

Analysis of Impediments to Fair Housing Choice  
for  
the State of Iowa

The Iowa Department of Economic Development  
And  
The Iowa Civil Rights Commission  
2009

## Table of Contents

|      |   |    |
|------|---|----|
| I.   | Introduction and Executive Summary of the Analysis.....             | 3  |
| II.  | Jurisdictional Background Data.....                                 | 12 |
| III. | Evaluation of Jurisdiction’s Current Fair Housing Legal Status..... | 28 |
| IV.  | Identification of Impediments to Fair Housing Choice.....           | 34 |
| V.   | Assessment of Current Fair Housing Programs and Activities.....     | 38 |
| VI.  | Conclusions and Recommendations.....                                | 42 |
| VII. | Signature Page.....   | 45 |

## **I. Introduction and Executive Summary of the Analysis for the State of Iowa**

**What is required:** Title VIII of the Civil Rights Act of 1968, as amended, is known as the Fair Housing Act. The Fair Housing Act makes it illegal to discriminate in housing due to a person’s “race, color, religion, sex, handicap, familial status, or national origin.” The Fair Housing Act requires the U.S. Department of Housing and Urban Development (HUD) and any grantee receiving HUD funding to “affirmatively” further fair housing. Each year the State of Iowa certifies to HUD that it will affirmatively further fair housing choice. HUD requires this certification before it will continue providing funds to the State through the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Shelter Grant (ESG) programs, through which the State of Iowa finances a variety of housing and community development activities.

The State’s Analysis of Impediments covers the State of Iowa, with the exception of those entitlement cities that receive funding under the CDBG and/or HOME programs. Ames, Cedar Falls, Cedar Rapids, Council Bluffs, Davenport, Des Moines, Dubuque, Iowa City, Sioux City, and Waterloo are responsible for preparing the Analysis of Impediments for each of their jurisdictions. The Iowa Department of Economic Development (IDED) is the State’s lead agency for administration of the CDBG, HOME, and ESG programs for the non-entitlement cities.

**What is an Analysis of Impediments and what is it supposed to do?** An analysis of impediments should identify those factors, which either intentionally or unintentionally, stand in the way of furthering fair housing choice because of “race, color, religion, sex, handicap, familial status, or national origin.” Not only does the analysis identify those factors, but it must also address how to overcome those factors.

**What have been the findings and recommendations from Analyses of Impediments in the past?** The last Analysis of Impediments for the State of Iowa was done in 2004. That analysis found the following impediments and made the following recommendations:

- 1) **Lack of affordable housing in low income areas and suburbs**
  - a) State and local governmental entities should encourage affordable housing in low income areas and the suburbs
  - b) Iowa’s Olmstead Implementation Plan should be integrated into all housing developed for low-income households

**2) Lack of jobs in low income areas**

State agencies, local governments, and private employers should collaborate to attract and retain employers in low income areas

**3) Discrimination still exists**

- a) The Iowa Civil Rights Commission should work with other state agencies addressing fair housing issues and local communities to conduct diversity appreciation training throughout Iowa
- b) The Iowa Civil Rights Commission should conduct more fair housing testing

**4) People are not familiar with the requirements of state and federal Fair Housing Laws**

The Iowa Civil Rights Commission should work with other organizations that address housing issues to increase and improve Fair Housing educational efforts.

**5) Construction plans for multifamily housing projects are not always reviewed to ensure accessibility standards are addressed prior to construction**

- a) The Code Review process needs to ensure accessibility standards for multifamily housing are addressed prior to construction

**What action steps were recommended to address those impediments and recommendations?**

- 1) The Iowa Department of Economic Development (IDED) will refer IDED clientele to the “2003 Housing Study” and “Iowa’s Consolidated Plan” for information and data as to where barriers to affordable housing exist. This will help identify ideal types and locations for housing projects, whether it would be for elderly, disabled, minority, etc. These documents can be found on the IDED web site at: [www.iowalifechanging.com/community/public-comment.aspx](http://www.iowalifechanging.com/community/public-comment.aspx) .
- 2) The Iowa Civil Rights Commission and IDED will work with other state and local governmental entities and other stakeholders to encourage affordable housing in low income areas and the suburbs and explore the possibility of developing an action plan to address this issue.  
If the decision is made to proceed with an action plan, begin implementation of the plan.
- 3) IDED will implement steps from Iowa’s Olmstead Implementation Plan for persons with disabilities as housing is developed for low-income households
- 4) The Iowa Civil Rights Commission will work with IDED, the Iowa Department of Workforce Development, the Iowa Association of Business and Industry, and other stakeholders to encourage attraction

and retention of employers in low-income areas and explore the possibility of developing an action plan to address this issue.

If the decision is made to proceed with an action plan, begin implementation of the plan.

- 5) The Iowa Civil Rights Commission will inform other state agencies and local communities about the availability of the Iowa Civil Rights Commission trainer to do diversity appreciation training.
- 6) The Iowa Civil Rights Commission will review past testing efforts, make necessary modifications, set up and begin new testing program
- 7) The Iowa Department of Economic Development (IDED) will publicize this new version of “Iowa’s Analysis of Impediments to Fair Housing Choice” and make it available to housing practitioners, funding agencies, local governments and others through the IDED web site at: [www.iowalifechanging.com/community/public-comment.aspx](http://www.iowalifechanging.com/community/public-comment.aspx) .
- 8) IDED will continually update the “Housing Fund Management Guide” and the “Community Development Block Grant Management Guide” to include requirements, and technical assistance on affirmatively furthering fair housing choice.
- 9) IDED will include discussion relating to affirmatively furthering fair housing at all CDBG and Housing Fund workshops
- 10) IDED will distribute fair housing brochures that the Iowa Civil Rights Commission has available, at conferences and workshops, Getting to Know IDED sessions, Exhibit Booths and other events where housing is involved, in order to promote fair housing to all Iowans.
- 11) The Iowa Civil Rights Commission will continue to provide fair housing workshops throughout Iowa.
- 12) The Iowa Civil Rights Commission will work with state and private entities to conduct a training session on accessibility requirements in multifamily housing for architects, builders, contractors, realtors, and housing providers
- 13) The Iowa Civil Rights Commission will work with other entities, including the State Fire Marshall’s Office, to begin the discussion of how to create a framework for reviewing new multifamily housing projects prior to construction to ensure accessibility standards are addressed.

#### **What has been done regarding those recommendations since 2004?**

##### **1) Impediment: Lack of affordable housing in low income areas and suburbs**

- A) The Iowa Civil Rights Commission and the Iowa Department of Economic Development worked with the private sector to eliminate barriers to affordable housing. The Iowa Department of Economic Development promoted its Housing Fund

programs to developers, lenders, affordable housing tax credit syndicators, nonprofit agencies, individuals, and others. IDED presented fair housing sessions at its application workshops and recipient workshops. IDED also provided data to private entities about areas of minority concentration and greatest housing needs to help them identify ideal types of and locations for their housing projects.

- B) Spring 09 – The Iowa Civil Rights Commission worked with Iowa Finance Authority regarding design and development of new YMCA homeless shelter in Des Moines. Staff reviewed provider’s plans and policies to check compliance with State and Federal Fair Housing Laws.
- C) In 2008 and 2009, the Iowa Civil Rights Commission began discussions regarding Postville and the issue of affordable housing. The Postville area has been subject to economic distress due to the raid and short term plant closure. ICRC assisted in securing pro bono planning assistance from the University of Iowa’s Institute for Public Affairs which worked on planning for the future of the community.
- D) Since 2004, the Iowa Civil Rights Commission has conducted hearings on the status of civil rights and diversity. From 2005 through 2007, ICRC held hearings in Des Moines, Council Bluffs, Cedar Rapids, and Marshalltown on the overall issues of civil rights, including the issues of fair housing.
- E) The Iowa Department of Economic Development referred IDED clientele to the “Affordable Housing in Iowa: Meeting New Challenges: and “Iowa’s Consolidated Plan” for information and data as to where barriers to affordable housing exist.

## **2) Impediment: Lack of jobs in low income areas**

2008 and continuing - The Iowa Civil Rights Commission continues to work with stakeholder organizations, SHRM (Society for Human Resource Management), and the Iowa Diversity Council on ways the private and public sector can better attract and retain racial and cultural minorities, women, and individuals with disabilities, who are disproportionately represented in the low income community.

ICRC is represented on, and is an active and ongoing participant with the Diversity Council, which has issued recommendations to the Governor on recruitment and retention. See

[http://das.hre.iowa.gov/documents/diversity\\_council/report\\_to\\_Governor\\_from\\_the\\_diversity\\_council-2009.pdf](http://das.hre.iowa.gov/documents/diversity_council/report_to_Governor_from_the_diversity_council-2009.pdf)

### **3) Impediment: Discrimination still exists**

- A) Summer 2009 – The Iowa Civil Rights Commission began a study to determine whether Iowa municipalities have adopted building codes that are deemed “safe harbor” by HUD, meaning they require substantially similar design and construction features as Title VIII. The study will also determine whether those cities/counties with safe harbor codes employ officials or inspectors who review building plans and conduct on-site inspections to ensure compliance with those design and construction requirements. The study will include 20 or more actual ICRC-conducted on-site inspections of covered multifamily dwellings.
- B) 2004 and continuing – The Iowa Civil Rights Commission contracted with the Fair Housing Center of Nebraska to conduct on-site and phone tests.
- C) 2004 and continuing – The Iowa Civil Rights Commission conducted three “Testing Studies” to determine compliance with State and Fair Housing Laws. Two studies focused on familial status, checking to see if housing providers would offer different terms and conditions of rental based on the presence of minor children in the household. The third study focused on disability, checking to see if builders/developers complied with the design and construction accessibility requirements.
- D) 2004 and continuing – The Iowa Civil Rights Commission conducted numerous tests for evidence after a complaint had been filed but before notice has been sent to the housing provider.
- E) 2004 and continuing – The Iowa Civil Rights Commission mediated and/or investigated fair housing complaints alleging discrimination in an impartial and fair manner (almost 30% being settled, an indicator of the merits of the case). See annual reports.

<http://www.state.ia.us/government/crc/docs/2008annualreport.pdf>

**4) Impediment: People are not familiar with the requirements of state and federal Fair Housing Laws**

- A. The Iowa Civil Rights Commission conducted a statewide training session via the ICN on accessibility requirements in multifamily housing for architects, builders, contractors, realtors, and housing providers on April 29, 2005.
- B. There has been increased and improved fair housing education efforts. The Iowa Civil Rights Commission does approximately 50 fair housing presentations/outreach events each year for advocacy groups, individuals, housing providers, builders, contractors, and realtors. In fiscal year 2008/2009 the Iowa Civil Rights Commission conducted 31 fair housing presentations and gave out fair housing materials at 21 additional outreach events. The number of individuals reached with fair housing information or materials were 4901.
- C. The Iowa Civil Rights Commission created fair housing posters with tear-off brochures and is using HUD coloring books with youth.
- D. The Iowa Department of Economic Development and the Iowa Civil Rights Commission formed a partnership to promote diversity awareness: The Iowa Civil Rights Commission conducts approximately 50 presentations on diversity awareness around the state of Iowa each year.
- E. The Iowa Department of Economic Development publicized the 2004 version of the “Iowa’s Analysis of Impediments to Fair Housing Choice” and made it available to housing practitioners, funding agencies, local governments, and others via the IDEED web site.
- F. IDEED continually updated the “Housing Fund Management Guide” and the “Community Development Block Grant Management Guide” to include requirements, and technical assistance on affirmatively furthering fair housing choice.
- G. IDEED included discussion relating to affirmatively furthering fair housing at all CDBG and Housing Fund workshops.
- H. IDEED distributed fair housing brochures that the Iowa Civil Rights Commission provided at conferences and workshops, Getting to Know IDEED sessions, Exhibit Booths and other events where housing issues were involved to promote fair housing to all Iowans.



**5) Impediment: Construction plans for multifamily housing projects are not always reviewed to ensure accessibility standards are addressed prior to construction**

- A) The Iowa Civil Rights Commission conducted a statewide training session via the ICN on accessibility requirements in multifamily housing for architects, builders, contractors, realtors, and housing providers on April 29, 2005.
- B) Summer 2009 – The Iowa Civil Rights Commission began a study to determine whether Iowa municipalities have adopted building codes that are deemed “safe harbor” by HUD, meaning they require substantially similar design and construction features as Title VIII. The study will also determine whether those cities/counties with safe harbor codes employ officials or inspectors who review building plans and conduct on-site inspections to ensure compliance with those design and construction requirements. The study will include 20 or more actual ICRC-conducted on-site inspections of covered multifamily dwellings.

**Current Analysis of Impediments –**

**Who performed it and what methodology was used?** The Iowa Department of Economic Development contracted with the Iowa Civil Rights Commission to perform the 2009 Analysis of Impediments. The Iowa Civil Rights Commission used five main components for the current Analysis:

- 1) The Iowa Civil Rights Commission conducted a survey of local civil rights commissions, attorneys, housing organizations, advocacy groups, businesses, and government entities with interests in fair housing using SurveyMonkey.com. Of the 309 surveys collected, 112 submissions were quantified, while 63% were ineffectual (75 unlisted demographics, 122 from entitlement cities). The data collected was reviewed and analyzed to establish a baseline, collect feedback on what impediments exist, and determine possible remedies.
- 2) The Iowa Civil Rights Commission conducted public fair housing hearings/forums in four small to medium sized towns (Marshalltown, Storm Lake, Perry, and Urbandale) identified as possessing especially diverse growing populations and which do not conduct internal impediment studies (e.g. CDBG entitlement cities).
- 3) The most recent census data was reviewed and analyzed to determine current status and future trends.

- 4) Data on housing complaints filed with and processed by the Iowa Civil Rights Commission was reviewed and analyzed.
- 5) Data on fair housing cases filed in Iowa courts and handled by Iowa Legal Aid was reviewed and analyzed.

### **Conclusions of Current Analysis of Impediments:**

#### **Impediments Found, Recommendations, and Actions Steps to Address Them**

Although common threads continued to exist from the last time the Analysis was done, new, and more specific information was uncovered as a result of this year's Analysis. This year the major impediments that were found were the following:

- 1) Discrimination still exists.**
- 2) People are not familiar with state and federal fair housing laws, nor the local, state and federal enforcement agencies.**
- 3) Fears exist which inhibit people from filing fair housing complaints.**
- 4) Construction plans for multifamily housing projects are not always reviewed to ensure accessibility standards are addressed prior to construction.**
- 5) Lack of affordable safe housing/lack of resources to pay housing costs are impediments to fair housing.**

The four forums that were conducted in Marshalltown, Storm Lake, Perry, and Urbandale revealed the following:

- Individuals are still discriminated against in some communities because of race, disability, and national origin.
- Undocumented individuals are afraid to complain to/about landlords because of their immigration status.
- It remains difficult for disabled persons on a limited income to find safe/accessible/affordable housing.
- Some landlords refuse to make necessary accommodations for disabled tenants.
- Many do not know fair housing laws protect family status. Some residences will advertise: "No Children".
- Many are unaware of the existence of HUD, ICRC, or local civil rights commissions.

The survey, conducted online and in person, revealed the following opinions expressed by Iowans regarding impediments to fair housing in Iowa (copies of the survey results will be available on the Iowa Civil Rights Commission website – [www.state.ia.us/government/crc](http://www.state.ia.us/government/crc)):

- 1) Discrimination because of race and national origin still exist because of prejudice and a fear of the unknown
- 2) Discrimination because of sex exists because of inequalities between men and women in the workplace, as well as gender stereotypes
- 3) Discrimination because of family status exists because of landlord's fear that children will destroy their property and that they will receive noise complaints
- 4) Discrimination because of mental disability exists due to a fear that the person will harm themselves or the property, as well as stereotypes of mental disabilities
- 5) Discrimination because of physical disability exists because of landlord's lack of knowledge of the law, refusal to accommodate, and/or cost concerns.
- 6) Discrimination because of sexual orientation or gender identity occurs because of prejudice in the community and fear.
- 7) Discrimination because of religion occurs due to incorrect stereotypes, and fear of differences.

Recommendations from both the forums and surveys stressed education, strict enforcement of existing fair housing laws, and stronger protections against retaliation once fair housing complaints are filed.

## II. Jurisdictional Background

### A. Demographic Data

From 2000 to 2008, the U.S. Census (American Community Service estimates) data shows a significant change in the demographics of Iowa. Almost half the increase in Iowa's population was a result of substantial increases in African American, Asian, Native American, and most notably Hispanic populations. See website of the Iowa Immigration Education Coalition for additional data, under Resources and Information page.

Table 1

Population and Percent of Change for the State of Iowa  
Comparison of 2000 and 2008 Census Data

| Population                                   | 2000 Census Data | 2008 Census Data | % of Change |
|--|------------------|------------------|-------------|
| Total  | 2,928,046        | 3,002,555        | +2.54%      |
| White (non-Hispanic)                         | 2,792,733        | 2,827,520        | +1.25%      |
| African American (non-Hispanic)              | 63,467           | 80,516           | +26.86%     |
| Hispanic (all races)                         | 83,166           | 126,453          | +52.05%     |
| Native American (non-Hispanic)               | 9,523            | 12,644           | +32.77%     |
| Asian and Pacific Islander<br>(non-Hispanic) | 39,034           | 49,009           | +25.55%     |

Not only has the number of African American, Asian, Hispanic, and Native American individuals increased, but their dispersion throughout Iowa has increased as well. This has been particularly true for individuals who are Hispanic. According to 1990 census data, there were 500 or more Hispanics in ten Iowa counties. By 2000, the number of counties with 500 or more Hispanic individuals had climbed to 27. By 2008, the number had risen to 33 counties.

Table 2  
Iowa Counties with More than 500 Residents who are African American  
2008 Census Data

|               |        |
|---------------|--------|
| Polk          | 23,178 |
| Black Hawk    | 10,585 |
| Scott         | 11,469 |
| Linn          | 7,724  |
| Johnson       | 5,233  |
| Woodbury      | 2,773  |
| Story         | 1,956  |
| Des Moines    | 1,784  |
| Dubuque       | 1,617  |
| Webster       | 1,515  |
| Clinton       | 1,167  |
| Lee           | 1,145  |
| Pottawattamie | 1,056  |
| Dallas        | 791    |
| Marshall      | 599    |

Table 3  
Iowa Counties with More than 500 Residents who are American Indian or Alaska Native  
2008 Census Data

|          |       |
|----------|-------|
| Woodbury | 2,228 |
| Polk     | 2,076 |
| Tama     | 1,234 |
| Linn     | 846   |
| Scott    | 701   |

Table 4  
Iowa Counties with More than 500 Residents who are Asian  
2008 Census Data

|               |        |
|---------------|--------|
| Polk          | 13,036 |
| Johnson       | 5,900  |
| Story         | 4,961  |
| Linn          | 4,102  |
| Scott         | 3,420  |
| Woodbury      | 2,483  |
| Black Hawk    | 1,563  |
| Dallas        | 1,066  |
| Buena Vista   | 847    |
| Dubuque       | 727    |
| Pottawattamie | 568    |

Table 5  
Iowa Counties with More than 500 Residents who are Hispanic - 2008 Census Data

|               |        |
|---------------|--------|
| Polk          | 28,438 |
| Woodbury      | 12,231 |
| Scott         | 8,188  |
| Muscatine     | 5,894  |
| Marshall      | 5,794  |
| Linn          | 4,908  |
| Johnson       | 4,183  |
| Buena Vista   | 4,099  |
| Pottawattamie | 3,940  |
| Dallas        | 3,640  |
| Black Hawk    | 3,600  |
| Crawford      | 3,284  |
| Wapello       | 2,358  |
| Story         | 1,902  |
| Louisa        | 1,840  |
| Sioux         | 1,790  |
| Dubuque       | 1,733  |
| Cerro Gordo   | 1,371  |
| Franklin      | 1,295  |
| Webster       | 1,177  |
| Allamakee     | 1,170  |
| Wright        | 1,131  |
| Des Moines    | 1,009  |
| Lee           | 969    |
| Clinton       | 943    |
| Washington    | 934    |
| Tama          | 920    |
| Wapello       | 799    |
| Warren        | 691    |
| Emmet         | 636    |
| Plymouth      | 633    |
| Hardin        | 574    |
| Jasper        | 554    |

Individuals with disabilities represent a significant population in Iowa. As Iowa's population ages, this number increases proportionately.

Table 6  
Disability Status of Iowans (Excludes those residing in institutions)  
2007 Census Data

| Age                | Number of Persons with a Disability | % of Total Population in Age Group |
|--------------------|-------------------------------------|------------------------------------|
| 5-15 years of age  | 30,002                              | 7%                                 |
| 16-64 years of age | 220,754                             | 11.6%                              |
| 65 and older       | 146,664                             | 35.9%                              |

#### B. Income Data

An analysis of income data shows some very troubling information. According to 2007 Supplementary Census Data (see Table 7), 19.3% of African American households in Iowa have a median income of less than \$10,000, this compared to 12.8% for Asian households, 6.1% of White households, and 8% of Hispanic households (up from 1.5% in 2000). The data sample was too small to figure percentages for Native American, Native Hawaiian, and other Pacific Islander households. According to 2007 Census Data (see Table 8), although there appears to have been a general increase of household income for Asian and White households since the 2000 census, the same is not true for other groups.

Table 7

Breakdown of Median Household Income by Race and National Origin  
 2007 American Community Survey – Data Based on 12 month samples during 2007  
 Incomes Adjusted for Inflation

| Income                | White     | African American | Asian  | Hispanic | Native American, Native Hawaiian, and other Pacific Islander |
|-----------------------|-----------|------------------|--------|----------|--|
| Total                 | 1,129,933 | 24,963           | 16,255 | 32,013   | Sample too small   |
| Less than \$10,000    | 69,237    | 4,826            | 2,079  | 2,575    |  |
| \$10,000 - \$14,999   | 65,072    | 3,847            | 610    | 2,172    |  |
| \$15,000 - \$19,999   | 66,024    | 1,908            | 765    | 3,249    |  |
| \$20,000 - \$24,999   | 67,810    | 3,018            | 1,262  | 2,831    |  |
| \$25,000 - \$29,999   | 67,492    | 1,128            | 677    | 2,244    |  |
| \$30,000 - \$34,999   | 69,067    | 1,428            | 596    | 2,074    |  |
| \$35,000 - \$39,999   | 60,809    | 816              | 723    | 2,142    |  |
| \$40,000 - \$44,999   | 62,278    | 1,072            | 816    | 1,922    |  |
| \$45,000 - \$49,999   | 54,354    | 300              | 197    | 1,412    |  |
| \$50,000 - \$59,999   | 106,866   | 2,273            | 2,225  | 3,266    |  |
| \$60,000 - \$74,999   | 136,574   | 1,170            | 2,292  | 4,196    |  |
| \$75,000 - \$99,999   | 145,691   | 2,077            | 1,501  | 2,442    |  |
| \$100,000 - \$124,999 | 74,794    | 673              | 813    | 1,034    |  |
| \$125,000 - \$149,999 | 32,330    | 0                | 682    | 270      |  |
| \$150,000 - \$199,999 | 26,787    | 427              | 269    | 74       |  |
| \$200,000 or more     | 24,748    | 0                | 748    | 110      |  |



Table 8

Racial and National Origin Breakdown of Household Income

| Households                            | Very Low Income<br>\$0 -<br>\$24,999 | Other Low Income<br>\$25,000 -<br>\$34,999 | Moderate Income<br>\$35,000 -<br>\$44,999 | % above<br>\$45,000 &<br>above |
|---------------------------------------|--------------------------------------|--|---|--------------------------------|
| White                                 | 23.7%                                | 12.1%                                      | 10.9%                                     | 53.3%                          |
| African American                      | 54.5%                                | 10.2%                                      | 7.6%                                      | 27.7%                          |
| Asian                                 | 35.6%                                | 7.8%                                       | 9.5%                                      | 53.7%                          |
| Hispanic                              | 33.8%                                | 13.5%                                      | 12.7%                                     | 40%                            |
| *Native American                      | --                                   | --   | --  | --                             |
| *Native Hawaiian<br>/Pacific Islander | --                                   | --   | --  | --                             |

\*Sample size for Native American and Native Hawaiian /Pacific Islander too small

Data for the median incomes of men and women in Iowa shows a significant difference in their median incomes. Women have median incomes that are 73.5% those of men.

Table 9  
Median Earnings by Sex in Iowa  
2007 Census Data

| Gender | Median Income |
|--------|---------------|
| Female | \$30,925      |
| Male   | \$41,375      |

C. Employment Data

Unemployment figures show similar disparities as those mentioned previously in the Income Data section. For African Americans the unemployment rate is 14.7%, 3.3 times the unemployment rate of Whites. For Hispanics it is 8.9%; and for Asians it is 2.6%. The size of the disparity indicates that these differences do not occur by chance.

Table 10

Unemployment by Race  
2007 Census Data

| Population                        | Employed | Unemployed |
|-----------------------------------|----------|------------|
| White                             | 95.5%    | 4.5%       |
| African American                  | 85.3%    | 14.7%      |
| *American Indian/Alaska Native    | --       | --         |
| Asian                             | 97.4%    | 2.6%       |
| *Native Hawaiian/Pacific Islander | --       | --         |
| Hispanic                          | 91.1%    | 8.9%       |

\*Sample size for American Indian and Native Hawaiian /Pacific Islander too small

D. Housing Profile

From 2000 to 2007, the number of households in Iowa grew at a faster rate than the population generally. Households increased from 1,150,197 to 1,214,353, an increase of 5.28%, while the total population only grew by 1.89%.

Table 11

Households and Population in Iowa  
2000 and 2007 Census Data

|            | 2000 Census Data | 2007 Census Data | % of Change |
|------------|------------------|------------------|-------------|
| Population | 2,928,046        | 2,983,360        | 1.89%       |
| Households | 1,150,197        | 1,214,353        | 5.28%       |

Most housing units in Iowa are 1-unit, detached housing units (74%). All other units are under 5% of the total number of units.

Table 12  
Housing Units by Number of Units in Structure  
2007 Census Data

| Units               | Number    | Percent |
|---------------------|-----------|---------|
| Total               | 1,329,388 | 100.0%  |
| 1-unit, detached    | 983,417   | 74.0%   |
| 1-unit, attached    | 41,532    | 2.1%    |
| 2 units             | 34,288    | 2.6%    |
| 3 or 4 units        | 49,461    | 3.7%    |
| 5 to 9 units        | 52,723    | 4.0%    |
| 10 to 19 units      | 52,264    | 4.0%    |
| 20 or more units    | 41,443    | 3.1%    |
| Mobile home         | 21,407    | 1.6%    |
| Boat, RV, van, etc. | 52,740    | 4.0%    |

A significant number of Iowa's housing units are over 60 years old (29%) and over 70% of all of Iowa's housing units are over 40 years old. According to the 2007 census, only approximately 10% of Iowa's housing units had been built since 2000.

Table 13  
Housing Units by Year Built  
2007 Census Data

| Year Built       | Number    | Percent |
|------------------|-----------|---------|
| Total            | 1,329,388 | 100.0%  |
| 2005 or later    | 36,773    | 2.8%    |
| 2000 – 2004      | 91,564    | 6.9%    |
| 1990 – 1999      | 144,486   | 10.9%   |
| 1980 – 1989      | 97,609    | 7.3%    |
| 1970 – 1979      | 206,976   | 15.6%   |
| 1960 – 1969      | 143,414   | 10.8%   |
| 1950 – 1959      | 144,844   | 10.9%   |
| 1940 – 1949      | 78,129    | 5.9%    |
| 1939 and earlier | 385,593   | 29%     |

A very large portion of Iowa’s housing units are occupied (91.3%). Although the rental vacancy rate in Iowa is low (7.5%), the homeowner vacancy rate is much lower (2%).

Table 14  
Housing Occupancy and Vacancy Rates  
2007 Census Data

| Housing Units          | Number    | Percent |
|------------------------|-----------|---------|
| Total                  | 1,329,388 | 100.0%  |
| Occupied housing units | 1,214,353 | 91.3%   |
| Vacant housing units   | 115,035   | 8.7%    |
| Homeowner Vacancy Rate | --        | 2%      |
| Rental Vacancy Rate    | --        | 7.5%    |

In close to half (47.6%) of Iowa households, individuals age 5 and older had lived in their current home since 2000, according to the 2007 census. This shows a very stable population that does not move frequently.

Table 15  
Residence in Same House since 2000  
2007 Census Data

|                 |       |
|-----------------|-------|
| Same House      | 47.6% |
| Different House | 52.4% |

Most Iowa households are families (65.4%). 29.6% of all Iowa households had children under the age of 18; and 6.3% were headed by female heads of household with children under 18.

Table 16  
Occupied Housing Units by Type  
2007 Census Data

| Type   | Number    | Percent |
|--|-----------|---------|
| Total  | 1,214,353 | 100.0%  |
| Families   | 794,320   | 65.4%   |
| Households with children under 18 years                        | 359,409   | 29.6%   |
| Female householder (no husband present) with children under 18 | 76,037    | 6.3%    |

The 2007 Census data show extreme disparities between different populations in Iowa in terms of who owns and who rents housing units in Iowa. 75.8% of Whites live in owner occupied units and 24.6% live in rental units. These numbers are almost reversed for African Americans. 31.4% of African Americans live in owner occupied housing, while 68.6% live in renter occupied units. Although the percentages are not as divergent for American Indians, Asians, or Hispanics, the numbers are still significantly different than those of Whites. These statistics are lower than the national averages of homeownerships for African Americans (46.5%) and Asian/Pacific Islanders (60.2%); but a little higher for Hispanics (49.9%). (Source: <http://www.infoplease.com/ipa/A0883976.html> )

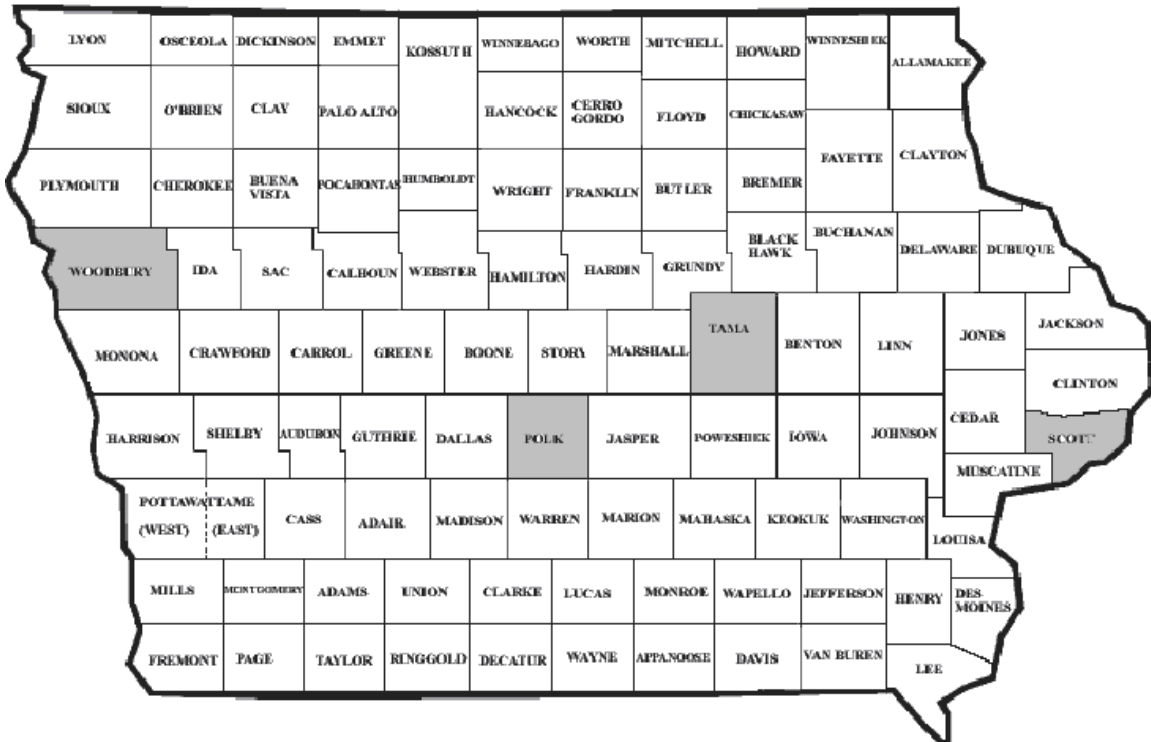
Table 17  
Housing Units by Race and Whether Owner/Renter Occupied  
2007 Census Data

| Occupant of Housing Unit             | Owner occupied | Renter Occupied |
|--------------------------------------|----------------|-----------------|
| White                                | 75.8%          | 24.6%           |
| African American                     | 31.4%          | 68.6%           |
| American Indian/Alaska Native        | 51.4%          | 48.6%           |
| Asian                                | 52%            | 48%             |
| *Native Hawaiian or Pacific Islander | --             | --              |
| Hispanic                             | 51.7%          | 48.3%           |

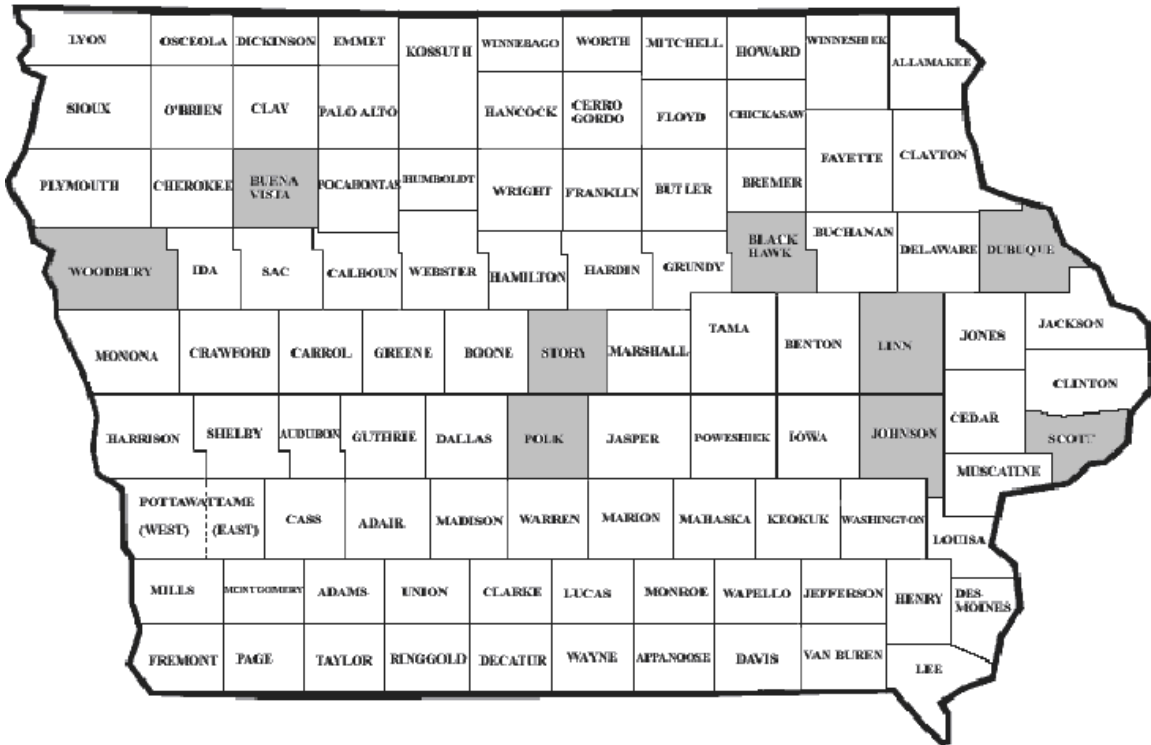
\*Sample size for Native Hawaiian /Pacific Islander too small



## Iowa Counties with 500 or More Residents Who are American Indian

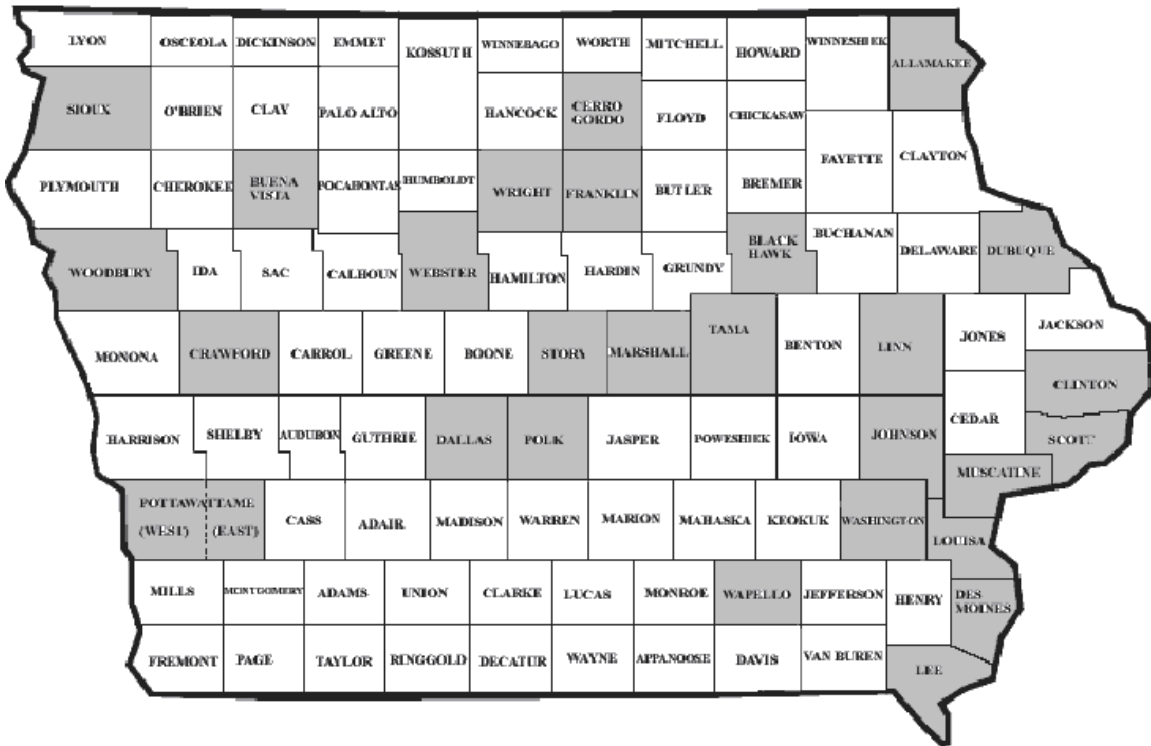


## Iowa Counties with 500 or More Residents Who are Asian





## Iowa Counties with 500 or More Residents Who are Latino (Hispanic)



## F. Other Relevant Data

Opportunities and access to affordable housing is inversely proportional to poverty and unemployment rates, with disproportionate impact on racial and cultural minorities, female heads of household, and individuals with disabilities. According to the 2007 study, *Affordable Housing in Iowa: Meeting New Challenges*, “Within each income category, affordability worsened significantly from 2000 to 2005. On average, among households earning between \$20,000 and \$34,999, 24.3% were cost-burdened in 2000, but 45.6% were cost-burdened in 2005. The situation was far worse for households earning \$20,000 or less; on average, about 70% of households in this income category were cost-burdened in 2000, but nearly 85% were burdened in 2005.” Coupled with the fact that renters in general have a larger tendency to be cost-burdened, the effects on African American, American Indian, Asian, and Hispanic households is obvious.

Those individuals living in metro areas tend to proportionately be more cost-burdened than those living in non-metro areas. However, poor rural families tend to have more problems with severe housing deprivation relative to those in urban areas. Exacerbated by fewer available homes to begin with, this housing deprivation disparately impacts minority groups in relation to their white counterparts due to numerous variables relating to race or ethnicity. Among these variables include the exploitation of Latino/immigrant families by landlords who charge more for less—taking advantage of poor credit history or poor understanding of the English language and US and Iowa law. ([www.extension.iastate.edu/hunger](http://www.extension.iastate.edu/hunger) )

In terms of homeowners, there is a larger cost-burden for those in metro areas than in non-metro areas. However, African American, American Indian, Asian, and Hispanic homeowners are more likely than Whites to have affordability problems in non-metro areas, reinforcing the information provided in the preceding paragraph.

The median income for female heads of household in 2007 was \$22,942. In other words, almost half of female-headed households are likely to be cost-burdened. These families have affordability problems in all housing markets.

In Iowa in 2007 the employment rate for individuals with disabilities was 45.1% compared to an 81.6% employment rate for individuals without a disability. The majority of non-elderly individuals with disabilities and no employment income are renters. For those individuals with disabilities who rely on SSI (Supplemental Security Income), the one income source for non-elderly individuals with disabilities who do not work, finding affordable housing that meets ADA standards can be extremely difficult.

Even though elderly households are more likely to own their own homes, the elderly who own homes have more affordability problems than younger homeowners. However, both elderly and very young renters face severe affordability problems, the elderly due to fixed incomes and the young due to low wages.

### III. Evaluation of Jurisdiction’s Current Fair Housing Legal Status

#### A. Fair housing complaints or compliance reviews where the HUD Secretary has issued a charge of or made a finding of discrimination

During fiscal year 2007/2008, there were 175 fair housing complaints filed with the Iowa Civil Rights Commission. 31.3% of the cases filed alleged discrimination based on race; 27.3% on disability, 12.3% on retaliation and 11.2% on sex. The four leading issues involved terms and conditions, eviction, harassment, and failure to accommodate. Most cases were resolved as no probable causes (insufficient evidence to believe discrimination occurred), settlements, or administrative closures. In fiscal year 2008/2009, 127 housing cases were filed with the Iowa Civil Rights Commission. The information for cases filed and resolved in fiscal year 2008/2009 follows in Tables 18-20 (due to multiple bases and incidents, numbers will not add up to exactly 127).

Table 18  
Fair Housing Cases Filed (127 Total) with the Iowa Civil Rights Commission by Basis  
July 1, 2008 – June 30, 2009

| Basis (A case may have more than one basis) | Number | Percent |
|---|--------|---------|
| Race  | 45     | 35.4%   |
| Disability                                  | 52     | 40.9%   |
| Familial Status                             | 14     | 11%     |
| National Origin                             | 19     | 15%     |
| Sex   | 17     | 13.4%   |
| Religion                                    | 1      | .8%     |
| Retaliation                                 | 17     | 13.4%   |
| Sexual Orientation                          | 2      | 1.6%    |
| Color                                       | 4      | 3.2%    |

Table 19  
Fair Housing Cases Filed with the Iowa Civil Rights Commission by Issue Alleged  
July 1, 2008 – June 30, 2009

| Issue (A case can have more than one issue) | Number | Percent |
|---|--------|---------|
| Terms and Conditions                        | 73     | 56.6%   |
| Eviction                                    | 37     | 28.7%   |
| Harassment                                  | 27     | 21.3%   |
| Refusal to Rent                             | 23     | 17.8%   |
| Failure to Accommodate                      | 25     | 19.4%   |

Table 20  
Fair Housing Cases Filed with the Iowa Civil Rights Commission by Type of Closure  
July 1, 2008 – June 30, 2009

| Type of Closure        | Number | Percent |
|------------------------|--------|---------|
| No Probable Cause      | 64     | 46.4%   |
| Settlement             | 37     | 26.8%   |
| Administrative Closure | 20     | 14.5%   |
| Withdrawal             | 3      | 2.2%    |
| Probable Cause         | 14     | 10.1%   |

**B. Fair Housing Discrimination Cases of Note**

**State of Iowa, ex. rel Alicia Claypool v. Michael Evans, et. Al.**

Iowa Supreme Court, No. 95/07-0158  
Filed October 24, 2008  
Statute of Limitations in Housing Discrimination

The Iowa Supreme Court stated “In this case the specific discriminatory practice was the sale of a housing unit designed and constructed to be inaccessible to a person with disabilities. This discriminatory practice was complete upon the sale. The lack of accessibility of the non-compliant development was a continuing effect of the discriminatory practice rather than a continuing violation. *Garcia*, 526 F.3d at 462–63; *Moseke v. Miller & Smith, Inc.*, 202 F. Supp. 2d 492, 507 (E.D. Va. 2002). Had the legislature wanted developers and designers of the unit to be liable after the sale, it could have expressly provided for continuing liability in the Iowa Civil Rights Act.”

**State v. Des Moines Municipal Housing Agency, City of Des Moines**

#7-272 / 06-1144  
Filed Dec. 28, 2007  
Disability

On May 8, 2002, Carol Henderson entered into a lease agreement with the Des Moines Municipal Housing Agency where she lived with her daughter in a two bedroom unit. The lease stated that reasonable accommodations would be made for persons with disabilities. After Henderson and her daughter experienced two attempted break-ins, they obtained two large dogs (over 90 pounds). Tenants were permitted to own pets if they first apply for a permit, and if the pet did not exceed twenty pounds. One pet

per household was permitted, and restrictions did not apply to service animals. A housing inspector noticed the dogs and Henderson was notified for violating the pet policy and given 14 days to comply. Henderson filed for the pet permit, and wanted the dogs to be classified as service animals. Her application was denied; the dogs exceeded the weight limit, there was more than one pet per household, and the dogs did not classify as service animals. She was informed that she needed to remove the dogs. Henderson submitted two letters from doctors, as well as the Iowa Division of Persons with Disabilities stating the animals were obtained as service animals due to Henderson's post traumatic stress disorder from domestic violence she allegedly suffered more than ten years earlier. She then filed a complaint with the Iowa Civil Rights Commission claiming she was discriminated against because the housing agency and the city did not recognize her animals as service animals, or waive the pet policy. The State found that the housing agency and the city of Des Moines violated section 216.8A(3)(c)(2) of the Iowa Civil Rights Code for not waiving the pet policy, and not allowing Henderson's pet to be permitted as a service animal to accompany her due to her mental disability. The Iowa Supreme Court reversed the previous grant of "summary judgment" by the district court and remanded for further proceedings.

**State v. Burche (Dobbs), Scott Co. # 97802**

Filed Oct. 29, 2001; Judgment: January 15, 2004

Sex Discrimination [Harassment]

[See State v. Burche [Halligan], below.

**State v. Burche [Halligan], Scott Co. # 98073**

Filed December 26, 2001; Judgment: January 15, 2004

Sex Discrimination [Harassment]

The complainants were single women who rented apartments in properties owned by John Burche, Maura Burche and I.J.P., Inc. They alleged that they were sexually harassed by John Burche and that his conduct towards them included unwelcome touching, unwelcome and forced kissing, unwelcome proposals for social outings for dinner or drinks, propositions that they provide sexual favors in return for concessions on their rent or utility expenses, entry into their apartments without advance notice or reason, and revocation of opportunities to perform work around the complex when they objected to the propositions or harassment. Their cases were consolidated for trial and additional victims of harassment were identified during discovery. The action was then amended to include an allegation of pattern or practice of sexual harassment.

The case was tried in January 2004 and judgment was entered for \$10,000.00 compensatory damages and \$25,000.00 punitive damages for

each of the named individuals, a civil penalty in the amount of \$50,000.00 payable to the State and an injunction precluding any of the defendants from future management of residential properties. The failure to award relief to the additional victims of harassment is an issue in an appeal.

### **Iowa Legal Aid Cases in Which Fair Housing Claims Arose in Pre-Litigation Negotiations, Defense of Eviction or in Administrative Proceedings:**

Examples in which Iowa Legal Aid has used fair housing claims to assist clients:

#### 1. Senior Client Facing Eviction for Disability-Related Problems Retains Tenancy

This client lived in a senior complex. She was given a termination notice, essentially for poor scooter control. Iowa Legal Aid represented her at a meeting with the landlord, and filed a complaint with HUD. The matter was settled by having the eviction dismissed, and education provided for the landlord's staff. The client was fast-tracked for eviction under Iowa's "clear and present danger" provisions based on one incident where she hit a table with her scooter as she joined the group at the table, and for supposedly having said she would like to kill the resident manager. Of course, she said the table bump was an accident, and she had a witness who was prepared to testify that it was. The flippant comment, whatever it was, had clearly not been intended as a threat. Iowa Legal Aid obtained statements from the client's doctor and a past landlord that said this client was harmless. Nevertheless, the landlord was determined to proceed with the eviction hearing. In preparing for the hearing, staff spoke with the Bazelon Center, who suggested that HUD be contacted, and provided the number for an attorney at HUD. HUD staff persuaded the landlord to continue the eviction so there could be an investigation. HUD sent an investigator out from Omaha a day or two later, and the case was settled the same day. The landlord had various small disputes about the phrasing of the settlement agreement, so that it wasn't finalized for some time. But, the landlord agreed to dismiss the eviction, and send the staff to fair housing school.

#### 2. A Young Woman with Disabilities Retains Housing Subsidy

A woman with a mental disability was terminated by a housing authority because she got into a fight in her home with a friend who would not leave. Iowa Legal Aid filed a Writ of Certiorari in District Court to appeal the decision of the housing authority, and also made a request for a reasonable accommodation with the housing authority. Iowa Legal Aid obtained an evaluation of the client, showing that her behavior was likely related to her various impairments, and that treatment and medication would likely help her. The housing authority agreed to

the request, and Iowa Legal Aid helped set up the services the client needed to be successful in her tenancy. The Writ of Certiorari was dismissed, since her subsidy had been preserved.

### 3. A Family with Children Preserves Their Tenancy and Housing Subsidy

A family was evicted for the behavior of their children, which then put at risk their continued receipt of a housing subsidy. Iowa Legal Aid filed an appeal of the eviction, and included a claim for fair housing based on discrimination against families with children. The lease made tenants responsible for any damage caused by children or the children's guests, regardless of whether the tenants were at fault. The case was settled, and the eviction was dismissed, and the housing subsidy was preserved.

Other examples of advocacy with housing authorities include:

--obtaining continued assistance for a client who moved to a new unit after the landlord refused to allow a therapy animal; --preserving the subsidy of a tenant using the amendments under the Violence Against Women Act, which does not allow a victim of violence to lose her subsidy as a result of an act of domestic violence; and --obtaining a reasonable accommodation for a woman who was a victim of childhood sexual abuse to move to a new unit and keep her subsidy when someone on the sex abuse registry moved in next door, even though the landlord refused to release her from her tenancy, which usually would prevent the housing authority from continuing the subsidy at the new location.

### **C. Reasons for any trends or patterns**

Disability (40.9%) and race (35.4%) continue to be the bases for most housing complaints. National origin cases are also beginning to increase in number and percentage (15%) of the housing cases filed.

Harassment is increasingly becoming an issue in housing complaints filed with the Iowa Civil Rights Commission. Although most often thought of as based on sex, harassment may be due to any of the other protected characteristics (bases), such as race, national origin, or religion.

Many fair housing cases settle before a determination of probable cause is made. The settlement rate for non-housing cases filed with the Iowa Civil Rights Commission is approximately 12%; for housing cases the settlement rate is 26.8%. This percentage, which is in contrast to the single-digit settlement rate for all other areas of discrimination, tends to demonstrate the visibility and persistence of housing discrimination.



#### **D. Discussion of other fair housing issues**

In fiscal year 2005, the number of fair housing cases filed with the Iowa Civil Rights Commission had shrunk to 53. But, beginning in fiscal year 2006, this number started to increase and is now almost triple that amount.

## **IV. Identification of Impediments to Fair Housing Choice**

### **A. Public Sector**

#### **1. Zoning and Site Selection**

Zoning becomes a fair housing issue most frequently when multi-unit construction is either prohibited by current zoning or residents of a community seek to restrict a residential area so that multi-units cannot be built. The NIMBY (Not in my back yard) philosophy prevents individuals with disabilities and people with lower incomes from having affordable housing choices.

Recently in Iowa, we have seen this become a factor as it relates to group homes for disabled individuals, care centers for Alzheimers residents, mobile home parks, and homeless shelters.

#### **2. Neighborhood Revitalization, Municipal and Other Services, Employment-Housing-Transportation Linkage**

Often higher incomes move housing and employment opportunities to the suburbs. There must be planning for affordable housing in suburbs as well. Removing employment opportunities from proximity to individuals with lower incomes, not only makes accessibility to employment more difficult for lower income individuals, but also increases the amount that lower income individuals must pay on items such as transportation.

Although neighborhood revitalization is commendable, the needs of current low-income residents in the area must be taken into account. Often low-income residents with few options are displaced when new housing developments appear that have high price tags. Such projects need to take into consideration provision of affordable housing for the residents who more than likely will not be able to afford the new higher-priced housing.

#### **3. PHA and Other Assisted/Insured Housing Provider Tenant Selection Procedures; Housing Choices for Certificate and Voucher Holders**

As has been alluded to in other parts of this report, the lower the income of an individual or a household, the more limited the choices are for affordable housing. In Iowa, a disproportionate number of African American, Asian, American Indian, Hispanic, single-mother heads of households, and individuals with disabilities have low incomes. It is, therefore, even more imperative that PHA and Other Assisted/Insured Housing be provided in a non-discriminatory manner, since individuals in

these populations are much more likely to have limited housing choices.

#### 4. Sale of Subsidized Housing and Possible Displacement

The issues here are similar to those discussed relative to neighborhood revitalization. Before selling subsidized housing, provisions need to be made that will allow those displaced to find similar housing in close proximity.

#### 5. Property Tax Policies

Property tax policies must encourage the construction of affordable housing. They must also encourage employers to stay or locate in close proximity to low-income communities.

#### 6. Planning and Zoning Boards

Planning and zoning boards must attract and retain employment and affordable housing opportunities in low-income neighborhoods. The interconnection of employment-income-affordable housing cannot be ignored. To do so will disproportionately affect African American, Asian, American Indian, Hispanic, and disabled communities, as well as single-mother heads of households.

#### 7. Building Codes

There is not a uniform system of reviewing construction plans for accessibility. Because reviews are not always done, many new housing projects are constructed that do not meet the fair housing accessibility requirements. In Iowa, each municipality with a building code enforcement official is responsible for reviewing plans for accessibility in that municipality. In those municipalities without building code officials, the State Fire Marshall has the responsibility for review of construction plans for accessibility. Additionally, a municipality with a building code official can request a review by the State Fire Marshall. However, the State Fire Marshall has no sanction power over local building code officials when it comes to accessibility standards. In addition, although the original ADAAG (Americans with Disabilities Act Accessibility Guidelines) are now the state standard, conflicts with other guidelines can make reviews problematic.

## B. Private Sector

### Lending Policies and Practices

Clearly, the private sector has a large role to play in removing the impediments to fair housing. Predatory lending has been an issue in Iowa communities since the last analysis. Not only must the private sector insure that its policies and practices do not intentionally discriminate, the private sector must continuously and proactively strive to encourage and support employment opportunities and the provision of affordable housing in low-income areas. The private sector can also continue or begin to take leading roles to support efforts encouraging an appreciation of diversity and inclusiveness within their communities

## C. Public and Private Sector

### 1. Lending Policies and Practices:

The public sector also has an obligation to ensure its policies and procedures do not intentionally discriminate or have a disparate impact due to a person's race, sex, national origin, religion, or disability. Policies should encourage attracting and retaining employers and housing providers in low-income neighborhoods, as well as support diversity and inclusiveness.

### 2. Fair Housing Enforcement

Civil and human rights agencies in Iowa must strongly enforce their enabling statutes. Over the past three years the Iowa Civil Rights Commission has significantly increased its testing for possible fair housing discrimination; but needs to continue to expand.

### 3. Informational Programs

Often violations of fair housing laws are the result of people not knowing what the law is. This is particularly true as it relates to accessibility requirements in multi-family housing. Even architects and builders who have been in business for a long period of time are often unaware of what their obligations are relative to the seven accessibility requirements set out in the federal fair housing act and Chapter 216 of the Iowa Code.

Another area of unfamiliarity, especially in small communities, relates to familial status discrimination. There are still a number of housing providers in small communities who do not realize it is illegal to refuse rental of a unit because a family has children.

4. Visitability in Housing

The issues here are similar to those mentioned previously in the sections dealing with Building Codes and Informational Programs. Failure to review plans and/or failure to have knowledge of fair housing accessibility requirements can negatively affect the visitability of housing.

- D. Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD under Title VI of the Civil Rights Act of 1964 or Section 504 of the Rehabilitation Act of 1973, or where the Secretary has issued a charge under the Fair Housing Act regarding assisted housing within a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to help remedy the discriminatory condition, including actions involving the expenditure of funds by the jurisdiction.

This section is not applicable in Iowa because there are currently no cases of this nature.

## V. **Assessment of the Current Public and Private Fair Housing Programs and Activities in the Jurisdiction**

### Iowa Civil Rights Commission Activities:

The Iowa Civil Rights Commission not only enforces the Iowa law on fair housing, but conducts extensive education and outreach efforts regarding fair housing issues. These efforts address the rights and responsibilities of individuals, housing providers, builders, contractors, real estate agents, lenders, and others who are involved in housing issues.

- **Presentations**  
In fiscal year 2008/2009, the Iowa Civil Rights Commission conducted 261 presentations/outreach events throughout Iowa. These presentations reached 16,317 individuals (up from 176 presentations that reached 4,373 in fiscal year 2002/2003). 31 of the 261 presentations dealt with fair housing issues, 21 outreach events provided fair housing information, and 36 of the presentations were on diversity appreciation.
- **Materials**  
The Iowa Civil Rights Commission distributed 63,584 materials in fiscal year 2008/2009 (up from 27,526 in fiscal year 2002/2003).
- **Fair Housing Advertising Campaign**  
This year, the Iowa Civil Rights Commission received Fair Housing Initiatives Program (FHIP) monies to conduct an extensive fair housing advertising campaign. The Iowa Civil Rights Commission is using movie, television, and newspaper ads to get out information on fair housing.
- **Informational Calls**  
The Iowa Civil Rights Commission received 963 requests for information, not directly related to someone wanting to file a complaint in fiscal year 2008/2009. This included 85 from landlords, housing managers, and realtors.
- **Website**  
The Iowa Civil Rights Commission's website ([www.state.ia.us/government/crc](http://www.state.ia.us/government/crc)) has a host of materials on fair housing. Fair housing posters, brochures, guides, studies, and the fair housing PowerPoint presentation used by the Iowa Civil Rights Commission trainer are all on this website.

- Video Lending Library  
The Iowa Civil Rights Commission has an extensive video lending library. The library includes videos on fair housing, diversity, and related civil rights laws and issues.
  
- Collaborative Projects:
  - a. Friends of Iowa Civil Rights, Inc.  
The Iowa Civil Rights Commission partners with Friends of Iowa Civil Rights, Inc. to coordinate the annual statewide diversity conference. The conference is a day-long event that attracts people with an interest in diversity and civil rights issues from all over Iowa to hear motivational speakers and develop a network of collaborating individuals and organizations. The Iowa Civil Rights Commission also partners with Friends and the I'll Make Me a World in Iowa organization to host the annual celebration of African American arts and culture each year at the end of January. In addition, the Iowa Civil Rights Commission also supports the Friends annual awards luncheon recognizing individuals, organizations, schools, and businesses for their contributions to civil rights in Iowa.
  
  - b. Federal and local agencies  
The Iowa Civil Rights Commission partners with HUD and EEOC on enforcement, as well as education and outreach projects. In addition, the Iowa Civil Rights Commission often partners with the **26** local human/civil rights agencies throughout the state.
  
  - c. Other organizations  
The Iowa Civil Rights Commission partners with numerous other organizations to further civil rights and fair housing issues throughout Iowa. Since 2005, ICRC has entered into unique partnerships with VISTA to do education and outreach in areas, including housing. Other partners include the Iowa Department of Human Rights and each of its divisions (Division of Latino Affairs, Commission on the Status of Asian and Pacific Islanders, Division of Native American Affairs, Division of Persons with Disabilities, Division on the Status of African Americans, and the Division on the Status

of Women), the Governor's DD (Developmental Disability) Council, The Olmstead Task Force, the Iowa Department of Economic Development, the Iowa Finance Authority, Iowa Workforce Development, the Iowa Department of Human Services, the Iowa Department of Revenue and Finance, the Bureau of Refugee Services, the Center for New Community, the Immigrants Rights Project, the NAACP, Latinos Unidos, the Iowa Association of Business and Industry, the Iowa Landlords Association, the Iowa Realtor's Association, the Labor and Employment Law section of the Iowa Bar, and Employer Councils throughout Iowa.

#### Iowa Department of Economic Development Activities:

- **Workshops**  
The Iowa Department of Economic Development conducts application workshops and recipient workshops apprising attendees of Civil Rights and Fair Housing Laws when accepting a federal grant award (CDBG, HOME, ESG).
- **Focus Groups**  
The Iowa Department of Economic Development conducts focus groups with clientele such as non-profit and for-profit developers of affordable housing, regional planning commission staff, other lending agencies (such as USDA, Federal Home Loan Bank, etc.), and city and county housing department staff. These focus group meetings involve input on Housing Fund Administrative Rule changes that include "emphasizing projects that target persons with disabilities."
- **Home Owner Education**  
IDED promotes and encourages homeowner education to recipients of CDBG and HOME. Each year, IDED helps sponsor the Iowa Homeownership Education Program (IHOEP) conference. Sessions presented include (but are not limited to) predatory lending, Train the Trainer to educate low-income



households of the financial responsibilities of being a homeowner, and other fair housing practices.

- **Work with CDBG and Home Recipients**  
The Housing Fund Management Guides and the CDBG Management Guides are distributed to all recipients of CDBG and HOME funds. These guides include detailed sections on fair housing. These manuals clearly explain the goals and criteria pertinent to fair housing and provide guidance to achieve these goals.
  
- **Affirmative Marketing**  
The State of Iowa requires HOME recipients to adopt an affirmative marketing plan for all HOME housing projects with five or more units. The affirmative marketing plan is a required element of the administrative plan recipients must submit for IDED approval. The affirmative marketing plan must describe how they will attract prospective buyers or tenants of all minority and non-minority groups in the housing market area regardless of race, color, religion, sex, or national origin who may be subject to housing discrimination.
  
- **Technical Assistance**  
IDED Project Managers provide technical assistance to recipients in the area of fair housing. Through project monitoring, project managers review each recipient's fair housing performance. If noncompliance with fair housing policies and procedures is indicated, further action is taken. Also, one IDED staff person is assigned fair housing as a specialty area and serves as the staff resource person on fair housing issues.
  
- **Olmstead Involvement**  
IDED continues to play an active role and is an ad hoc committee member to the Iowa Olmstead Real Choices Task Force. IDED is identifying how the department resources will be used efficiently and effectively to support the goals of the Americans with Disabilities Act.

## VI. Conclusions and Recommendations

As a result of this Analysis of Impediments to Fair Housing in Iowa, five major impediments were found. Following is a table listing those impediments, recommendations for addressing those impediments, and action steps with timetables for implementing those recommendations:

| Impediment   | Recommendation(s)   | Action Steps   | Timetable |
|--|---|--|-----------|
| Discrimination still exists  | The Iowa Civil Rights Commission should continue to conduct diversity appreciation training throughout Iowa   | The Iowa Civil Rights Commission will continue to publicize the availability of the Iowa Civil Rights Commission trainer and other staff to do diversity appreciation training and fair housing outreach   | Ongoing   |
|  | The Iowa Civil Rights Commission should expand fair housing testing   | Review past testing efforts, make necessary modifications  | Ongoing   |
| People are not familiar with the requirements of state and federal Fair Housing Laws | The Iowa Civil Rights Commission should work with other organizations that address housing issues to increase and improve Fair Housing educational efforts. | The Iowa Department of Economic Development (IDED) will publicize this new version of “Iowa’s Analysis of Impediments to Fair Housing Choice” and make it available to housing practitioners, funding agencies, local governments and others through the IDED web site at:<br><a href="http://www.iowalifechanging.com/community/public-comment.aspx">www.iowalifechanging.com/community/public-comment.aspx</a> . | Ongoing   |
|  |   | IDED will continually update the “Housing Fund Management Guide” and the “Community Development Block Grant Management Guide” to include requirements, and technical assistance on affirmatively furthering fair housing choice.   | Ongoing   |

|   |   |   |  |
|---|---|---|--|
|   |   | <p>IDED will include discussion relating to affirmatively furthering fair housing at all CDBG and Housing Fund workshops.</p> <p>IDED will distribute fair housing brochures that the Iowa Civil Rights Commission has available, at conferences and workshops, Getting to Know IDEED sessions, Exhibit Booths and other events where housing is involved, in order to promote fair housing to all Iowans.</p> <p>The Iowa Civil Rights Commission will continue to provide fair housing presentations and materials at outreach events throughout Iowa.</p> <p>The Iowa Civil Rights Commission will have a dedicated fair housing page on its website</p> | <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>December 2010 and continuing</p> |
| Fears exist which inhibit people from filing fair housing complaints  | People wanting to file fair housing complaints need to understand that provisions in the law exist to help protect them against retaliation | The Iowa Civil Rights Commission and the Iowa Department of Economic Development will inform people about the retaliation provisions of state and federal fair housing laws and that immigration status is not a consideration for filing a complaint with the Iowa Civil Rights Commission.  | Ongoing  |
| Construction plans for multifamily housing projects are not always reviewed to ensure accessibility standards are addressed prior to construction | The Code Review process needs to ensure accessibility standards for multifamily housing are addressed prior to construction                 | The Iowa Civil Rights Commission will work with other entities to create a framework for reviewing new multifamily housing projects prior to construction to ensure accessibility standards are addressed.  | Ongoing  |

|   |   |  |         |
|---|---|--|---------|
| Lack of safe, affordable housing/lack of resources to pay housing costs are impediments to fair housing | State and local governmental entities should encourage affordable housing                                   | The Iowa Department of Economic Development (IDED) will refer IDED clientele to the “Affordable Housing in Iowa: Meeting New Challenges” and “Iowa’s Consolidated Plan” for information and data as to where barriers to affordable housing exist. This will help identify ideal types and locations for housing projects, whether it would be for elderly, disabled, minority, etc. These documents can be found on the IDED web site at:<br><a href="http://www.iowalifechanging.com/community/public-comment.aspx">www.iowalifechanging.com/community/public-comment.aspx</a> . | Ongoing |
|   |   | The Iowa Civil Rights Commission and IDED will work with other state and local governmental entities and other stakeholders to encourage affordable housing  | Ongoing |
|   | State agencies, local governments, and private employers should collaborate to attract and retain employers | The Iowa Civil Rights Commission will work with IDED, the Iowa Department of Workforce Development, the Iowa Association of Business and Industry, and other stakeholders to encourage attraction and retention of employers   | Ongoing |
|   | Iowa’s Olmstead Implementation Plan should be integrated into all housing developed                         | IDED will implement steps from Iowa’s Olmstead Implementation Plan for persons with disabilities as housing is developed   | Ongoing |

## VIII. Signature Page

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\_\_\_\_\_, Executive Director  
Iowa Department of Economic Development

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Date

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Ralph Rosenberg, Executive Director  
Iowa Civil Rights Commission

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Date