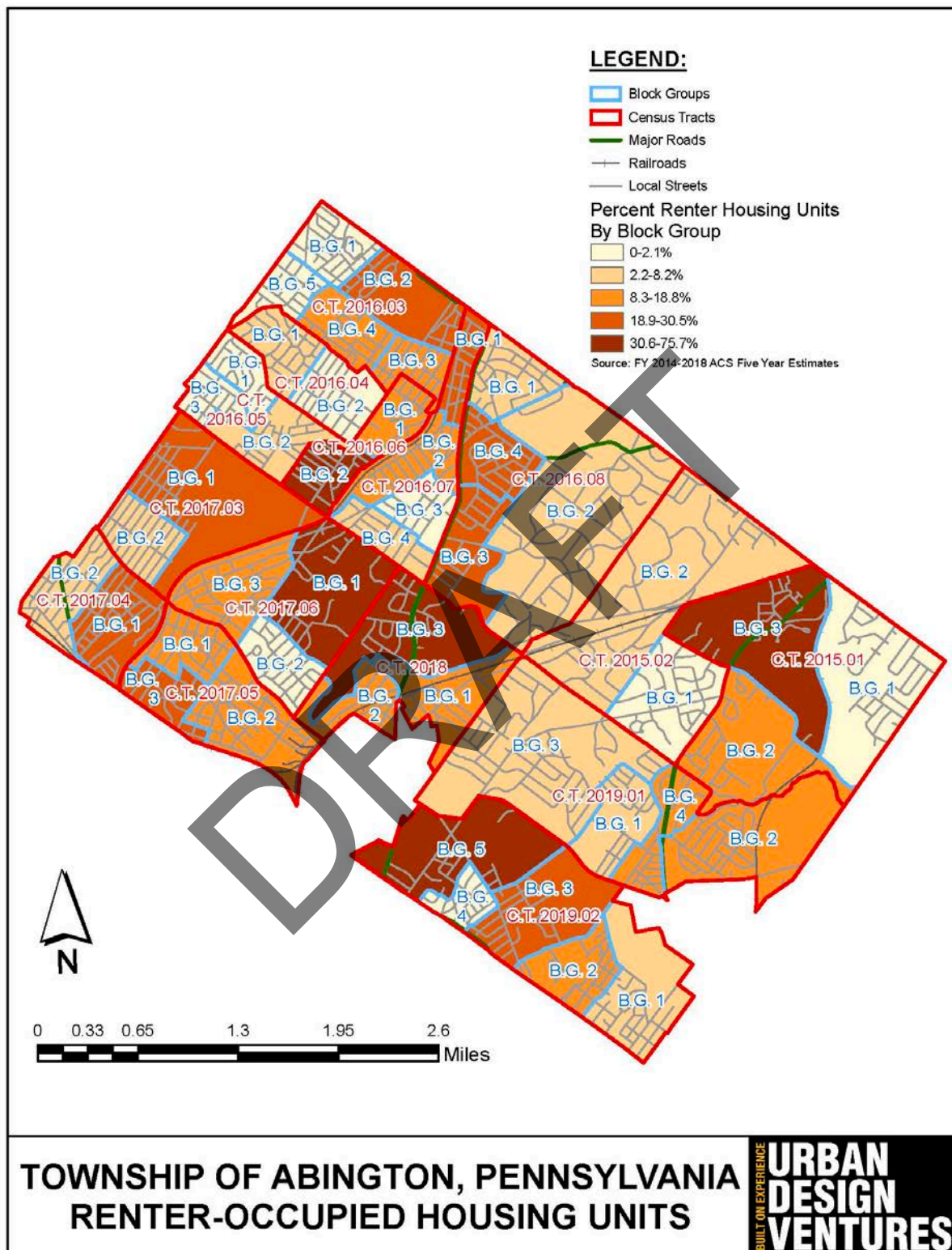
The 2007-2011 ACS data shows that the average size of the owner-occupied households was 2.75 persons and the average renter household was 1.89 persons. The chart below illustrates household size breakdown for owner and renter households.



Source: 2010 U.S. Census

The maps below illustrate the percentages of Owner and Renter-Occupied Housing Units by Block Group in the Township of Abington.







The table below compares homeowners and renters by race, according to the 2000 and 2010 Census. This table shows that “White” households represent the largest percentage of homeownership (70.0%) with “Black or African American” households comprising (7.4%) of total homeowners.

Household Tenure by Race in Abington

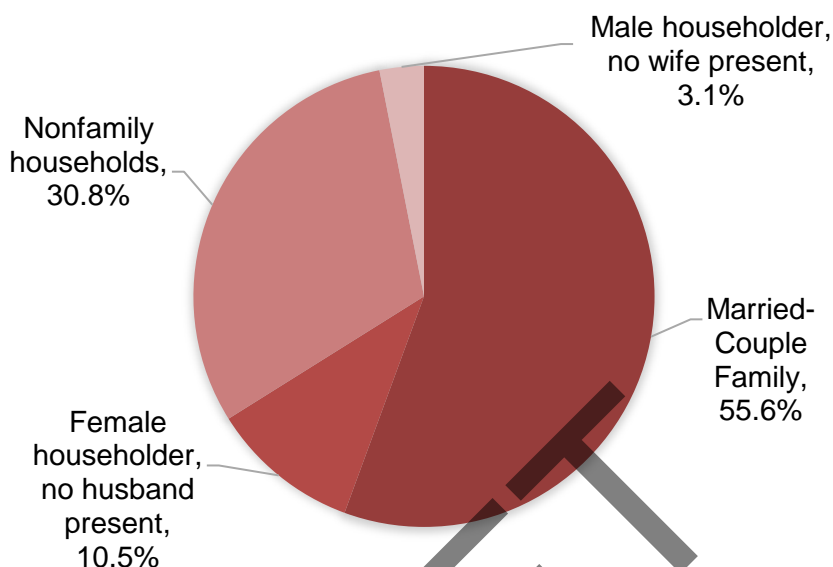
Cohort	2000 U.S. Census		2010 U.S. Census	
	Owner (79.3%)	Renter (37.2%)	Owner (78.2%)	Renter (21.8%)
Householder who is White alone	70.0%	16.2%	66.8%	15.7%
Householder who is Black or African American alone	7.4%	2.5%	8.1%	3.7%
Householder who is American Indian and Alaska Native alone	0.0%	0.0%	0.0%	0.0%
Householder who is Asian alone	1.4%	1.2%	2.2%	1.8%
Householder who is Native Hawaiian and Other Pacific Islander alone	0.0%	0.0%	0.0%	0.0%
Householder who is some other race alone	0.1%	0.3%	0.3%	0.2%
Householder who is two or more races	0.3%	0.4%	0.7%	0.3%
Householder who is Hispanic or Latino	0.8%	0.6%	1.4%	0.7%

Source: 2000 & 2010 U.S. Census

Families comprised 69.2% of households in the Township; 30.3% of households included families with their own children less than 18 years of age. More than ten percent (10.5%) of families were female-headed households, with no husband present. The chart below illustrates households by type in Abington.



Households by Type in the Township of Abington, PA



Source: 2007-2011 American Community Survey

C. Income and Poverty:

The 2000 Census reported that the per capita income for the Township of Abington was \$30,331. The median household income for the Township was \$59,921, compared to \$60,829 for Montgomery County and \$40,106 for the Commonwealth of Pennsylvania. The 2007-2011 American Community Survey reported that the per capita income for the Township in 2011 was \$39,753. The median household income for Abington was \$77,928, compared to \$78,446 for Montgomery County, and \$51,651 for the Commonwealth of Pennsylvania. The median income of the area increased by 30.1% over the time period. This increase in median income represents a change in nominal dollars and not a change in real dollars. To calculate the change in real dollars, the Consumer Price Index is used to calculate the inflation rate for a given period. Between 2000 and 2011, the cumulative inflation rate was 30.6%, meaning that the \$59,921 median income in 2000 would be \$77,957 if it were expressed in 2011 dollars. By taking into consideration the rate of inflation, the median income in Abington has increased at a rate similar to the rate of inflation. The table below illustrates household income trends.



Household Income in the Township of Abington, PA

	2000 U.S. Census		2007-2011 American Community Survey	
Items	Number of Households	Percentage	Number of Households	Percentage
Total Households	21,707	100.0%	21,287	100.0%
Less than \$10,000	839	3.9%	830	3.9%
\$10,000 to \$14,999	912	4.2%	1,681	3.1%
\$15,000 to \$24,999	1,803	8.3%	1,681	7.9%
\$25,000 to \$34,999	1,997	9.2%	1,456	6.8%
\$35,000 to \$49,999	3,183	14.7%	2,004	9.4%
\$50,000 to \$74,999	4,913	22.6%	3,752	17.6%
\$75,000 to \$99,999	3,321	15.3%	3,181	14.9%
\$100,000 to \$149,999	2,771	12.8%	4,119	19.3%
\$150,000 to \$199,999	826	3.8%	1,177	8.3%
\$200,000 or more	1,142	5.3%	1,833	8.6%
Median Household Income (\$)	59,921	(X)	77,928	(X)

Source: 2000 U.S. Census and 2007-2011 American Community Survey

The following table identifies the Section 8 Income Limits in Montgomery County based on household size for 2015. The Median Family Household Income for a family of four living in Montgomery County was \$81,100 in 2015.

Section 8 Income Limits for 2015

Income Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low (30%) Income Limits	17,050	19,500	21,950	24,350	28,410	32,570	36,730	40,890
Very Low (50%) Income Limits	28,400	32,450	36,500	40,550	43,800	47,050	50,300	53,550
Low (80%) Income Limits	45,450	51,950	58,450	64,900	70,100	75,300	80,500	85,700

Source: Hud.gov



The table below highlights the low- and moderate-income population in the Township of Abington. The Township of Abington has an overall low- and moderate-income percentage of 26.21%. The low- and moderate-income statistics are based on the 2006 – 2010 American Community Survey were obtained from the U.S. Department of Housing and Urban Development's website, www.hud.gov. The Census Tracts and Block Groups (highlighted and bold) that qualify as low- and moderate-income are based on the Upper Quartile Exception Criteria established by HUD. The upper quartile cutoff for the Township's low/mod population is 34.73%. This is based on 12 block groups out of 47 block groups with the greatest percentage of low/mod income persons.

Low- and Moderate-Income in the Township of Abington, PA

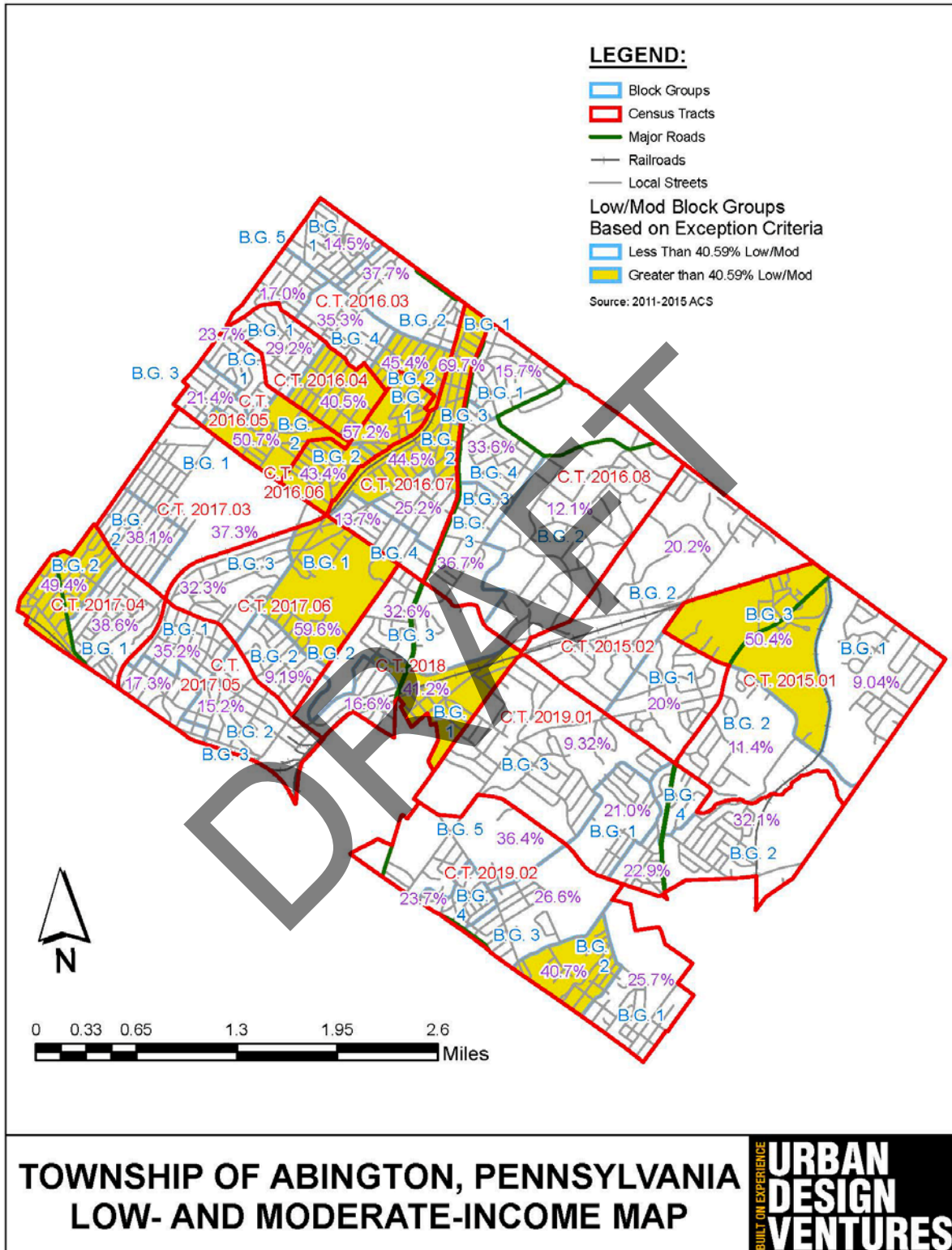
TRACT	BLKGRP	LOWMOD	LOWMODUNIV	LOWMODPCT
201501	1	180	960	18.75%
201501	2	195	850	22.94%
201501	3	630	1,265	49.80%
201502	1	125	685	18.25%
201502	2	155	1,130	13.72%
201603	1	170	1,135	14.98%
201603	2	225	600	37.50%
201603	3	545	935	58.29%
201603	4	150	745	20.13%
201603	5	105	1,240	8.47%
201604	1	565	1,400	40.36%
201604	2	370	1,985	18.64%
201605	1	265	1,115	23.77%
201605	2	345	1,145	30.13%
201605	3	210	690	30.43%
201606	1	630	880	71.59%
201606	2	445	1,475	30.17%
201607	1	165	855	19.30%
201607	2	140	1,275	10.98%
201607	3	50	325	15.38%
201607	4	200	960	20.83%
201608	1	240	1,345	17.84%
201608	2	180	1,040	17.31%
201608	3	215	1,435	14.98%
201608	4	350	875	40.00%
201703	1	320	1,690	18.93%



201703	2	315	1,420	22.18%
201704	1	380	1,650	23.03%
201704	2	535	1,415	37.81%
201705	1	400	1,525	26.23%
201705	2	310	1,520	20.39%
201705	3	500	1,275	39.22%
201706	1	455	1,310	34.73%
201706	2	20	980	2.04%
201706	3	550	2,135	25.76%
201800	1	95	680	13.97%
201800	2	190	620	30.65%
201800	3	635	1,310	48.47%
201901	1	150	565	26.55%
201901	2	335	1,095	30.59%
201901	3	255	1,865	13.67%
201901	4	350	980	35.71%
201902	1	265	1,270	20.87%
201902	2	390	1,280	30.47%
201902	3	115	915	12.57%
201902	4	65	900	7.22%
201902	5	795	1,720	46.22%
Township of Abington Total:		14,275	54,465	26.21%

Source: Hud.gov

Just over five percent (5.5%) of the population in the Township of Abington was living below the poverty level in 2011, according to the 2007-2011 American Community Survey. In comparison, 5.7% of the population in Montgomery County and 12.6% of the population in Pennsylvania were living below the poverty level. Additionally, 3.2% of all families in the Township of Abington were living under the poverty level, while just 3.7% of families were living in such conditions in Montgomery County and 8.8% of families from the Commonwealth of Pennsylvania. The map below illustrates the percentages of Low-Income Population by Block Group in the Township of Abington.

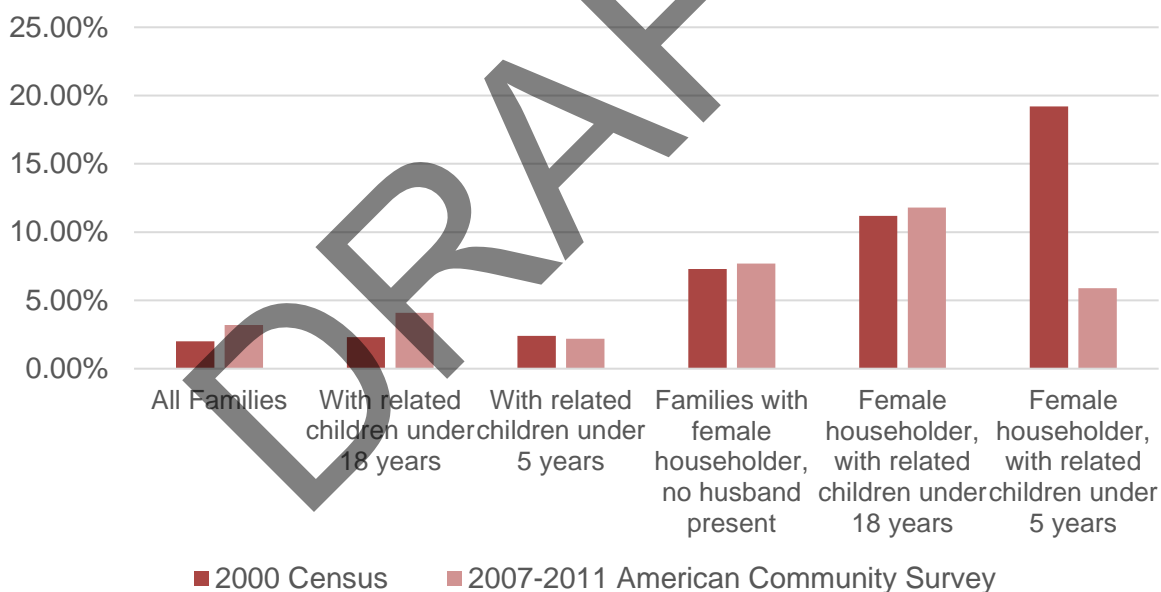




The Township's poverty statistics for families with children are significant, particularly for single mothers. The chart below illustrates the poverty statistics for families living in the Township of Abington. At the time of the 2007-2011 American Community Survey, the percentage of some families with children living below the poverty level was as follows:

- Families with related children under the age of 18 was 4.1%.
- Families with related children under the age of 5 was 2.2%.
- Female-headed families with related children under the age of 18 was 11.8%
- Female-headed families with related children under the age of 5 was 5.9%

Families in Poverty in the Township of Abington, PA



The Township of Abington does not have any Census Tracts or Block Groups that qualify as racially/ethnically-concentrated areas of poverty (RCAP/ECAPs). RCAP/ECAPs are defined by HUD as an area that has a non-white population of 50% or more and extreme poverty (Census Tracts with 40% or more of individuals living at or below the poverty line or is three times the average tract poverty rate for the area, whichever threshold is lower). There are not any Census Tracts that have a non-white population over 50%, nor are there any Census Tracts that have a poverty rate over 40% or three times the area average (approximately 5%).



Referring to the LMI concentration map, there are significant areas of overlap in the Township where economic and service centers are located that represent areas of opportunity. There are higher concentrations of low- and moderate-income populations by the schools, retail areas, and hospitals. Some specific actions the Township should consider include:

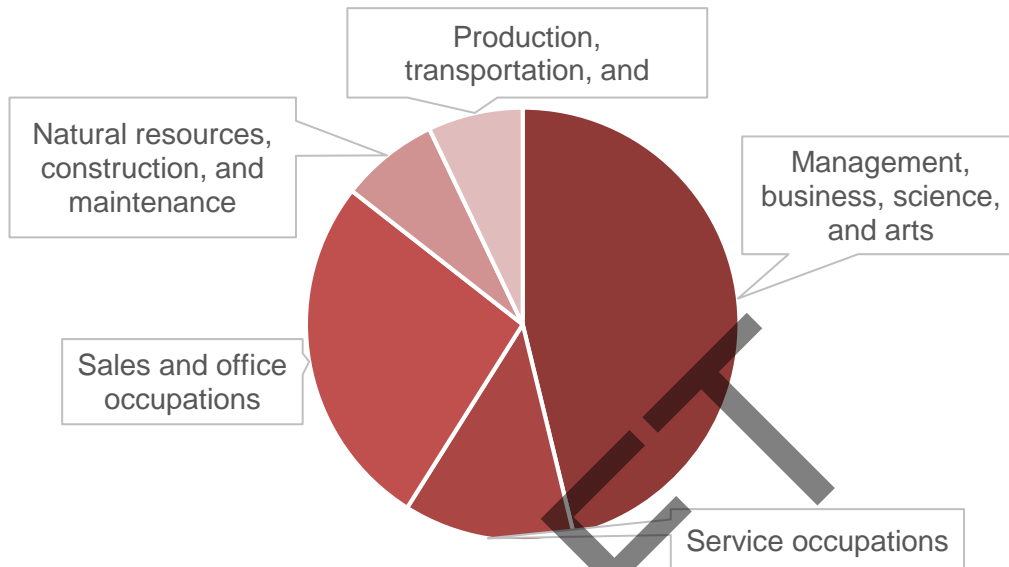
- Encourage financial assistance to include private and public investment in impacted areas of the Township in future economic and transportation plans
- Encourage public funding to improve infrastructure in the impacted areas of the Township
- Encourage financial assistance to build affordable housing, through the use of FHLBank, PHFA, LIHTC, CDBG, and HOME programs outside of impacted areas
- Encourage financial assistance to rehabilitate housing, through the use of FHLBank, PHFA, LIHTC, CDBG, and HOME programs outside of impacted areas
- Provide educational materials to residents of the Township to improve the public's understanding of Fair Housing Choice outside of impacted areas
- Encourage the creation of a regional Resource Guide (paper and electronic versions) that provides residents information on affordable housing opportunities and social service options

D. Employment:

According to the 2007-2011 ACS, 68.1% of the Township's residents 16 years of age and over were considered a part of the labor force in 2011. The charts below illustrate the classes of workers and the occupations. Most workers were employed in four occupations: management, business, science, and arts (46%), sales and office (27%), service (13%), and production, transportation, and material moving occupations (7%). The class of worker consisted primarily of private wage and salary workers (66%), to go along with private not-for-profit wage and salary workers (16%), government (12%) and self-employed workers (6%).

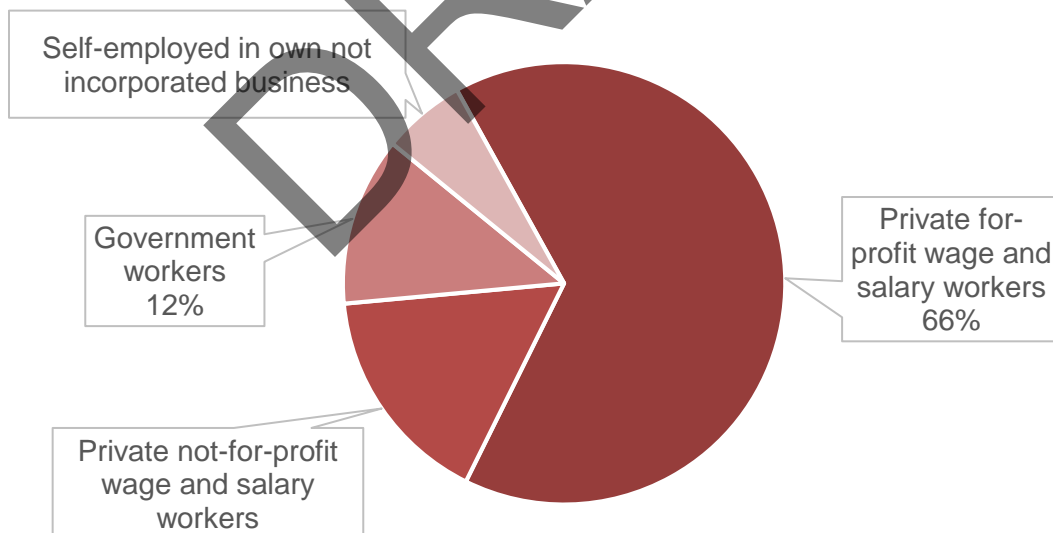


Abington Occupations



Source: 2007-2011 American Community Survey

Abington Class of Worker

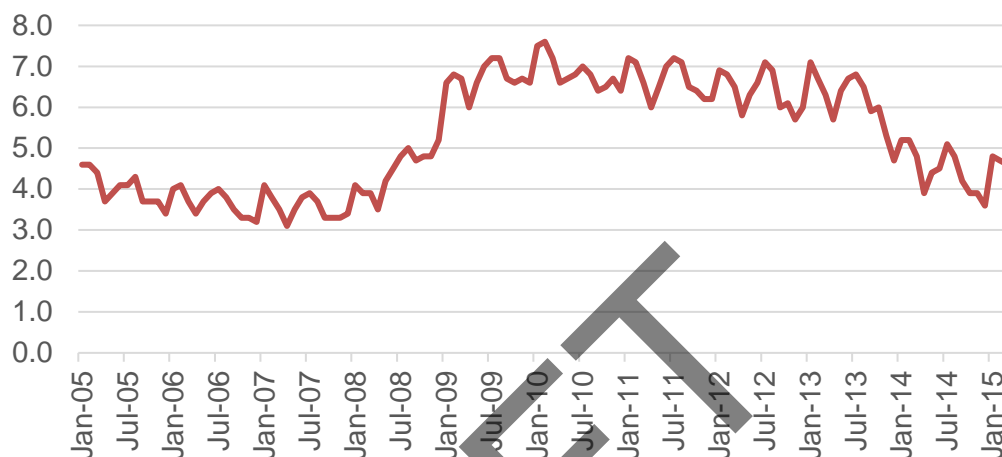


Source: 2007-2011 American Community Survey



The following chart illustrates the unemployment rate trends for the Township of Abington, PA from January 2005 through July 2015 from the Bureau of Labor (www.bls.gov).

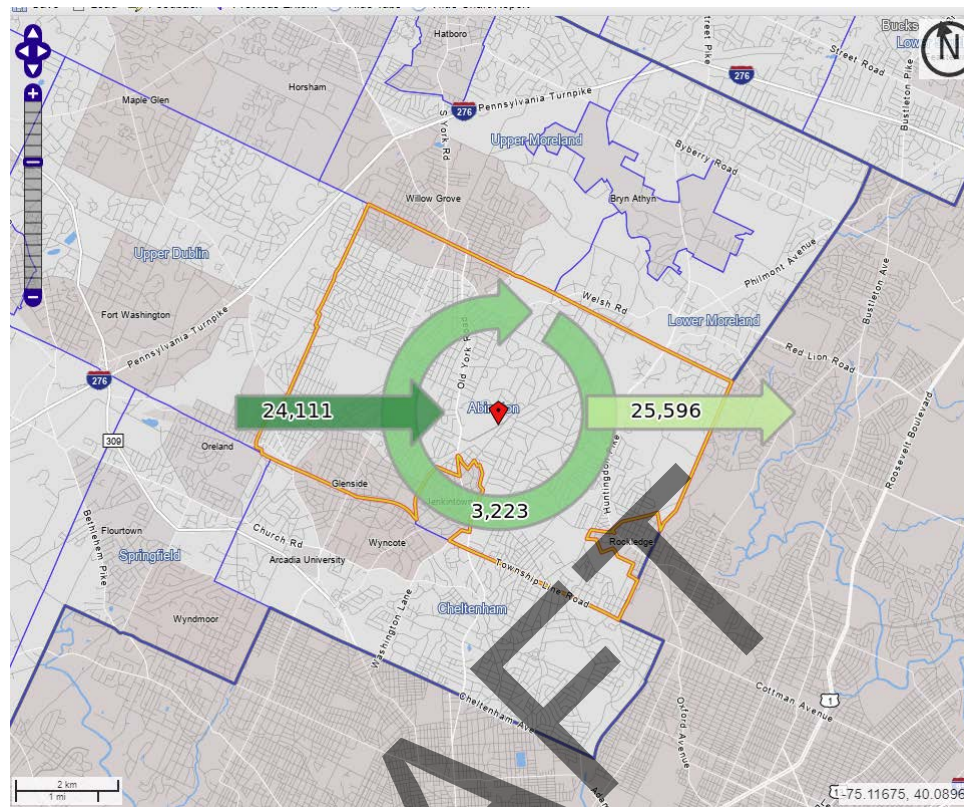
Abington Area Unemployment Rate



Source: <http://data.bls.gov>

Between mid-2008 and early 2010, Abington experienced a spike in unemployment rate, but the overall unemployment rate has recently decreased from approximately 7.5% in early 2010 to the preliminary unemployment rate in January 2015 of 4.8%. The seasonally adjusted, preliminary unemployment rate in the Commonwealth of Pennsylvania at this same time was 5.1%.

Workers in 2017 had a mean travel time to work of 23.6 minutes. The following graphic from OnTheMap.ces.census.gov highlights the inflow/outflow of jobs in Abington. There are 24,111 workers employed in Abington and live outside of Abington, 25,596 workers that live in Abington and employed outside of Abington, and 3,223 workers employed in Abington that live in Abington.



(Source: <https://onthemap.ces.census.gov/>)

E. Housing Profile:

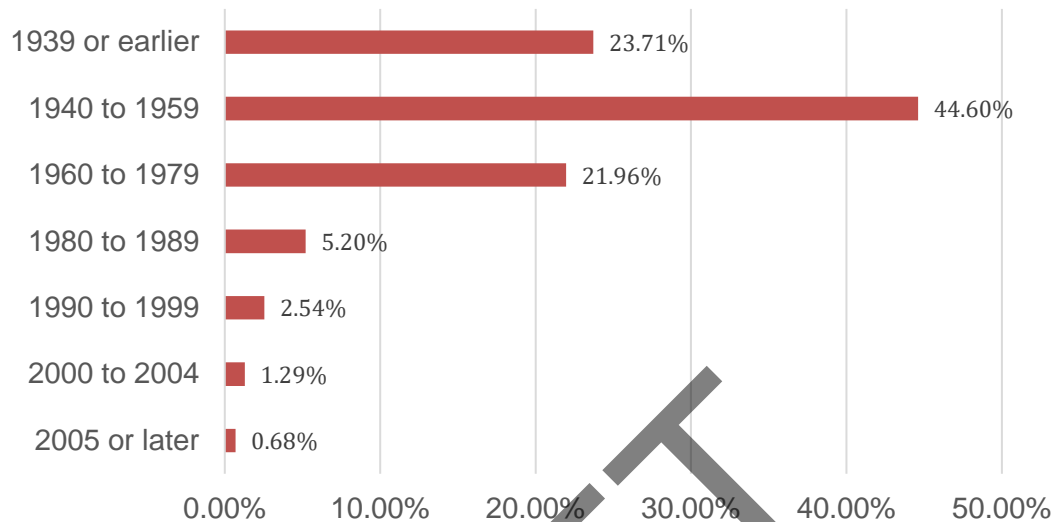
According to the 2010 U.S. Census, there were 22,369 housing units in the Township of Abington, of which 21,382 (95.6%) were occupied. This leaves a vacancy rate of 4.4% in Abington.

Based on the 2007-2011 American Community Survey Data, the Township of Abington's housing stock is considered older, because just under half of the housing stock (44.6%) was constructed between 1940 and 1959 and another 23.71% was constructed prior to 1939. Therefore, over two-thirds of the Township's housing stock (68.31%) was built prior to 1960. It is estimated that the Township of Abington has seen little new construction of housing in recent years. Since the year 2000, the Township has seen just 1.97% of their housing stock built.

The Chart below illustrates the year that housing structures were built in the Township of Abington based on the 2007-2011 ACS.



Year Structure Built in the Township of Abington, PA



Source: 2007-2011 American Community Survey

The table below outlines the number of new units for which building permits were filed annually in the Township of Abington. Overall, most new construction has been for single family units. The County has experienced a sharp decrease in the total number of new units between 2007 and 2008, and a steady decrease overall until the present day. Data for the Township of Abington drastically shows less construction; according to local records, there were six (6) building permits issued for housing units in Abington in 2013, and nine (9) issued in 2014. This data backs up the chart below, which illustrates very little new housing construction has taken place within the Township of Abington.

Units Authorized by Building Permits Abington, PA

Year	Single Family	Multi Family	5+ Units	Total
2004	23	3	0	26
2005	23	6	0	29
2006	19	6	0	25
2007	15	6	0	21
2008	13	0	0	13
2009	11	0	0	11
2010	15	0	0	15
2011	10	0	0	10
2012	8	0	0	8
2013	6	0	0	6
2014	9	0	0	9

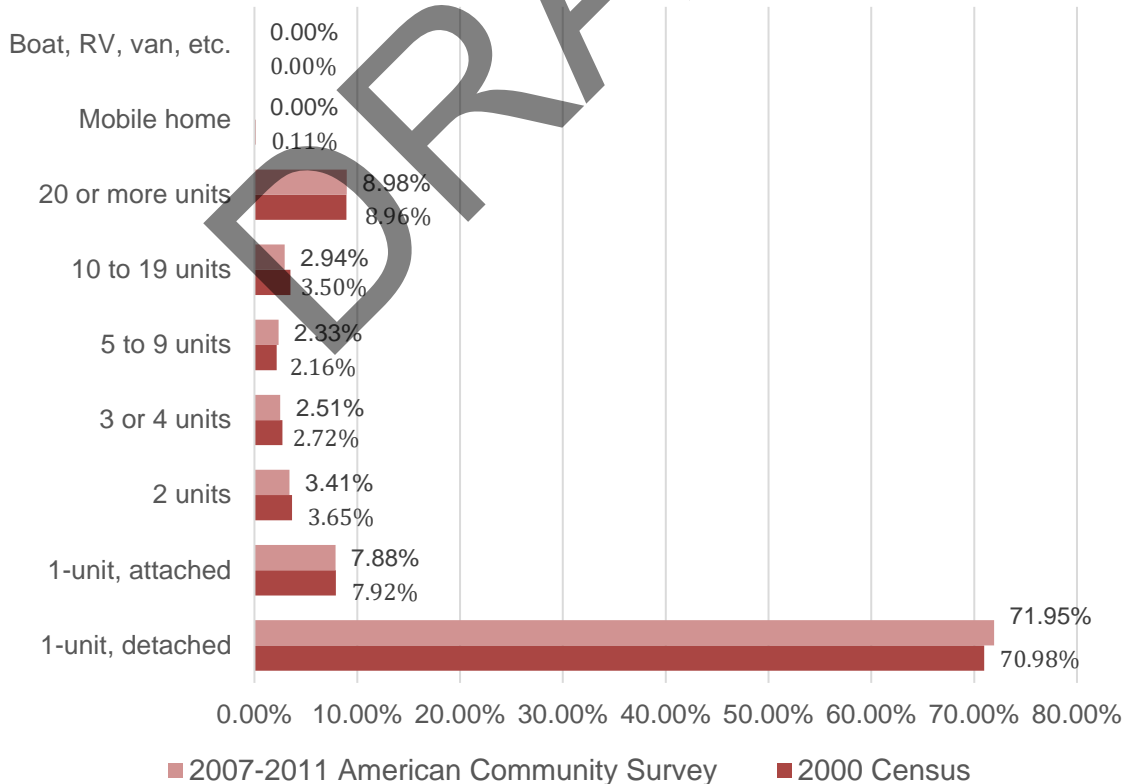
Source: socds.huduser.org/permits/summary.odt



In 2000, the Township's housing stock primarily consisted of single-family detached (70.98%) and single-family attached (7.92%). In 2000, multi-family units in the Township of Abington consisted of two units (3.61%), three to four units (2.72%), five to nine units (2.16%), ten to nineteen units (3.5%) and twenty units or more (8.96%). Mobile homes made up 0.11% of the housing stock. The median value of owner-occupied homes in the Township of Abington in 2000 was \$142,100 compared to \$160,700 for Montgomery County and \$97,000 for the Commonwealth of Pennsylvania.

In 2011, the Township's housing stock consisted primarily of single-family detached (71.95%) and single-family attached (7.88%). In 2011, multi-family units in the Township of Abington consisted of two units (3.41%), three to four units (2.51%), five to nine units (2.33%), ten to nineteen units (2.94%) and twenty units or more (8.98%). There were no mobile homes recorded in 2011. The median value of owner-occupied homes in the Township of Abington in 2011 was \$272,000, compared to \$292,600 for Montgomery County and \$164,700 for the Commonwealth of Pennsylvania. The chart below shows the trends in these housing statistics over the last decade.

Housing Stock in the Township of Abington, PA



Source: 2000 U.S. Census & 2007-2011 American Community Survey



F. Housing Costs:

Owner Costs -

The median mortgage expense in the Township of Abington for 2000 was \$499, compared to \$762 in 2011. The table below illustrates mortgage status and selected monthly owner costs. Monthly owner costs increased by 29.8% while median income during the same time period increased by 30.1%. Given that the inflation rate for the time period between 2000 and 2011 was 30.6, real monthly owner costs have actually decreased. Furthermore, there appears to be a decreasing strain on home ownership given that real monthly ownership costs have decreased more than real income between 2000 and 2011. Close to two-thirds (65.63%) of all houses in Abington had mortgages in 2000, compared to 70.22% in 2011.

Mortgage Status and Selected Monthly Owner Costs

Monthly Owner Cost	2000 U.S. Census		2007-2011 American Community Survey	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Houses with a mortgage	10,487	65.63%	11,738	70.22%
Less than \$300	0	0.00%	12	0.10%
\$300 to \$499	62	0.59%	47	0.40%
\$500 to \$699	382	3.64%	117	1.00%
\$700 to \$999	1,317	12.56%	481	4.10%
\$1,000 to \$1,499	4,684	44.66%	2,066	17.60%
\$1,500 to \$1,999	2,395	22.84%	3,474	29.60%
\$2,000 or more	1,647	15.71%	5,552	47.30%
Median (dollars)	\$1,375	(X)	\$1,958	(X)
Houses without a mortgage	5,493	34.37%	4,978	29.78%
Median	\$499	(X)	\$762	(X)

Source: 2000 U.S. Census and 2007-2011 American Community Survey

Over a quarter (26.3%) of owner-occupied households with a mortgage had monthly housing costs that exceeded 30% of their monthly income in 2011, indicating a relatively high percentage of owners whose housing is not considered affordable. This is illustrated in the table below, which shows housing costs for owner-households. Between the 2000 census count and the 2007-2011 ACS, there was a slight trend of increased monthly housing costs.



Selected Monthly Owner Costs as a Percentage of Household Income

Owner Costs as a % of Income	2000 Census		2007-2011 American Community Survey	
	Number of Housing Units	Percentage of Units	Number of Housing Units	Percentage of Units
Housing units with a mortgage	10,487	65.63%	11,738	70.22%
Less than 20 percent	4165	39.72%	3901	33.23%
20 to 24.9 percent	1904	18.16%	1890	16.10%
25 to 29.9 percent	1352	12.89%	1659	14.13%
30 to 34.9 percent	832	7.93%	1415	12.05%
35 percent or more	2220	21.17%	2849	24.27%
Not computed	14	0.13%	24	0.20%
Housing units without a mortgage	5,493	34.37%	4,978	29.78%
Less than 20 percent	3,726	67.83%	3,170	63.68%
20 to 24.9 percent	405	7.37%	332	6.67%
25 to 29.9 percent	411	7.48%	320	6.43%
30 to 34.9 percent	292	5.32%	192	3.86%
35 percent or more	551	10.03%	912	18.32%
Not computed	108	1.97%	52	1.04%

Source: 2000 U.S. Census & 2007-2011 American Community Survey

The median value of owner-occupied homes in the Township of Abington in 2011 was \$272,000, compared to \$297,900 for Montgomery County and \$163,200 for the Commonwealth of Pennsylvania.

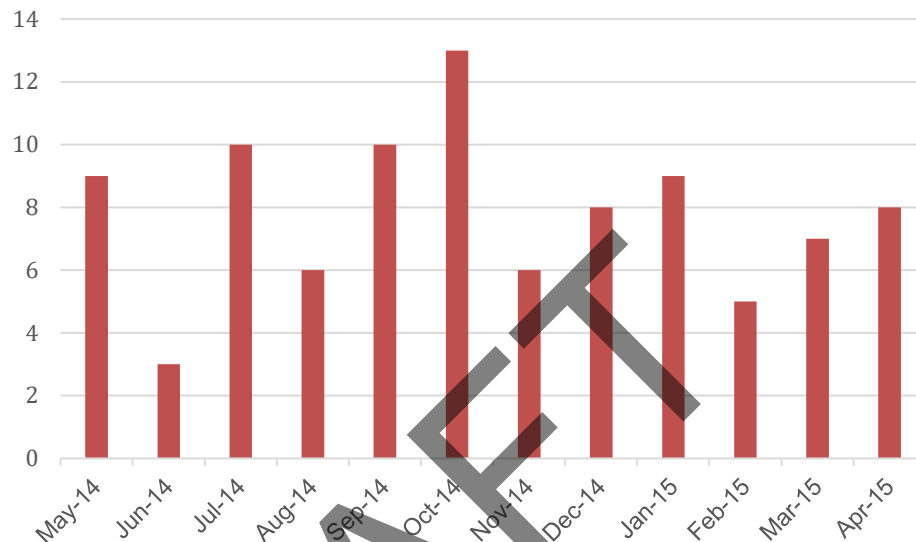
Foreclosures -

According to RealtyTrac, the Township of Abington had a foreclosure rate of 1 in every 813 housing units as of April 2015. In April 2015, the



Commonwealth of Pennsylvania had a foreclosure rate of 1 in every 1,064 housing units. Montgomery County had a foreclosure rate of 1 in every 997 housing units. The following chart illustrates the foreclosure rate of the Township of Abington.

Foreclosures in the Township of Abington, PA



Source: www.realtytrac.com

The number of foreclosures for the Township of Abington was at its highest in October 2014, with 13 foreclosures.

Renter Costs -

The median monthly rent in 2000 was \$749, compared to \$1,040 in 2011, an increase of 38.8%. The table below illustrates rental rates within the Township at the time of the 2000 U.S. Census and 2007-2011 American Community Survey.

Gross Monthly Rent

Rental Rates	2000 U.S. Census		2007-2011 American Community Survey	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Less than \$200	92	2.05%	12	0.26%
\$200 to \$299	137	3.05%	126	2.76%
\$300 to \$499	220	4.90%	105	2.30%
\$500 to \$749	1639	36.51%	604	13.21%
\$750 to \$999	945	21.05%	1,126	24.63%



\$1,000 to \$1,499	826	18.40%	1,402	30.67%
\$1,500 or more	402	8.96%	864	18.90%
No cash rent	128	2.85%	321	7.02%
Median (dollars)	\$749	-	\$1,040	-

Source: 2000 U.S. Census & 2007-2011 American Community Survey

The table below illustrates the housing cost for renter-households. The monthly housing costs for 37.1% of all renter-occupied households exceeded 30% of monthly income in 2000, indicating an even higher percentage of renters whose housing is not considered affordable. In 2011, that amount increased to 48.3%.

Gross Rent as a Percentage of Household Income

Rental Cost as a % of Income	2000 U.S. Census		2007-2011 American Community Survey	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Less than 15 percent	795	17.71%	333	7.29%
15 to 19 percent	709	15.79%	718	15.71%
20 to 24 percent	589	13.12%	472	10.33%
25 to 29 percent	536	11.94%	467	10.22%
30 to 34 percent	365	8.13%	341	7.46%
35 percent or more	1,298	28.92%	1,867	40.84%
Not computed	197	4.39%	373	8.16%

Source: 2000 U.S. Census & 2007-2011 American Community Survey

The 2014 Fair Market Rents for the Township of Abington, PA MSA are shown in the following table.

Final FY 2014 FMRs by Unit Bedrooms

	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
Final FY 2014 FMR	\$814	\$959	\$1,156	\$1,440	\$1,546

Source: www.hud.gov

G. Household Types:

Based on a comparison between the 2000 and 2011 populations, the Township of Abington experienced a 1.2% decrease in population and a



1.86% decrease in households. The median income of the area increased by 21% but an actual decrease in real dollars when inflation is taken into account.

Demographic Changes between 2000 & 2011

Demographics	2000	2011	% Change
Population	56,103	55,429	-1.20%
Households	21,690	21,287	-1.86%
Median Income	\$59,921	\$77,928	30.05%

Source: 2000 Census and 2007-2011 American Community Survey

Number of Households by Income

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	1,880	1,920	2,825	2,045	12,620
Small Family Households *	245	445	890	740	7,190
Large Family Households *	70	70	230	225	1,370
Household contains at least one person 62-74 years of age	495	345	690	285	2,390
Household contains at least one person age 75 or older	640	800	695	494	1,179
Households with one or more children 6 years old or younger *	110	168	430	389	864

Source: 2007-2011 CHAS

* the highest income category for these family types is >80% HAMFI



Housing Problems by Income for Renters and Owners (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing - Lacking complete plumbing or kitchen facilities	75	20	4	30	129	25	0	0	0	25
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	0	30	0	4	34	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	0	25	10	0	35	0	4	15	15	34
Housing cost burden greater than 50% of income (and none of the above problems)	565	475	65	15	1,120	665	425	565	105	1,760
Housing cost burden greater than 30% of income (and none of the above problems)	50	265	340	145	800	95	340	660	745	1,840
Zero/negative Income (and none of the above problems)	55	0	0	0	55	75	0	0	0	75

Source: 2007-2011 CHAS



Severe Housing Problems by Income for Renters and Owners (Households with one or more Severe Housing Problems)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more of four housing problems	640	545	80	49	1,314	690	430	580	120	1,820
Having none of four housing problems	300	370	715	454	1,839	130	575	1,450	1,415	3,570
Household has negative income, but none of the other housing problems	55	0	0	0	55	75	0	0	0	75

Source: 2007-2011 CHAS

Cost Burdened Greater Than 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	90	210	95	395	85	189	510	784
Large Related	4	35	0	39	30	35	160	225
Elderly	280	360	150	790	555	475	449	1,479
Other	270	210	165	645	109	75	114	298
Total need by income	644	815	410	1,869	779	774	1,233	2,786

Source: 2007-2011 CHAS

Cost Burdened Greater Than 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	90	80	0	170	85	114	255	454
Large Related	4	0	0	4	30	20	85	135
Elderly	235	265	65	565	455	255	184	894
Other	260	150	0	410	109	45	55	209
Total need by income	589	495	65	1,149	679	434	579	1,692

Source: 2007-2011 CHAS



Overcrowding Conditions

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	0	55	10	4	69	0	0	15	0	15
Multiple, unrelated family households	0	0	0	0	0	0	4	0	15	19
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	0	55	10	4	69	0	4	15	15	34

Source: 2007-2011 CHAS

According to the 2007-2011 American Community Survey (ACS), there were 21,287 households in 2011 in the Township of Abington. Of the Township's households 5,535 (26.0%) of all households were single person households living alone. Single person households aged 65 and over in the Township comprised 2,789 households or 13.1% of all households and it can be presumed that as they age in place, additional accommodations and special needs will be necessary for this portion of the Township's population. The Township will need to assist in obtaining funding and working with housing service and elderly support agencies to provide programs, activities and accommodations for its elderly population.

The elderly and disabled populations are the most affected by the high cost of housing in the Township of Abington. The elderly and disabled are on fixed or limited incomes. The lack of affordable housing that is decent, safe, and sound forces them into below code standards housing.

The other large group affected by the lack of affordable housing is the homeless and persons at-risk of becoming homeless, including persons who are victims of domestic violence.

The high cost of decent, safe, and sanitary housing in the Township creates instability of housing for the lower income families in the area. Many families are living from paycheck to paycheck and are paying over 30% of their income for housing.

H. Cost Burden:

A major housing problem facing the Township of Abington is the lack of affordable housing. Lower income households are most affected by the cost of housing options. For the jurisdiction as a whole, 32% of all households were cost burdened by 30% or more and 13% of all households were cost



burdened by 50% or more. Additionally, 3,270 White households were cost burdened by 30% to 50%, and 2,105 White households were cost burdened by more than 50%; 445 Black/African American households were cost burdened by 30% to 50%, and 420 Black/African American households were cost burdened by more than 50%.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	13,965	3,950	2,740	55
White	11,485	3,270	2,105	45
Black / African American	1,465	445	420	0
Asian	510	35	145	10
American Indian, Alaska Native	0	0	0	0
Pacific Islander	0	0	0	0
Hispanic	325	135	30	0

Source: 2007-2011 CHAS

The racial and ethnic demographics of the Township of Abington's households according to the 2011 American Communities Survey was: 81.5% White; 13.6% African American; 0.8% Native American; 5.7% Asian; 0.0% Pacific Islander; and the Hispanic or Latino population of any race was reported as 3.4%. A disproportionately greater need was identified when a racial or ethnic group experienced a 10 percentage points or higher occurrence rate of housing cost burdens. A housing cost burden is defined as a household paying over 30% of household AML on housing costs.

Comparing all households that are housing cost burdened by 30% to 50%: 19% of White households were cost burdened; 18% of Black/African American households were cost burdened; 4% of Asian households were cost burdened; 0% of American Indian, Alaska Native households were cost burdened; 0% of Pacific Islander households were cost burdened; and 30% of Hispanic households were cost burdened.

Comparing all households that are housing cost burdened by over 50%: 12% of White households were cost burdened; 17% of Black/African American households were cost burdened; 17% of Asian households were cost burdened; 0% of American Indian, Alaska Native households were cost burdened; 0% of Pacific Islander households were cost burdened; and 7% of Hispanic households were cost burdened.



I. Housing Problems:

A household is considered to have a housing problem if a household has one of the following four housing problems: 1) lacks complete kitchen facilities; 2) lacks complete plumbing facilities; 3) more than 1 person per room; or 4) cost burden greater than 30%.

During the planning process for the preparation of the Township of Abington's Five Year Consolidated Plan, an evaluation and comparison was made to determine the needs of any racial/ethnic groups in comparison to the overall needs in the Township. A disproportionate need is defined as a group having at least 10 percentage points higher than the percentage of persons as a whole. The following tables illustrate the disproportionate needs in the Township of Abington:

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,370	210	55
White	1,150	150	45
Black / African American	145	45	0
Asian	75	0	10
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	15	0

Source: 2007-2011 CHAS

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,570	475	0
White	1,210	385	0
Black / African American	235	30	0



Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Asian	80	15	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	40	0	0

Source: 2007-2011 CHAS

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,450	1,335	0
White	1,120	1,135	0
Black / African American	230	140	0
Asian	25	50	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	39	10	0

Source: 2007-2011 CHAS

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,070	1,575	0
White	900	1,300	0
Black / African American	90	120	0
Asian	0	55	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	45	100	0

Source: 2007-2011 CHAS



The racial and ethnic demographics of the Township of Abington's households according to the 2011 American Communities Survey was: 81.5% White; 13.6% African American; 0.8% Native American; 5.7% Asian; 0.0% Pacific Islander; and the Hispanic or Latino population of any race was reported as 3.4%. There were no disproportionately impacted groups in terms of housing problems.

Comparing housing problems for households across all income groups based on race and ethnicity the prevalence of housing problems was: 25% for White households; 28% for Black/African American households; 21% for Asian households; 0% for American Indian, Alaska Native households; 0% for Pacific Islander households; and 27% for Hispanic households.

J. Disproportionately Greater Need Severe Housing Problems:

A household is considered to have a severe housing problem if a household has one of the following four housing problems: 1) lacks complete kitchen facilities; 2) lacks complete plumbing facilities; 3) more than 1.5 persons per room; or 4) cost burden greater than 50%.

During the planning process for the preparation of the Township of Abington's Five Year Consolidated Plan, an evaluation and comparison was made to determine the needs of any racial/ethnic groups in comparison to the overall needs in the Township. A disproportionate need is defined as a group having at least 10 percentage points higher than the percentage of persons as a whole. The following tables illustrate the disproportionate needs in the Township of Abington:

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,190	390	55
White	965	335	45
Black / African American	145	45	0
Asian	75	0	10
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	15	0



Source: 2007-2011 CHAS

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	870	1,175	0
White	600	995	0
Black / African American	145	120	0
Asian	80	15	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	40	0	0

Source: 2007-2011 CHAS

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	505	2,280	0
White	380	1,875	0
Black / African American	90	275	0
Asian	0	75	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	4	45	0

Source: 2007-2011 CHAS

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	160	2,485	0
White	135	2,065	0



Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Black / African American	25	185	0
Asian	0	55	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	145	0

Source: 2007-2011 CHAS

The racial and ethnic demographics of the Township of Abington's households according to the 2011 American Communities Survey was: 81.5% White; 13.6% African American; 0.8% Native American; 5.7% Asian; 0.0% Pacific Islander; and the Hispanic or Latino population of any race was reported as 3.4%. There were no disproportionately impacted groups in terms of severe housing problems.

K. Disabled Households:

The following table includes the 2007-2011 ACS data for the number of disabled individuals in the Township of Abington. The total population over the age of 5 is 54,818 and the disabled portion of this population is 6,435, or (11.70%). This is an indicator of the need for housing for the disabled, which are oftentimes low- and moderate-income, and do not have housing resources that are accessible and/or affordable.

Disability Status for Abington, PA

Disability Status of the Civilian Non-Institutional Population	Total Population Over 5 Years of Age	Population with a Disability	Percent with a Disability
Total civilian noninstitutionalized population	54,818	6,435	11.70%
Population under 5 years	2,817	0	0.00%
With a hearing difficulty	(X)	0	0.00%
With a vision difficulty	(X)	0	0.00%
Population 5 to 17 years	9,268	581	6.30%



With a hearing difficulty	(X)	76	0.80%
With a vision difficulty	(X)	34	0.40%
With a cognitive difficulty	(X)	455	4.90%
With an ambulatory difficulty	(X)	31	0.30%
With a self-care difficulty	(X)	135	1.50%
Population 18 to 64 years	33,632	2,824	8.40%
With a hearing difficulty	(X)	549	1.60%
With a vision difficulty	(X)	438	1.30%
With a cognitive difficulty	(X)	1,037	3.10%
With an ambulatory difficulty	(X)	1,415	4.20%
With a self-care difficulty	(X)	430	1.30%
With an independent living difficulty	(X)	923	2.70%
Population 65 years and over	9,101	3,030	33.30%
With a hearing difficulty	(X)	1,308	14.40%
With a vision difficulty	(X)	569	6.30%
With a cognitive difficulty	(X)	631	6.90%
With an ambulatory difficulty	(X)	1,880	20.70%
With a self-care difficulty	(X)	934	10.30%
With an independent living difficulty	(X)	1,554	17.10%
SEX			
Male	26,255	2,966	11.30%
Female	28,563	3,469	12.10%
RACE AND HISPANIC OR LATINO ORIGIN			
One Race	N	N	N
White alone	43,854	5,212	11.90%
Black or African American alone	6,868	864	12.60%
American Indian and Alaska Native alone	N	N	N
Asian alone	2,755	228	8.30%
Native Hawaiian and Other Pacific Islander alone	N	N	N
Some other race alone	N	N	N
Two or more races	N	N	N
White alone, not Hispanic or Latino	42,441	5,026	11.80%
Hispanic or Latino (of any race)	2,113	244	11.50%

Source: 2007-2011 American Community Survey



The disabled population of the Township of Abington comprises 11.17% of the Township's residents; 3.53% of the population has a hearing difficulty; 1.9% of the population has a vision difficulty; 3.87% of the population has a cognitive difficulty; 6.07% of the population has an ambulatory difficulty; 2.73% of the population has a self-care difficulty; and 4.52% of the population has an independent living difficulty.

Of the population age 65 and older, 33.3% have a disability, made up largely due to ambulatory difficulty (20.7%) and an independent living difficulty (17.1%). The overall data shows a fairly even percentage between males and females, with 11.3% and 12.1% of the respective populations having disabilities.

As of January 2020, the maximum monthly Supplemental Security Income (SSI) amount was \$783.

DRAFT



L. Segregation

The following map is a racial dot map representing one dot for every person counted during the 2010 Census. Each dot is color-coded by the individual's race and ethnicity. White individuals are coded as blue; Black individuals, green; Asian individuals, red; Hispanic individuals, orange; and all Other racial categories are coded as brown. The map was created by the University of Virginia Weldon Cooper Center for Public Service Demographics Research Group. The map provides a picture of any areas that may have a grouping of non-White residents. The Township is mainly White and has a concentration of Black persons in the Willow Grove and Crestmont neighborhoods.

Racial Dot Map



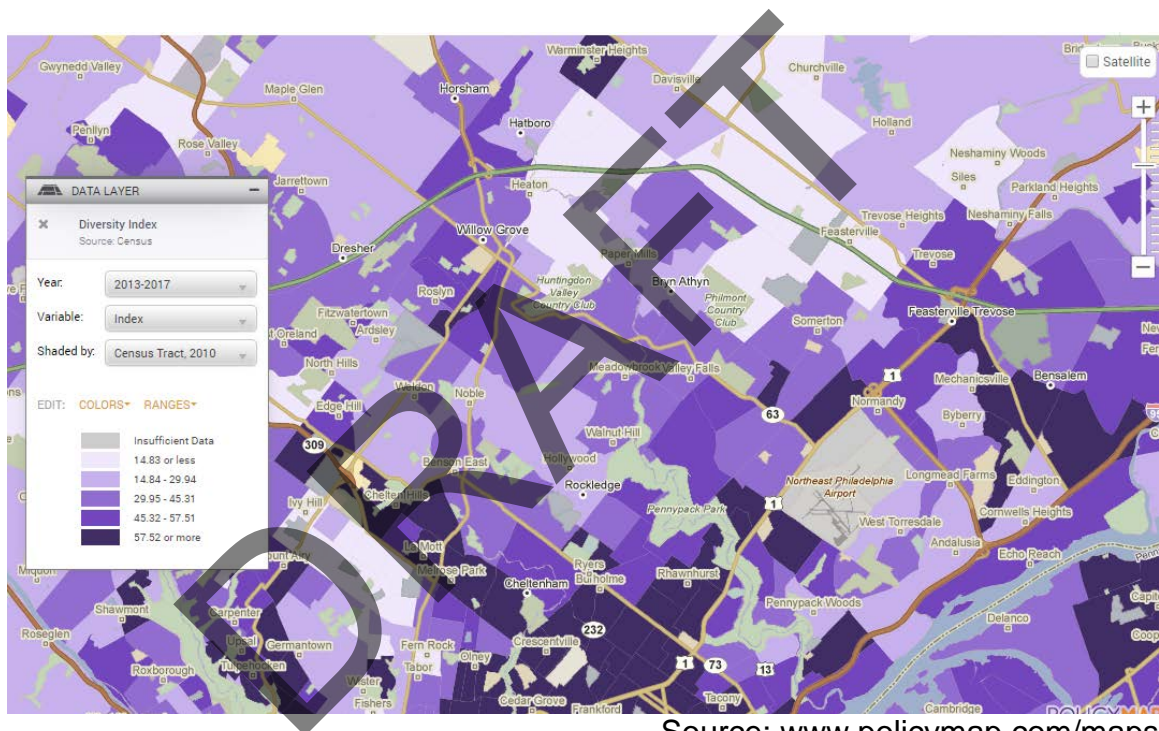
(Source: demographics.coopercenter.org/racial-dot-map)

The following map calculates the diversity index per Census Tract in the Township. “The diversity index is an index ranging from 0 to 87.5 that represents the probability that two individuals, chosen at random in the given geography, would be of different races or ethnicities between 2013-2017. Lower index values between 0 and 20 suggest more homogeneity



and higher index values above 50 suggest more heterogeneity. Racial and ethnic diversity can be indicative of economic and behavioral patterns. For example, racially and ethnically homogenous areas are sometimes representative of concentrated poverty or concentrated wealth. They could also be indicative of discriminatory housing policies or other related barriers. Data were obtained from the Census' American Community Survey 2013-2017 estimates and calculated by PolicyMap.” (Source: PolicyMap.com) The Township’s diversity index in most areas of the Township are 29.95 to 45.31 with additional areas above 50.

Diversity Index



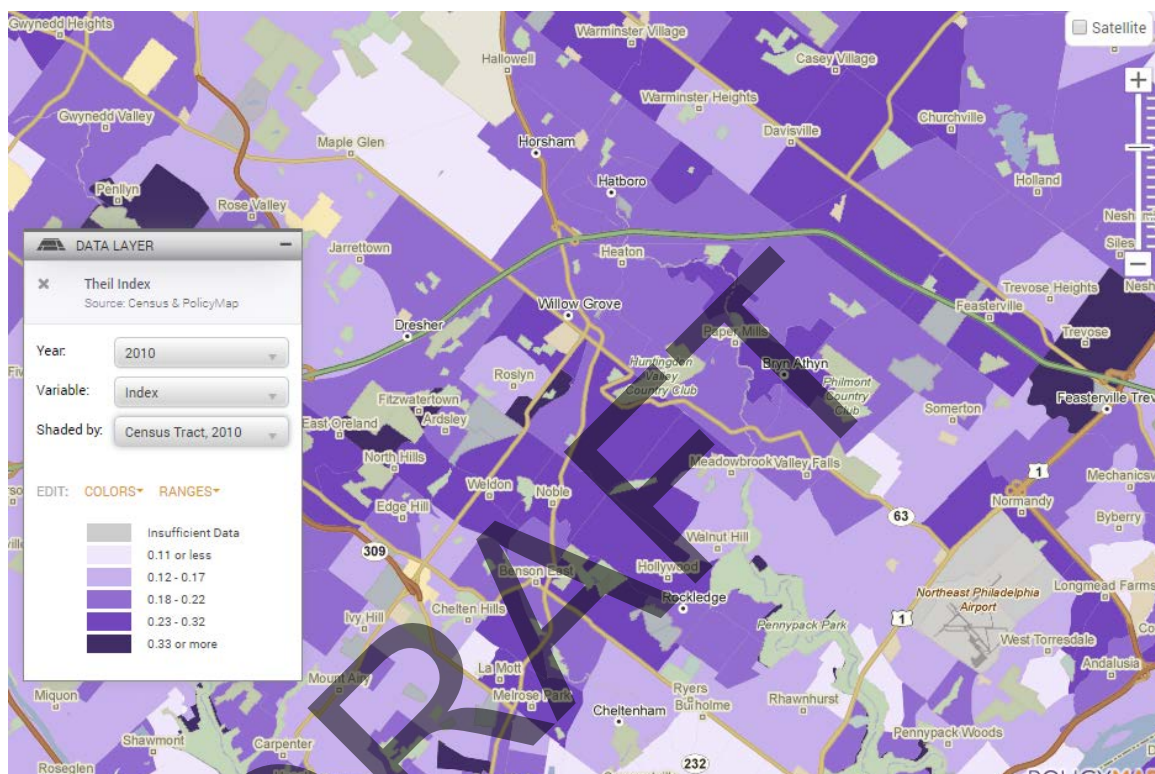
Source: www.policymap.com/maps

The following map provides the Theil Index calculations per Census Tract in the Township. “The Theil Index is an index ranging from 0 to 1 that displays information about racial segregation. Lower index values below 0.20 suggest less segregation and higher index values above 0.40 suggest more segregation. The Theil Index is a measure of how evenly members of racial and ethnic groups are distributed within a region, calculated by comparing the diversity of all sub-regions (Census Blocks) to the region as a whole. Patterns of racial segregation can emerge as a result of systemic barriers and opportunities or localized individual preferences. For example, highly segregated areas may be indicative of discriminatory housing practices or other related barriers. Data used in the calculation of this index were derived from the U.S. Census Bureau's 2010 Decennial Census.”



(Source: PolicyMap.com) The Theil Index was 0.33 in two areas of the Township.

Theil Index



Source: www.policymap.com/maps

HUD defines a racially/ethnically concentrated area of poverty (R/ECAP) as a census tract where the number of families in poverty is equal to or greater than 40% percent of all families, or an overall family poverty rate equal to or greater than three times the metropolitan poverty rate, and a non-white population, measured at greater than 50 percent of the population. The Township did not have any areas identified by HUD as an R/ECAP.



III. Review/Update to Original Plan

The Township of Abington identified specific goals and strategies for the Township to affirmatively further fair housing in 2015, as part of its Five Year Consolidated Plan and subsequent Annual Action Plans. During the FY 2015-2018 CAPER period, Abington Township took the following actions to address the impediments identified in the 2015 Analysis of Impediments to Fair Housing Choice Impediments.

Impediment 1: FAIR HOUSING EDUCATION AND OUTREACH – There is a continuing need to educate persons about their rights and responsibilities under the Fair Housing Act and raise awareness, especially for low-income households, that all residents of Abington Township have a right to fair housing choice.

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

The strategies to achieve this goal include:

- **1-A:** Continue to promote the Township Police Department's "No Place for Hate" Program in the schools and provide educational opportunities for all persons to learn about their rights under the Fair Housing Act and the Americans With Disabilities Act.
- **1-B:** Continue to make available and distribute literature and informational material concerning fair housing issues. These documents should be translated for the applicable LEP population in Abington.
- **1-C:** Support the continuing efforts of the local fair housing organizations to provide training and technical assistance to the staff of Abington Township, the local Human Relations Commission members, Township Solicitor, affordable housing providers, and other organizations that are concerned with housing and civil rights in Abington.

2015 Accomplishments: The Township purchased a table and tent for the Abington Human Relations Commission to use during events; the Human Relations Commission offers programs to local organizations and businesses regarding discrimination. The Township also provided a youth diversity education program during the annual "Pre-Night Out" community block party that is put on by the Abington Community Taskforce (ACT). The Township was a sponsor of the Fair Housing Rights Center in Southeastern Pennsylvania's "There's No Place Like Home!" workshop. Annually, the Township sends a calendar to all Abington residents. In this calendar the Office of Community Development pays for a fair housing education ad and notes that April is Fair Housing Month. The Township declared April Fair Housing month on April 14, 2016 during a Township



Commissioners meeting. Additionally, Abington Township, Abington Human Relations Commission, and Abington Y Achievers funded a “One Community Program” focused on diversity and inclusion. The teen program focused on disabilities, race, ethnicity, religion, sexual orientation, gender identify, and age and culminated in a contest asking the teens to respond to what they learned about diversity and inclusion through types of art media.

2016 Accomplishments: The Township held two events: 1) Abington Human Relations Commission Pre-Night Out is a community engagement block party that was an opportunity for representatives of the HR Commission to engage the public concerning fair housing awareness; and 2) Township Staff Fair Housing Training with the Fair Housing Rights Center in Southwest Pennsylvania.

2017 Accomplishments: The Township held two events: 1) Abington Human Relations Commission Pre-Night Out is a community engagement block party that was an opportunity for representatives of the HR Commission to engage the public concerning fair housing awareness; and 2) Township Staff Fair Housing Training with the Fair Housing Rights Center in Southwest Pennsylvania.

2018 Accomplishments: The Township conducted two (2) fair housing awareness activities: 1) Abington Human Relations Commission Pre-Night Out (community engagement block party that was an opportunity for representatives of the HR Commission to engage the public concerning fair housing awareness) and 2) Willow Grove NAACP education events. One hundred (100) individuals participated in the fair housing education activities.

Impediment 2: PUBLIC POLICIES AND REGULATIONS – The Township, in conjunction with the Montgomery County Planning Department, has been working on revising its Zoning Ordinance in accordance with the latest model codes. The Township needs to continue to move forward and complete this major revision to its Zoning Ordinance to bring it into compliance with the Federal Fair Housing Act, Section 504, the Americans with Disabilities Act, etc.

Goal: Complete the work on the revisions to the Township’s Zoning Ordinance to promote and affirmatively further fair housing by revising its purposes, definitions, and land use regulations.

The strategies to achieve this goal include:

- **2-A:** Review and revise the definition of "Family" in the Zoning Ordinance to permit up to six (6) disabled persons to live together as a single family unit in any residential zoning district. The Township has been administratively abiding by this, but should now include this in the wording of the Zoning Ordinance.



- **2-B:** Revise the General Purpose and Intent Section of the Zoning Ordinance to reaffirm the Township's commitment to affirmatively further fair housing.
- **2-C:** Revise the Zoning Ordinance to develop a chart with the revised permitted uses, including all types of housing: i.e. group residences, community living arrangements, elderly housing, etc.
- **2-D:** Review and revise all of the other definitions in the Zoning Ordinance Township's and include new definitions for Handicapped (Disabled), Fair Housing Act, Group Home, Community Living Arrangement, Elderly Housing (Senior Citizen Housing), Visitability, Accessibility, Americans With Disabilities Act, etc.

2015 Accomplishments: The Township continued to work on the revisions to its Zoning Ordinance; the Zoning Ordinance has not yet been approved by all parties.

2016 Accomplishments: The Township Staff received Fair Housing Training led by Angela McIver of the Fair Housing Rights Center in Southwest Pennsylvania.

2017 Accomplishments: The Township Staff received Fair Housing Training led by Angela McIver of the Fair Housing Rights Center in Southwest Pennsylvania.

2018 Accomplishments: The Township Staff has been working with the Montgomery County Planning Commission to finalize the update to the Township's Zoning Ordinance.

Impediment 3: NEED FOR AFFORDABLE RENTAL HOUSING UNITS – The cost of rent for apartments in the Township has increased over the past ten years to the point that 52.6% of all renter households in Abington are paying more than 30% of their income on the cost of their housing, which means that these households are considered cost overburdened.

Goal: Promote and encourage the construction and development of additional affordable rental housing units in the Township, especially for households whose income is less than 80% of the median income.

The strategies to achieve this goal include:

- **3-A:** Support and encourage both private developers and non-profit housing providers to develop and implement plans for the construction of new affordable mixed income rental housing that would be located throughout the Township that provide access to employment opportunities, transportation, amenities, and services throughout the Township; especially for the Elderly.



- **3-B:** Assist in supporting and promoting financial assistance to households that are cost overburdened, particularly those households below 80% of the area median family income.
- **3-C:** Continue to support and encourage the rehabilitation of existing housing units and the construction of upper floor housing units in mixed use buildings, as outlined in the “Old York Road Corridor Improvement Study,” to increase the supply of decent, safe and sound rental housing that is affordable to low- and moderate-income households.

2015 Accomplishments: The Township supported the Willow Grove Community Development Corporation in its efforts to provide affordable housing, management, regular inspections, and preventative maintenance to individuals and families in Abington Township and other Eastern Montgomery County areas. Additionally, the Township funded Crest Manor, the Montgomery County Housing Authority’s general occupancy public housing community located in the Crestmont neighborhood. The rehabilitation work is on-going and will be completed during the FY 2016 CAPER period.

2016 Accomplishments: The Township completed construction of forty (40) rental-housing units with MCHA replacing the Crestmont Public Housing Development.

2017 Accomplishments: The Township funded the Renter-Occupied Housing Rehabilitation Program with \$100,000 in FY 2017 CDBG funds. No units were completed in FY 2017 but are expected to be completed during the FY 2018 and 2019 Program Years.

2018 Accomplishments: The Township funded the Renter-Occupied Housing Rehabilitation Program with \$100,000 in FY 2017 CDBG funds; activity is ongoing.

Impediment 4: NEED FOR AFFORDABLE HOUSING FOR SALE – The monthly housing cost for homeowners with a mortgage has increased to over \$1,958 per month and it is estimated that 36.4% of all homeowners with a mortgage are paying more than 30% of their income on housing costs, which makes them cost overburdened, and limits the choice of housing for lower income households.

Goal: Promote and encourage the development of for-sale single family houses that are affordable to low- to moderate-income households.

The strategies to achieve this goal include:

- **4-A:** Continue to support the construction and development of new for sale housing that provides affordable housing options to low- and moderate-income households outside of economically impacted areas.



- **4-B:** Continue to support down-payment assistance and financing to assist low- and moderate-income homebuyers to purchase housing outside of economically impacted areas.
- **4-C:** Continue to support the rehabilitation of the existing housing stock to increase the supply of decent, safe, and sound housing that is affordable to low- and moderate-income households.
- **4-D:** Continue to support homebuyer education and training programs to improve homebuyer awareness and increase the opportunities of fair housing choice for lower income households to move outside impacted areas.
- **4-E:** Apply to the Federal Home Loan Bank, Pennsylvania Housing Finance Agency, and State CDBG and HOME programs for funds for down payment assistance to lower income households so they can become homeowners.

2015 Accomplishments: The Township provided funding for the Owner-Occupied Housing Rehabilitation program, which assisted a total of three (3) households during this CAPER period. Additionally, the Township has engaged the Habitat for Humanity of Montgomery County to initiate the development of Habitat housing in the Township.

2016 Accomplishments: No activities this CAPER period.

2017 Accomplishments: The Township's Owner-Occupied Housing Rehabilitation Program assisted two (2) owner-occupied households.

2018 Accomplishments: The Township's Owner-Occupied Housing Rehabilitation Program assisted one (1) owner-occupied households.

Impediment 5: NEED FOR ACCESSIBLE HOUSING – There is a need for more accessible housing that is decent, safe, and sound, as well as affordable to persons with disabilities.

Goal: Increase the number of accessible housing units that are decent, safe, and sound, as well as affordable to lower income households throughout the Township.

The strategies to achieve this goal include:

- **5-A:** Increase the number of accessible housing units through rehabilitation of the existing housing stock.
- **5-B:** Increase the number of accessible housing units through the development and construction of new rental and single family homes for sale.



- **5-C:** Continue to enforce the ADA requirements for landlords to make “reasonable” modifications and accommodations to their rental properties, which will increase the number of accessible housing units for the disabled.
- **5-D:** Provide financial assistance to homeowners to make their properties accessible in order to allow the elderly to remain in their residences.

2015 Accomplishments: Abington Township assisted in the funding of Crest Manor for the rehabilitation of 40 affordable housing rental units. The units were rehabilitated to be accessible or convertible to be accessible and “visitable.”

2016 Accomplishments: The Township completed construction of forty (40) rental-housing units with MCHA replacing the Crestmont Public Housing Development. Three (3) units are fully accessible and the housing development is visitable.

2017 Accomplishments: Previous years’ CDBG funds were used to make one (1) owner-occupied housing unit handicap accessible.

2018 Accomplishments: The Township has funded its Owner-Occupied Housing Rehabilitation program with multiple years of CDBG funds; activity is ongoing.

Impediment 6: COUNTYWIDE APPROACH TO AFFIRMATIVELY FURTHERING FAIR HOUSING – There are four (4) Federal Entitlement jurisdictions in Montgomery County: Abington, Lower Merion, Norristown, and Montgomery County. Housing, racial, and socio-economic data from the U.S. Census of 2010, as well as the location of subsidized housing illustrates that there is a disproportionate concentration of low- and moderate-income persons, minorities, and Hispanics living in impacted areas throughout Montgomery County, which demonstrates a lack of housing choice.

Goal: Provide housing and economic opportunities for low- and moderate-income persons and the protected classes to live and work throughout all of Montgomery County, including outside impacted areas.

The strategies to meet this goal include:

- **6-A:** Establish an Affirmatively Furthering Fair Housing (AFFH) Task Force for Montgomery County with representatives from the Township of Abington, Lower Merion Township, the Municipality of Norristown, Montgomery County, U.S. Department of Housing and Urban Development (HUD), the two Fair Housing Councils, and the Montgomery County Housing Authority (MCHA).
- **6-B:** The AFFH Task Force should review the mobility policies and procedures of the Montgomery County Housing Authority to encourage and



support low- and moderate-income Housing Choice Voucher holders to move outside racially and economically impacted areas in Montgomery County.

- **6-C:** The four (4) federal Entitlement jurisdictions: Montgomery County, Norristown, Lower Merion and Abington should coordinate and cooperate in the preparation and implementation of their individual Analysis of Impediments (A.I.) and/or prepare and adopt a joint countywide fair housing strategic plan.
- **6-D:** The three (3) federal Entitlement jurisdictions should work with Montgomery County to promote and encourage the development of affordable housing throughout Montgomery County in areas that are not economically or racially impacted.

2015 Accomplishments: Abington Township assisted in the funding of the rehabilitation of 40 affordable housing rental units located in Crest Manor and owned by the Montgomery County Housing Authority. The Office of Community Development is a routine participant in countywide community and housing development meetings, including such activities as the homeless Point In Time Count. Additionally, the Township Human Relations Commission activities are regularly disseminated to surrounding communities and their participation is encouraged.

2016 Accomplishments: The Township has been discussing participation with other Montgomery County Entitlement Communities to form a Consortium to complete a countywide Assessment of Fair Housing.

2017 Accomplishments: The Township has been partnering with surrounding municipalities to address regional fair housing issues by exploring opportunities to collaborate on projects and informing partners of the Township's fair housing needs and goals.

2018 Accomplishments: The Township has been partnering with surrounding municipalities to address regional fair housing issues by exploring opportunities to collaborate on projects and informing partners of the Township's fair housing needs and goals.

Impediment 7: SUPPORT THE HUMAN RELATIONS COMMISSION – The Township needs to continue to support the Human Relations Commission, to become a local coordination, outreach, investigation, and adjudication organization; fair housing choice will be promoted and encouraged.

Goal: The Human Relations Commission of Abington Township will be a motivating force in affirmatively furthering fair housing in the Township and will promote fair housing choice for all protected classes of people.



The strategies to achieve this goal include:

- **7-A:** The local governing body of the Township will keep the appointments of members to the Human Relations Commission current and will provide the Commission with technical and clerical support.
- **7-B:** Establish procedures and protocols for how fair housing complaints are to be reported, monitored, and mediated, as well as training for Commission members and the Township Solicitor.
- **7-C:** Advertise to the community, including the Township's website, the existence of the Human Relations Commission, its mission, and how to report fair housing complaints.
- **7-D:** Promote seminars and educational programs for the community in cooperation with local fair housing organizations to increase the knowledge base of all residents, owners, renters, and landlords, concerning their rights under the Fair Housing Act, as well as the Americans with Disabilities Act.

2015 Accomplishments: During this CAPER period, Abington Township continued to financially and programmatically assist the Human Relations Commission. This was accomplished by conducting housing inspections and assisting occupants on fair housing related issues for the Commission. Additionally, the Township purchased a table and tent for the Abington Human Relations Commission to use during events, such as the "One Community Program" focused on diversity and inclusion.

2016 Accomplishments: The Township sponsored the Abington Human Relations Commission participation in the Township's Pre-Night Out community engagement block party.

2017 Accomplishments: The Township sponsored the Abington Human Relations Commission participation in the Township's Pre-Night Out community engagement block party.

2018 Accomplishments: The Township sponsored the Abington Human Relations Commission participation in the Township's Pre-Night Out community engagement block party.



IV. Impediments to Fair Housing 2020

In order to determine if impediments to fair housing choice exist, interviews and meetings were conducted, as well as a review of previous fair housing complaints filed in the Township.

A. Fair Housing Complaints:

1. Township of Abington Human Relations Commission

The Abington Township Board of Commissioners adopted the "Abington Township Human Relations Ordinance" on April 12, 2012 by Ordinance Number 2029. In the ordinance, the Township of Abington declared its intent: "To

foster equality and equal opportunity for all citizens, regardless of actual or perceived race, color, religious creed, ancestry, sex, national origin, handicap or disability, use of guide or support animals because of blindness, deafness or physical handicap of the user or because the user is a handler or trainer of support or guide animals, or because of an individual's sexual orientation, gender identity of gender expression in all matters affecting employment, housing and commercial property and public accommodation, and to safeguard the right of all persons to remain free of discrimination or discriminatory practices in any of the foregoing aspects of their lives."

The Abington Township Human Relations Commission consists of five (5) members. The Commission members are appointed by the Board of Commissioners to terms of three years. The terms of the members of the Commission are staggered, such that the terms of one third (1/3) of the members of the Commission shall expire each year. All members of the Commission must be residents or business owners in the Township of Abington and will serve without compensation.

The Human Relations Commission annually designates one member to serve as Chairperson of the Commission. The Chairperson is responsible for coordinating the activities, meetings, and operations of the Commission. The Chairperson also reports, from time to time, to the President of the Board of Commissioners regarding the activities of the Commission. All members of the Commission are





required to attend training and educational seminars in conjunction with the state Human Relations Commission.

When complaints are received, the Chairperson of the Commission will designate one member of the Commission to be responsible to receive the complaint and conduct an intake meeting with the complainants. The member charged with this duty does not participate in any mediations involving parties to the complaint for which they handled the intake.

Complaints may be filed in person at the office of the Township Manager, or by mailing complaints to the Township offices, to the attention of the Township Manager or the Human Relations Commission. All complaints must be received by the Township within one hundred eighty (180) days of the occurrence of the act giving rise to the complaint or the complaint shall be dismissed as untimely.

The Commission provides a process by which persons seeking to file a complaint may consult with a volunteer or other staff person affiliated with the Commission who is trained to assist the prospective complainant in discerning the facts relevant to the prospective complaint. The process also includes referral of additional information to the prospective complainant, the content of the Pennsylvania Human Relations Act, and the availability of the Pennsylvania Human Relations Commission as an additional venue within which the prospective complainant may seek redress when possible.

The Township formed the Human Relations Commission at the end of 2012 and has not received any complaints or implemented any programs or activities to promote fair housing.

To contact the Human Relations Commission, the following contact information is applicable:

The Township of Abington Human Relations Commission
1176 Old York Road, Abington, PA 19001

OR

Michael LeFevre, Township Manager
1176 Old York Road, Abington, PA 19001
Phone: 267-536-1001
Email: mlefevre@abington.org

In addition to the Human Relations Commission, there are two Fair Housing Rights organizations that operate in the Abington Township



area. The two groups are the Fair Housing Rights Center in Southeastern Pennsylvania, located in Philadelphia, PA, and the Fair Housing Equality Center of Pennsylvania, located in Fort Washington, PA.

The Fair Housing Rights Center in Southeastern Pennsylvania was incorporated in 1992 with a mission to ensure equal access to housing opportunities for all people. The Center educates the public on fair housing laws, provides assistance to individuals who have experienced housing discrimination, monitors the community for compliance with applicable housing laws, and offers information and counseling on housing related issues. The Fair Housing Rights Center did not have any major fair housing findings regarding the Township.



Fair Housing Rights Center in Southeastern Pennsylvania
444 N. 3rd Street, Suite 110, Philadelphia, PA 19123
Toll Free: 886-576-1968 Phone: 215-625-0700
<http://www.fairhousingrights.org>

The Housing Equality Center of Pennsylvania (formerly known as the Fair Housing Council of Suburban Philadelphia) is the oldest fair housing agency in the United States. Founded in 1956, the Housing Equality Center's mission is to educate and advocate for equal access to quality, affordable housing for everyone in Southeast Pennsylvania. As a part of the Housing Equality Center's contract with Montgomery County, the Fair Housing Council has conducted testing, reviewed zoning codes, and reviewed housing advertisements. There were no major findings from these activities in the Township of Abington over the past few years. Additionally, no complaints for housing discrimination were filed with the Housing Equality Center.



Housing Equality Center of Pennsylvania
455 Maryland Drive, Suite 190, Fort Washington, PA 19034
Toll Free: (866) 540-FAIR (3247) Phone: (267) 419-8918
<http://www.equalhousing.org>



2. Pennsylvania Human Relations Commission

The Pennsylvania Human Relations Commission (PHRC) is tasked to enforce state laws that prohibit discrimination: which are the Pennsylvania Human Relations Act, and the Pennsylvania Fair Educational Opportunities Act. The

Pennsylvania Fair Educational Opportunities Act, created in 1961 by the General Assembly of the Commonwealth of Pennsylvania and amended in 1992, prohibits discriminatory practices in educational institutions based on race, religion, color, ancestry, national origin, or sex. The Pennsylvania Human Relations Act was created in 1955 and amended in 1997; the Act prohibits certain discriminatory practices because of race, color, religious creed, ancestry, age, or national origin by employers, employment agencies, labor organizations, etc. This Act additionally created the Pennsylvania Human Relations Commission (PHRC) in the Governor's Office and defined its powers; PHRC's mission is to "not only seek to end and prevent discrimination through enforcement of the laws, but through educating Pennsylvanians on their legal rights and responsibilities" (PHRC 2011-2013 Annual Plan.

**PA Human Relations
Commission**
Executive Offices
333 Market St., 8th Floor
Harrisburg, PA 17101-2210
(717) 787-4410 (Voice)
(717) 787-7279 (TTY users only)

PHRC investigates employment and housing discrimination complaints on behalf of the U.S. Equal Employment Opportunity Commission (EEOC) and the U.S. Department of Housing and Urban Development (HUD), respectively. The State Governor appoints eleven commissioners (confirmed by the Senate) to act as public liaisons, establish policies, and resolve cases not settled voluntarily. The commission is independent and nonpartisan, with the chairperson appointed by the governor and a vice-chairperson, secretary, and assistant secretary elected by the commissioners every year. The commission holds monthly meetings, which are open to the public, to address issues of discrimination or civil tension.

The PHRC organizes the PA Interagency Task Force on Community Activities and Relations, a group of state agencies unified in preventing and stopping civil tension and violence stemming from conflicts between ethnic or cultural groups. In addition, the PHRC offers hotlines to report bias and hate crimes, as well as an online way of filing a complaint regarding discrimination; the current law



protects citizens in matters of employment, education, public accommodations, housing, and commercial property.

The PHRC publishes an annual summary of docketed cases filed during the State's fiscal year (July 1st – June 30th). The table below illustrates the trends for new complaints that were docketed and conciliated for Montgomery County from 2010 to 2014. In FY 2014, housing related complaints accounted for 16.99% of total complaints; since 2010, housing related complaints have accounted for 6.77% of total complaints. Housing related complaints have been steadily increasing in comparison to other types of complaints from 2010 to 2014 in Montgomery County, with the exception of the comparative decrease in housing related complaints between 2012 and 2013.

PHRC New Complaints Docketed in Montgomery County

Category	2010	2011	2012	2013	2014	Total
Employment	362	190	191	185	118	1,046
Housing	20	19	26	16	26	107
Public Accommodations	191	15	14	13	7	240
TOTALS	573	224	231	214	151	1,393

Source: Pennsylvania Human Rights Commission Annual Reports, 2010-2014

PHRC New Complaints Docketed in the Commonwealth of Pennsylvania

Category	2010	2011	2011	2013	2014	Total
Employment	4,403	2,675	2,431	1,899	1,554	12,962
Housing	293	253	243	210	184	1,183
Public Accommodations	430	160	157	103	78	928
TOTALS	5,377	3,187	2,804	2,207	1,816	15,391

Source: Pennsylvania Human Rights Commission Annual Reports, 2010-2014

PHRC Complaints Closed

Category	2010	2011	2012	2013	2014
Percentage of Complaints Closed	39.8%	56.0%	50.0%	48.6%	53%

Source: Pennsylvania Human Rights Commission Annual Reports, 2010-2014



3. Fair Housing & Equal Opportunity (HUD)

The U.S. Department of Housing and Urban Development's (HUD) Office of Fair Housing & Equal Opportunity (FHEO) receives complaints regarding alleged violations of the Fair Housing Act. From January 1, 2008 to December 31, 2013 there were a total of 97 fair housing complaints originated in Montgomery County.

Philadelphia HUD Regional Office
The Wanamaker Building
100 Penn Square East
Philadelphia, PA 19107-3380
(215) 656-0500
(215) 861-7620 (Voice)

HUD-FHEO Complaints

Case Number	Filing Date	Violation County	Filed Cases	Race Basis	Color Basis	National Origin Basis	Disability Basis	Familial Status Basis	Religion Basis	Sex Basis	Retaliation Basis
03-08-0215-8	01/24/08	Montgomery	1	1	0	0	0	0	0	0	0
03-08-0209-8	01/28/08	Montgomery	1	0	0	0	1	0	0	0	0
03-08-0248-8	02/19/08	Montgomery	1	0	0	0	1	0	0	0	0
03-08-0282-8	03/03/08	Montgomery	1	0	0	0	0	1	0	0	0
03-08-0343-8	04/09/08	Montgomery	1	1	1	0	0	0	0	0	0
03-08-0354-8	04/10/08	Montgomery	1	0	0	0	1	0	0	0	0
03-08-0361-8	04/28/08	Montgomery	1	1	0	0	0	0	0	0	0
03-08-0440-8	06/17/08	Montgomery	1	0	0	1	0	0	0	0	0
03-08-0441-8	06/17/08	Montgomery	1	0	0	1	0	0	0	0	0
03-08-0484-8	07/02/08	Montgomery	1	1	0	0	0	0	0	0	0
03-08-0514-8	07/28/08	Montgomery	1	1	0	0	0	0	0	1	0
03-08-0521-8	08/01/08	Montgomery	1	1	0	0	0	0	0	0	0
03-08-0599-8	09/16/08	Montgomery	1	1	1	0	1	1	0	1	0
03-09-0001-8	10/02/08	Montgomery	1	0	0	0	1	0	0	0	0
03-09-0002-8	10/03/08	Montgomery	1	1	0	0	0	0	0	0	0
03-09-0025-8	10/16/08	Montgomery	1	1	0	1	0	0	0	0	0



03-09-0050-8	10/30/08	Montgomery	1	1	0	0	0	0	0	1	0
03-09-0085-8	12/01/08	Montgomery	1	0	0	0	0	1	0	0	0
03-09-0141-8	12/30/08	Montgomery	1	1	0	0	1	0	0	0	0
03-09-0196-8	01/30/09	Montgomery	1	1	0	0	0	0	0	0	0
03-09-0265-8	03/10/09	Montgomery	1	1	0	0	0	0	0	0	0
03-09-0328-8	04/28/09	Montgomery	1	0	0	0	1	0	0	0	0
03-09-0388-8	06/05/09	Montgomery	1	1	0	0	0	0	0	0	0
03-09-0449-8	07/08/09	Montgomery	1	0	0	0	1	0	0	0	0
03-09-0473-8	07/21/09	Montgomery	1	0	0	0	0	1	0	0	0
03-09-0476-8	07/22/09	Montgomery	1	0	0	0	1	0	0	0	0
03-09-0511-8	08/10/09	Montgomery	1	0	0	1	0	0	0	0	0
03-09-0519-8	08/12/09	Montgomery	1	0	0	0	1	0	0	0	0
03-09-0564-8	09/11/09	Montgomery	1	0	0	0	0	0	0	1	1
03-09-0585-8	09/24/09	Montgomery	1	0	0	0	1	0	0	0	0
03-10-0006-8	10/06/09	Montgomery	1	1	0	0	0	0	0	0	0
03-10-0115-8	01/07/10	Montgomery	1	1	0	0	0	0	0	0	0
03-10-0142-8	01/21/10	Montgomery	1	0	0	0	0	1	0	0	0
03-10-0166-8	02/12/10	Montgomery	1	1	0	0	0	0	0	0	0
03-10-0332-8	05/24/10	Montgomery	1	0	0	0	0	1	0	0	0
03-10-0416-8	07/06/10	Montgomery	1	0	0	0	1	0	0	0	0
03-10-0556-8	08/23/10	Montgomery	1	0	0	0	1	0	0	0	0
03-11-0071-8	11/29/10	Montgomery	1	1	0	0	0	0	0	0	0
00-11-0017-8	12/06/10	Montgomery	1	1	0	1	0	0	0	0	0
03-11-0117-8	01/06/11	Montgomery	1	1	0	0	0	0	0	0	0
03-11-0120-8	01/07/11	Montgomery	1	0	0	0	1	0	0	0	0



03-11-0167-8	01/07/11	Montgomery	1	1	0	0	0	0	0	0	0
03-11-0162-8	02/16/11	Montgomery	1	1	0	0	0	0	0	0	0
03-11-0202-8	03/18/11	Montgomery	1	0	0	0	1	0	0	1	0
03-11-0224-8	04/04/11	Montgomery	1	0	0	0	0	1	0	0	0
03-11-0237-8	04/11/11	Montgomery	1	0	0	0	0	0	0	0	1
03-11-0272-8	05/06/11	Montgomery	1	0	0	0	1	0	0	0	0
03-11-0340-8	06/07/11	Montgomery	1	0	0	0	1	0	0	0	0
03-11-0362-8	07/08/11	Montgomery	1	1	0	0	0	0	0	0	0
03-11-0462-8	08/19/11	Montgomery	1	0	0	0	0	0	0	0	1
03-11-0468-8	09/23/11	Montgomery	1	0	0	0	0	0	0	0	1
03-11-0470-8	09/26/11	Montgomery	1	0	0	0	1	0	0	0	0
03-11-0492-8	09/27/11	Montgomery	1	0	0	0	1	0	0	0	0
03-12-0058-8	10/27/11	Montgomery	1	0	0	0	1	0	0	0	0
03-12-0234-8	02/09/12	Montgomery	1	0	0	0	1	0	0	0	0
03-12-0140-8	02/24/12	Montgomery	1	1	0	0	0	0	0	0	0
03-12-0201-8	02/29/12	Montgomery	1	0	0	0	0	0	0	0	1
03-12-0145-8	03/02/12	Montgomery	1	0	0	1	0	0	0	0	0
03-12-0211-8	04/19/12	Montgomery	1	0	0	0	1	0	0	0	0
03-12-0223-8	04/30/12	Montgomery	1	0	0	0	1	0	0	0	0
03-12-0309-8	05/07/12	Montgomery	1	1	0	0	1	0	0	0	0
03-12-0295-8	05/21/12	Montgomery	1	1	0	0	0	0	0	0	0
03-12-0352-8	05/29/12	Montgomery	1	1	0	0	1	0	0	0	1
03-12-0280-8	06/05/12	Montgomery	1	0	0	0	1	0	1	0	0
03-12-0367-8	06/25/12	Montgomery	1	0	0	0	1	0	0	0	0
03-12-0391-8	07/10/12	Montgomery	1	0	0	0	1	0	0	0	0



03-12-0336-8	07/11/12	Montgomery	1	0	0	0	1	0	0	0	0
03-12-0392-8	07/19/12	Montgomery	1	0	0	0	1	0	0	0	0
03-12-0426-8	07/31/12	Montgomery	1	0	0	0	1	0	0	0	0
03-12-0414-8	08/06/12	Montgomery	1	0	0	0	1	0	0	0	0
03-12-0438-8	08/28/12	Montgomery	1	1	0	0	0	1	0	0	0
03-12-0401-8	08/31/12	Montgomery	1	1	0	0	0	0	0	0	0
03-12-0437-8	09/20/12	Montgomery	1	0	0	0	0	1	0	0	0
03-13-0005-8	10/05/12	Montgomery	1	1	1	1	0	0	0	0	0
03-13-0030-8	11/01/12	Montgomery	1	1	0	0	1	0	0	0	0
03-13-0066-8	11/02/12	Montgomery	1	1	0	0	0	0	0	0	0
03-13-0054-8	11/23/12	Montgomery	1	0	0	0	1	0	0	0	0
03-13-0057-8	11/28/12	Montgomery	1	0	0	0	1	0	0	0	0
03-13-0074-8	12/04/12	Montgomery	1	0	0	0	1	0	0	0	0
03-13-0083-8	12/06/12	Montgomery	1	0	0	0	0	1	0	0	0
03-13-0106-8	12/19/12	Montgomery	1	1	0	0	0	0	0	0	0
03-13-0177-8	03/07/13	Montgomery	1	0	0	0	1	0	0	0	0
03-13-0264-8	05/29/13	Montgomery	1	0	0	0	0	1	0	0	0
03-13-0277-8	06/05/13	Montgomery	1	0	0	0	0	0	0	1	0
03-13-0303-8	06/27/13	Montgomery	1	0	0	0	0	1	0	0	0
03-13-0430-8	07/09/13	Montgomery	1	1	0	0	1	0	0	0	0
03-13-0310-8	07/11/13	Montgomery	1	0	0	0	1	0	0	0	0
03-13-0342-8	07/12/13	Montgomery	1	1	0	0	1	0	0	0	0
03-13-0314-8	07/15/13	Montgomery	1	0	0	0	0	0	0	1	0
03-13-0428-8	07/15/13	Montgomery	1	0	0	0	0	0	0	0	1
03-13-0340-8	07/16/13	Montgomery	1	0	0	0	0	0	0	0	1



03-13-0316-8	07/17/13	Montgomery	1	1	0	0	1	0	0	0	0
03-13-0424-8	08/05/13	Montgomery	1	0	0	0	1	0	0	0	0
03-13-0372-8	08/21/13	Montgomery	1	0	0	0	1	0	0	0	0
03-14-0151-8	10/07/13	Montgomery	1	0	0	0	1	0	0	0	0
03-14-0153-8	10/28/13	Montgomery	1	0	0	0	0	0	0	0	1
03-14-0152-8	10/30/13	Montgomery	1	1	0	0	0	0	0	0	0
TOTAL			97	37	3	7	44	12	1	7	9

National Trends

The U.S. Department of Housing and Urban Development (HUD) releases annual reports on the basis of fair housing complaints nationwide. The following table highlights the frequency of housing complaints by basis from 2010 to 2013.

Housing Complaints Nationwide

Basis	FY 2010		FY 2011		FY 2012		FY 2013	
	Number of Complaints	% of Total	Number of Complaints	% of Total	Number of Complaints	% of Total	Number of Complaints	% of Total
Disability	4,839	48%	4,498	48%	4,379	50%	4,429	53%
Race	3,483	34%	3,025	32%	2,597	29%	2,337	28%
Familial Status	1,560	15%	1,425	15%	1,301	15%	1,149	14%
National Origin	1,177	12%	1,195	13%	1,114	13%	1,040	12%
National Origin - Hispanic or Latino	722	7%	759	8%	691	8%	629	8%
Sex	1,139	11%	1,033	11%	1,067	12%	985	12%
Retaliation	707	7%	856	9%	970	11%	928	11%
Religion	287	3%	262	3%	229	3%	220	3%
Color	219	2%	185	2%	155	2%	170	2%
Number of Complaints filed	10,155	-	9,354	-	8,818	-	8,368	-

Source: www.hud.gov



Much like housing complaints in Montgomery County in the past few years, complaints based on disability and race are the most common causes for complaints across the nation, with complaints based on sex beginning to have a larger proportional share as well. Note that the total percentages for each year do not equal 100% and that the number of complaints each year does not equal the total number of complaints per basis. The reason for this is that most housing complaints reported are based on multiple factors and as such all sources of complaints are recorded.

4. Legal Aid of Southeastern PA

Legal Aid of Southeastern PA (LASP) serves Bucks, Chester, Delaware, and Montgomery Counties. The LASP stated mission is: "To provide quality

Legal Aid of Southeastern PA
625 Swede Street
Norristown, PA 19401
(610) 275-4500

legal representation to low-income and vulnerable people in Bucks, Chester, Delaware and Montgomery County, to empower them to solve problems without legal representation through legal education and increased access to the courts, and to change community practices and systems that cause or aggravate poverty."

LASP provides free legal services and advising to those who are eligible based on finances, residency, and the type of issue requiring assistance. Those seeking help are encouraged to call the toll-free hotline for more information regarding what actions they should take. LASP has access to interpreters for over 150 languages and several Spanish-speaking staff members. Links to legal information on some topics, such as disability, immigrant issues, and health law, are available on the website. Along with these topics, general legal information on housing is available online. Brochures with more detailed information relating to rights and procedures are available by contacting LASP.

Examples of legal information that LASP provides regarding housing issues include: landlord/tenant law, evictions, security deposits, public housing, utility law, LIHEAP, and preventing foreclosure. It is unclear from this list whether housing discrimination cases are advised or handled through this organization.

5. Housing and Human Services Agencies

Agencies offering housing and human services within the Township were contacted and interviewed in order to obtain their input and gain



insight into potential impediments to fair housing in the Township of Abington. A summary of agency input can be found in Appendix D.

B. Public Sector:

Part of the Analysis of Impediments is to examine the public policies of the jurisdiction and the impact on fair housing choice. The local government controls land use and development through the comprehensive plan, zoning regulations, subdivision regulations, and other laws and ordinances passed by the local governing body. These regulations and ordinances govern the types of housing that may be constructed, the density of housing, and the various residential uses in a community. Local officials determine the community's commitment to housing goals and objectives. The local policies therefore determine if fair housing is to be promoted or passively tolerated.

This section of the Analysis of Impediments evaluates the Township's policies to determine if there is a commitment to affirmatively further fair housing.

Low Income Housing Tax Credit

The Low Income Housing Tax Credit (LIHTC) Program was created under the Tax Reform Act of 1986 and is intended to attract private investment to develop affordable rental housing for low- and moderate-income households. This program provides a dollar-for-dollar tax credit to reduce the developer's Federal income tax.

Montgomery County is supportive of the use of Low Income Housing Tax Credit (LIHTC) projects to provide housing that is affordable to low income households. There are twenty-one (21) LIHTC projects with 821 LIHTC units in Montgomery County. However, there currently are no known, proposed, or planned projects in the Township of Abington, which is probably due to the fact that Abington is almost a totally developed environment and has less than 2% of its land area as vacant or unimproved.

The chart below illustrates which LIHTC projects in Montgomery County:



LIHTC in Montgomery County

HUD ID Number:	Project Name:	Project Address:	Project Township:	Project State:	Project ZIP Code:	Total Number of Units:	Total Low-Income Units:
PAA1987210	618-620 CHERRY ST.	618 CHERRY ST	NORRISTOWN	PA	19401	4	4
PAA1989105	1802 E. RIDGE PIKE	1802 E RIDGE PIKE	ROYERSFORD	PA	19468	4	4
PAA1989215	246 MAPLE AVENUE	246 W MAPLE ST	AMBLER	PA	19002	1	1
PAA1989455	829 SWEDE ST.	829 SWEDE ST	NORRISTOWN	PA	19401	3	3
PAA1989765	ROLLING HILLS	2120 BUCHERT RD	SANATOGA	PA	19464	232	231
PAA1990080	311 N. FRANKLIN ST.	311 N FRANKLIN ST	POTTSTOWN	PA	19464	2	2
PAA1990150	611 GREEN STREET	611 GREEN ST	NORRISTOWN	PA	19401	1	1
PAA1991405	FORD APARTMENTS	159 MAIN ST	ROYERSFORD	PA	19468	9	9
PAA1993010	1402 DRAYTON LANE	1402 DRAYTON LN	WYNNEWOOD	PA	19096	3	3
PAA1993240	POWELL 224 DUPLEX REHAB	224 E HECTOR ST	CONSHOHOCKEN	PA	19428	2	2
PAA1993275	RAHN'S HORIZON III	12 SCHOOL HOUSE RD	COLLEGEVILLE	PA	19426	3	3
PAA1993330	STEPS - KING STREET	519 KING ST	POTTSTOWN	PA	19464	10	10
PAA1997005	13 ST. ASAPH'S ROAD	13 SAINT ASAPHS RD	BALA CYNWYD	PA	19004	6	6
PAA2000075	LIMERICK GREEN	827 N LEWIS RD	LIMERICK	PA	19468	80	80
PAA2001010	AMBLER MANOR APARTMENTS	32 N MAIN ST	AMBLER	PA	19002	60	60
PAA2001145	PARKVIEW AT OAK CREST	560 OAK DR	HARLEYSVILLE	PA	19438	100	99
PAA2003090	JEFFERSON APARTMENTS	250 HALE ST	POTTSTOWN	PA	19464	46	46
PAA2003185	VILLAS AT RED HILL	550 SINGER WAY	RED HILL	PA	18076	68	67
PAA2006005	ARDMORE CROSSING APTS	213 W COUNTY LINE RD	ARDMORE	PA	19003	53	53
PAA2006120	PARK VIEW AT CHELTENHAM	990 ASHBOURNE RD	ELKINS PARK	PA	19027	75	74
PAA2008155	SCHWENCKFELD MEWS	1292 ALLENTOWN RD	LANSDALE	PA	19446	63	63

Source: <http://lihtc.huduser.org/>



1. Planning, Zoning, and Building Codes -

Township of Abington:

The Montgomery County Regional Planning Commission prepared a Zoning Ordinance for the Township of Abington in 2006, which was adopted by the Township on September 28, 2006. A “draft” Zoning Ordinance was prepared in 2014 to revise the existing zoning ordinance. For the purpose of this Analysis of Impediments, the proposed “draft” zoning ordinance has been reviewed for conformance with the Fair Housing Act, as amended, and current HUD policies and regulations. The Township of Abington should review the proposed “draft” zoning ordinance and make the following revisions prior to its adoption:

- Article I: Section 102. General Purpose and Intent: add “M.” – Abide by the provisions of the Fair Housing Act of 1968, as amended, by promoting fair housing choice for all residents in the Township, assure the rights of all individuals who are identified as members of a protected class by the Federal

Government, and therefore affirmatively further fair housing. The “draft” zoning ordinance does not appear to contain any discriminatory language, however, several definitions need to be added to the document and other definitions should be revised. These definitions should be reviewed by the planning staff and solicitor for conformance with the Fair Housing Act, as amended.

- Article II: Section 201. SPECIFIC DEFINITIONS. Add the following:
 - Accessibility: the ease of access to and around the exterior and interior of a building or facility without obstruction to a person who may be physically disabled.
 - Visitability: the basic level of accessibility that enables persons with disabilities to visit the home or housing unit of a friend, family member, or neighbor.
 - Disabled/Handicapped: Disabled means “handicapped” as defined according to the Fair Housing Act Amendments of 1988. 42 U.S.C.S. Subsection 3602 (h), and any amendments thereto. Federal laws define a person with a disability as “Any person who has a physical or mental impairment that substantially limits one or more major life activities; has a



record of such impairment; or is regarded as having such an impairment.” In general, a physical or mental impairment includes hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex, and mental retardation that substantially limits one or more major life activities. Major life activities include walking, talking, hearing, seeing, breathing, learning, performing manual tasks, and caring for oneself.’

- Group Care Facility: A facility which provides services to six (6) or more individuals who are mentally or physically handicapped, homeless, disabled, or undergoing rehabilitation, and are provided a program to meet their needs. When required, or available, Group Care Facilities must be licensed by appropriate Federal, State, or County health/welfare agencies. Group Care Facility is not a “family” as defined by this Ordinance, but is a conditional use in Residential Districts. Neither is a Group Care Facility a nursing home or senior citizen housing, which are regulated separately.”

- The definition of “family” should be revised and clarified.

- Family: One or more persons related by blood, marriage, or adoption, or a group of not more than five (5) unrelated disabled persons living together as a single housekeeping unit in a dwelling unit and sharing common facilities as considered reasonably appropriate for a family related by blood, marriage or adoption. If appropriate, one (1) staff person may or may not reside on the premises and will not be counted in the total number of occupants of the dwelling unit.

If the definition of “family” is revised and includes a group of 5 or less disabled persons, then that group of unrelated individuals will be allowed by right to live in any residential zoning district in the Township. However, a “Group Care Facility” will have to abide by the higher density residential provision of the zoning ordinance.

Article XXI: Section 2103. Categories of Permitted Uses –

Use E-7: Group Home/Personal Care Home: The Use Regulations are too vague and general and should be more specific. In the case of a Group Care facility for the disabled, the facility may contain six (6) or more residents and should be considered a multi-family use



and permitted in multi-family zoning districts. It is permitted in the R1, R2, R3 and R4 Districts but not in the RC District.

In its 2009 Analysis of Impediments to Fair Housing Choice, the Township of Abington identified one impediment to Fair Housing that directly related to the Township's planning, zoning, and building codes; this impediment was first identified in the Township of Abington's 1996 Analysis of Impediments to Fair Housing Choice: Act, in the following areas:

- Land Use Ordinances – Many of the Township's regulations are outdated and could serve as impediments to fair housing for the protected classes.

The 2009 A.I. review of the Zoning Ordinance did not identify what language it considered to be restrictive, in accordance with the Fair Housing Act.

The Zoning Ordinance was reviewed and revised as necessary, to bring it into compliance with the Federal Fair Housing Act, as revised.

The Township has adopted the Pennsylvania State Building Code which contains the 2009 International Building Code Amendments.

U.S. Department of Housing and Urban Development (HUD):

HUD encourages its grantees to incorporate "visitability" principles into their designs. Housing that is "visitable" has the most basic level of accessibility that enables persons with disabilities to visit the home of a friend, family member, or neighbor. "Visitable" homes have at least one accessible means of egress/ingress for each unit, and all interior and bathroom doorways have 32-inch clear openings. At a minimum, HUD grantees are required to abide by all Federal laws governing accessibility for disabled persons.

Federal Requirements:

Federal laws governing accessibility requirements include Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and the Fair Housing Act.

Section 504 of the Rehabilitation Act (24 CFR Part 8), known as "Section 504" prohibits discrimination against persons with disabilities in any program receiving Federal funds. Specifically, Section 504 concerns the design and construction of housing to



ensure that a portion of all housing developed with Federal funds is accessible to those with mobility, visual, and hearing impairments.

The Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, and 225) (ADA) prohibits discrimination against persons with disabilities in all programs and activities sponsored by state and local governments. Specifically, ADA gives HUD jurisdiction over housing discrimination against persons with disabilities.

The Fair Housing Act was amended in 1988 to include persons with disabilities as a protected class, as well as to include design and construction requirements for housing developed with private or public funds. Specifically, this law requires property owners to make reasonable modifications to units and/or public areas in order to allow the disabled tenant to make full use of the unit. Additionally, property owners are required to make reasonable accommodations to rules or procedures to afford a disabled tenant full use of the unit. As it relates to local zoning ordinances, the Fair Housing Act prohibits local government from making zoning or land use decisions, or implementing land use policies that exclude or discriminate against persons of a protected class.

2. Environmental Justice –

Federal Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" dated February 11, 1994 focuses attention on the environmental and human health conditions of minority and low-income populations with the goal of achieving environmental protection for all communities. The Order directs federal entitlement communities to develop environmental justice strategies to help those communities address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations. The order is also intended to promote nondiscrimination in federal programs that affect human health and the environment and aims to provide minority and low-income communities' access to public information and public participation in matters relating to human health and the environment.

For HUD, environmental justice means equal access to safe and healthy housing for all; mitigating risks to communities in disaster-prone areas; improving access to affordable, quality housing free of hazards to residents' health; and working to achieve inclusive, sustainable communities free from discrimination. (Source: 2012-2015 HUD Environmental Justice Strategy dated March 30, 2012)



In determining decent, safe, and sound housing conditions one needs to look at the environmental quality of these units. Lead based paint is one of the most significant environmental factors that affect residential units. In 1978, lead was banned from residential paint; more than half of the total housing stock in the United States contains some lead based paint. It is estimated that 20 million housing units contain lead hazards, which include flaking or peeling lead based paint and excessive levels of tiny lead particles in household dust.

HUD estimates that 3.8 million homes containing such immediate lead hazards are occupied by families with young children who are at immediate risk of lead poisoning. Half of these families own their homes and of those, half have incomes above \$30,000 per year.

Lead-based paint in residential housing can cause severe health risks for children. HUD provides a general formula to estimate the potential presence of lead-based paint (LBP) in housing built prior to 1979, before lead based paint was banned in the United States.

These estimates for the Township are illustrated in the table below and are based on the 2007-2011 American Community Survey.

Estimate of Units with Lead-Based Paint

Year Unit Built	Number of Units	Est. % of Units With LBP	Est. No. of Units with LBP
Pre-1939	5,231	90%	4,708
1940-59	9,839	80%	7,871
1960-79	4,844	62%	3,003
Total	19,914	78%	15,582

Source: 2007-2011 American Community Survey

For the Township of Abington it is estimated that 15,582 housing units are at risk of lead-based paint hazards. Based on the 2007-2011 American Community Survey, 70.6% of the Township's total housing stock is at risk for lead-based-paint hazards. CHAS data reports that there are 190 (1%) owner occupied housing units with children present that contain LBP and 8 (0%) renter occupied housing units with children present that contain LBP in the Township.

The Township complies with Title 24 Part 35: Lead-Based Paint Poisoning Prevention in Residential Structures (Current Rule). In order to meet the requirements of the new lead-based paint



regulations the Township of Abington will take the following actions regarding housing rehabilitation:

- Applicants for rehabilitation funding receive the required lead-based paint information and understand their responsibilities.
- Staff properly determines whether proposed projects are exempt from some or all lead-based paint requirements.
- The level of Federal rehabilitation assistance is properly calculated and the applicable lead-based paint requirements determined.
- Properly qualified personnel perform risk management, paint testing, lead hazard reduction, and clearance services when required.
- Required lead hazard reduction work and protective measures are incorporated into project rehabilitation specifications.
- Risk assessment, paint testing, lead hazard reduction, and clearance work are performed in accordance with the applicable
- Standards established in 24 CFR Part 35, Subpart R.
- Required notices regarding lead-based paint evaluation, presumption, and hazard reduction are provided to occupants and documented.
- Program documents establish the rental property owner's responsibility to perform and document ongoing lead-based paint maintenance activities, when applicable.
- Program staff monitors owner compliance with ongoing lead-based paint maintenance activities.

3. Taxes -

Real estate property taxes also impact housing affordability. This may not be an impediment to fair housing choice but it does impact the affordability of housing.

The Township's tax assessments are set by the County; therefore the Township does not have any control over the assessed value. The last time a county-wide reassessment was done was 1996. The assessment is the basis used by the County and Township to levy taxes by multiplying the millage rate of the taxing authority times the assessment. The following equations apply:

$$\text{Market Value} \times \text{Assessment Ratio} = \text{Assessment}$$



Assessment X Millage Rate = Taxes

Currently, all assessments are set at 100% of the 1996 base year value. The following tables represent the 2015 Real Estate and Township taxes for Abington residents:

Real Estate Taxes 2015	Mils
Abington Township	3.9711
Abington School District (07/01/11 to 06/30/12)	29.89
Montgomery County	3.152
Total	37.0131

Breakdown of Township Taxes	Mils
General	2.1177
Fire Tax (to support Abington Volunteer Companies)	0.641
Library Tax	0.43
Debt Service	0.52
Ambulance Service	0.01
Parks & Recreation Tax	0.2524
Total	3.9711

According to "City-Data.com," the median real estate property taxes paid in Montgomery County for housing units with mortgages in 2009 was \$3,936 (1.3%). Meanwhile, the median real estate property taxes paid for housing units with no mortgage in 2009 was \$3,417 (1.2%).

4. Public Housing -

The Montgomery County Housing Authority (MCHA) is the public housing agency that serves the Township of Abington. The



Montgomery County Housing Authority owns and operates seven public housing communities. There are a total of 616 housing units in the public housing communities through Montgomery County. Roughly one quarter of the public housing units are reserved for the elderly. There is one public housing community in Abington, Crest Manor.

Since, 1963 the Montgomery County Housing Authority (MCHA) has owned and managed Crest Manor, located in Abington, as rental housing for very low income households. Today, over fifty (50) years after its construction, Crest Manor is in need of critical functional and aesthetic improvements in order to preserve the development's sustained habitability as a vibrant, affordable asset to the Crestmont neighborhood, Abington Township and Montgomery County. Through competitive procurement, the MCHA partnered with Pennrose Properties, LLC (Pennrose) to redevelop and revitalize Crest Manor. The partnership, Crest Manor Housing LP, submitted an application for Low Income Housing Tax Credits ("LIHTC") to the Pennsylvania Housing Finance Agency ("PHF A"). The partnership plans on investing over \$17 million, through the combination federal, state and local funds, to completely revitalize Crest Manor. As part of its financing plan, the MCHA together with Pennrose requested \$200,000 in Community Development Block Grant (CDBG) funds from the Township to support the redevelopment of Crest Manor.

Crest Manor's proposed plans call for comprehensive rehabilitation of thirty-four (34) existing twin homes and the new construction of twelve (12) one-bedroom units for a total of forty-six (46) units, an increase of six (6) total units from the current condition. Bedroom sizes will vary from one to five (5)-bedroom units. A newly constructed, high-quality community building with management, maintenance, amenity space, and a computer lab is included in the plans. The property, while increasing the number of affordable units it offers, also alleviates stress on the existing flood plain at Hamilton and Washington Avenues by demolishing two structures and building in its place tot-lot and playground.

Additionally, the Housing Authority administers 2,814 Housing Choice Vouchers for low- to moderate-income households for rental units in the Municipality and surrounding region. The Housing Authority also administers Veteran Affairs Supportive Housing (VASH) and Family Unification Program (FUP) Vouchers. According to the Montgomery County Housing Authority's Five Year Plan for the period of 2015 - 2019, the goals of the Housing Authority are as follows:



- Continue to demonstrate a successful conversion to asset management and project based management
- Improve the quality of assisted housing by striving to maintain a high performer rating and achieving high scores in each component
- Concentrate on efforts to improve specific management functions (if PHAS scores show a need for improvement, MCHA will concentrate on areas of need)
- Strive to reduce public housing vacancies and improve vacant unit turnaround time
- Increase customer satisfaction and improve marketability of current public housing units
- Continue to consult with Resident Advisory Board with management and maintenance planning and policy development
- Renovate and modernize public housing units and systems to be energy efficient and appealing to the community
- Diligently preserve renovated public housing units and systems
- Acquire or build units or developments
- Demolish or dispose of obsolete public housing
- Consider submitting applications to HUD for competitive grants to support the revitalization of public housing properties
- Explore leveraging private or other public funds to create additional housing opportunities, including mixed-finance public housing and assisted housing with Section 8 project-based voucher subsidy
- Consider conversion of at-risk public and assisted housing to long-term Section 8 rental assistance contracts under the HUD Rental Assistance Demonstration Program
- Consider providing public housing homeownership opportunities
- Provide an improved living environment by implementing measures to deconcentrate poverty by bringing higher income public housing households into lower income developments and vice versa
- Implement public housing security improvements
- Promote self-sufficiency and asset development of assisted households by increasing the number and percentage of employed persons in public housing families
- Continue to actively promote Section 3 requirements through contracting preferences and advertisement
- Ensure equal opportunity and affirmatively further fair housing by ensuring a suitable living environment is available for families living in public housing, regardless of race, color, religion national origin, sex, familial status and disability



- Ensure accessible housing is available to persons with all varieties of disabilities
- Continue to maintain cooperative agreements with other agencies and support the Montgomery County Consolidated Plan to ensure housing and supportive services are available for low income residents

5. Comprehensive Plan -

The Township of Abington updated its Comprehensive Plan in 2007. The previous Comprehensive Plan had been completed in 1992. The stated purpose of the Comprehensive Plan is to define goals and objectives for the future of the Township and chart the path through which those goals can be realized. The primary focus of the Township's goals focus on the following areas: Housing; Natural Resources/Green Spaces; Parks and Recreation; Community Identity and Pride; Wastewater Treatment; Transportation; Township Finance; Economic Development; and Land Use and Zoning.

Specific to Housing the following goal and objectives have been identified:

Housing Goal – As a community, Abington Township should work to maintain the existing housing diversity and encourage the creation of housing choices to meet the needs of current and future residents.

Objective A: Conserve the character and encourage the maintenance of existing housing within Abington Township and where practical rehabilitate and renovate deteriorated housing.

Objective B: With new incentives encourage replacement of untenable, existing units with new housing to provide a diversity of alternative housing types which will serve the needs of all age groups and economic levels.

Objective C: Establish communities of interest or create an agency which encourages private and public resources to be directed to achieving housing goals and objectives.

Objective D: Encourage housing which maximizes the use of existing transit infrastructure, to achieve a greater utilization of available economic resources.

Objective E: Develop/redevelop communities which allow for living, walking, and working within Abington Township.



6. Transportation -

Public transit is important to the economic development and housing development in the Township and County. Many people rely on bus service for access to work, school, and other services, and often use mass transit routes to decide where they will live.

The residents of the Township of Abington and Montgomery County are served by the Southeastern Pennsylvania Transportation Authority (SEPTA) bus and rail lines. There is also a Montgomery County Transportation Authority, which oversees transportation improvement issues, except for mass transit.



The Township of Abington has selected two existing Septa Regional Railroad Stations, within its jurisdiction, to improve vehicular mobility and pedestrian accessibility. Improvements at these two regional railroad stations will act as a catalyst for future real estate development projects in the area. The Township was approved for \$3,000,000 in PennDOT Multi-modal Transportation Fund grant and \$200,000 in Montgomery County Local Share Account grant funds.

SEPTA's Customized Community Transportation (CCT) provides on-demand, paratransit services to individuals with disabilities and senior citizens. Additionally, there is a Shared-Ride Program which picks up senior citizens aged 65 and over at their door, following an advanced reservation. The Shared-Ride Program is funded by The Commonwealth of Pennsylvania Lottery Fund, but also costs riders \$4.00 for one way.

SEPTA also operates regional rail lines, trolley lines, light rail, a high speed line, and the bus system. There are 16 regional rail lines, including service between Center City and Philadelphia International Airport, Center City and Trenton, NJ, and even Center City and Newark and Wilmington, DE. Abington itself is serviced by West Trenton Line, and Warminster Line; the Warminster Line's Roslyn stop is accessible for people with disabilities.

Fares, if paid in cash, costs \$2.25, but tickets, tokens, and passes also exist and offer savings to regular commuters. The following table, found on www.septa.org, gives a comparison of fares.



If you ride SEPTA	Best Fare Value	Total Cost	Average Savings Over Cash Fare
5 Days and use 2 or more Transit Routes	Weekly or Monthly TransPass	\$24 (W) \$91 (M)	\$8.50 and Unlimited rides
5 Days and use 1 Transit Route each way	Tokens	\$18.00	\$4.50
More than 3 rides on any Transit Route in one day	One Day Convenience Pass (8 ride limit)	\$8.00	\$10.00
More than 3 rides on any Transit Route or Regional Rail Line in one day	Independence Day Pass	\$12.00	\$6.50
Norristown High Speed Line	Zone 1 TrailPass	\$27.25	\$.25 and Unlimited rides

SEPTA has recently adopted the use of electronic fare cards called the SEPTA Key. Currently there are 71 fare kiosks throughout Philadelphia and surrounding areas that dispense the SEPTA Keys. There are currently 115 turnstiles that accept that Key, with 14 ADA gates, and over 200 validators on buses, trolleys, and light rail. The SEPTA Key will adhere to the fares listed above, providing no additional discount.

According to the 2007-2011 American Community Survey estimates, workers age 16 years and over in the Township of Abington and Montgomery County largely took cars, trucks, or vans for commuting. Of commuters in Abington, 86.8% drove, with 78.1% driving alone; in Montgomery County, 87.2% of commuters drove, 79.4% driving alone. Public transportation accounted for just 7.4% of commuters in Abington Township, and 4.9% of commuters in Montgomery County.

However, Abington Township was recently awarded a Transportation & Community Development Initiative (TCDI) Grant for \$60,000.00 from the Delaware Valley Regional Planning Commission. The grant, along with a cash match from the township, will help fund a Township Master Bicycle Plan. The plan will identify areas in which bicycle lanes of varying classes will link residential areas, businesses, transportation, schools, existing trails, and other municipalities. The addition of bicycle lanes can help low- to moderate-income residents with alternatives to owning a car or constantly using public transportation for shorter trips.



7. Education -

Education is often an important factor influencing where people choose to live. The Abington School District is located in the southeastern corner of Montgomery County, Pennsylvania. The district covers Abington Township and the Borough of Rockledge. The school district serves the Township's population of 55,310 and has a student population of 7,639 in grades K-12. The school district employs 647 full time K-12 professional teaching faculty, with 100% considered Highly Qualified. The school district contains seven elementary schools (Copper Beech, Highland, McKinley, Overlook, Roslyn, Rydal East, and Willow Hill), one middle school (Abington Junior High School), and one senior high school (Abington).

The Abington School District's mission is to *"Build upon the historical and culturally diverse roots of our community and its proud traditions, and recognize the uniqueness in each student, the Abington School District promotes excellence as our standard and achievement as the result"*. The school district has a minority population of 34.44% and a high school enrollment of 1,745. The high school Class of 2014 saw 87% attend college, with 4% joining the military, and 9% joining the work force directly.

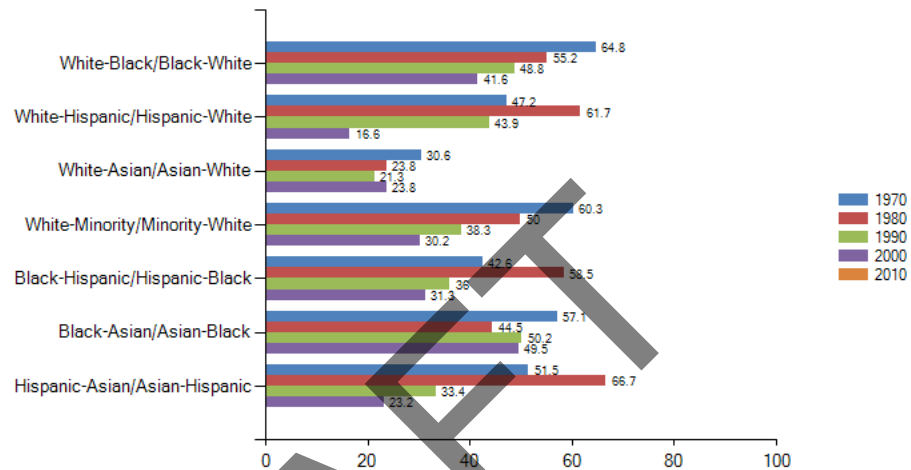
20.02% of students within the district are considered economically disadvantaged; the schools participate in the National School Lunch and Breakfast Program, which serves free or low-cost nutritionally balanced meals throughout the school week. The district's website provides contact information for resources that can help provide free meals to children throughout the summer months.

According to the 2007-2011 American Community Survey, 93.5% of the Township's population age 25 years and over have at least a high school education or higher, and 42.3% have a bachelor's degree or higher. The Abington Senior High School for 2013-2014 shows that the district has met most of its indicators of academic achievement; however, the Science and Biology – Percent Proficient or Advanced on PSSA/Keystone is at 69.53%, the lowest of any indicator score for the year.

The following school dissimilarity index focusing on the public school system is based on Census data and was calculated as part of Brown University's American Communities Project (<http://www.s4.brown.edu/us2010/>). The dissimilarity index measures whether one particular group is distributed across census tracts in the metropolitan area in the same way as another group. A

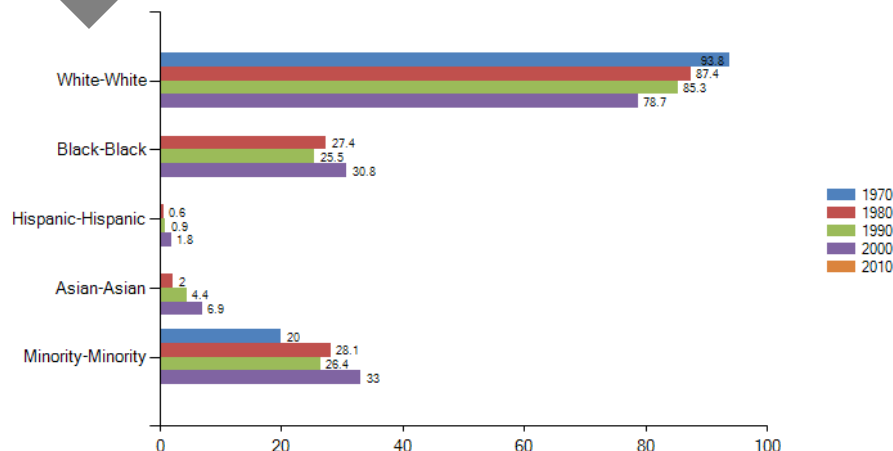


high value indicates that the two groups tend to live in different tracts. Dissimilarity ranges from 0 to 100. A value of 60 (or above) is considered very high. It means that 60% (or more) of the members of one group would need to move to a different tract in order for the two groups to be equally distributed. Values of 40 or 50 are usually considered a moderate level of segregation, and values of 30 or below are considered to be fairly low.



Source: American Communities Project, U.S. Census

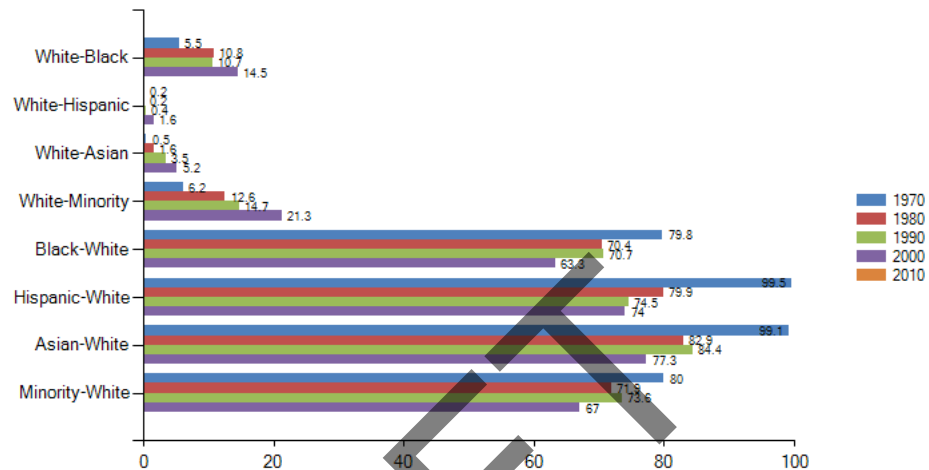
The isolation index (below) is the percentage of same-group population the elementary schools where the average member of a racial/ethnic group attends. It has a lower bound of zero (for a very small group that is quite dispersed) to 100 (meaning that group members are entirely isolated from other groups). It should be kept in mind that this Index is affected by the size of the group -- it is almost inevitably smaller for smaller groups, and it is likely to rise over time if the group becomes larger.



Source: American Communities Project, U.S. Census



Indices of exposure to other groups, illustrated below, also range from 0 to 100, where a larger value means that the average group member attends elementary school with a higher percentage of children from the other group. These indices depend partly on the overall size of the other group in the region.



Source: American Communities Project, U.S. Census

The Abington School District recently approved a Comprehensive Plan for the 2015-2018 cycle, which identifies the following shared values:

1. *“Public education, providing opportunities for all children, is the cornerstone of American society and essential to the future of our country.*
2. *Diversity is a strength and an asset.*
3. *Everyone can learn and learning is accomplished in different ways and at different rates.*
4. *Every individual has equal human value.*
5. *A secure and safe environment and peaceful conflict resolution are essential to learning and to society.*
6. *The commitment to excellence is essential and worth the effort.*
7. *A quality school district requires the allocation of appropriate resources.*



8. *Successful individuals and institutions actively engage in the process of reflection and improvement.*
9. *Shared decision making and active participation strengthen organizations and communities.*
10. *The involvement of each school family and every member of the community essential to the educational process.*
11. *Every individual needs to be prepared to function in a global society.*

-Abington School District Comprehensive Plan (pg. 2)

8. **Section 3 -**

HUD's definition of Section 3 is:

Section 3 is a provision of the Housing and Urban Development Act of 1968. The purpose of Section 3 to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State and local laws and regulations, be directed to low- and very low income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons.

During this Analysis of Impediments study, no impediments or complaints were mentioned or filed based on Section 3 Requirements.

9. **Food Access**

Limited access to supermarkets, supercenters, grocery stores, or other sources of healthy and affordable food may make it harder for some Americans to eat a healthy diet. There are many ways to measure food store access for individuals and for neighborhoods, and many ways to define which areas are food deserts - neighborhoods that lack healthy food sources. Most measures and definitions take into account at least some of the following indicators of access:

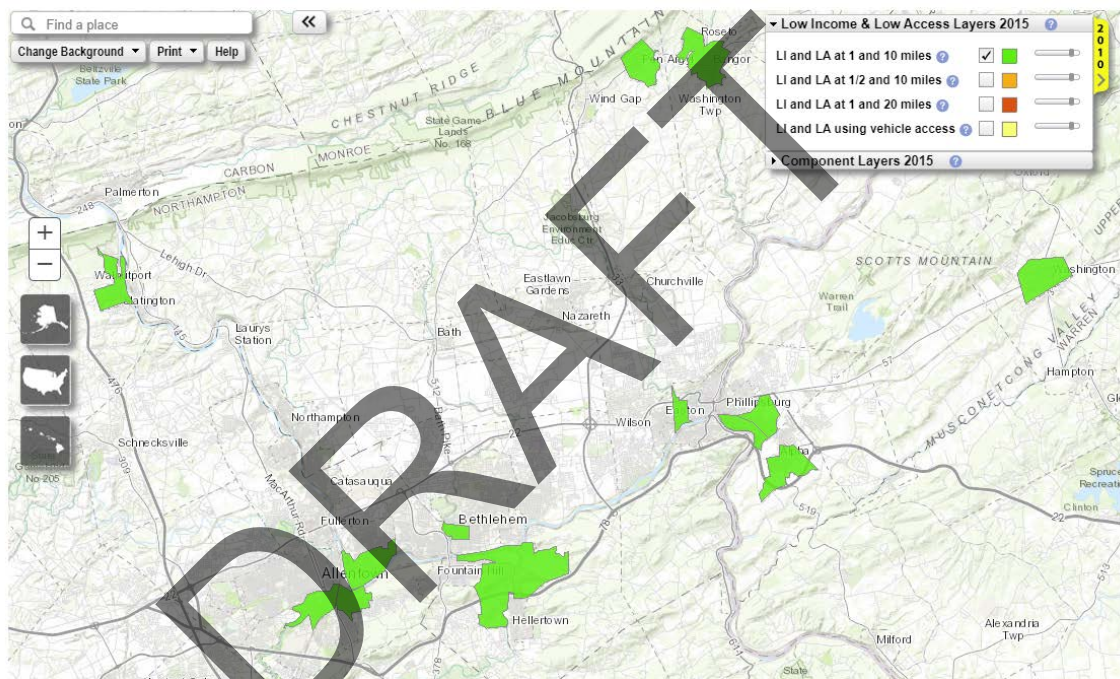
- Accessibility to sources of healthy food, as measured by distance to a store or by the number of stores in an area.



- Individual-level resources that may affect accessibility, such as family income or vehicle availability.
- Neighborhood-level indicators of resources, such as the average income of the neighborhood and the availability of public transportation.

(Source: <https://www.ers.usda.gov/data-products/food-access-research-atlas/documentation>)

Food Access Map



(Source: www.ers.usda.gov/data-products/food-access-research-atlas/go-to-the-atlas)

In the map above, low access to healthy food is defined as being far from a supermarket, supercenter, or large grocery store. A census tract is considered to have low access if a significant number or share of individuals in the tract is far from a supermarket. There are three (3) census tracts located in Allentown, two census tracts located in Bethlehem, and one (1) census tract located in Easton that are defined as having low access to healthy food

C. Private Sector:

The private sector has traditionally been the greatest impediment to fair housing choice in regard to discrimination in the sale, rental or advertising



of dwellings, the provision of brokerage services, or in the availability of financing for real estate purchases. The Fair Housing Act prohibits such practices as the failure to give the same terms, privileges, or information, charging different fees, steering prospective buyers or renters toward a certain area or neighborhood, or using advertising that discourages prospective buyers or renters because of race, color, religion, sex, handicap, familial status or national origin.

1. Real Estate Practices -

The Montgomery County Association of Realtors, a member of the National Association of REALTORS, Inc., is the local organization of real estate brokers operating in Montgomery County. The Montgomery County Association of REALTORS has an open membership policy and does not discriminate. Members are bound by the Code of Ethics of the National Association of REALTORS (NAR). This Code of Ethics is available on the Montgomery County Association of REALTORS website (<http://www.mcarealtors.org>) and it obligates its members to maintain professional standards including efforts to affirmatively further fair housing.



In order for realtors to maintain their license in Pennsylvania they must annually complete continuing education courses which includes fair housing education. The Montgomery County Association of REALTORS offers continuing education courses on a variety of topics including fair housing, ethics and professional standards to ensure that its members are up to date on policies, practices, and procedures. Pennsylvania requires that realtors complete 14 hours of continuing education every two years. There is generally a 3.5 hour class offered which includes fair housing that is available several times a year. In addition, new members must complete an orientation course which includes a 2.5 hour Code of Ethics class which also incorporates Fair Housing. In the event of a complaint of discrimination, the Montgomery County Association of REALTORS has the policies in place to handle such complaints. There have not been any fair housing complaints against local area realtors reported during the review period.

Each year, the Pennsylvania Association of Realtors recognizes the significance of the anniversary of the 1968 Fair Housing Act and reconfirms their commitment to uphold fair housing laws as well as the commitment to offer equal professional service to all Pennsylvania citizens in their search for real property by participating



in the Pennsylvania Human Rights Commission's Annual Fair Housing Conference.

2. Newspaper Advertising -

Under Federal Law, no advertising with respect to the sale or rental of a dwelling unit may indicate any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial status, or national origin. Under the Fair Housing Act Amendments, descriptions are listed in regard to the use of words, photographs, symbols or other approaches that are considered discriminatory.



Real estate advertisements were reviewed for several real estate publications, including *The Intelligencer*, *The Times Chronicle*, *Apartments for Rent*, and Craigslist. There were no signs of discriminatory advertising in the sources reviewed.

3. Private Financing -

The Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.) requires any commercial institution that makes five (5) or more home mortgage loans, to report all home loan activity to the Federal Reserve Bank under the Home Mortgage Disclosure Act (HMDA). The data does not suggest wide spread discriminatory lending practices but there are some patterns of minority groups having higher denial rates.

The table below compares lending in Abington Township to Montgomery County and the Philadelphia, PA MSA; this MSA includes all the Census Tracts in Montgomery County, as well as the Township of Abington. Conventional mortgages in Abington Township made up 5.9% of the conventional mortgages in Montgomery County and 1.6% of such mortgages in the Philadelphia MSA for 2013.

Home Purchase Loans Originated

	FHA, FSA/RHS & VA		Conventional		Refinancing		Home Improvement Loans	
	#	Amount \$000's	#	Amount \$000's	#	Amount \$000's	#	Amount \$000's



Abington Township	139	30,778	382	87,900	1,195	234,114	92	6,646
Montgomery County	1,771	385,750	6,478	1,727,513	17,465	3,873,736	1,508	144,260
Philadelphia MSA	8,833	1,683,314	25,212	6,630,590	67,689	13,960,137	6,899	562,177
% of County Lending in Abington	7.8%	8.0%	5.9%	5.1%	6.8%	6.0%	6.1%	4.6%
% of MSA Lending in Montgomery County	20.0%	22.9%	25.7%	26.1%	25.8%	27.7%	21.9%	25.7%
% of MSA Lending in Abington	1.6%	1.8%	1.5%	1.3%	1.8%	1.7%	1.3%	1.2%

Source: <http://www.ffiec.gov/hmda>

The table below shows the conventional loan applications in Abington Township. Of the conventional loan applications in the township, 7.04% were denied, while 7.87% were withdrawn and 4.14% were approved but not accepted.

Disposition of Conventional Loans

	Abington Township (Count)	% of Abington Township Applications	% of Montgomery County Applications	% of Total MSA Applications
Loans Originated	382	79.09%	5.90%	1.52%
Approved, Not Accepted	20	4.14%	0.31%	0.08%
Applications Denied	34	7.04%	0.52%	0.13%
Applications Withdrawn	38	7.87%	0.59%	0.15%
File Closed for Incompleteness	9	1.86%	0.14%	0.04%

Source: <http://www.ffiec.gov/hmda>



The following table outlines the disposition of conventional loans in the Philadelphia, PA MSA by income level. Loan applications from households making less than 50% of MSA median income have the lowest origination rates and highest denial rates.

Disposition of Conventional Loans by Income Level

Income Level	Applications Received		Loans Originated		Applications Approved, Not Accepted		Applications Denied		Applications Withdrawn		Applications Withdrawn or Closed for Incompleteness	
	Count	% of Total	Count	% of Income Level Applications	Count	% of Income Level Originations	Count	% of Income Level Originations	Count	% of Income Level Originations	Count	% of Income Level Originations
Less than 50% of MSA Median	2,351	7.06%	1,436	61.08%	97	4.13%	569	24.20%	182	7.74%	67	2.85%
50-79% of MSA Median	5,590	16.78%	4,018	71.88%	260	4.65%	668	11.95%	503	9.00%	141	2.52%
80-99% of MSA Median	3,699	11.11%	2,773	74.97%	156	4.22%	385	10.41%	300	8.11%	85	2.30%
100-119% of MSA Median	3,322	9.97%	2,496	75.14%	140	4.21%	290	8.73%	309	9.30%	87	2.62%
120% or More of MSA Median	18,342	55.07%	13,755	74.99%	965	5.26%	1,389	7.57%	1,852	10.10%	381	2.08%
Total	33,304	100.00%	24,478	73.50%	1,618	4.86%	3,301	9.91%	3,146	9.45%	761	2.29%

Source: <http://www.ffiec.gov/hmda>



The following table shows the dispositions of conventional loans disaggregated by minority status and income level for the Philadelphia, PA MSA. The number of applications for conventional loans submitted by White, non-Hispanic applicants significantly outnumbers minority applicants in each income level analyzed. The percentage of loans originated by White households is greater than the percentage of loans originated by minority households; however, as the White, non-Hispanic applicants far outnumber the minority applicants in each category, the results may be misleading.

**Conventional Loan Disposition Rates by Minority Status,
Less than 50% of MSA Median Income**

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Applications Received by Minority Status	Applications Denied	% of Loans Originated by Minority Status	Applications Approved but Not Accepted	% of Loans Originated by Minority Status	Applications Withdrawn	% of Loans Originated by Minority Status	Applications Closed for Incompleteness	% of Loans Originated by Minority Status
White, Non-Hispanic	1273	60.27%	841	66.06%	61	4.79%	249	19.56%	91	7.15%	31	2.44%
Minority, Including Hispanic	839	39.73%	481	57.33%	28	3.34%	239	28.49%	65	7.75%	26	3.10%
Total	2,112	100.00%	1,322	62.59%	89	4.21%	488	23.11%	156	7.39%	57	2.70%

Source: <http://www.ffiec.gov/hmda>

The number of White, non-Hispanic low-income applicants significantly outnumbers the number of minority applicants. Minority applicants have a lower applicant origination rate and a lower denial rate.



**Conventional Loan Disposition Rates by Minority Status,
50-79% of MSA Median Income**

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Applications Received by Minority Status	Applications Denied	% of Loans Originated by Minority Status	Applications Approved but Not Accepted	% of Loans Originated by Minority Status	Applications Withdrawn	% of Loans Originated by Minority Status	Applications Closed for Incompleteness	% of Loans Originated by Minority Status
White, Non-Hispanic	3999	79.35%	3014	75.37%	178	4.45%	394	9.85%	323	8.08%	90	2.25%
Minority, Including Hispanic	1041	20.65%	666	63.98%	51	4.90%	175	16.81%	119	11.43%	30	2.88%
Total	5,040	100.00%	3,680	73.02%	229	4.54%	569	11.29%	442	8.77%	120	2.38%

Source: <http://www.ffiec.gov/hmda>

The number of White, non-Hispanic middle-income applicants significantly outnumbers the number of minority applicants. White, non-Hispanic households have a higher origination, while Minority applicants have a slightly higher denial rate.



**Conventional Loan Disposition Rates by Minority Status,
80-99% of MSA Median Income**

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Applications Received by Minority Status	Applications Denied	% of Loans Originated by Minority Status	Applications Approved but Not Accepted	% of Loans Originated by Minority Status	Applications Withdrawn	% of Loans Originated by Minority Status	Applications Closed for Incompleteness	% of Loans Originated by Minority Status
White, Non-Hispanic	2733	82.97%	2124	77.72%	101	3.70%	245	8.96%	211	7.72%	52	1.90%
Minority, Including Hispanic	561	17.03%	381	67.91%	25	4.46%	94	16.76%	46	8.20%	15	2.67%
Total	3,294	100.00%	2,505	76.05%	126	3.83%	339	10.29%	257	7.80%	67	2.03%

Source: <http://www.ffiec.gov/hmda>

The number of White, non-Hispanic upper middle-income applicants significantly outnumbers the number of minority applicants. In this income category, minority applicants have a lower origination rate and a higher denial rate.



**Conventional Loan Disposition Rates by Minority Status,
100-119% of MSA Median Income**

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Applications Received by Minority Status	Applications Denied	% of Loans Originated by Minority Status	Applications Approved but Not Accepted	% of Loans Originated by Minority Status	Applications Withdrawn	% of Loans Originated by Minority Status	Applications Closed for Incompleteness	% of Loans Originated by Minority Status
White, Non-Hispanic	2454	82.52%	1916	78.08%	88	3.59%	176	7.17%	221	9.01%	53	2.16%
Minority, Including Hispanic	520	17.48%	351	67.50%	34	6.54%	61	11.73%	53	10.19%	21	4.04%
Total	2,974	100.00%	2,267	76.23%	122	4.10%	237	7.97%	274	9.21%	74	2.49%

Source: <http://www.ffiec.gov/hmda>

The number of White, non-Hispanic upper-income applicants significantly outnumbers the number of minority applicants. Minority applicants have a lower loan origination rate than White, non-Hispanic upper-income applicants, as well a higher denial rate.



**Conventional Loan Disposition Rates by Minority Status,
120% or More of MSA Median Income**

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Applications Received by Minority Status	Applications Denied	% of Loans Originated by Minority Status	Applications Approved but Not Accepted	% of Loans Originated by Minority Status	Applications Withdrawn	% of Loans Originated by Minority Status	Applications Closed for Incompleteness	% of Loans Originated by Minority Status
White, Non-Hispanic	13034	82.16%	10166	78.00%	558	4.28%	868	6.66%	1209	9.28%	233	1.79%
Minority, Including Hispanic	2831	17.84%	1976	69.80%	143	5.05%	278	9.82%	352	12.43%	82	2.90%
Total	15,865	100.00%	12,142	76.53%	701	4.42%	1146	7.22%	1561	9.84%	315	1.99%

Source: <http://www.ffiec.gov/hmda>

The number of White, non-Hispanic high-income applicants significantly outnumbers the number of minority applicants. Compared to white applicants, minority applicants have a higher denial rate, though a smaller origination rate.



The following table offers a closer look at the denial rates of conventional loans by denial reason and income level. For applicants earning up to 119% of median income, the most common reason for denial is debt-to-income ratio. Collateral is the most common reason for denial for applicants earning 120% of median income or more. Overall, the most common reasons for denial were debt-to-income ratio, followed by collateral and credit history.

Conventional Loan Denial Rates by Denial Reason and Income Level

	Less than 50% Low		50-79%		80-99%		100-119%		120% or More		Income Not Available		Total Denials	
	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of total
Debt to Income Ratio	211	35.64%	170	28.57%	80	22.99%	58	23.29%	196	15.67%	17	24.64%	732	23.58%
Employment History	24	4.05%	24	4.03%	7	2.01%	3	1.20%	26	2.08%	2	2.90%	86	2.77%
Credit History	132	22.30%	118	19.83%	58	16.67%	29	11.65%	151	12.07%	9	13.04%	497	16.01%
Collateral	74	12.50%	86	14.45%	76	21.84%	56	22.49%	315	25.18%	8	11.59%	615	19.81%
Insufficient Cash	37	6.25%	40	6.72%	20	5.75%	11	4.42%	66	5.28%	3	4.35%	177	5.70%
Unverifiable Information	24	4.05%	37	6.22%	19	5.46%	11	4.42%	92	7.35%	7	10.14%	190	6.12%
Credit Application Incomplete	32	5.41%	59	9.92%	48	13.79%	49	19.68%	242	19.34%	10	14.49%	440	14.18%
Mortgage Insurance Denied	5	0.84%	5	0.84%	3	0.86%	5	2.01%	13	1.04%		0.00%	31	1.00%
Other	53	8.95%	56	9.41%	37	10.63%	27	10.84%	150	11.99%	13	18.84%	336	10.82%
Total Denials/ % of Total	592	19.07%	595	19.17%	348	11.21%	249	8.02%	1,251	40.30%	69	2.22%	3,104	100.00%

Source: <http://www.ffiec.gov/hmda>



In summary, the HMDA Data indicates that low income households have a higher rate of denial than higher income households; More than one-third (38.24%) of denied loans originated from applicants earning less than 80% of the area's median income. Overall, the origination rate of conventional loans in the Philadelphia MSA is 73.5%; the number of white applicants far exceeds the number of minority applicants and the origination and denial rates by race do vary by income. The most common reasons for denial are debt-to-income ratio, followed by collateral and credit history.

In every income category, White, non-minority applicants for a conventional home purchase loan significantly outnumber minority applicants. The percentage of total applications by Whites accounts for at least 79% or more of the total in all income groups except for those making less than 50% AMI, where White applicants accounted for 60% of all applicants. Loan origination rates are slightly higher for White applicants (76.9%) than for minority applicants (66.1%) as a whole, and minority denial rates (4.9%) are higher than White denial rates (4.2%). However, the disparity in the categories of results of the applications is not as great between Whites and minorities as it is when comparing the percentage of applications.

An additional analysis of loans granted by race in Montgomery County, Pennsylvania, and across the country, is beneficial to further illustrate the financial trends in the Township of Abington. The following tables' present data gathered from www.dataplace.org. The table below presents loans for the purchase of single-family homes by race. Montgomery County has a lower rate of loans made to minorities as compared to the national rate.

Home Purchase Loans by Race

Loans by Race	Montgomery County	Pennsylvania	United States
Percentage of owner-occupied home purchase loans to Whites (2007)	83.2%	84.1%	72.7%
Percentage of owner-occupied home purchase loans to Blacks (2007)	5.3%	5.9%	7.9%
Percentage of owner-occupied home purchase loans to Asian/Pacific Islanders (2007)	6.8%	3.6%	5.2%



Percentage of owner-occupied home purchase loans to Native Americans (2007)	0.1%	0.1%	0.3%
Percentage of owner-occupied home purchase loans to Hispanics (2007)	1.9%	4.5%	10.8%
Percentage of owner-occupied home purchase loans to mixed race pairs (2007)	2.5%	1.7%	2.9%
Percentage of owner-occupied home purchase loans to minorities (2007)	16.8%	15.9%	27.3%
Percentage of owner-occupied home purchase loans made to multiracial applicants (2007)	0.2%	0.1%	0.2%

Source: www.dataplace.org

The table below highlights home loans made in Montgomery County, Pennsylvania, and the United States. The median income in the Montgomery County is higher than the median income in Pennsylvania and the United States. Montgomery County has a low rate of lending to very low- and low-income borrowers.

Home Purchase Loans by Income

Income (2007)	Montgomery County	Pennsylvania	United States
Median borrower income for owner-occupied purchase 1 to 4 family	\$90,000	\$66,000	\$74,000
Median borrower income for owner-occupied purchases of manufactured homes	\$50,000	\$43,000	\$42,000
Percentage of owner-occupied home purchase loans to very low-income borrowers	2.6%	8.4%	5.7%
Percentage of owner-occupied home purchase loans to low-income borrowers	15.9%	23.1%	19.2%
Percentage of owner-occupied home purchase loans to middle-income borrowers	27.1%	26.7%	25.8%
Percentage of owner-occupied home purchase loans to high-income borrowers	54.4%	41.8%	49.3%

Source: www.dataplace.org



The table below considers the percentage of conventional and refinancing mortgages made by subprime lenders. The prevalence of these loans in Montgomery County in 2005 (the most recent data available) is lower than rates in the Commonwealth of Pennsylvania and United States.

Loans from Subprime Lenders by Purpose and Loan Type

Type	Montgomery County	Pennsylvania	United States
Percentage of conventional home purchase mortgage loans by subprime lenders (2005)	6.6%	9.8%	17.7%
Percentage of conventional refinancing mortgage loans by subprime lenders (2005)	14.6%	18.1%	20.4%

Source: www.dataplace.org

4. Insurance

The Housing Equality Center of Pennsylvania conducted a review of insurance practices in Montgomery County. It found discrepancies in the rates and amounts of insurance coverage available to minority households. Further investigation and assessment is needed to determine if there is a barrier for a discrimination lawsuit.



V. Actions and Recommendations

The following impediments to fair housing choice and recommendations are presented to assist the Township of Abington to affirmatively further fair housing in the community. The previously identified impediments to fair housing choice were discussed in Section III and progress was reported for each impediment. New and carried over impediments to Fair Housing Choice are presented on the pages that follow. The FY 2020-2024 Analysis of Impediments to Fair Housing Choice has identified the following impediments, goals, and strategies to affirmatively further fair housing.

- **Impediment 1: Fair Housing Education and Outreach**

There is a need to educate persons about their rights and responsibilities under the Fair Housing Act and raise awareness, especially for low-income households, that all residents of Abington Township have a right to fair housing choice.

Goal: Improve the knowledge and awareness of both the public and the local officials of the Fair Housing Act, related laws, regulations, and requirements to affirmatively further fair housing in the community.

The strategies to achieve this goal include:

- **1-A:** Continue to educate and make residents aware of their rights under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- **1-B:** Continue to educate and make realtors, bankers, and housing providers aware of their responsibilities under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- **1-C:** Continue to support Fair Housing organizations and legal advocacy groups to assist persons who may be victims of housing discrimination and/or not aware of how to file a housing complaint.
- **1-D:** Support the continuing efforts of the local fair housing organizations to provide training and technical assistance to the staff of Abington Township, the local Human Relations Commission members, Township Solicitor, affordable housing providers, and other organizations that are concerned with housing and civil rights in Abington.
- **1-E:** Continue to identify Limited English Proficiency (LEP) persons to provide the specific language assistance that is needed.
- **1-F:** Support the Human Relations Commission to become a local coordination, outreach, investigation, and adjudication organization.



- **1-G:** Promote seminars and educational programs for the community in cooperation with local fair housing organizations to increase the knowledge base of all residents, owners, renters, and landlords, concerning their rights and responsibilities under the Fair Housing Act, as well as the Americans with Disabilities Act.

- **Impediment 2: Continuing Need for Affordable Housing**

According to the 2011-2015 ACS, 45.6% of renter households in the Township paid rents that exceeded 30% of their household income and 27.7% of owner households in the Township had housing costs that exceed 30% of their household income.

Goal: Increase the supply of affordable housing by new construction and rehabilitation of various types of housing that is affordable to lower income households.

The strategies to achieve this goal include:

- **2-A:** Continue to support and encourage private developers and non-profit housing providers to create, through construction or rehabilitation, affordable and mixed-income housing that provides access to employment opportunities, transportation, amenities, and services throughout the Township; especially for the Elderly.
- **2-B:** Continue to support and encourage the rehabilitation of existing housing units in the Township to become decent, safe, sound and affordable housing for households below 80% AMI.
- **2-C:** Continue to support homebuyer education and training programs, as well as down-payment assistance and financing to increase low-income homeownership rates.
- **2-D:** Continue to support tenant education and training programs, as well as rental and utility assistance for low-income renter households.
- **2-E:** Provide federal, state and local funding in response to HMDA data discrimination patterns to support a higher loan to value ratio for minority homebuyers.

- **Impediment 3: Continuing Need for Accessible Housing**

There is a lack of accessible housing units in the Township as the supply of accessible housing has not kept pace with the demand of individuals desiring to live independently.



Goal: Increase the supply of accessible housing by new construction and rehabilitation of accessible housing for persons with disabilities.

The strategies to achieve this goal include:

- **3-A:** Continue to promote the need for accessible housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing that is accessible to persons with disabilities.
- **3-B:** Continue to provide financial assistance for accessibility improvements to owner-occupied and renter-occupied housing units to enable the elderly and/or persons with disabilities to remain in their existing homes.
- **3-C:** Continue to enforce the ADA and Fair Housing requirements for landlords to make “reasonable accommodations” to their rental properties so they become accessible to tenants with disabilities.

- **Impediment 4: Public Policy**

The Township, in conjunction with the Montgomery County Planning Department, has been working on revising its Zoning Ordinance in accordance with the latest model codes. The Township needs to continue to move forward and complete this major revision to its Zoning Ordinance to bring it into compliance with the Federal Fair Housing Act, Section 504, the Americans with Disabilities Act, etc.

Goal: Complete the work on the revisions to the Township’s Zoning Ordinance to promote and affirmatively further fair housing by revising its purposes, definitions, and land use regulations.

The strategies to achieve this goal include:

- **4-A:** Revise the Zoning Ordinance to include additional definitions, statements, and revisions.
- **4-B:** Adopt a written Reasonable Accommodation Policy for housing developers and the Planning/Zoning Commission to follow when reasonable accommodation requests are made concerning zoning and land use as it applies to protected classes under the Fair Housing Act.
- **4-C:** Develop financial incentives to encourage developers and housing providers to offer more affordable housing options in the Township.
- **4-D:** Encourage LMI, minority, and protected class resident participation in the various Township Boards and Commissions.



- **Impediment 5: Regional Approach to Fair Housing**

There are four (4) Federal Entitlement jurisdictions in Montgomery County: Abington, Lower Merion, Norristown, and Montgomery County. Housing, racial, and socio-economic data from the U.S. Census, as well as the location of subsidized housing illustrates that there is a disproportionate concentration of low- and moderate-income persons, minorities, and Hispanics living in impacted areas throughout Montgomery County, which demonstrates a lack of housing choice.

Goal: Form a regional cooperative fair housing consortium to affirmatively further fair housing in the area by providing housing and economic opportunities for low- and moderate-income persons and the protected classes to live and work throughout all of Montgomery County, including outside impacted areas.

The strategies to meet this goal include:

- **5-A:** Establish an Affirmatively Furthering Fair Housing (AFFH) Consortium for Montgomery County with representatives from the Township of Abington, Lower Merion Township, the Municipality of Norristown, Montgomery County, U.S. Department of Housing and Urban Development (HUD), the two Fair Housing Councils, and the Montgomery County Housing Authority (MCHA).
- **5-B:** The AFFH Consortium should review the mobility policies and procedures of the Montgomery County Housing Authority to encourage and support low- and moderate-income Housing Choice Voucher holders to move outside racially and economically impacted areas in Montgomery County.
- **5-C:** The AFFH Consortium should coordinate and cooperate in the preparation and implementation of their individual Analysis of Impediments (A.I.) and prepare and adopt a joint countywide fair housing strategic plan.
- **5-D:** The AFFH Consortium should plan and promote regional fair housing activities and projects.
- **5-E:** The AFFH Consortium should work with affordable housing developers/providers to develop affirmative fair marketing plans and encourage the development of affordable housing throughout Montgomery County through deconcentration policies in areas that are not economically or racially impacted.