

Pinal County Arizona

2024
Analysis of
Impediments to
Fair Housing
Choice

December 2023 Draft



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Introduction and Executive Summary

The Analysis of Impediments to Fair Housing Choice (AI) is part of the Pinal County requirement to further Fair Housing and receive Community Development Block Grant (CDBG) and other Community Planning and Development program funding from the US Department of Housing and Urban Development (HUD). The AI is completed every five years in coordination with the Consolidated Planning process.

The results of the AI are used to develop a Fair Housing Action Plan with measurable actions to address any identified impediments. To comply with HUD’s AFH requirements, Pinal County must then implement the Action Plan and maintain records of the actions they have taken.

This AI first presents the 2024 Fair Housing Choice Action Plan. The Action Plan is followed by:

1. A summary of fair housing legislation and policies.
2. Data analysis to identify conditions that indicate possible impediments, including:
 - a. Demographic, economic and housing conditions;
 - b. Geographic concentrations;
 - c. Fair Housing enforcement activity;
 - d. Public policies and practices; and
 - e. Home Mortgage Disclosure Act (HMDA) data.
3. A summary of community and stakeholder engagement.
4. Review of the 2019 Action Plan.
5. Appendices, including geographic concentration tables and maps.

**What are
Impediments to
Fair Housing
Choice?**

**Any actions, omissions,
or decisions that have
the effect of restricting
housing choices or the
availability of housing
choice on the basis of
race, color, religion, sex,
disability, familial status,
or national origin.**

Pinal County Fair Housing Goals

Pinal County's Fair Housing goals include to:

- Create a comprehensive Analysis of Impediments to Fair Housing Choice (AI) document and devise a structured plan for addressing identified impediments based on a realistic assessment of available resources.
- Identify and track actions taken.
- Increase community and public awareness of fair housing choices to promote equal housing opportunity.

Methodology

The methodology used to complete the AI included small group discussions, a public and stakeholder survey, and the collection and analysis of data and information from numerous sources including the US Census, the Consumer Financial Protection Bureau, and other public and private agencies.

2024 Fair Housing Impediments Action Plan

Five Fair Housing Impediments were identified through data analysis and community input:

1. Community Awareness.
2. Geographic Concentrations.
3. Uneven Understanding of the Credit Market.
4. Insufficient Housing Stock to Meet Broad Demand.
5. Fair Housing Monitoring.

Indicators of impediments are highlighted throughout this document using green-shaded text boxes like this one.

Impediment # 1 – Community Awareness	
Indicators	Action Plan
<p>A community survey, small group discussions, and fair housing testing and complaint data indicate there is a need for more outreach and education.</p> <ol style="list-style-type: none"> 1. Refusing, discouraging, or charging more to rent or buy a home was the most often cited type of discrimination among survey respondents who believe housing discrimination occurs in Pinal County. 2. 30% of survey respondents indicated they would not know where to report housing discrimination if they encountered it. 3. The HUD Fair Housing and Equal Opportunity Office reported 18 complaints in Pinal County between January 1, 2019 and December 31, 2022. Four of ten (39%) of complaints were on the basis of disability and four of ten (41%) filed cases included discriminatory terms, conditions, privileges, or services and facilities. One of five complaints (18%) included either discriminatory refusal to rent or failure to permit or make a reasonable accommodation. 4. HUD’s records show 16 fair housing complaints were processed between January 1, 2019 and December 31, 	<p>Fair housing education and awareness will aide in identifying and addressing housing discrimination.</p> <ol style="list-style-type: none"> 1. Encourage potential complainants to contact the Arizona Attorney General’s Office, HUD, or the Southwest Fair Housing Council. 2. Each April: <ol style="list-style-type: none"> a. Adopt a proclamation declaring April to be observed as Fair Housing Month. b. Reach out to stakeholders, residents, and the community at large, including faith, education, and nonprofit organizations through local and online media to announce April as Fair Housing Month. <ol style="list-style-type: none"> i. Include information regarding Fair Housing, Fair Housing services, and who to call for more information. c. Sponsor a fair housing event in cooperation with the City of Casa Grande and other jurisdictions. Use sign-in sheets to track the volume of participating residents, landlords, City and County staff, and industry stakeholders. d. Sponsor an event, such as a poster or essay contest, in cooperation with the local Association of Realtors and/or similar private-sector organizations, one or more education institutions



Impediment # 1 – Community Awareness

Indicators	Action Plan
<p>2022. Of the complaints processed, one was conciliated and settled, four were withdrawn after resolution, and eleven were found to have no cause. The high number of complaints that result in a no cause finding may indicate a low number of meritorious complaints or the need for assistance from Fair Housing Initiative Programs that can help complainants navigate the complaint filing process and communicate the nature of their complaint with investigators.</p>	<p>and/or faith organizations to improve awareness of fair housing among youth.</p> <ol style="list-style-type: none"> 3. Continually: <ol style="list-style-type: none"> a. Make available fair housing posters, pamphlets and literature at County program offices, program partner offices, and at other community locations such as libraries and faith organizations. <ol style="list-style-type: none"> i. Maintain records of the type of literature, distribution location(s) and number distributed. 4. Maintain a Fair Housing page on the County website. Include direct links to the Southwest Fair Housing Council, HUD Fair Housing, and the Arizona Attorney General Civil Rights Division websites.



Impediment #2. Geographic Concentrations

Indicators	Action Plan
<p>Concentrations of minority and poverty households persist. Socio-economic and housing market conditions impact minority and low-income population access to housing choice and opportunity.</p> <ol style="list-style-type: none"> 1. There are 36 census tracts where the population of persons with disabilities exceeds 17.6%. These census tracts are considered areas of disability concentration. Of these census tracts, 20 are also areas of poverty concentration and eight includes parts of the City of Casa Grande. 2. There are 41 census tracts where the population of persons who are not White non-Hispanic exceeds 49%. These census tracts are considered areas of minority concentration. Of these census tracts, four include Indian communities, where the Fair Housing Act does not apply. Ten of these census tracts include parts of the City of Casa Grande. 3. There are 34 census tracts where the population living in poverty exceeds 13.3%. These census tracts are considered areas of poverty concentration. Of these census tracts, 4 include Indian communities, where the Fair Housing Act does not apply. Five of the census tracts include parts of the City of Casa Grande. 4. There are 9 racially/ethnically-concentrated areas of poverty (RE/CAPs), where there are concentrations of both minorities and people living in poverty. Five of these census tracts are Indian communities, where the Fair Housing Act does not apply. Three of the RE/CAPs include parts of the City of Casa Grande. 	<p>Program and project policies have the potential to expand housing choice and access to opportunity, and to alleviate segregated housing patterns.</p> <ol style="list-style-type: none"> 1. Distribute fair housing brochures in both English and Spanish. 2. Encourage housing education for minority, female, and lower-income households regarding mortgage lending criteria by adding information to the county website. 3. Continue to provide advice to Housing Choice Voucher holders about areas of high opportunity. 4. When investing in affordable housing development projects, assess how investments in concentration areas balance housing availability with possible increased concentrations.



Impediment #3 – Uneven Understanding of the Credit Market	
Indicators	Action Plan
<p>Female and minority loan applicants experience a disproportionately high rate of mortgage loan denial.</p> <ol style="list-style-type: none"> 1. Black/African American applicants had the highest rates of loan denial (18.6%) followed by White Hispanic applicants (15.1%), and applicants of 2 or more races (14.3%). 2. Loan applications not originated for other reasons were highest among Black/African American applicants (33.6%), followed by White Hispanic (27.4%), Native Hawaiian/Pacific Islander (30.0%) and Native American (27.6%) applicants. 3. Female loan applicants were 4 times more likely than joint or male applicants to be denied for unverifiable information, 2.3 times more likely than joint or male applicants to be denied for insufficient cash, and 1.9 times more likely than joint or male applicants to be denied for debt-to-income ratio. 	<p>Education targeted to minority, female and low-income borrowers will increase understanding of the credit market.</p> <ol style="list-style-type: none"> 1. Continually encourage minority, female, and lower-income households to seek housing counseling from HUD-certified housing counseling agencies. 2. Examine opportunities for portfolio lending partnerships that lower the cost of borrowing and expand access to credit for minority, female, and low-income borrowers.



Impediment #4 - Insufficient Housing Stock to Meet Broad Demand

Indicators	Action Plan
<p>Limited understanding of the range of housing needed weakens the County’s ability to effectively encourage a variety of housing stock.</p> <ol style="list-style-type: none"> 1. An analysis of current and future estimated demand for housing by households at various income levels has not yet been conducted to identify the type and density of housing needed, recommend potential locations for housing, and how current zoning could address demand. 2. Development requirements and processes have not yet been analyzed to determine incentives or regulatory changes that could support housing development. 3. An assessment of sites suitable for higher-density development and the corresponding infrastructure needs for each has not yet been conducted. 4. The use of inclusive design provisions has not been explored to improve housing choice for persons with disabilities. 	<p>Additional analysis of possible barriers to affordable and accessible housing development will assist in identifying incentives and other actions that could promote development to meet broad demand.</p> <p>As allowed by funding and under Arizona law, Pinal County will:</p> <ol style="list-style-type: none"> 1. Analyze zoning and development and requirements and processes to identify potential efficiencies or modifications that could support or facilitate a variety of housing options, including housing choices for persons with disabilities. 2. Examine infrastructure funding needs and options, including special districts, to support higher-density development at suitable sites.



Impediment #5 - Fair Housing Monitoring

Indicators	Action Plan
<p>Information that describes how to file a fair housing complaint, and County actions to address fair housing impediments is difficult to find.</p> <ol style="list-style-type: none"> 1. A search of the Pinal County website using the term “fair housing” produced limited results, suggesting additional information could be added to guide residents that may have a fair housing inquiry. 2. Documentation is not easily found by website search regarding dissemination of fair housing materials. 3. Documentation is not maintained regarding fair housing inquiries and referrals. 	<p>Public information regarding fair housing on the County website and documentation about the nature of complaints and actions to address housing discrimination will support community education and further focus activities to further fair housing.</p> <ol style="list-style-type: none"> 1. Identify a staff person responsible for fair housing monitoring and reporting to: <ol style="list-style-type: none"> a. Maintain a fair housing complaint log that includes the department initially contacted, date of contact, and to whom the complainant is referred. If voluntarily provided by the contact, including a summary of the complaint, protected basis, and housing tenure. b. Annually summarize all fair housing activities conducted by impediment and action and include the summary in the Consolidated Annual Performance Evaluation Report. c. Based on results of activities, identify education and other activities to support fair housing.



Fair Housing Legislation and Policies

The history of federal and State of Arizona Fair Housing legislation, and current and proposed federal regulations and requirements provide important context for understanding the impediments identified in this assessment and the actions proposed to address those impediments.

History of Fair Housing Legislation

The Fair Housing Act of 1968 made it illegal to discriminate in housing because of a person’s race, color, religion, or national origin. Gender was added as a protected class in 1974. In 1988, the Fair Housing Amendments Act (FHAA) added familial status and disability (referred to as “handicapped” in the FHAA), creating seven “protected classes” of individuals. The familial status provision protects households with children under 18 years of age. Disability covers physical and mental disabilities, individuals who are perceived as having a disability, persons with HIV/AIDS, and persons recovering from substance abuse.

Fair Housing Improvement Act

Senator Tim Kaine (D-VA) and Representative Scott Peters (D-CA) introduced the Fair Housing Improvement Act in the U.S. Congress on April 25, 2023. If passed, the bill would expand housing choice by prohibiting source-of-income discrimination as well as discrimination based on military or veteran status. If passed, the bill would prohibit housing discrimination based on source of income, military status, and veteran status by adding each to the list of classes protected under the Fair Housing Act. Aimed primarily at discrimination in the rental housing market, the legislation would provide landlords with 40 months to come into compliance with the law.

Arizona Fair Housing Law

The Arizona Fair Housing Act (ARS § 41.1491) provides the same substantive protections as the Federal Fair Housing Act; however, it provides different procedures for the administrative complaint filing process. The Arizona Fair Housing Act also amended the Arizona Landlord and Tenant Act to bring it into compliance with the State Fair Housing Statute.

Because the Arizona Fair Housing Act is essentially the same as the Federal Fair Housing Act, the State’s law is federally designated as “substantially equivalent.” As a result, under the Federal Fair Housing Assistance Program (FHAP), HUD contracts with the Arizona Attorney General’s Civil Rights Division to investigate and rule on fair housing cases on its behalf. Complainants in Pinal County may choose to file a fair housing complaint through HUD, the Arizona Attorney General’s Office, or the Southwest Fair Housing Council (SWFHC).

HUD's Implementation of the Fair Housing Act's Disparate Impact Standard

The 2013 “Disparate Impact Rule” codified HUD’s interpretation that the Fair Housing Act creates liability for practices that have an unjustified discriminatory effect, even if those practices were not motivated by discriminatory intent. The Rule also established a burden-shifting framework for analyzing claims of disparate impact. Under the 2013 HUD Regulations, there is a three-part burden shifting framework. The complaining party must first demonstrate that the challenged practice caused or predictably will cause a discriminatory effect. The burden then shifts to the defending party to prove that the challenged practice is necessary to achieve one or more “substantial, legitimate, nondiscriminatory interests”. If the defending party satisfies this burden of proof, the burden then shifts back to the complaining party to prove that the “substantial, legitimate, nondiscriminatory interest” could be accomplished through a practice that has a less discriminatory effect.

A policy would cause disparate impact if it constituted an “artificial, arbitrary and unnecessary” barrier to fair housing.

US Supreme Court

A 2015 Supreme Court decision in the Texas Department of Housing and Community Affairs vs. Inclusive Communities Project, Inc. held that disparate impact claims are cognizable (could be judicially heard) under the Fair Housing Act and clarified the standards for and constitutional limitations of disparate impact claims. The Supreme Court affirmed disparate impact liability, and imposed a significantly higher burden on the party making the claim, requiring that the claimant would need to “produce statistical evidence demonstrating a causal connection” between the policy and discriminatory effect.

On September 24, 2020, HUD published the 2020 Rule, which removed the definition of discriminatory effect, added pleading elements that made it far more difficult to initiate a case, altered the burden-shifting framework, created new defenses, and limited available remedies in claims. Following publication of the 2020 Rule, HUD was sued in three separate federal courts. The plaintiffs in each case contended the 2020 Rule was invalid because it was inconsistent with the Act and violated the Administrative Procedure Act.

The 2020 Rule never took effect and was effectively rescinded on April 17, 2023 by the “Restoring HUD’s Discriminatory Effects Standard” final rule. The discriminatory effects doctrine, which includes disparate impact and perpetuation of segregation, is a tool for addressing policies that unnecessarily cause systemic inequality in housing, regardless of whether they were adopted with discriminatory intent. It has long been used to challenge policies that unnecessarily exclude people from housing opportunities, including zoning requirements, lending and property insurance policies, and criminal records policies.

Equity Plans: The Future of Fair Housing Planning

On February 9, 2023 HUD published a proposed rule for Affirmatively Furthering Fair Housing (AFFH). The proposed rule requires recipients of HUD funding, including Public Housing Authorities and Community Planning and Development grantees to develop an Equity Plan to overcome local fair housing issues in their geographic area. The proposed rule will require Pinal County to answer 31 questions plus 28 sub-questions for Consolidated Plan Community Planning and Development programs and 21 questions plus 30 sub-questions for PHA plans. These questions are intended to identify fair housing issues in at least seven categories:

1. Segregation and integration;
2. Racially or ethnically concentrated areas of poverty, R/ECAPs;
3. Disparities in access to opportunity;
4. Inequitable access to affordable housing and homeownership opportunities);
5. Laws, ordinances, policies, practices, and procedures that impede the provision of affordable housing in well-resourced areas of opportunity, including housing that is accessible for people with disabilities;
6. Inequitable distribution of local resources, which may include municipal services, emergency services, community-based supportive services, and investments in infrastructure; and
7. Discrimination or violations of civil rights law or regulations related to housing or access to community assets based on race, color, national origin, religion, sex, familial status, and disability (the Fair Housing Act's "protected classes").

Under the proposed rule, Pinal County would be required to submit its first Equity Plan to HUD by May 15, 2028 and every five years after that. HUD will then have 100 days to review and approve the Equity Plan. The approved Equity Plan goals, strategies and actions will then be incorporated into the subsequent Consolidated Plan and/or PHA Plan. A combined CPD-grantee and PHA Equity Plan may be developed, as may a regional Equity Plan.

Discriminatory Effects Liability and Enforcement of Nuisance Ordinances and Crime-Free Housing Ordinances

A local government's policies and practices to address nuisances, including enactment or enforcement of a nuisance or crime-free housing ordinance, violate the Fair Housing Act (Act) when they have an unjustified discriminatory effect, even when the local government had no intent to discriminate. Under this standard, a facially-neutral policy or practice that has a discriminatory effect violates the Act if it is not supported by a legally sufficient justification. A local policy or practice may only restrict the availability of housing if it is necessary to serve a substantial, legitimate, nondiscriminatory interest of the local government. The local government must also examine whether another practice could have a less discriminatory effect. Any local policy or practice that restricts the availability of housing on the basis of nuisance conduct and has a disparate impact on individuals of a particular protected class is otherwise unlawful under the Fair Housing Act.

Lesbian, Gay, Bisexual, Transgender, Questioning (LGBTQ) Protections

On September 21, 2016, HUD published a final rule in the Federal Register entitled "Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs." Through this final rule, HUD ensures equal access to individuals in accordance with their gender identity in programs and shelters funded under the programs administered by HUD's Office of Community Planning and Development (CPD). This rule builds on HUD's February 2012 "Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity" final rule, also known as the 2012 Equal Access Rule.

The 2016 rule requires that housing eligibility be determined regardless of sexual orientation, gender identity or marital status; prohibits discrimination based on conformance with gender or sex stereotypes; grants equal access to programs and facilities consistent with gender identity and provides the individual's family equal access; prohibits asking for anatomical information or documents (such as ID), physical, or medical evidence of gender identity; and requires that non-discriminatory steps be taken when necessary and appropriate to address privacy concerns raised by individuals or other residents or occupants. The 2016 rule also clarified HUD's definitions of sexual orientation, gender identity and perceived gender identity:

1. Sexual orientation means one's emotional or physical attraction to the same and/or opposite sex (e.g., homosexuality, heterosexuality, or bisexuality).
2. Gender identity means the gender with which a person identifies, regardless of the sex assigned to that person at birth and regardless of the person's perceived gender identity.
3. Perceived gender identity means the gender with which a person is perceived to identify based on that person's appearance, behavior, expression, other gender related characteristics, or sex assigned to the individual at birth or identified in documents.

Executive Order 14075

Executive Order 14075 of June 15, 2022 Advancing Equality for Lesbian, Gay, Bisexual, Transgender, Queer and Intersex Individuals includes Section 9 *Preventing and Ending LGBTQI+ Homelessness and Housing Instability*. The Presidential order requires HUD to establish a Working Group on LGBTQI+ Homelessness and Housing Equity to lead an initiative that aims to prevent and address homelessness and housing instability among LGBTQI+ individuals, including youth, and households. As part of that initiative, HUD must:

1. Identify and address barriers to housing faced by LGBTQI+ individuals and families at high risk of housing instability and homelessness;
2. Provide guidance and technical assistance to HUD contractors, grantees, and programs on effectively and respectfully serving LGBTQI+ individuals and families;
3. Develop and provide guidance, sample policies, technical assistance, and training to Continuums of Care, homeless service providers, and housing providers to improve services and outcomes for LGBTQI+ individuals and families who are experiencing or are at risk of homelessness;
4. Ensure compliance with the Fair Housing Act and HUD's 2012 and 2016 Equal Access Rules; and
5. Seek funding opportunities, including through the Youth Homelessness Demonstration Program, for culturally appropriate services that address barriers to housing for LGBTQI+ individuals and families, and the high rates of LGBTQI+ youth homelessness.

Criminal Background Screening

Citing national statistics that racial and ethnic minorities face disproportionately high rates of arrest and incarceration, HUD clarified that it has grounds to investigate complaints based on criminal history policies. On April 4, 2016, the HUD Office of General Counsel issued guidance on the application of Fair Housing Act Standards to the use of criminal records by providers of housing and in real estate-related transactions. This guidance reminded housing providers and others involved in real estate transactions that while having a criminal record is not a protected characteristic under the Fair Housing Act, criminal history-based restrictions on housing opportunities violate the Act if, without justification, their burden falls more often on persons of one race or national origin over another. Additionally, the guidance reminded the industry that intentional discrimination in violation of the Act occurs if a housing provider treats individuals with comparable criminal history differently because of their race, national origin, or other protected characteristic.

PIH Notice 2015-19

Prior to the guidance issued by HUD's Office of General Counsel, HUD issued PIH Notice 2015-19 to Public Housing Agencies (PHAs) and Owners of Federally-Assisted Housing on Excluding the Use of Arrest Records in Housing Decisions. This guidance clarified HUD's position on using arrest records in the admission and termination processes, HUD's position on "one-strike" policies, the due process rights of applicants and tenants, and provided examples of policies that would help to ensure that admissions and occupancy requirements comply with Civil Rights laws.

Federal Housing Finance Agency (FHFA) Fair Lending, Fair Housing, and Equitable Housing Finance Proposed Rule

The April 26, 2023 FHFA Fair Lending, Fair Housing, and Equitable Housing Finance Proposed Rule intends to address barriers to sustainable housing opportunities for underserved communities. The goal of the regulation is to address the challenges and barriers that continue to limit sustainable housing opportunities for minority, low-income, and senior borrowers, as well as families living in rural areas and on tribal land. The rule proposes to codify and add new requirements related to fair housing, fair lending, and Equitable Housing Financing Plans. The proposed rule would specifically codify in regulation:

- FHFA's fair lending oversight requirements for Fannie Mae and Freddie Mac (the government-sponsored enterprises, or GSEs) and the Federal Home Loan Banks;
- The requirements for the GSEs to maintain Equitable Housing Finance Plans. The Plans are designed to promote the GSE's safety and soundness while fostering housing finance markets that provide equitable access to affordable and sustainable housing. The Plans accomplish these goals through consumer education initiatives and expanded counseling services; and
- The requirements for the GSEs to collect and report homeownership education, housing counseling, and language preference information from the Supplemental Consumer Information Form (SCIF), also announced in 2022.

Nondiscrimination on the Basis of Disability: Possible Updates to HUD's Section 504 Regulations

Section 504 of the Rehabilitation Act of 1973 (Section 504) was originally published in 1988. Section 504 prohibits discrimination on the basis of disability in all programs and activities receiving Federal financial assistance and in programs and activities conducted by executive agencies. HUD intends to draft a Notice of a Proposed Rulemaking (NPRM) that would propose the adoption of an updated Federal accessibility standard, including redefining an individual with disabilities, clarifying the obligations of recipients of HUD funding, and accounting for advances in accessible design, information and communication technology, and assistive technologies.

While the process of rulemaking may take several years, it is important to note that Pinal County, and subrecipients and owner/developers receiving HUD funding through Pinal County will be required to update policies, procedures, and design standards to accommodate any changes that are made. HUD anticipates revising the current regulation based on responses received to twenty-one questions that examine: disability accessibility in the context of challenges faced by people with disabilities; essential accessibility features and the number and type of affordable accessible housing units; design standards, approaches and construction materials; accessibility in public and common use areas of housing and non-housing facilities; the types of reasonable accommodations that would be useful for people with different types of disabilities; the intersectionality of disability with other protected classes and LGBTQ+ persons; and procedures and enforcement mechanisms HUD should consider for initiating and conducting investigations.

Justice40 – A Whole of Government Initiative

The Federal government has established a goal that 40% of overall benefits of certain Federal investments flow to disadvantaged communities (census tracts) that are marginalized, underserved, and overburdened by pollution. Disadvantaged communities are those that meet one of the categories of burden or are on land within the boundaries of Federally Recognized Tribes. More information about disadvantaged census tracts is found in the geographic concentrations section of this document.

Pinal County Fair Housing Policies

Pinal County does not have a fair housing ordinance that is separate from the State of Arizona Fair Housing Statute. Pinal County residents alleging illegal housing discrimination may file a complaint with HUD, the Arizona Attorney General’s Office, or the Southwest Fair Housing Council (SWFHC).

Pinal County Reasonable Accommodation Policies and Processes

It is the policy of Pinal County to provide reasonable accommodation for persons with disabilities and limited English proficiency. Each department is responsible for ensuring equal and meaningful access to services, programs, and facilities.

Project Plans to Affirmatively Further Fair Housing

Affirmative marketing and outreach are required in all HUD-funded projects consisting of five or more units. These projects must complete an Affirmative Fair Housing Marketing Plan (AFHMP). Pinal county follows the AFHMP requirements as issued by HUD.

Service Animals and Assistance Animals for People with Disabilities in Housing and HUD-Funded Programs

All housing providers receiving HUD funding from Pinal County are covered by the Fair Housing Act, Section 504, and the Americans with Disabilities Act. Persons with disabilities may request a reasonable accommodation for any assistance animal, including an emotional support animal, under the Fair Housing Act and Section 504 and/or the Americans with Disabilities Act (which have separate definitions).

Fair Housing Cases in Pinal County

Maricopa Water Improvement District Disparate Impact Prima Facie Case. In November 2021, a Ninth Circuit panel ruled that Southwest Fair Housing Council and two individual plaintiffs met the legal requirements for establishing a prima facie case under the disparate impact method of proof. The plaintiffs alleged that a deposit for water service imposed on public housing tenants that was higher than the deposits required of other customers violated the Fair Housing Act by discriminating against tenants in protected classes. The court held that the Water Improvement District's evidence that it implemented the higher deposits to protect itself against delinquencies satisfied its burden of justification by providing evidence that its policy served a legitimate business interest.

Pinal County Geography and History

Pinal County is centrally located in Arizona and was formed out of portions of Maricopa and Pima Counties on February 1, 1875. It covers approximately 5,374 square miles and is the third most populous county in Arizona. The County seat is in Florence, Arizona. The county includes two distinct geographic regions. The eastern region of the county is characterized by lower population density and mountains reaching 6,000 feet in elevation, while the western region is characterized by higher population density and primarily low desert valleys with irrigated agricultural land.

Pinal County includes the entirety of the Ak-Chin Indian Community, and parts of the Tohono O’odham Nation, the Gila River Indian Community, and the San Carlos Apache Indian Reservation. Together these tribal lands comprise twenty-three percent of Pinal County land. The largest landholder in Pinal County is the State of Arizona (35%). Individuals and corporations hold twenty-two percent of land, while fourteen percent of the land is held by the U.S. Forest Service and Bureau of Land Management, and the remaining 6 percent is other public land.

The portion of Pinal County south of the Gila River was part of Mexico until the United States acquired it through the Gadsden Purchase in 1854. Many Hispanic residents of Pinal County trace their roots back several generations. Like Hispanic residents, many residents of African American descent also have a long Pinal County history. Workers of all racial and ethnic backgrounds migrated to Pinal County following the emancipation proclamation and through the 1930s to work in the large cotton fields. Several African American communities settled in Pinal County during the era of cotton growing that preceded machine picking and remain today, including the unincorporated community of Randolph¹. For many decades, Pinal County has also been a destination for both retirees and families attracted by the warm weather and the relatively low cost of living.

Demographic and Economic Profile

Demographic and economic data can profoundly affect how important investments in housing and community development are made. Demographic information in this AI is primarily drawn from the US Census Bureau 2020 and 2021 5-year American Community Survey (ACS). The ACS is a survey conducted annually by the United States Census Bureau and is the most current source of available data.

Pinal county includes all or part of thirteen towns and cities – Apache Junction, Case Grande, Coolidge, Eloy, Florence, Hayden, Kearny, Mammoth, Marana, Maricopa, Queen Creek, Superior, and Winkelman. The county has executed CDBG urban county agreements with the City of Eloy and the

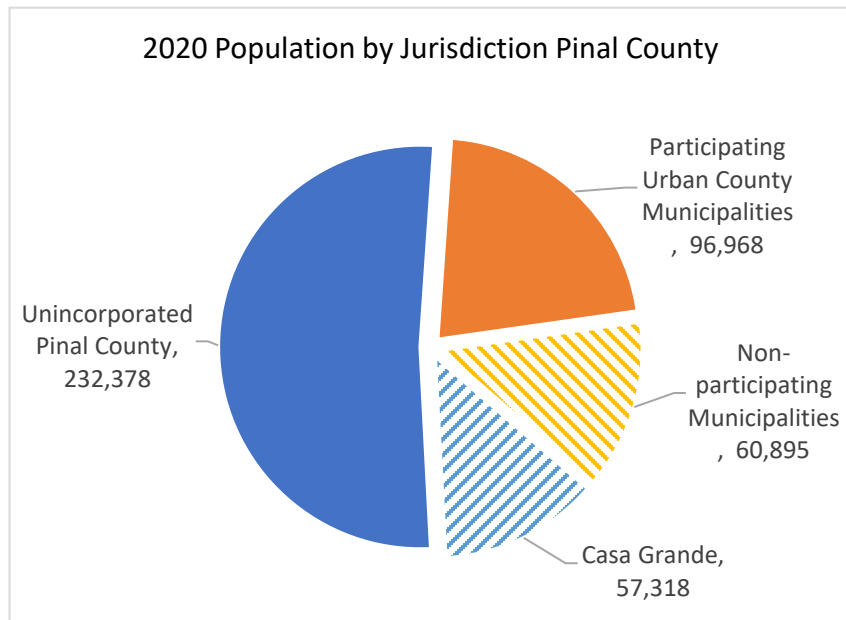
¹ “Not all Okies are White: The Lives of Black Cotton Pickers in Arizona. Geta J. Leseur. March 30, 2000.

Towns of Florence and Mammoth, and a joint administration agreement with the City of Maricopa. Other jurisdictions may elect to join the urban county every three years. Data presented in this AI covers all geographic areas of Pinal County, including tribal lands and all towns and cities.

People who are incarcerated at the time of the US Census are counted as residents of Pinal County living in group quarters. According to the 2020 Decennial Census, 21,631 adults were counted in correctional facilities located in Pinal County. Adults in correctional facilities comprised 5.1% of the 2020 Pinal County population. Of Arizona’s adult correctional facility population, 33.7% are in facilities located in Pinal County.

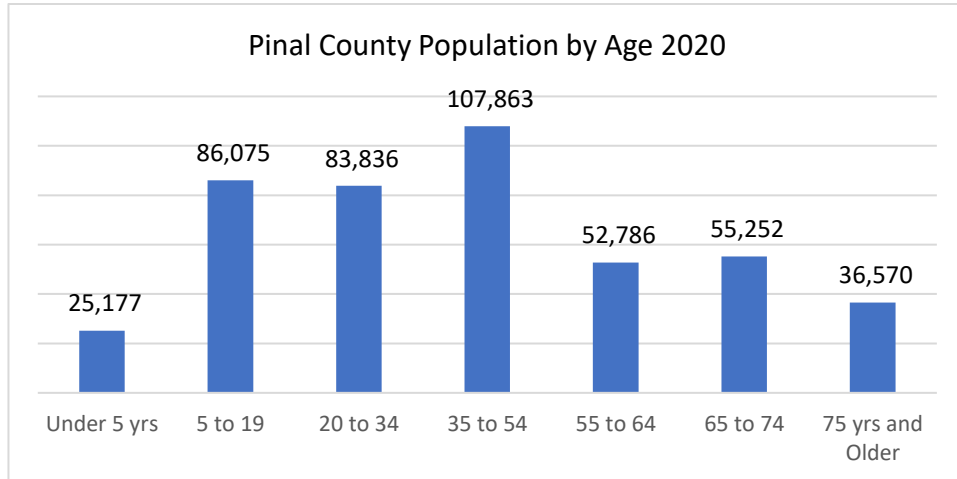
Population

The Pinal County 2020 estimated population is 447,559. Nearly three quarters (74%) of the county population resides in unincorporated areas or jurisdictions that participate in the Pinal County CDBG Urban County. Another 13% resides in the Casa Grande CDBG entitlement jurisdiction, and 13% reside in incorporated communities that do not participate in the Pinal County CDBG Urban County.



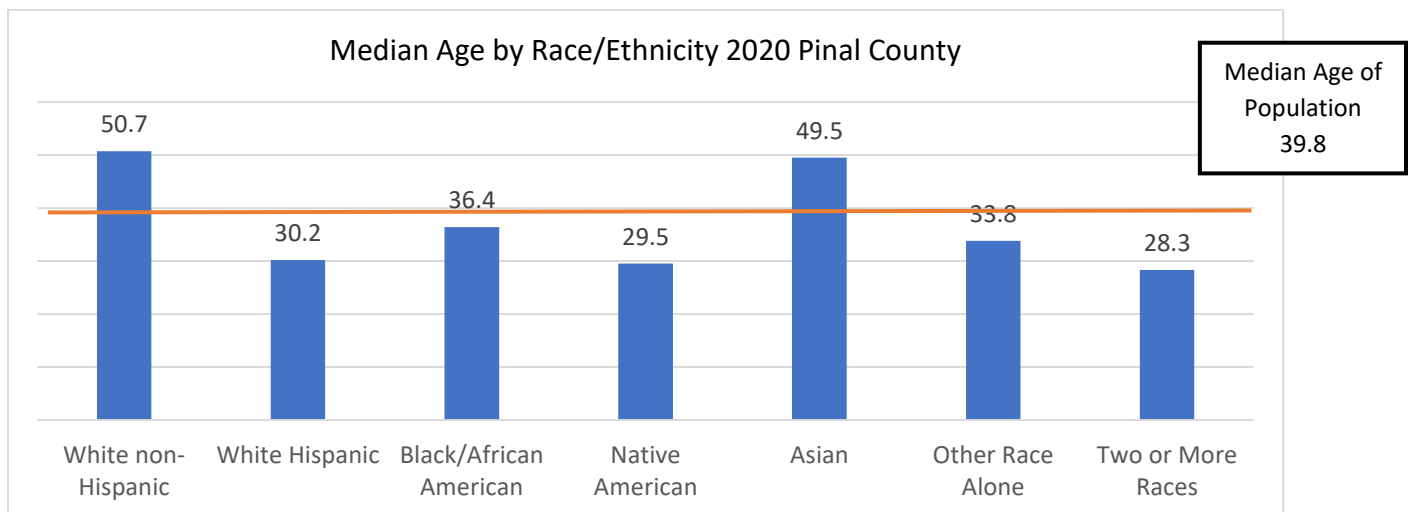
Age of the Population

The US Census Bureau projects that by 2035 for the first time in US history, more of the U.S. population will be over the age of 65 than under². In 2020, one of five Pinal County residents is age 65 or older, and an additional 12% are between age 55 and 64 years. One of four residents are in their prime earning years and one in four are age 19 or younger.



Median Age by Race/Ethnicity

At the same time the US Census Bureau reports an aging population, it is also becoming more diverse, with White non-Hispanic children representing less than half of children in 2022³. This shift is reflected in the median age of Pinal County residents. In 2020, the median age for all residents was 39.8 years, and the median age of the White non-Hispanic population was 50.7 years, compared to 29.5 for the Native American population and 30.2 for the White Hispanic population.



² www.census.gov/newsroom/press-releases/2018/cb18-41-population-projections.html

³ <https://www.census.gov/newsroom/press-releases/2022/population-estimates-characteristics.html>

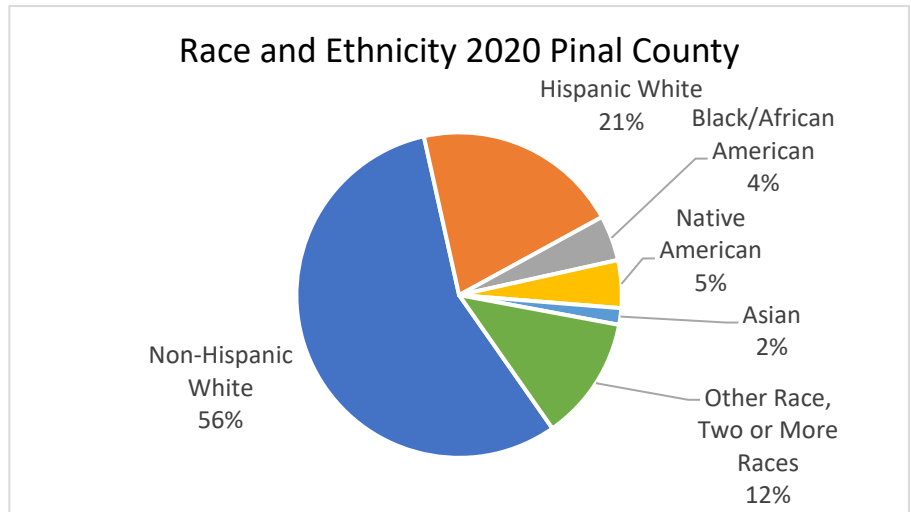


Racial and Ethnic Composition

Forty-four percent (44%) of the Pinal County population identifies as a racial or ethnic minority. The largest racial and ethnic minority populations are Hispanic White (21%), and people of another race or two or more races (12%).

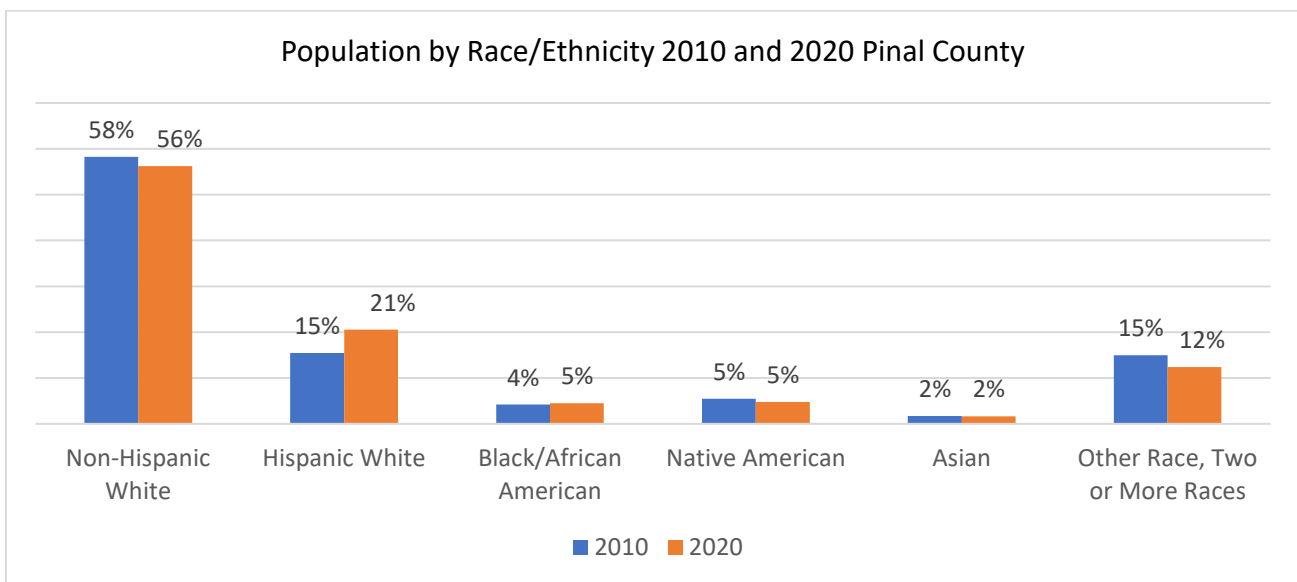
The adult population in correctional facilities is more racially and less ethnically diverse than the overall Pinal

County population. One-third (33%) of the adults in correctional facilities are non-Hispanic White, 5% are Hispanic White, 10% are Black/African American, 7% are Native American, 7% are people of two or more races. More than one-third (36%) of adults in correctional facilities are counted as “other” race.



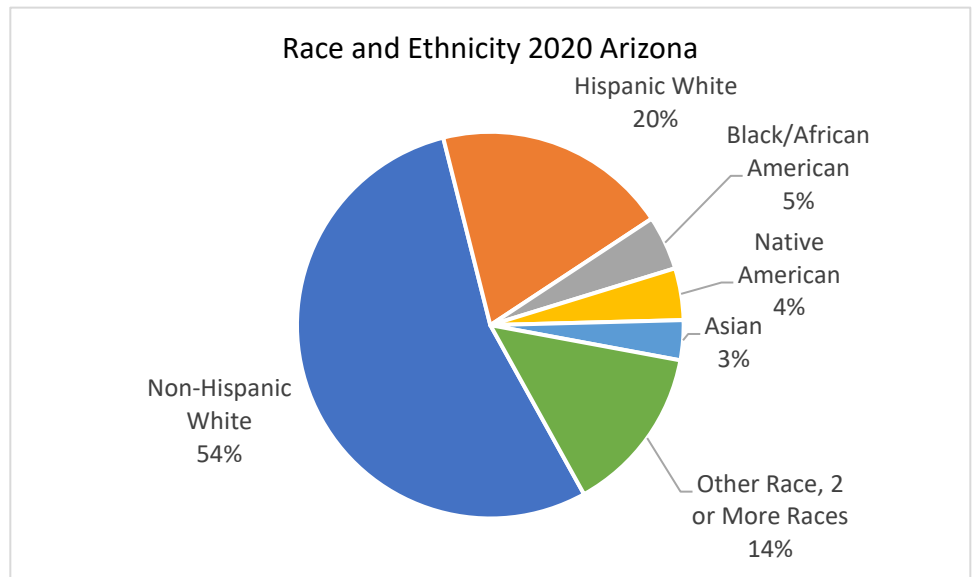
Population by Race/Ethnicity Trend

The Pinal County population grew by 36% from 2010 to 2020. The greatest rate of population growth during this period was among the Hispanic White population (81%), followed by Black/African American (46%). Overall, the percentage of people who are White non-Hispanic declined from 58% in 2010 to 56% in 2020, and the percentage of people who are an “other” race or two or more races declined from 15% to 12%.

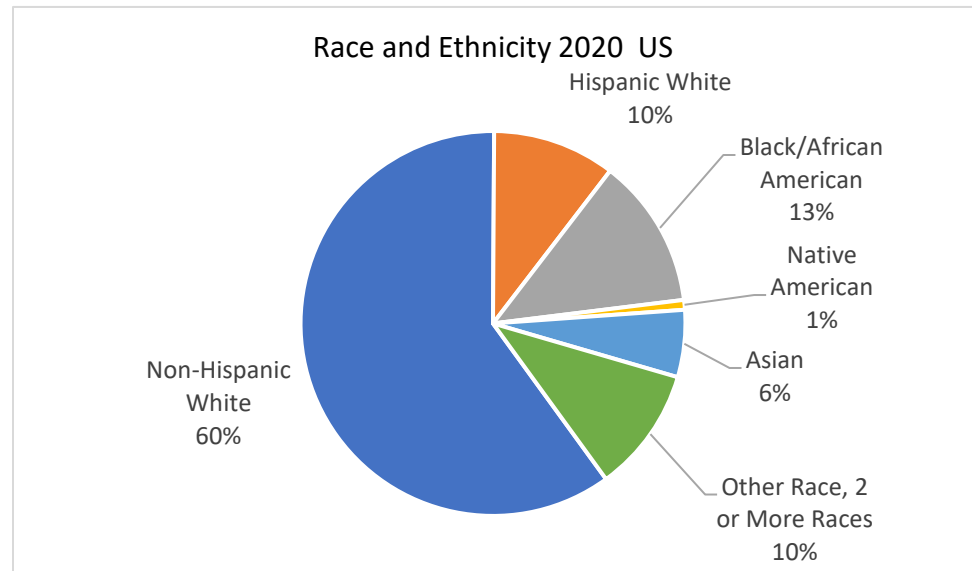


Pinal County Race and Ethnicity Compared to Arizona and the U.S.

Compared to Arizona, the Pinal County population is slightly less racially diverse, with 46% of the Arizona population a race/ethnicity other than White non-Hispanic, compared to 44% in Pinal County.



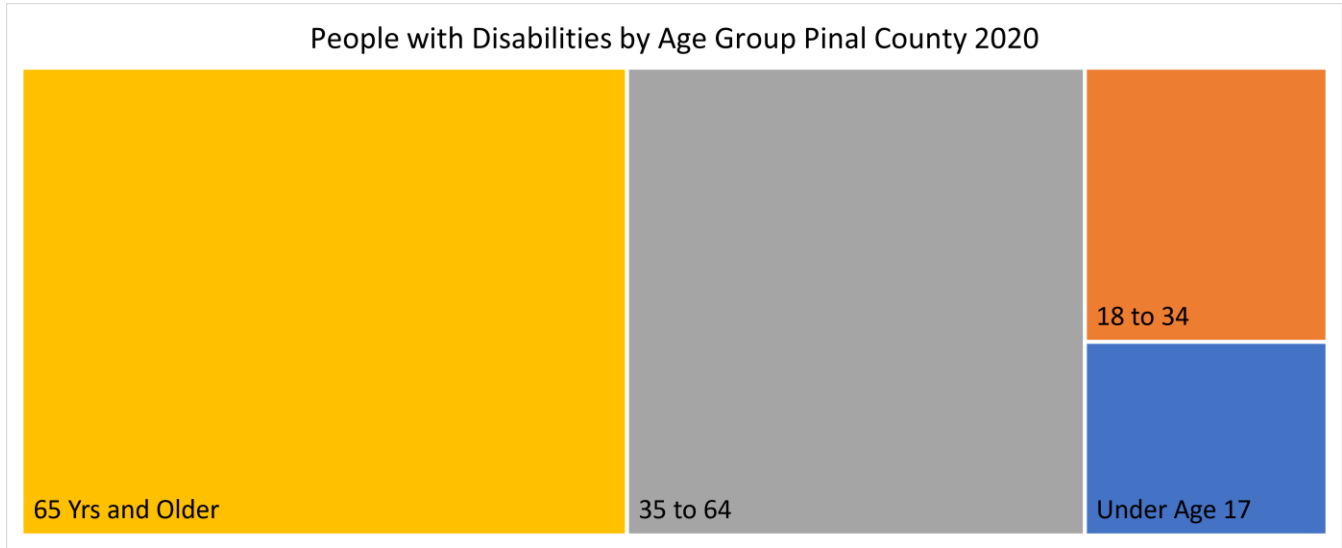
Compared to the United States, Pinal County is much more ethnically diverse, with Pinal County residents twice as likely as US residents to be Hispanic. In addition, residents of Pinal County are five times more likely than residents across the US to be Native American.



Persons with Disabilities

In 2020, 67,886 Pinal County residents had one or more disabilities, and 46% were age 65 and older. More than one third (35%) of Pinal County residents who are age 65 and older have one or more disabilities, compared to 16% of residents age 35 to 64, 9% of residents age 18 to 34, and 5% of residents under age 17.

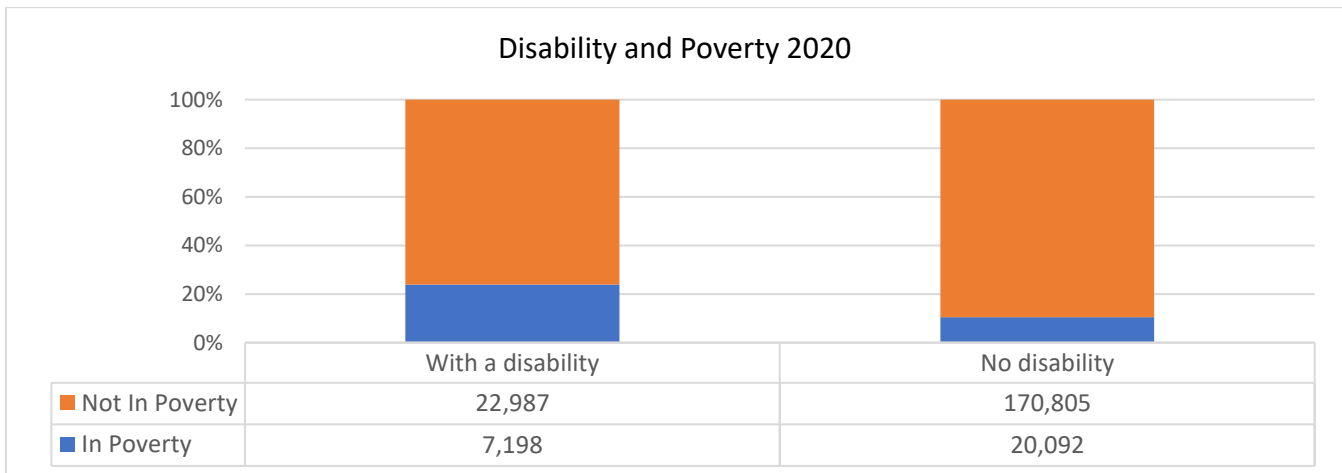
67,886 Pinal County residents have one or more disabilities, including 31,479 residents age 65 and older.



Disability and Poverty

Pinal County residents with disabilities are 2.3 times more likely than residents without disabilities to live in poverty. Nearly one-quarter (24%) of Pinal County residents with disabilities lives below the poverty level, compared to 11% of people without disabilities.

Nearly one-quarter (24%) of Pinal County residents with disabilities lives below the poverty level.



Disability and Employment

While not all Pinal County residents with disabilities participate in the labor force, the unemployment rate among those who do participate is 2.24 times the rate of unemployment for people without disabilities. People with disabilities who participate in the labor force have an unemployment rate of 12.4%, compared to 5.8% for people without disabilities.

A 2014 report by the staff of the US Senate Committee on Health, Education, Labor and Pensions (HELP)⁴ discussed the economic well-being challenges of people with disabilities. As part of the HELP report, 400 people with disabilities who currently or had in the past lived in poverty completed a questionnaire; a small group was interviewed to better understand their experiences. Upon reviewing all the responses to the questionnaire and listening to the in-depth interviews, six themes emerged related to the economic well-being of people with disabilities:

1. Increased economic and social costs of having a disability;
2. Fear that earning or saving too much money will result in termination of government benefits and the loss of needed health care, housing, and food;
3. Inability to save for emergencies and large anticipated expenses;
4. Difficulties in navigating a complex bureaucratic system to obtain basic needs;
5. Alienation from the economic mainstream caused by a lack of adequate transportation; and
6. Difficulties finding accommodating workplaces and overcoming persistently low expectations, pay and employment discrimination.

Disability and Housing Problems

Compared to households that do not include a person with a disability, households that include a person with one or more disabilities are 1.2 times more likely to have income less than 50%. Lower income households that include a person with a disability are 1.3 times more likely to have one or more housing problems. Housing problems are more common among lower-income owners with disabilities, reflecting the higher rates of both disability and homeownership among people age 65 and older.

⁴ Fulfilling the Promise: Overcoming Persistent Barriers to Economic Self-Sufficiency for People with Disabilities. September 18, 2014.

Financial Inequality, Disability and Race

Over the coming decade the aging population is expected to become more racially and ethnically diverse. Given current racial and ethnic disparities in wealth, the next decade is likely to present both fair housing and housing choice challenges as many minority households enter older age with fewer resources and increased risk of disability.

Given current racial and ethnic wealth disparities, the next decade is likely to present both fair housing and housing choice challenges as minority households enter older age with fewer resources and increased risk of disability.

The 2019 “Financial Inequality: Disability, Race and Poverty in America” report by the National Disability and Race/Ethnicity Disability Institute further revealed that race and disability are not separate sources of disadvantage. Instead, the data revealed that race and disability combined to create greater systemic inequality. In particular, the report concluded that due to poorer health status and lower incomes, African Americans with disabilities are proportionately more likely to live in poverty. Other findings of the report include:

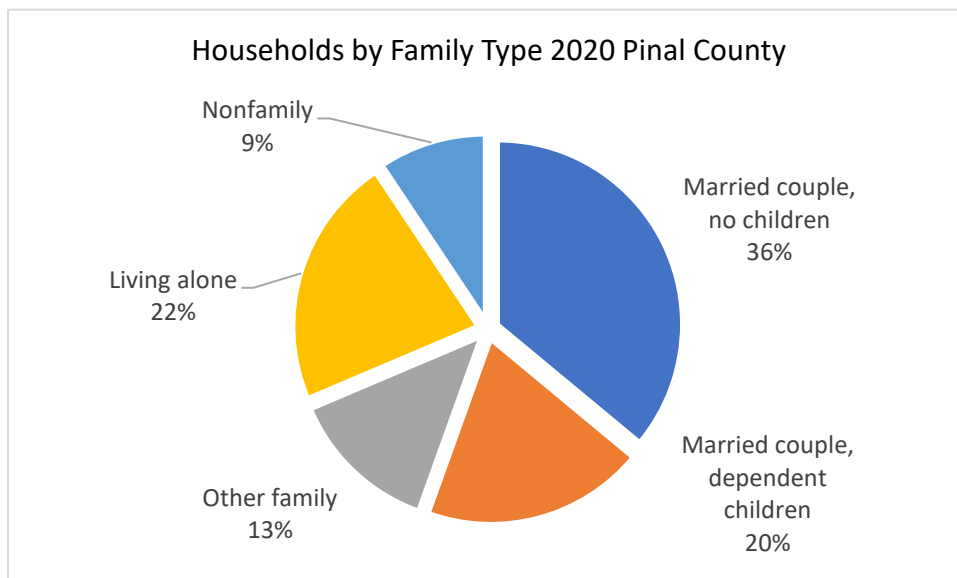
1. People with disabilities are twice as likely to use alternative financial credit services such as pawn shops, payday lenders, and tax-refund anticipation loans.
2. One-third of adults with disabilities had difficulty paying medical bills, compared to 14% of all adults without disabilities and 20% of African American adults without disabilities.
3. Adults with disabilities were three times more likely to not get medical care than people without disabilities, due to cost. African Americans were the most likely to face cost barriers.
4. Working-age adults with disabilities are four times more likely to face food insecurity.
5. African American adults with disabilities were 50% less likely than African American adults without disabilities to complete college.
6. African Americans with disabilities have the lowest employment rate of people with disabilities.

For people of color with disabilities... the barriers to financial security pile up with increased reliance on alternative financial services, growing debt and diminishing health and wellness.

Financial Inequality: Disability, Race and Poverty in America. National Disability Institute.

Household and Family Characteristics

The average household size in Pinal County was 2.8 people in 2020, with four of ten (39%) of households containing two people. More than one-third (36%) of Pinal County households are married couples with no children and another one of five (20%) households are married couples with dependent children.



Married-couple families headed by a person age 65 or older represent one of five (21%) of all Pinal County households, and one quarter (25%) of all homeowners, reflecting the attractiveness of Pinal County as a retirement destination. Comparatively, married-couples age 35 to 64 represent 29% of all households and 31% of homeowners.

Thirteen percent (13%) of households are “other” family households, including single-parents and cohabiting couples where one partner has dependent children. Of “other” family households, seven of ten (68%) are headed by a female. Four of ten (41%) “other” family households rent, with the highest rate of renting (58%) among single-female headed households under the age of 35.

One of five (22%) households is a person that lives alone. Half of people who live alone are under age 65 and the other half are age 65 or older. Of people age 65 living alone, 82% own their home, compared to 64% of people under age 65 living alone.

Household Income

While households have housing choice it is essential to recognize that adequate household income is essential to opportunity, including location opportunity and wealth generation. Many lower income households struggle to find housing and must make a choice between quality housing near opportunities, and sufficient resources to pay for basic goods and services.

Household income directly affects the housing opportunities that are available and the choices that a household makes about where they will live, whether to rent or own, and how much of their income will be used for housing.

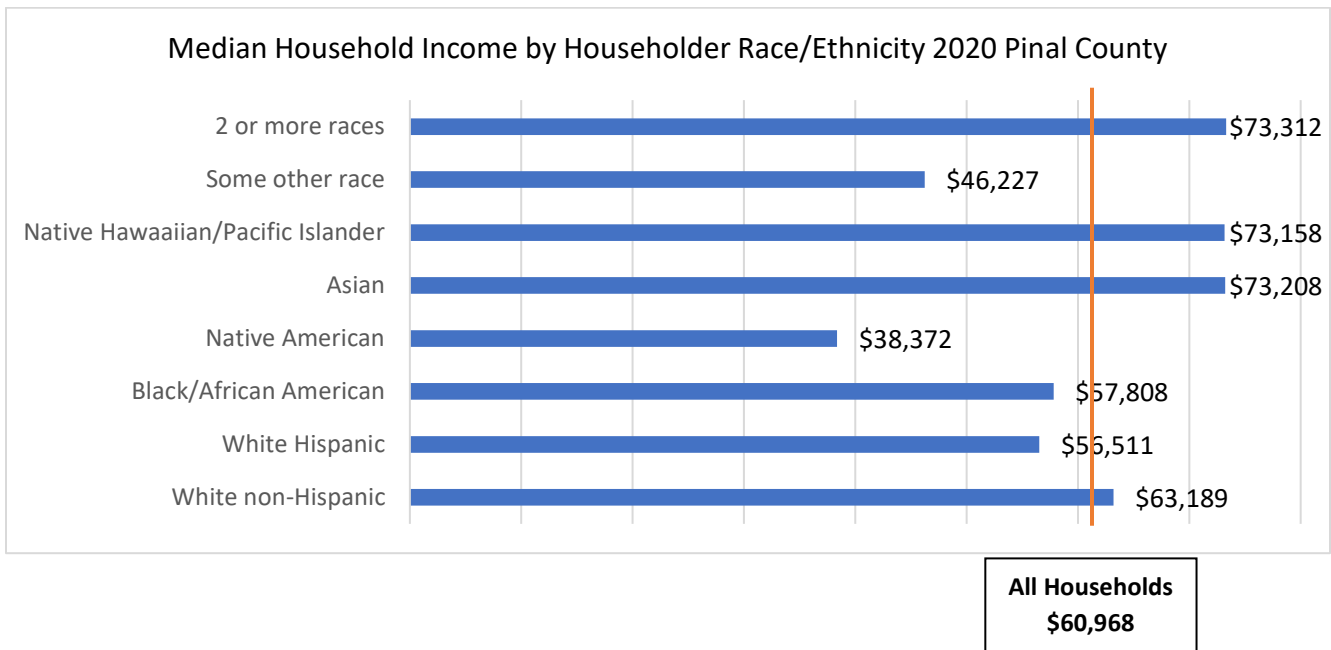
Median Household Income

Median household income is the measure used by the housing and community development industry to target HUD resources. Median income includes income from employment and from other sources such as investments, retirement, and public assistance. The Pinal County median household income in 2020 was \$60,968.

Individuals and families that are under-resourced must make difficult and personal decisions about which basic needs are most urgent or important and towards which the insufficient resources will be applied.

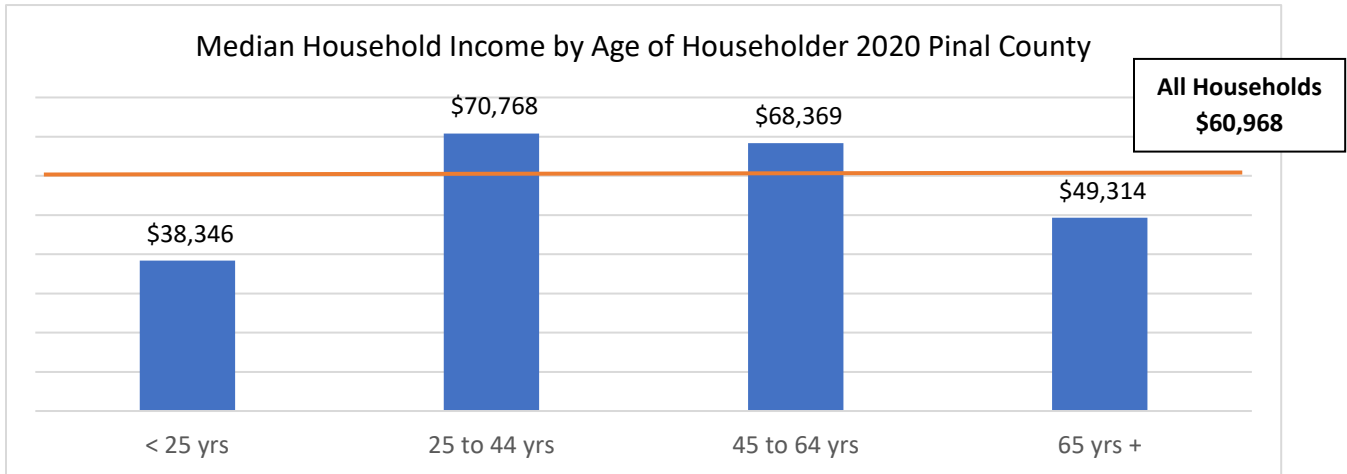
Median Household Income by Race and Ethnicity

The income of households and their race and ethnicity can contribute to greater understanding of the housing choice and opportunity limitations faced by households of all races and ethnicities. In 2020, Pinal County households headed by a person who identified as Two or More Races, Asian or Native Hawaiian/Pacific Islander had the highest median annual household income, while households headed by a person who identified as Native American had the lowest median annual income.



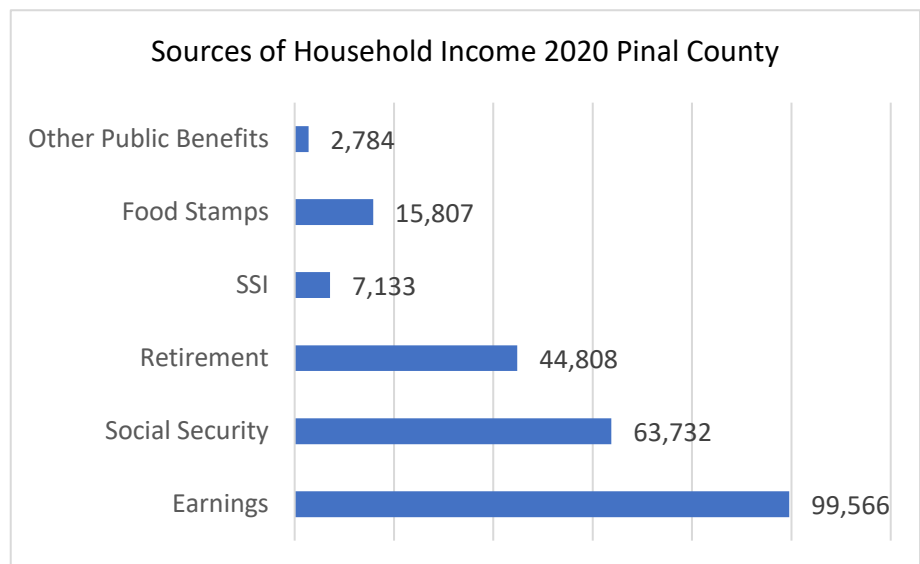
Householder Age and Median Income

Households headed by a person age 25 to 64 have the highest median incomes, generally because they are more likely to include two wage earners than are households headed by a person under age 25 or over age 65.



Sources of Household Income

Household members may have multiple sources of income. In 2020, seven of ten (68%) Pinal County households had income from earnings, while 44% had Social Security income and 31% had retirement income. One of ten households included a member that received SNAPs benefits (food stamps), and one of twenty (5%) received Supplemental Security Income or SSI benefits.



Low-and-Moderate Income Households

Low- and moderate-income households are those that have income less than 80% of the area median income (AMI) as defined by HUD. When targeting HUD resources, households are categorized as:

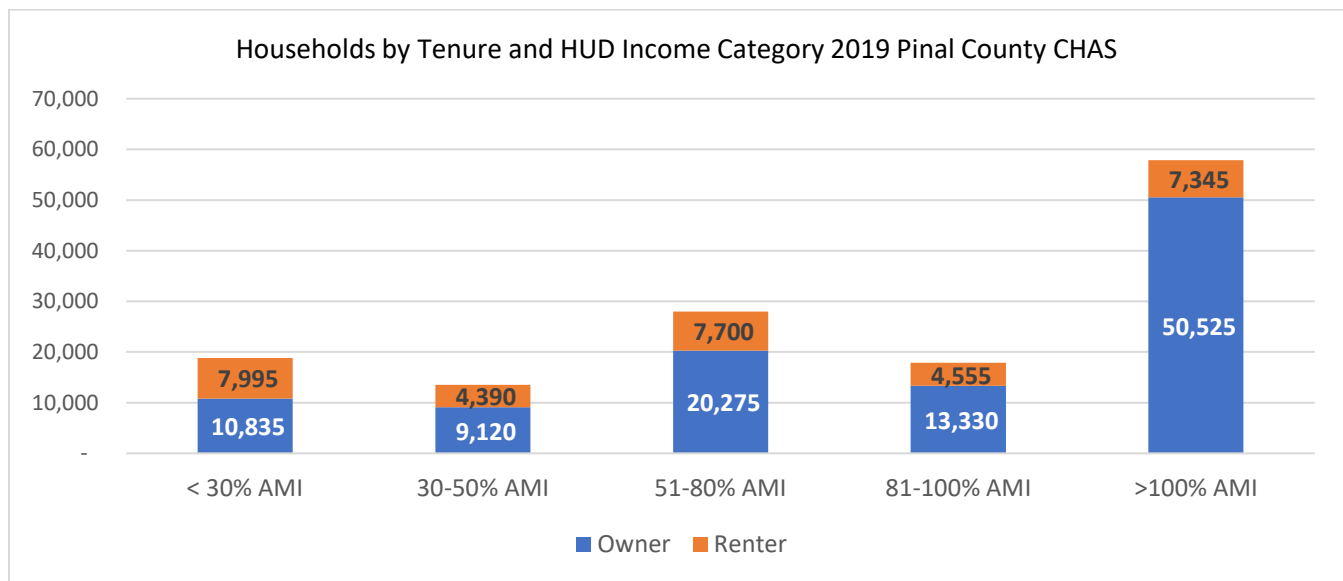
- Extremely low-income (less than 30% AMI).
- Low-income (31% to 50% AMI).
- Moderate-income (51% to 80% AMI).
- Middle-income (81% to 100% AMI).
- Higher-income (greater than 100% AMI).

Households by HUD Income Category

The US Department of Housing and Urban Development periodically releases special tabulations of US Census data called Comprehensive Housing Affordability Strategy or CHAS data. CHAS data examines housing problems by income level, race and ethnicity, presence of disability, family size and type, and age of householder.

44% of Pinal County households met HUD's definition of low- and moderate-income in 2019.

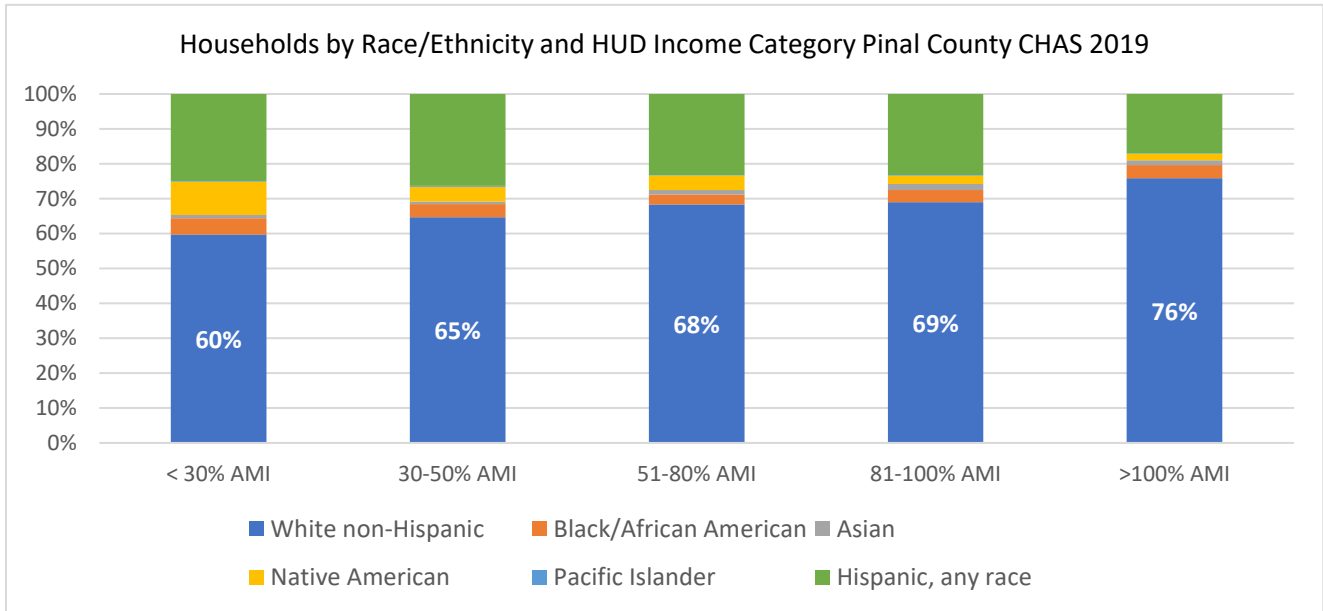
HUD 2019 CHAS data identified 60,135 low- and moderate-income households. Of these households, 18,830 are considered extremely low-income, 13,510 are considered low-income, and 27,975 are considered moderate income.



Household Race/Ethnicity by HUD Income Category

Two of five (39%) extremely low-income households are headed by a racial or ethnic minority, compared to one of four (23%) middle-higher income households. Households headed by a White non-Hispanic householder are 3.4 times more likely than households headed by a racial or ethnic minority to be middle-higher income.

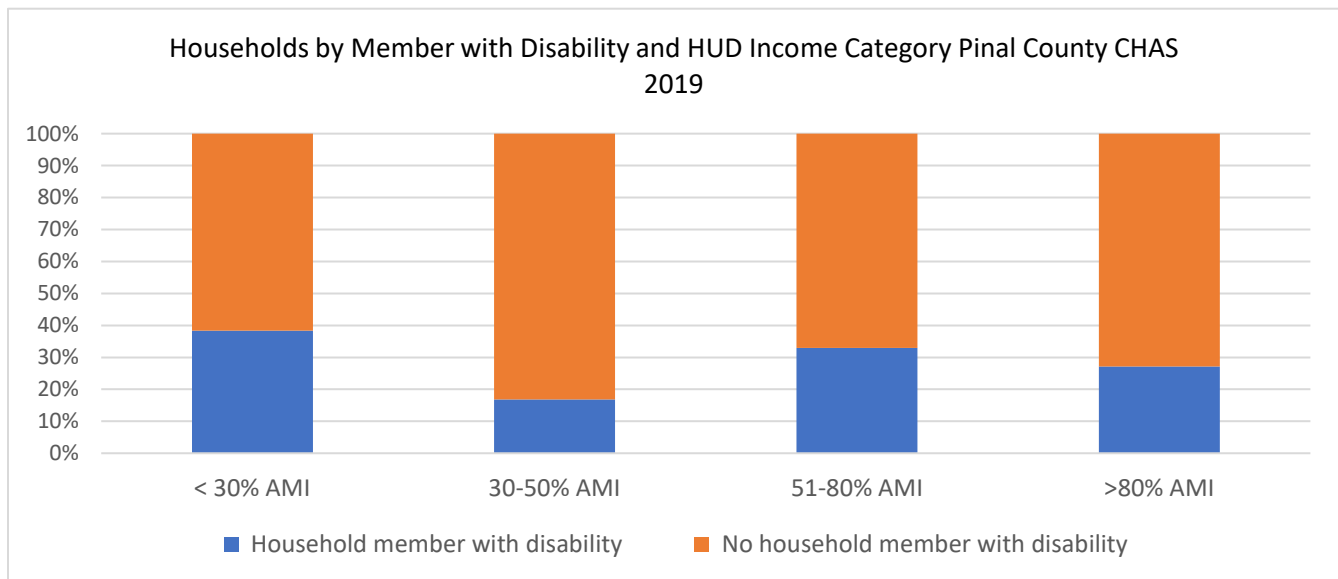
Households headed by a racial or ethnic minority are more likely to be low- and moderate-income than are households headed by a person who is White non-Hispanic.



Household Member with a Disability by HUD Income Category

Four of ten (38%) extremely low-income households include a person with a disability, compared to 27% of middle-higher income households. Given the positive correlations between age and disability, age and income, and age and homeownership, it is likely that higher-income households that include a person with a disability are homeowners, while lower-income households are more likely to be renters.

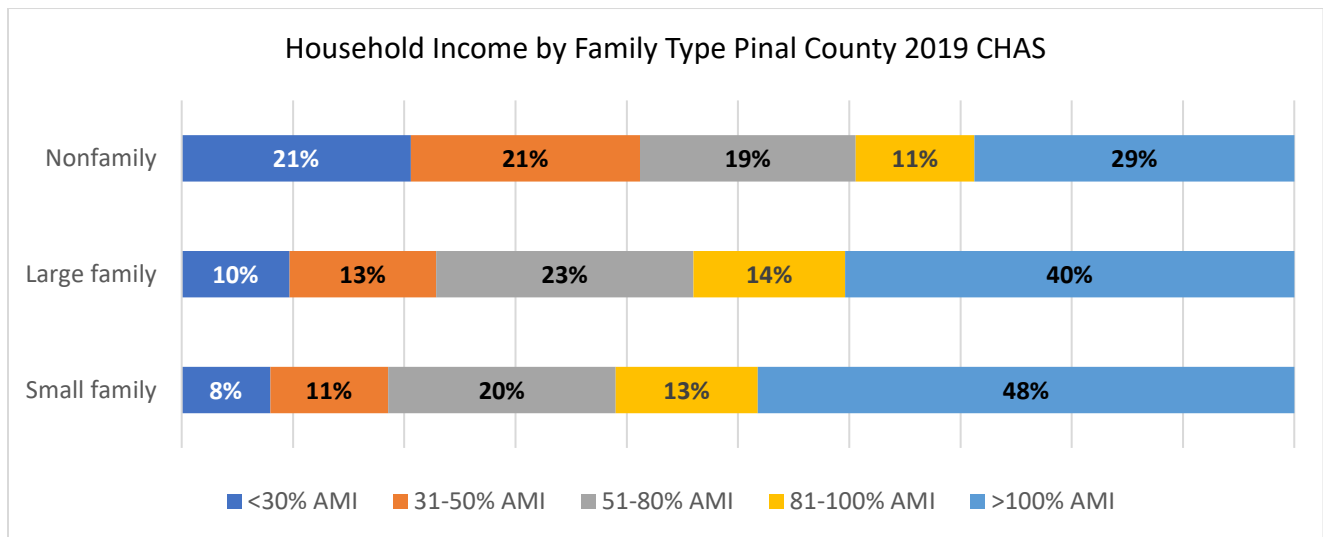
Households that include a person with a disability are more likely to be low- and moderate-income than are households that do not include a person with a disability.



PINAL COUNTY ARIZONA 2024 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

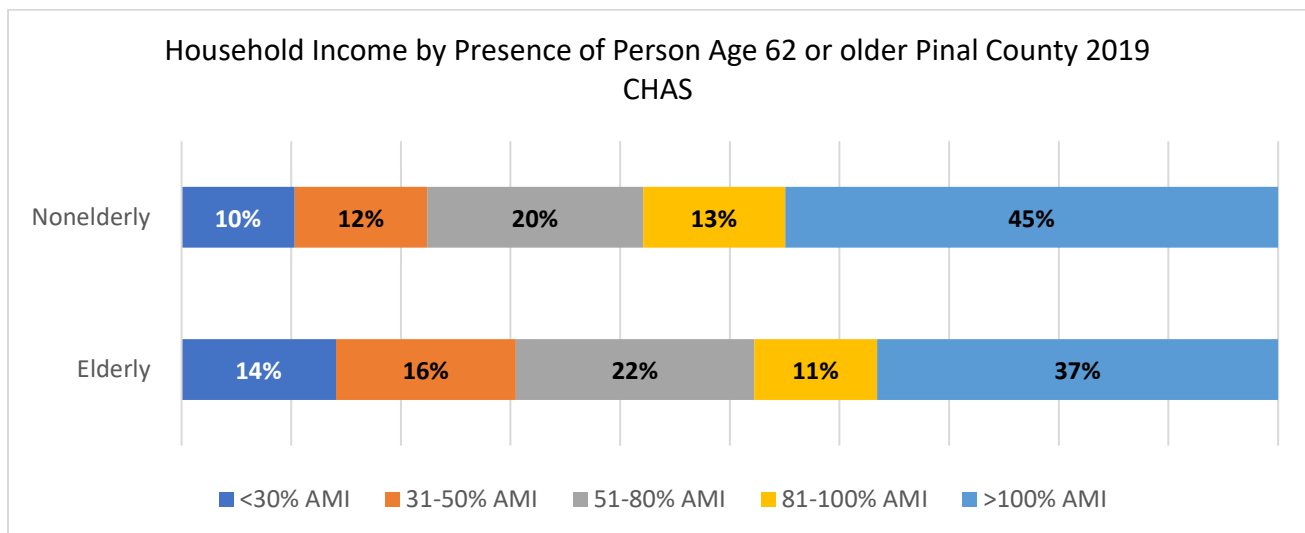
Household Type by HUD Income Category

Nonfamily households, which include single-person households and unrelated people living together are 2 times more likely than large family households and 2.5 times more likely than small family households to be extremely low-income. Small family households consist of 2 to 4 related people living together, while large family households consist of 5 or more related people living together.



Householder Age by HUD Income Category

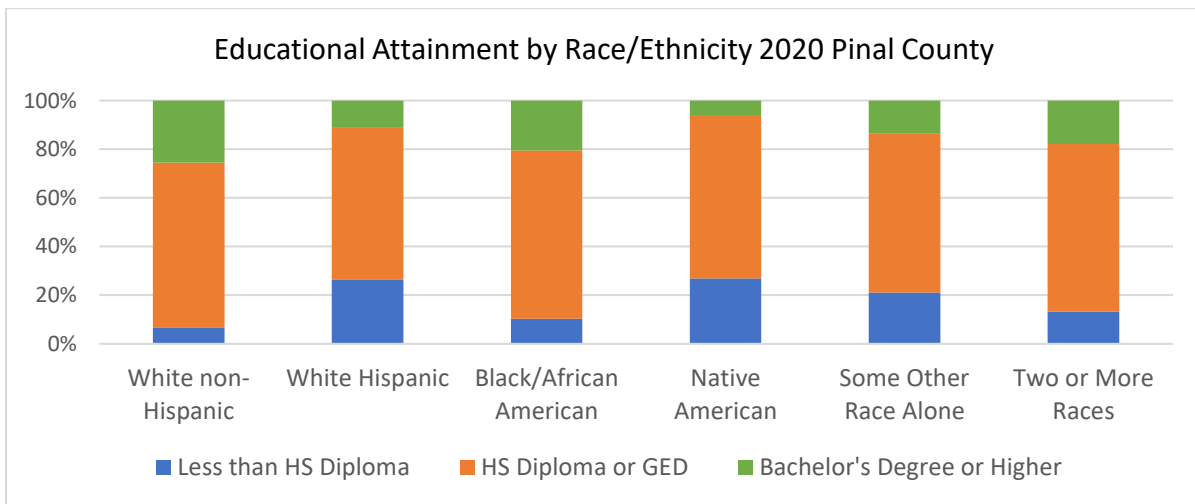
Elderly households, or households that include a person age 62 or older, are 1.5 times more likely to be extremely low-income than households that do not include a person age 62 or older. The proportion of extremely low-income elderly households can be largely attributed to the estimated 21,350 people age 62 and older who live alone.



Educational Attainment

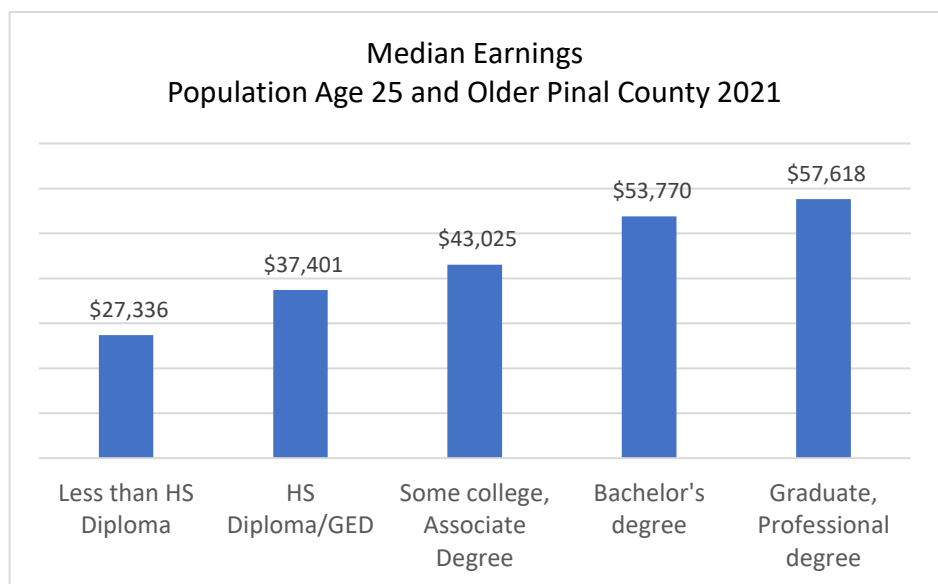
Of the Pinal County population age 25 years and over, 12% has no High School Diploma or equivalent, 67% have a High School Diploma or equivalent, some college, or an Associate’s Degree, 21% have a Bachelor’s Degree or higher. Attainment of a Bachelor’s Degree or higher varies by race and ethnicity. Twenty Five percent (25%) of White non-Hispanic people

have a degree as do 11% of White Hispanic people. Among racial minorities, attainment of a Bachelor’s degree ranges from a low of 6% for the Native American population to a high of 32% for the Asian population; 21% of the Black/African American population has attained a Bachelor’s degree.



Educational Attainment and Median Earnings

As educational attainment rises so do earnings. Median earnings for employed Pinal County residents with some college or an Associate’s Degree are 1.15 times those of employed residents with a High School Diploma or GED. For employed residents with a Bachelor’s Degree, median earnings are 1.44 times that of a resident with a High School Diploma or GED.



Access to High-Quality K-12 Education

High-quality K-12 education is one of the core elements of opportunity. Access to high performing schools has a direct impact on a child’s future employment, wealth, and health status. School proficiency is one indication of the quality of education that is available to residents of an area.

Arizona Revised Statutes § 15-241 requires the Arizona Department of Education to develop an annual achievement profile for every public school in the state using an A through F scale. The system measures year to year student academic growth, and proficiency on English language arts, math and science exams. It also includes: the proficiency and academic growth of English language learners; indicators that an elementary student is ready for success in high school; high school student readiness for a career or higher education; and high school graduation rates.

Of the 58 Pinal County education campuses reported by the Arizona Department of Education for the 2021-22 school year, four received an “A” grade, 30 received a “B” grade, 20 received a “C” grade, and 4 received a “D” grade. There were no schools that received an “F” grade.

Schools with lower grades were not concentrated in any one area. Middle-school and High-school education campuses were more likely to have a lower grade than were elementary school campuses.



Employment

Employment and earnings are important indicators of housing choice and access to opportunity. Numerous researchers have published research that describes US employment trends and conditions. This research provides context for understanding economic conditions that may impact protected classes in Pinal County.

Nationwide, wages rose for workers in the top of the income distribution between 1979 and 2016, wages remained stable for workers in the bottom and middle of the income distribution. During this time, wages for earners in the top quintile rose 27%, while wages for workers in the bottom fifth quintile fell 1% after adjusting for inflation⁵. Overall, average wage growth did not exceed inflation as the economy recovered from the COVID-19 pandemic job losses. In April 2023, average hourly wages of all employees on private payrolls were 4.4% higher than a year earlier, with earnings for non-management employees 5.0% higher than a year earlier. Both increases are below the rate of inflation over the same period⁶.

Between 1990 and 2015, across the US wages for jobs requiring analytical and soft skills obtained through a college curriculum or job experience have increased more quickly compared to jobs requiring physical skill and little formal training⁷. Stagnant wages for low-

wage earners also make it challenging to keep up with rising housing prices.

During the pandemic downturn, women experienced a greater decline in employment than men. This reflects the larger losses in jobs that require face-to-face interaction, which employ a disproportionate number of women. By April 2023, employment for women was 0.6% greater than in February 2020, compared to 2.2% greater for men. Job gains by females since the pandemic vary significantly by race and ethnicity. Employment of White non-Hispanic women declined 0.5% since February 2020, while employment of Black women increased 3.6%, Latina women increased by 4.9% and Asian women increased by 11.6%.

Adults without a Bachelor's degree had the largest job losses during the pandemic and in April 2023 remained 3.3% below February 2020 levels. In contrast, jobs for adults with a Bachelor's degree was 6.9% above the February 2020 level.

During the pandemic, unemployment rose substantially across all racial and ethnic groups, with Latino (18.8%) and Black (16.6%) workers experiencing the highest unemployment rates. In April 2023, Black unemployment reached the lowest-ever recorded percentage of 4.7%, while Latino unemployment remained the same as in February 2020, and White unemployment increased slightly from 3.0% to 3.1%.

⁵ Shambaugh, J., Nunn, R., Lui, P., Nantz, G. (2017). "Thirteen Facts about Wage Growth." Brookings.

⁶ Center on Budget and Policy Priorities <https://www.cbpp.org/research/economy/tracking-the->

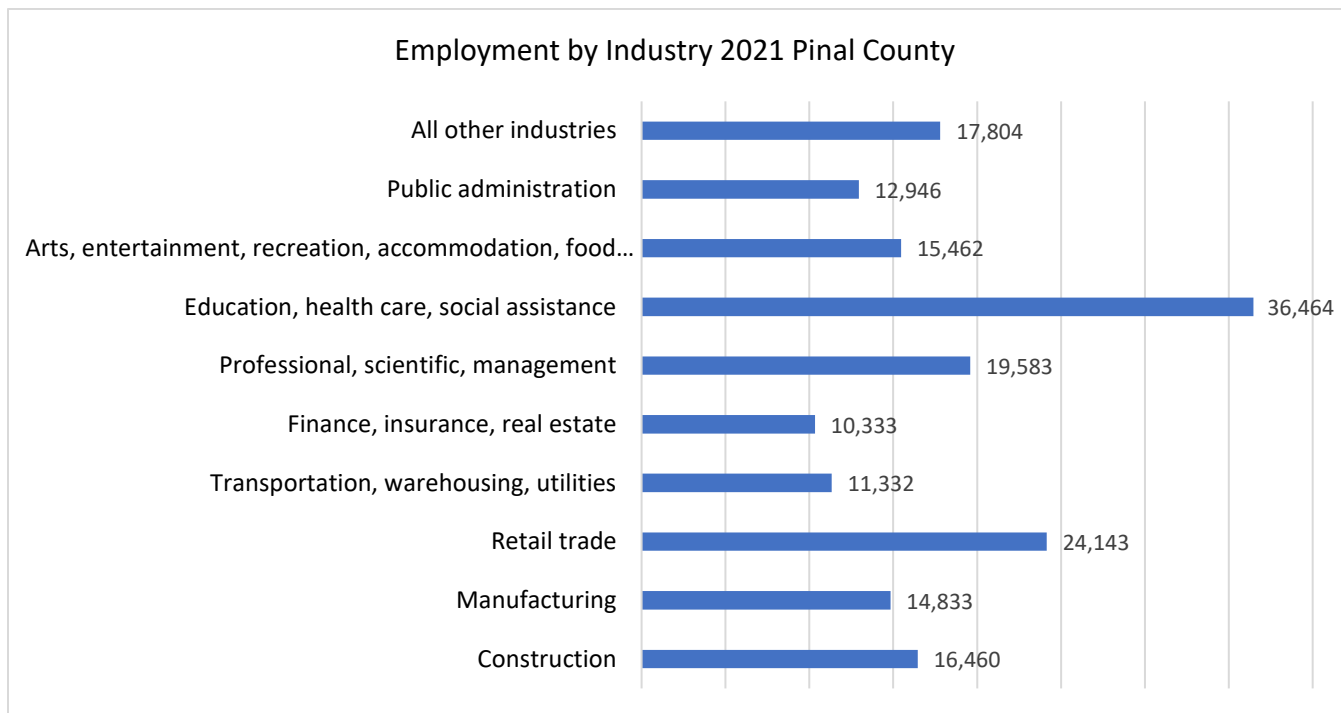
[recovery-from-the-pandemic-rec](#). Accessed on May 20, 2023.

⁷ Parker, K., Rainie, L., Kochhar, R., Rohal, M. (2016). "The State of American Jobs." Pew Research Center.

Employment by Industry

Historically, people employed in retail trade, arts, entertainment, recreation, accommodation and food service industries had the lowest-paying jobs. One of five (22%) employed Pinal County residents held jobs in these industries in 2021. Jobs in these industries are often characterized by unpredictable work schedules and hours that vary from week to week. This unpredictability has historically been challenging as lower-income individuals struggle to arrange childcare, and plan and stick to a monthly budget.

Unpredictable work schedules and hours have also meant high variability in take-home income from month to month, hindering a family’s ability to save and attain housing stability. One report found that more than half of families in these industries experienced a 30% month-to-month change in total income, most of which was experienced by workers who did not change jobs⁸.



In November 2022, the Bureau of Labor Statistics substantially revised industry classifications. These revisions mean that data will be difficult to impossible to track until wage information is collected over a period of time.

⁸ Farrell, D., Greig, F. (2016). “Paychecks, Paydays, and the Online Platform Economy.” JP Morgan Chase Institute.



Race, Ethnicity, Occupation and Wages

Nearly one-third (31%) of employed Pinal County residents works in Management, Business, Science and Arts occupations, and an additional quarter (23%) work in Sales and Office occupations. The median wage for all Pinal County occupations in 2021 was \$36,924. People employed in Management, Business, Science and Arts occupations had the highest earnings, while those employed in service occupations had the lowest earnings.

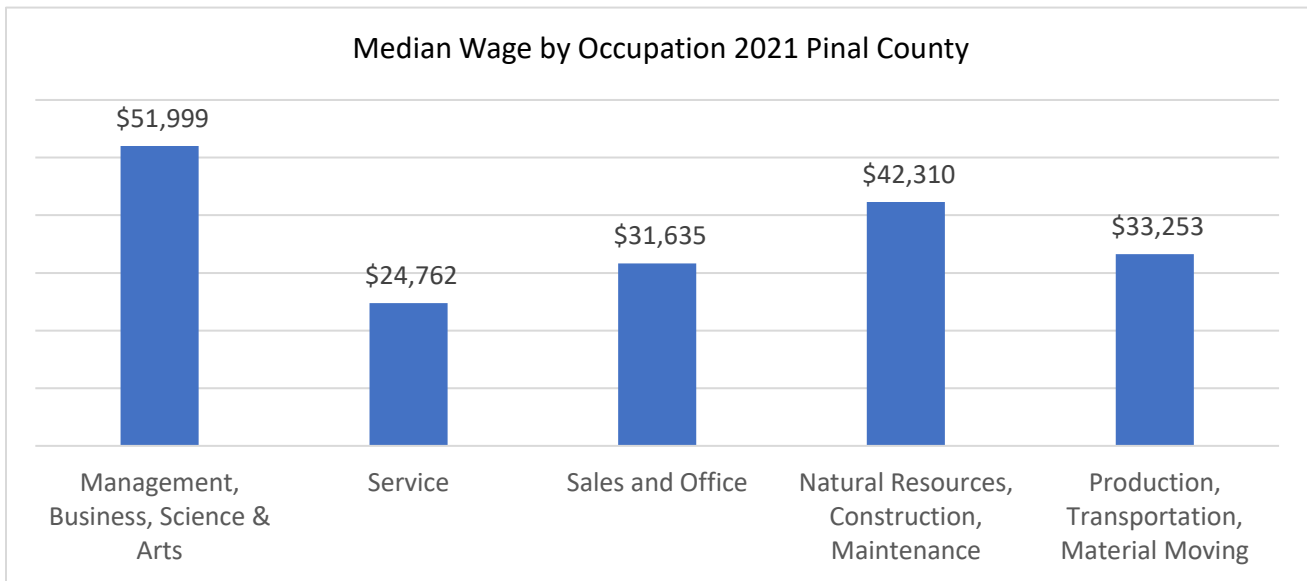
White non-Hispanic employees comprise 47% of employed residents and 57% of residents employed in higher-paying Management, Business, Science and Arts occupations. Comparatively, White Hispanic residents comprise 20% of employed residents and 21% of residents employed in Management, Business, Science and Arts occupations. Employees who are a race/ethnicity other than White non-Hispanic are 1.2 times more likely to be employed in low-paying Service occupations, many of which are at higher risk of loss in an economic downturn.

Pinal County employed residents who are a racial or ethnic minority are:

2.7 times less likely than White non-Hispanic residents to be employed in higher-paying Management, Business, Science and Arts occupations

AND

1.2 times more likely that White non-Hispanic residents to work in low-paying Service occupations.

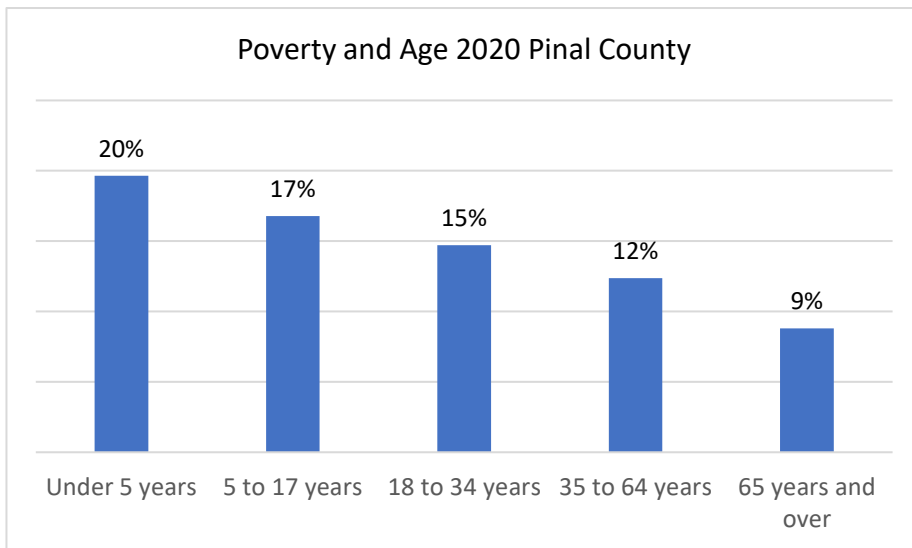


Poverty

In 2020, Pinal County had a poverty rate of 13.2%. People living in poverty often lack education and have a higher incidence of illness. The poverty rate for people age 25 and older with no High School Diploma or GED was 22.9%, compared to 14.5% for people with a High School Diploma or GED, and 8.6% for people with some college or an Associate’s Degree. These characteristics result in increased costs to health, justice and other systems that provide supports. People living in poverty are also often socially excluded and are least likely to understand their rights under the fair housing act or to access fair housing education.

Poverty and Age

In 2020, one of five children in Pinal County lived in poverty. As age increased, poverty decreases, with 9% of people age 65 and older living in poverty. Higher rates of poverty among young children are associated with low employment rates among females with young children, including single mothers.



Poverty

“Poverty is hunger. Poverty is lack of shelter. Poverty is being sick and not being able to see the doctor. Poverty is not having access to school and not knowing how to read. Poverty is not having a job, is fear for the future, living one day at a time.”

Poverty has many faces, changing from place to place and across time, and has been described in many ways. Most often, poverty is a situation people want to escape. So, poverty is a call for action – for the poor and wealthy alike – a call to change the world so that many more can have enough to eat, adequate shelter, access to education and health, protection from violence, and a voice in what happens in their communities.”

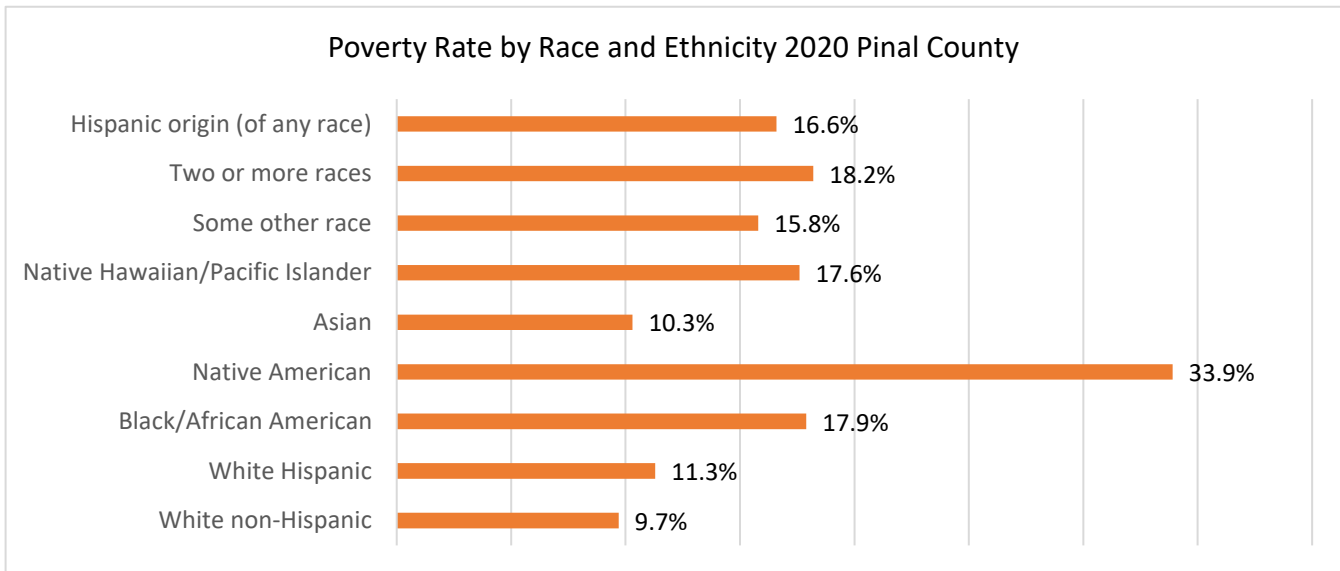
The World Bank



Poverty and Race/Ethnicity

Minorities in Pinal County are more likely to live in poverty. The highest rates of poverty are among people who are Native American, followed by people who are Two or more races, and Black/African American. The poverty rate of the Native American population is 3.5 times that of the poverty rate of the White non-Hispanic population.

Minority residents in Pinal County are more likely to live in poverty. The highest rates of poverty are among Native American residents, Black/African American residents, and residents of two or more races.



Poverty and Household Type

Married-couple families with and without children, who often have multiple earners, have the lowest poverty rate (9%). Female headed households with no children had the highest poverty rate, with 81% living in poverty. Many of these households are headed by an older single female. Female headed households with children (51%) also had a higher poverty rate than male households with children (29%).

One half of Pinal County single-mother families lives in poverty.

The poverty rate for female headed households with dependent children is 5.9 times the rate for married couples with children and 1.8 times the rate for single male headed households with dependent children.

Housing Profile

Understanding housing characteristics creates a baseline for understanding housing choice and access to opportunity. The housing market consists of structures and units and the people and households who choose to occupy them. While the housing market is based on supply and demand, many complex variables influence the housing market. Some of these variables include household income, family composition, access to suitable employment and education opportunities, age, and the cost of goods and services in the community.

Quality, variety, and affordability move in tandem within the housing market. Variety is

defined as the types of housing that are available, which changes over time to meet demand. Demand is in turn influenced by housing affordability and quality and by demographic change, including population growth and household and family composition.

In general, the housing market moves roughly in line with the rest of the economy over the long term. The Pinal County economy continues to grow, with demand for housing creating a mini-boom, increased construction employment, and increased demand for consumer goods and services related to home purchase and moves within the rental market.

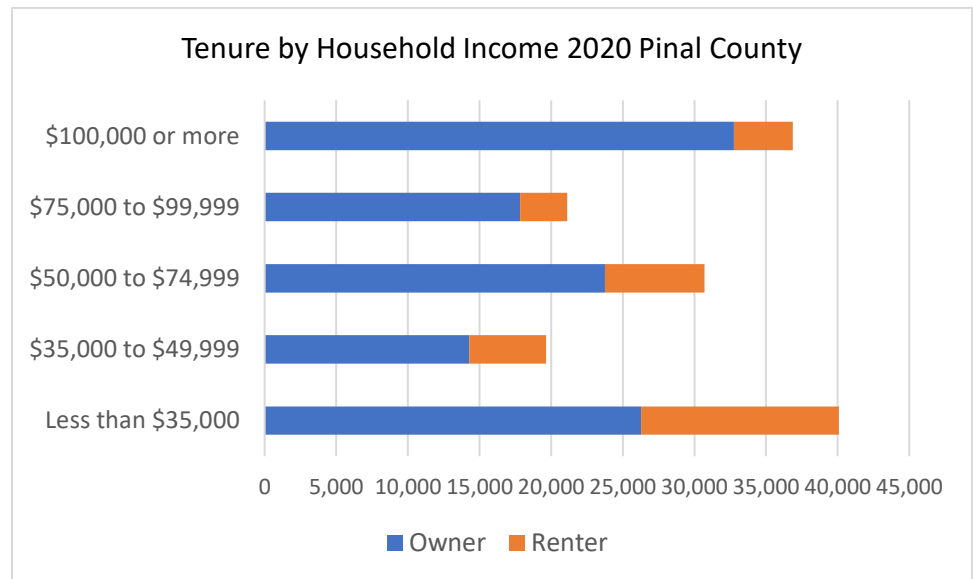
Tenure

Multiple factors contribute to a household’s homeownership status, including household income, householder age, and family status. A higher homeownership rate is directly correlated with higher household income, older age of householder, and being married.

The homeownership rate in Pinal County in 2020 is 77.4%.

Tenure and Household Income

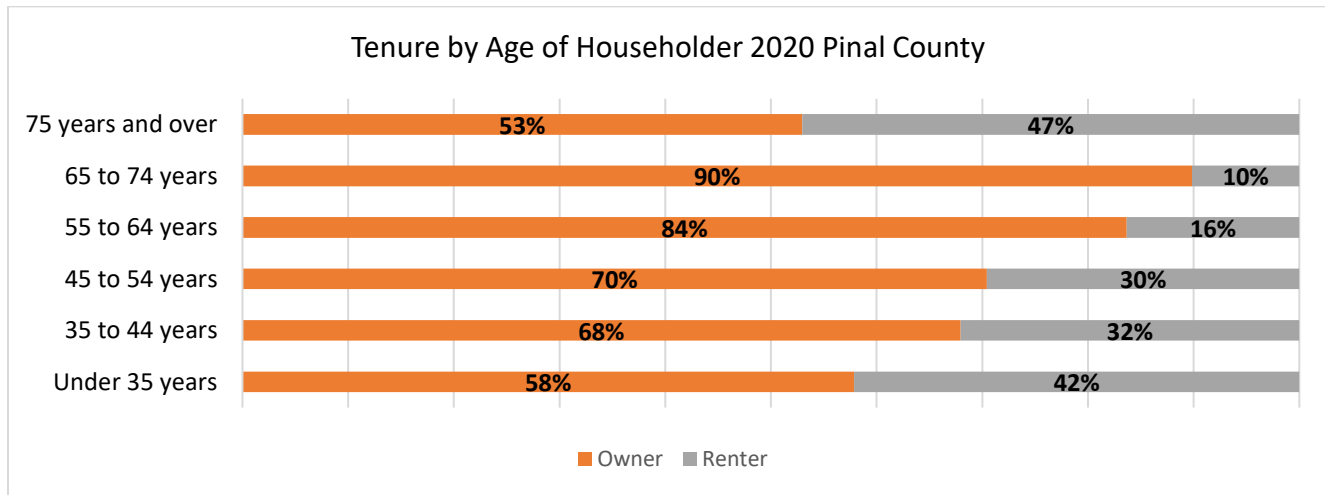
Higher income households are more able to save for down payment and closing costs and are more likely to have a positive credit history, two factors that contribute to successful home purchase. One quarter of Pinal County households have annual income of \$100,000 or more, and 89% of households in this income category own their home. Slightly more than one quarter (27%) of Pinal County households have annual income less than \$35,000, and 66% of households in this income category own their home. Households with annual income \$100,000 or more are 1.4 times more likely to be homeowner than households with income less than \$35,000.



Tenure and Age of Householder

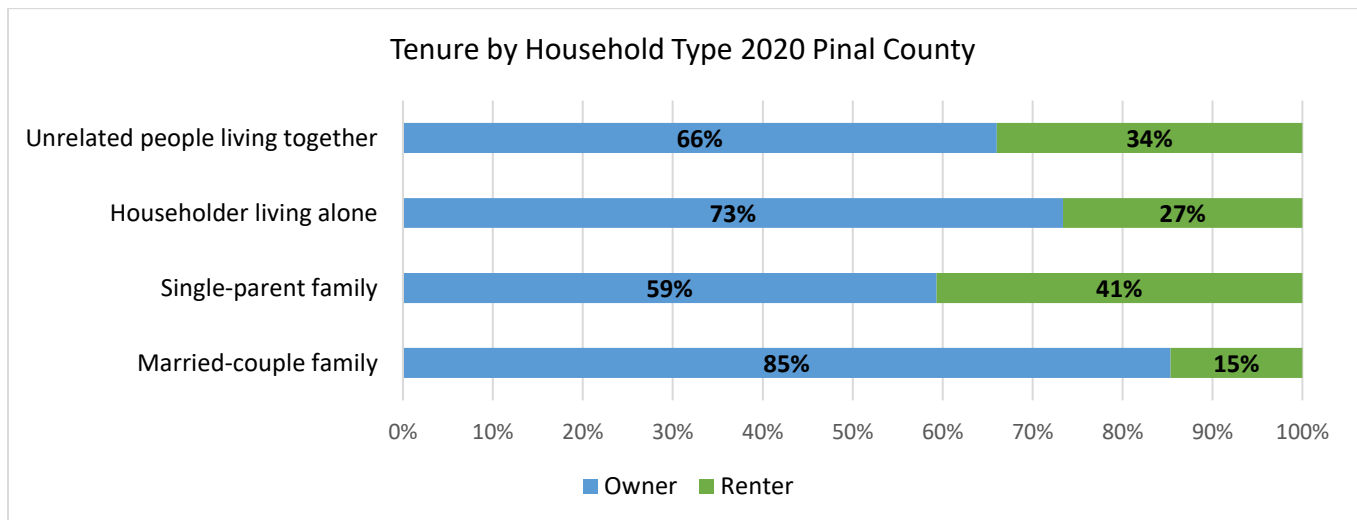
Households headed by a person age 65 to 74 are 1.3 times more likely to be a homeowner than householders age 45 to 64. Householders under age 35 and under and 75 and older are least likely to own their home.

Nine of ten households headed by a person age 65 to 74 are homeowners.



Tenure and Family Type

The highest rates of homeownership are among married-couple families (85%) and people living alone (73%). The higher homeownership rate among single people can be partially attributed to the likelihood of an older householder living alone. The homeownership rate is lowest among single-parent households (59%) and unrelated people living together (66%). Married couple families are 1.4 times more likely than single-parent families to own their home.

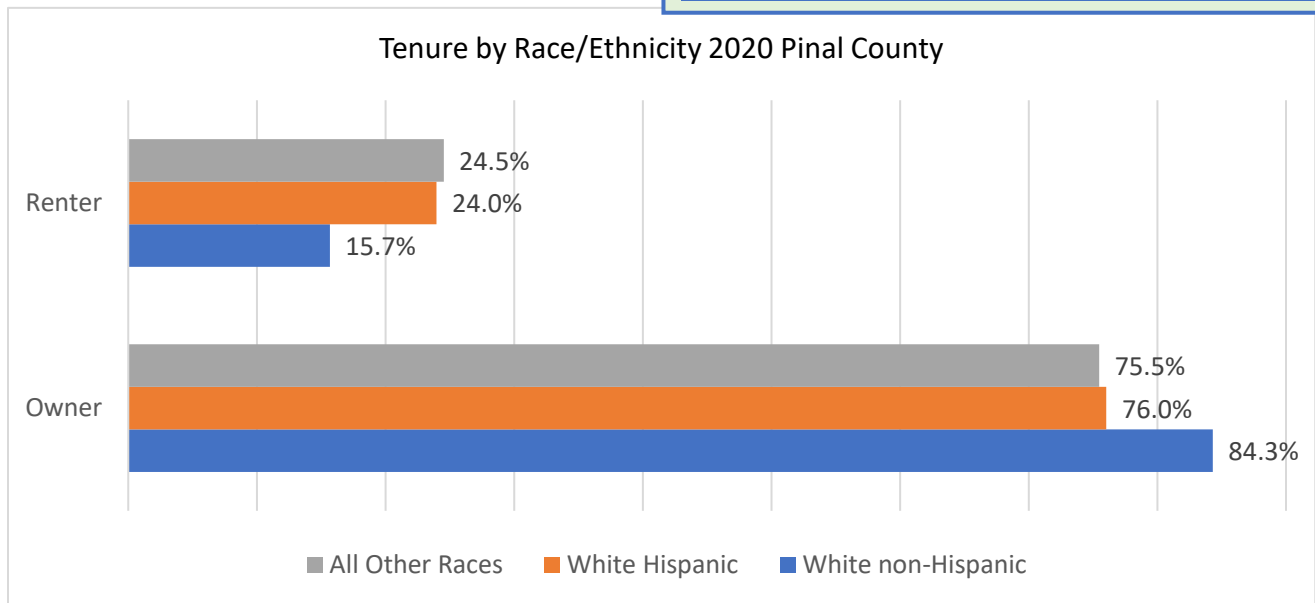


Tenure and Race / Ethnicity

The homeownership rate for households headed by a person who is White non-Hispanic is 1.1 times higher than the homeownership rate for households headed by a person of another race or ethnicity. The higher homeownership rate may be partially attributed to the older age of White non-Hispanic householders.

84% of households headed by a person who is White non-Hispanic own their home, compared to 76% of households headed by a person of another race or ethnicity. The higher homeownership rate is partially explained by a larger proportion of older householders who are White non-Hispanic.

Lower rates of homeownership and higher rates of housing cost burden among minorities may hinder access to opportunity.



Housing Variety

A variety of housing types are necessary to meet the diverse needs and desires of owners and renters. The types of available housing are driven largely by demand. However, many other factors influence housing variety including public policy such as zoning and building requirements, the availability and cost of infrastructure, neighborhood acceptance, and the cost of construction.

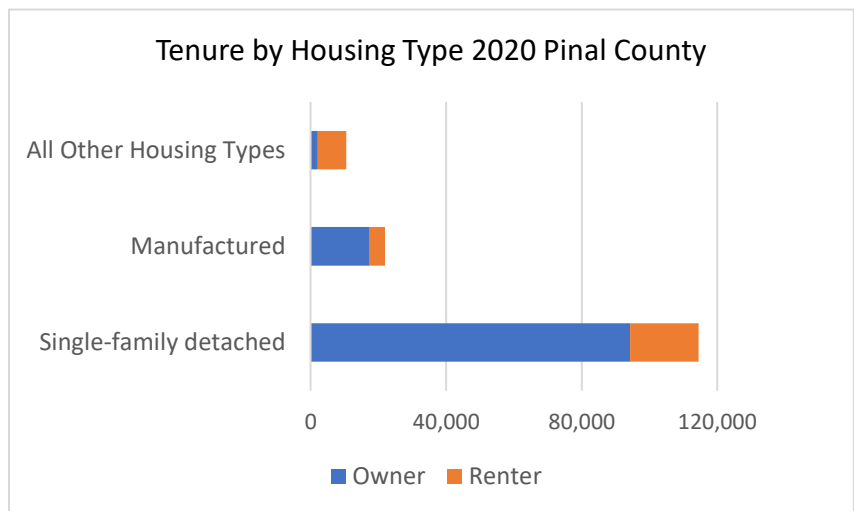
Located between Arizona’s two largest counties, Pinal County has experienced cycles of rapid development driven by demand and access to capital. These cycles of rapid growth have historically been followed by periods of lower demand and higher vacancy. Building up to the housing crisis of the mid-2000’s, “drive until you qualify” spurred demand for single-family housing.

Unlike more urbanized areas, demand for multi-family housing did not follow during the economic recovery as investors purchased and rented the available single-family housing stock. More recently, the pandemic economy spurred demand for additional single-family housing among higher-paid employees no longer constrained by needing to live close to work coupled with continued demand by migrating retirees. For some owners of single-family rental units, the pandemic eviction moratorium forced the sale of homes, reducing the available rental stock.

In 2020, nearly eight of ten (78%) Pinal County housing units was single-family detached housing, and another 15% was manufactured. Multi-unit structures comprised only 7% of the housing stock.

Tenure by Housing Type

Given limited housing variety, single-family detached housing represents 61% of the rental housing stock. Nearly one of five (18%) single-family detached and manufactured (21%) homes are renter occupied.



Tenure, Housing Type and Household Characteristics

Considering housing type and occupancy by households of various compositions and characteristics:

- Households headed by a person age 65 or older are 2.3 times more likely to occupy manufactured housing than households headed by a person under age 65.
- White non-Hispanic and White-Hispanic households are 1.5 times more likely to occupy manufactured housing than households of other races and ethnicities.
- One quarter of households headed by a White Hispanic person occupy multi-family housing, compared to 4% of White non-Hispanic households and 10% of households headed by a person of another race or ethnicity.
- Nonfamily households are 5 times more likely than family households to occupy multi-family housing.

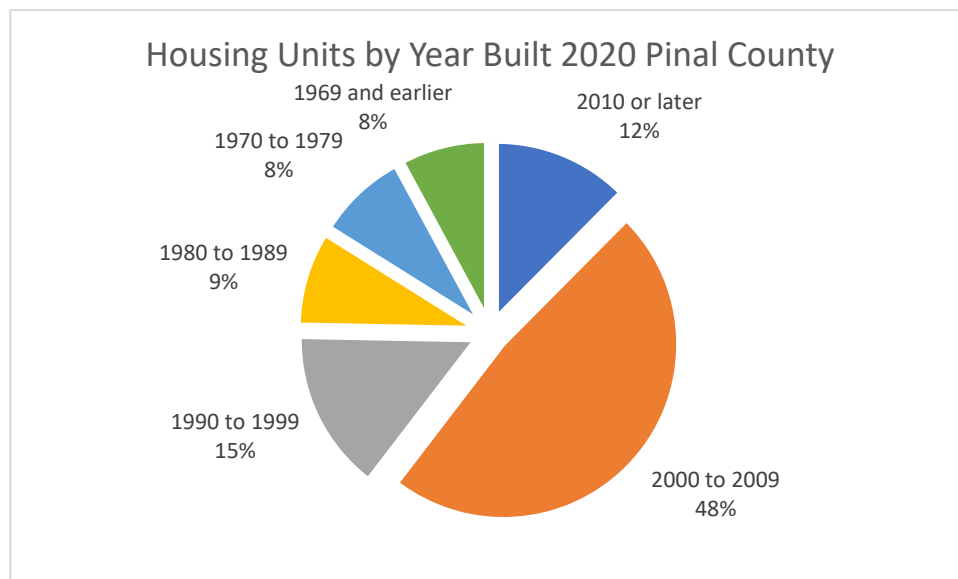
Housing Quality

Housing quality encompasses a range of issues that are central to quality of life, including housing safety, design and appearance, accessibility for persons with disabilities, maintenance and energy efficiency, and community safety and livability. The quality of the existing housing stock reflects economic prosperity and community investment. Pinal County takes a proactive approach to community and neighborhood sustainability through housing rehabilitation, community clean up, and code enforcement activities. These activities contribute to voluntary correction of code violations, create community and neighborhood pride, and contribute to the health and safety of residents.

Year Built

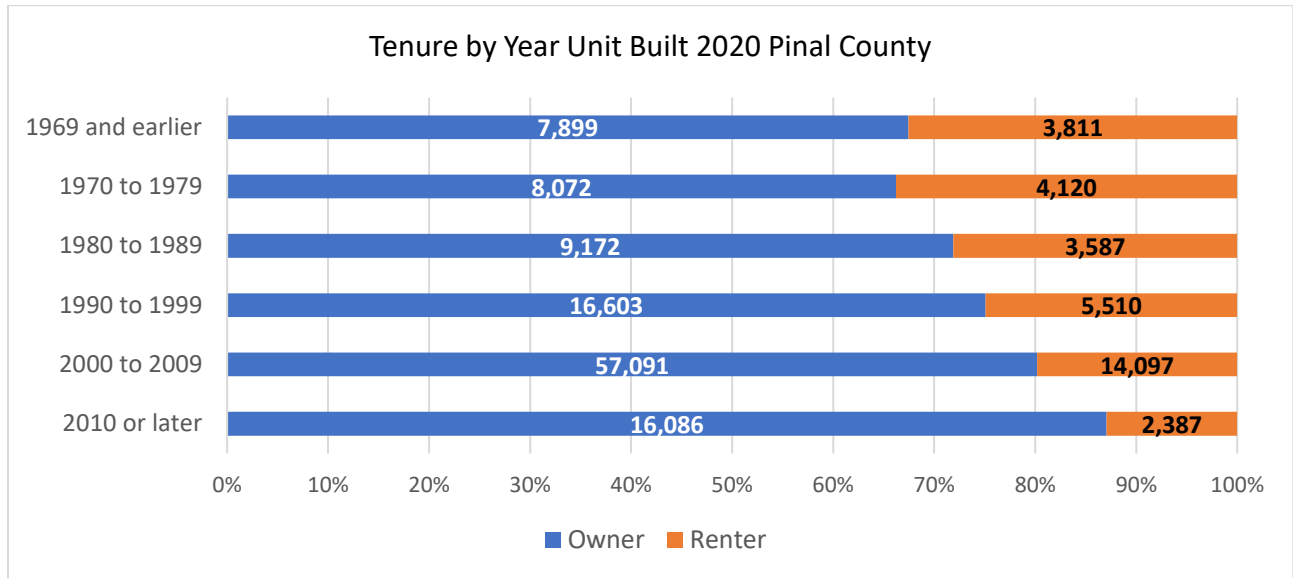
The age of the housing stock is one indicator of housing quality. Older housing units may be less energy efficient, resulting in higher utility costs for occupants, and some materials such as lead paint (in units built prior to 1978) and asbestos may represent health hazards to occupants. Sixteen percent (16%) of housing units in Pinal County are 40 years old or older, and 12% were built in 2010 or later. The high volume of housing built between 2000 and 2009 means that half of the housing stock is likely to require one or more major systems replacements between 2020 and 2030.

Nearly half (48%) of the Pinal County housing stock was built between 2000 and 2009. Major systems replacement is often necessary when a housing unit reaches 20 years old.



Tenure by Year Built

Newer housing units are more likely to be owner-occupied. Eighty-seven percent (87%) of units built in 2010 or later are owner-occupied, as are 80% of units built between 2000 and 2009. Comparatively, 66% of units built before 1980 are owner-occupied. The higher rental rate of older units can pose a problem for persons with disabilities. Many older units do not meet ADA requirements and may need modification to reasonably accommodate a person with a disability.



Housing Affordability

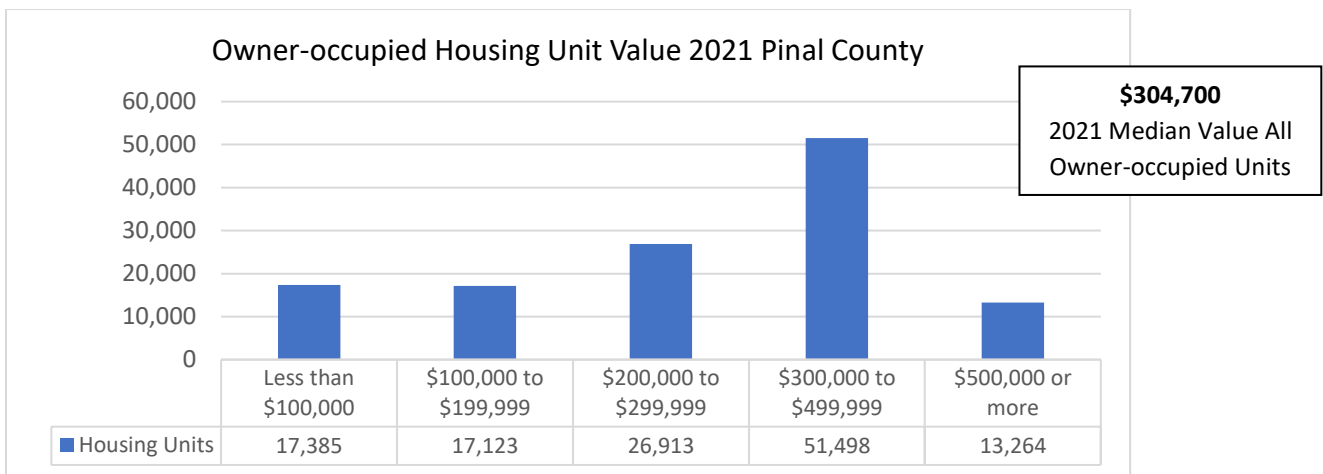
Both owners and renters may choose to occupy housing that is disproportionately costly for any number of reasons – location, availability, public transportation and access to services, proximity to family, schools and employment, anticipated income increases, and housing quality are just some of the complex factors that impact housing choice. Housing values impact whether a household can afford to purchase a home within an affordable range, and rents impact a household’s choice of where to live, their mobility, and the ability to save for home purchase.

Owner-occupied Housing Value

Housing values directly impact the amount of funds that a buyer can borrow as well as the amount of taxes paid. Values are generally reflected in prices but during a time of high demand, prices can exceed values. In turn, higher prices drive up values as comparing prices is one method of determining value. Lenders provide financing up to a percentage of the value of a housing unit and this is one factor in determining whether a buyer is able to purchase a unit.

With a 20% down payment, rising home prices and interest rates require an annual income of \$85,600 to purchase the median-value home.

In 2021, the median value of a Pinal County housing unit was \$304,700, up 42% from the US Census Bureau estimate of \$213,300 in 2019. The 2021 median monthly costs for an owner-occupied unit with a mortgage was \$1,458 and for an owner-occupied unit without a mortgage was \$425. To purchase the median-priced housing unit in 2021 required approximately \$57,000 annual income. Purchase of the same unit in 2023 requires approximately \$85,600 annual income⁹.



⁹ Assumes 20% down payment, 30-year, 3% fixed interest in 2021, 7.7% fixed interest in 2023, \$586/month other debt, \$400/month escrow payments, no HOA fees, and 30%/43% housing debt/total debt to income.

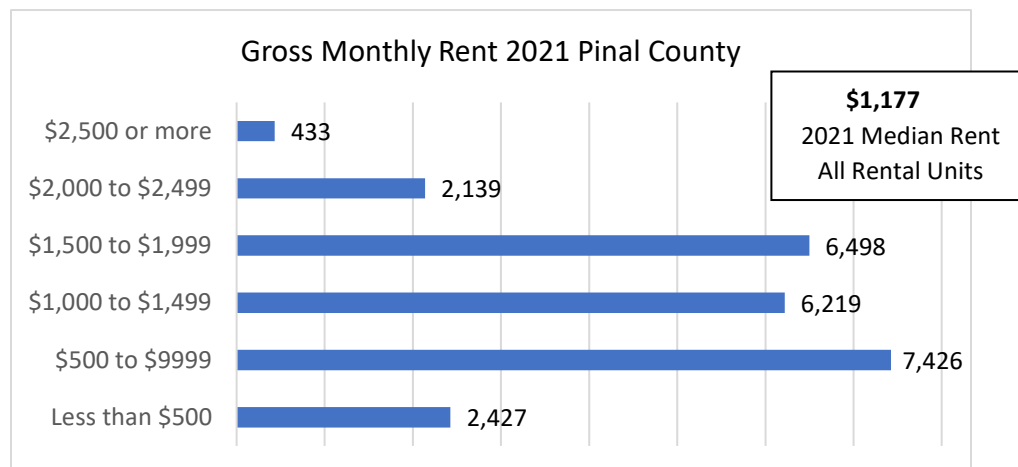


Rents

Renting provides the opportunity for households to learn more about a neighborhood or community before making a homeownership investment and provides for mobility among the workforce. For some households, renting is the only choice because the cost of homeownership is prohibitive. Renting is also chosen over homeownership for a variety of reasons including:

- Renting may be less expensive than owning, especially during the first five years.
- Rental units are maintained and repaired by their owners, so unplanned and sometimes costly repairs are not the renter’s responsibility.
- Renting carries less financial risk, especially in volatile markets.

The median gross monthly rent in Pinal County was \$1,177 in 2021. This rent is affordable to a household with monthly income of approximately \$3,923 and annual income of approximately \$47,080.



Transportation and Housing Affordability

Combining the cost of housing and transportation provides a comprehensive understanding of the affordability of a place, primarily for working residents. Transportation is typically a household’s second-largest expense besides housing. According to the Center for Neighborhood Technology’s Housing and Transportation (H+T®) Affordability Index, the average H+T index for Pinal County is 47%, with housing consuming 22% of a household budget and transportation consuming 25% of a household budget. Both less densely-populated areas and areas closest to job centers in Maricopa and Pima counties have higher indices. An estimated 61,000 households have combined housing and transportation costs between 45 and 54% of household income, and an estimated 27,300 have combined housing and transportation costs greater than 55% of household income.



Households with Housing Problems

Housing problems include overcrowding/severe overcrowding and housing cost burden/severe housing cost burden. Overcrowding occurs when there is more than one person per room in a housing unit, while severe overcrowding occurs when there is more than 1.5 people per room. Housing cost burden occurs when a household pays more than 30% of household income for housing costs. Severe housing cost burden occurs when a household pays more than 50% of household income for housing costs.

HUD CHAS data provides detailed information about housing problems among households with varying compositions and incomes. Defining housing problems can help to identify which classes of people may have limited housing and economic opportunities.

Housing Cost Burden and Severe Housing Problems

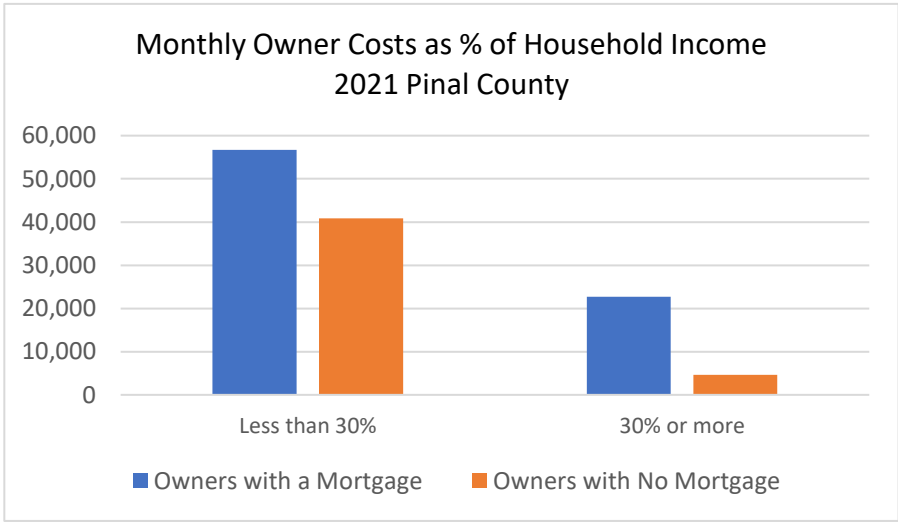
Government programs define housing cost burden as paying more than 30% of gross household income for total housing cost (rent or mortgage plus utilities). Even when spending 30% of household income for housing, lower-income households may struggle to pay for the remaining essentials – clothing, food, transportation, and childcare, yet many lower-income households pay more than 30% of income for housing. For higher-income households, paying more does not generally require making the same difficult choices that lower-income households must make.

CHAS data provides insight into owners and renters experiencing severe housing problems. Severe housing problems are defined as being severely overcrowded (more than 1.5 people per room), lacking both complete kitchen and bathroom facilities, or paying more than 50% of household income for housing costs.

Owner Housing Cost Burden

In addition to having to make difficult choices about essential purchases, cost burdened homeowners are often challenged to maintain their properties. Deferred maintenance may lead to failure of major housing systems, loss of home equity, and deterioration of neighborhoods and communities. While owners at all income levels experience cost burden, it is more prevalent among lower-income owners. In 2021, more than 27,000 or 22% of homeowners paid more than 30% of household income for housing, including 29% of owners with a mortgage and 10% of owners without a mortgage.

27,000 Pinal County homeowners paid more than 30% of income for housing in 2021.



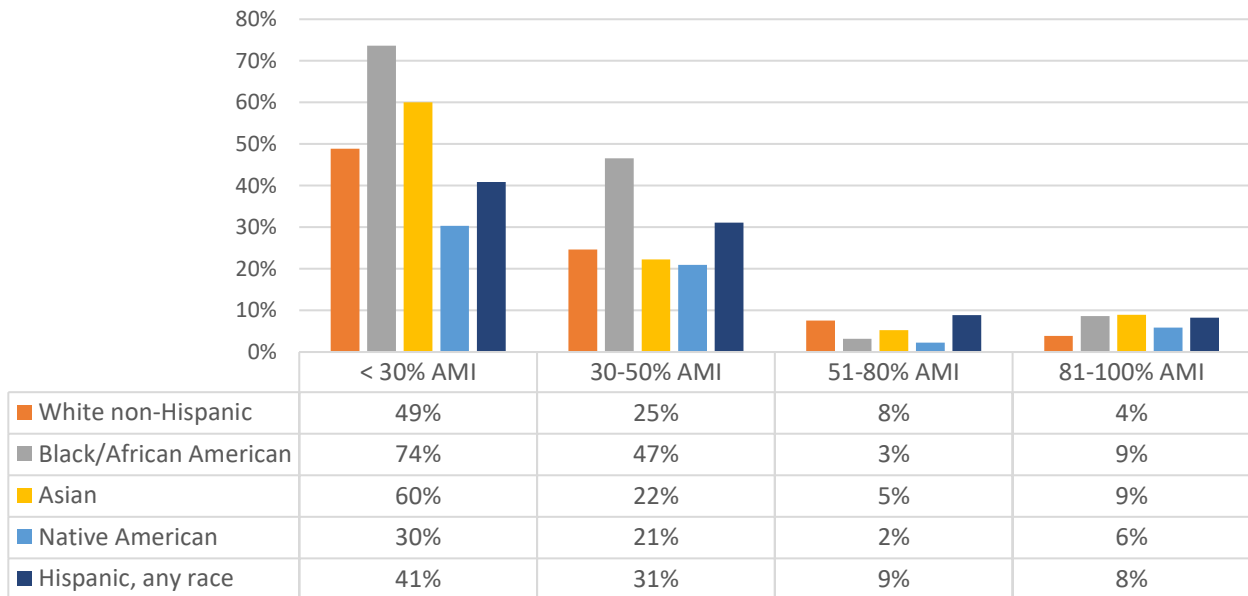
Owner Severe Housing Problems by Income and Race/Ethnicity

Severe housing problems are more common among the lowest-income homeowners, with nearly half (48%) of Pinal County homeowners with income less than 30% AMI experiencing severe housing problems.

Minority homeowners at all income levels are more likely to experience severe housing problems than are White non-Hispanic homeowners.

At the lowest income level, severe housing problems are more prevalent among Black/African American and Asian homeowners. Among owners with household income between 30% and 50% AMI, severe housing problems are more prevalent among Black/African American, Asian and Hispanic householders.

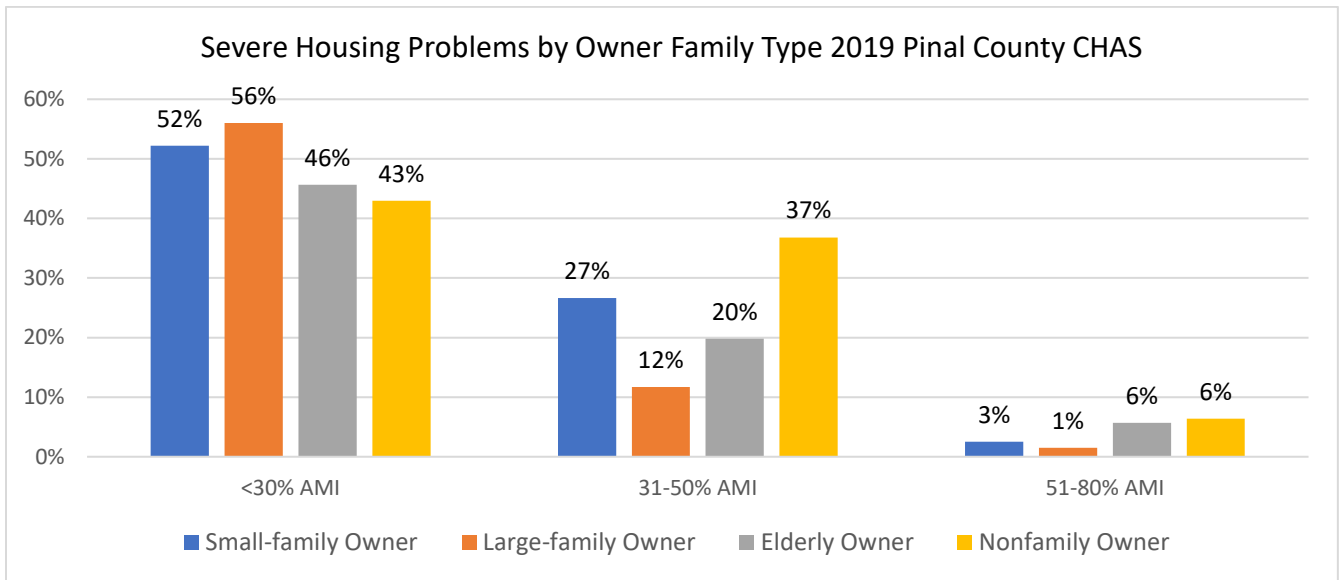
Owners with one or more Severe Housing Problems by Income and Race/Ethnicity Pinal County 2019 CHAS



Owner Severe Housing Problems by Household Type and Householder Age

Severe housing problems are most common among homeowners with income less than 30% AMI. More than half of large-family owners (56%) and small-family owners (52%) with income less than 30% AMI experience one or more severe housing problems, as do 46% of elderly and 43% of nonfamily homeowners in this income category. Housing problems among owners decline among most household types as income increases; however, four of ten (37%) nonfamily owners and one-quarter (27%) of small-family owners with income 31-50% AMI also experience severe housing problems.

Extremely low-income large-family owners are disproportionately impacted by severe housing cost burden.



Renter Housing Cost Burden

In addition to having to make difficult choices about essential purchases, cost burdened renters have little opportunity to save for emergencies or future purchases, including moves to another location to increase opportunity, or the purchase of a home.

11,200 Pinal County renters paid more than 30% of income for housing in 2021.

While renters at all income levels experience cost burden, it is more prevalent among lower-income renters. In 2021, more than 11,200 or 46% of renters paid more than 30% of household income for housing, including over 8,900 who paid more than 35% of household income for housing.

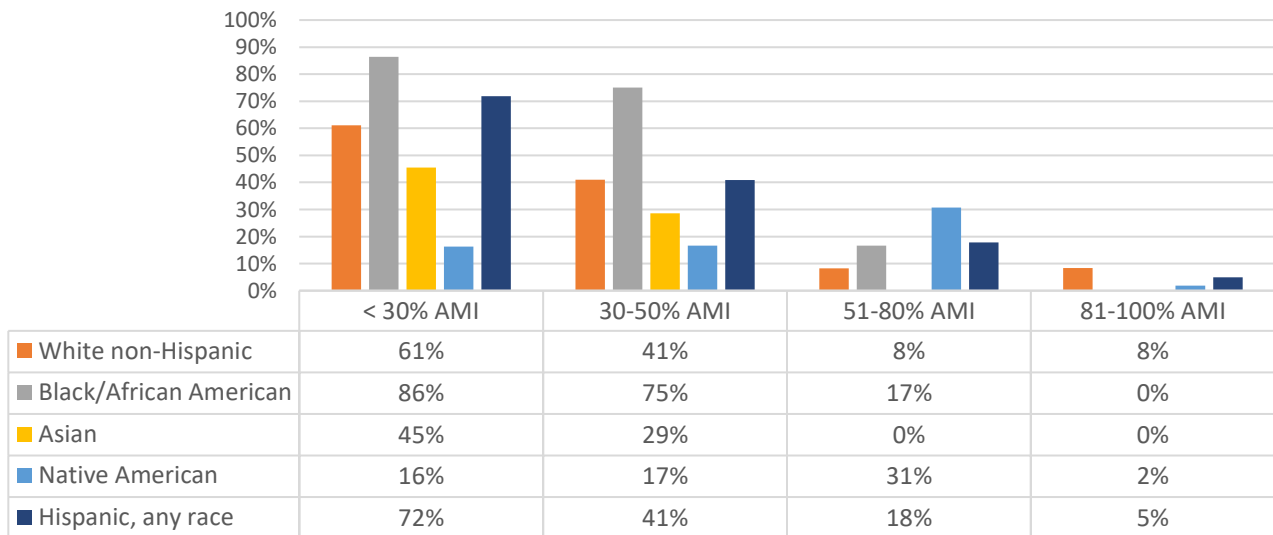
Renter Severe Housing Problems by Income and Race/Ethnicity

In general, renters are more likely to experience severe housing problems than are owners. Severe housing problems are more common among the lowest-income renters, with six of ten (59%) Pinal County renters with income less than 30% AMI experiencing severe housing problems. At the lowest income level, severe housing problems are more prevalent among Black/African American and White non-Hispanic renters.

Extremely low-income Black/African American and Hispanic renters are disproportionately impacted by severe housing problems.

Among renters with household income between 30% and 50% AMI, severe housing problems are more prevalent among Black/African American renters. At higher income levels, White non-Hispanic renters are more likely to experience severe housing problems.

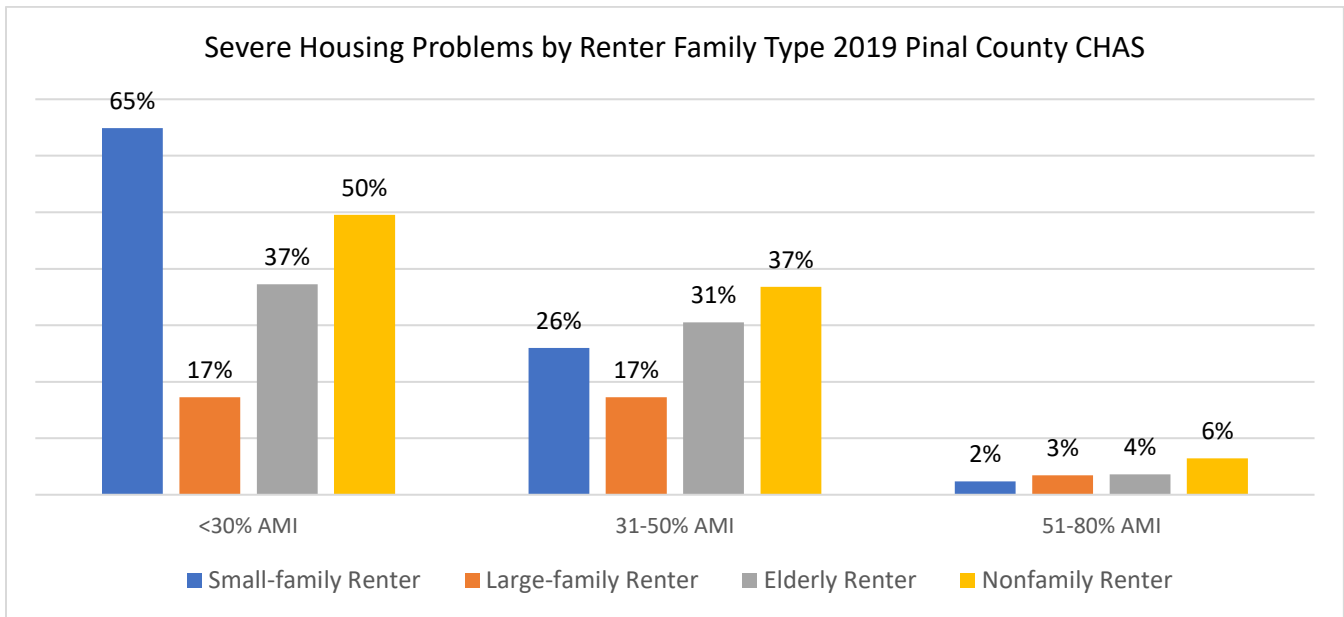
Renters with one or more Severe Housing Problems by Income and Race/Ethnicity Pinal County 2019 CHAS



Renter Household Type and Age and Severe Housing Problems

Severe housing problems are also most common among renters with income less than 30% AMI. Two thirds (65%) of small-family renters and one-half (50%) of nonfamily renters with income less than 30% AMI experience one or more severe housing problems, as do 37% of elderly and 17% of large-family renters in this income category. Housing problems among renters decline among most household types as income increases; however, four of ten (37%) nonfamily renters, three of ten (31%) elderly renters, and one-quarter (26%) of small-family renters with income 31-50% AMI also experience severe housing problems.

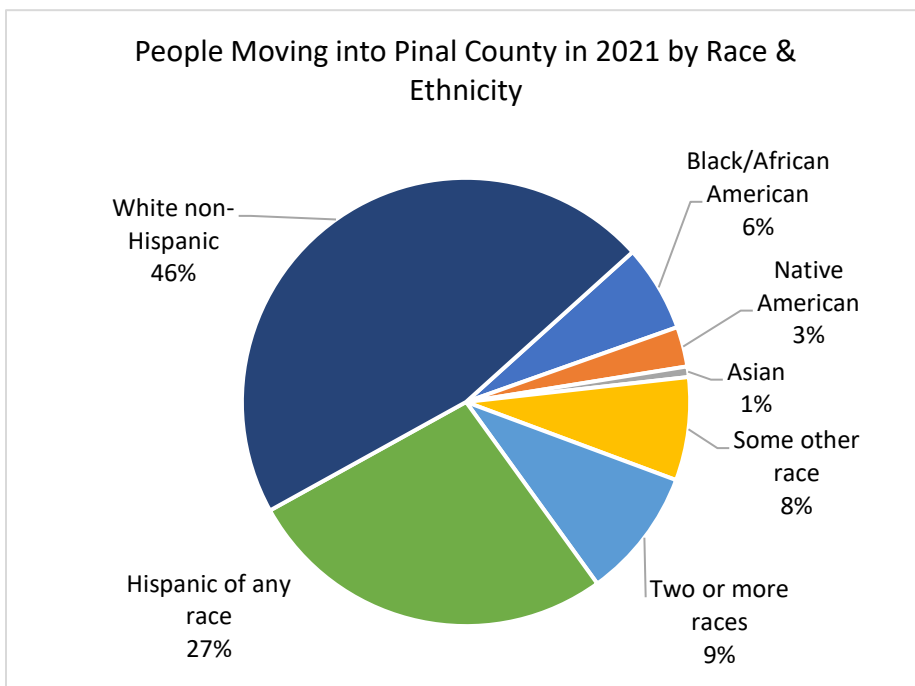
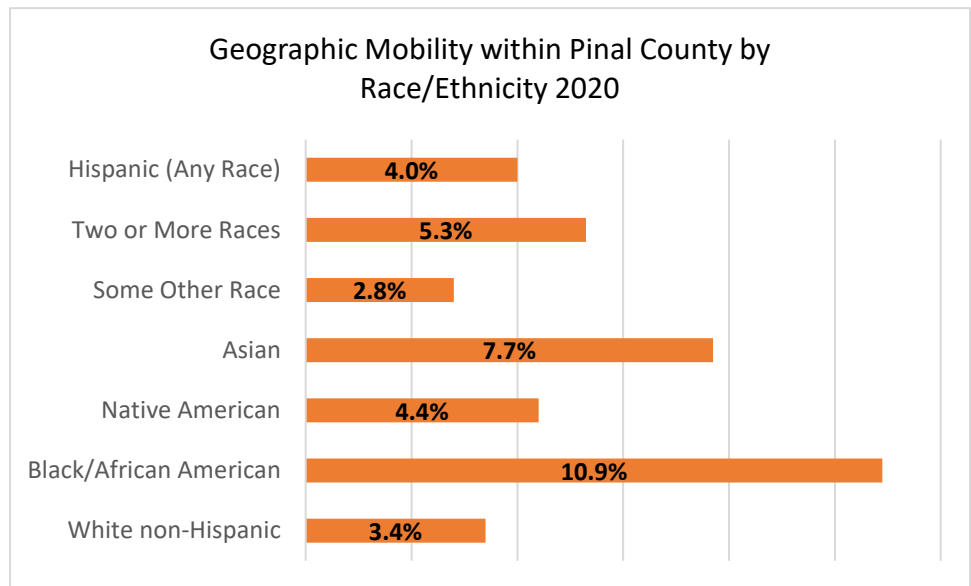
Extremely low-income small-family renters are disproportionately impacted by severe housing problems.



Geographic Mobility

Based on 2021 estimates, 4.2% or one in twenty Pinal County households moved within Pinal County during the year. Moves were most common among renters – 10% moved compared to 2.4% of owners. Lower-income individuals were also more likely to move – 4.6% of people with income under \$25,000 moved, compared to 2.2% of people with income \$75,000 or more. People who had never married, and people who were divorced or separated moved more frequently than married or widowed people.

Considering race and ethnicity, moving within Pinal County was more prevalent for Black/African American people (10.9%) who are also more likely to rent and to be lower income, followed by Asian people (7.7%).



An estimated 49,900 people moved into Pinal County from other Arizona counties, out-of-state, and abroad in 2021.

Considering race, of people moving into Pinal County, nearly half (46%) were White non-Hispanic and slightly more than one quarter (27%) were Hispanic of any race. All other races represented 27% of people migrating into Pinal County.

Geographic Concentrations

Areas of concentration exist when the proportion of a class of persons in a census tract is 10% or more higher than the average for all Pinal County census tracts. Areas of concentration can occur because of historic or current practices that limited or limit where people live, or because housing opportunities are not distributed throughout a geographic area. Some geographic concentrations are by design, such as age-restricted developments that provide housing tailored for older adults.

Concentration areas may be areas of disability, minority, poverty or combined racial/ethnic areas of poverty concentration (R/ECAPs). Table 1 highlights census tracts that are considered areas of minority, disability, and/or poverty concentration, high concentration, or very high concentration. Indian Communities and census tracts shared with the City of Casa Grande are also highlighted. Maps may be found in the appendices.

Geographic concentrations exist when the proportion of a class of persons in a census tract is 10% or more higher than the average for all Pinal County census tracts. Based on the 2020 census of Pinal County tracts, there are:

41 minority concentration tracts.

34 poverty concentration tracts.

9 combined areas of minority and poverty concentration.

36 disability concentration tracts.

Table 1 – Areas of Minority, Poverty and Disability Concentration (Pinal County 2020)

2020 Census Tract Number	Minority Concentration	Poverty Concentration	Racially/Ethnically Concentrated Area of Poverty (R/ECAP)	Disability Concentration	Indian Community	Shared with Casa Grande
2.01	No	No		Yes	No	No
2.04	No	No		No	No	No
2.06	No	Yes		No	No	No
2.08	No	No		No	No	No
2.11	No	No		No	No	No
2.12	No	No		No	No	No
2.15	No	No		No	No	No
2.16	No	No		No	No	No
2.17	No	No		No	No	No
2.18	No	No		No	No	No



PINAL COUNTY ARIZONA 2024 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Table 1 – Areas of Minority, Poverty and Disability Concentration (Pinal County 2020)

2020 Census Tract Number	Minority Concentration	Poverty Concentration	Racially/Ethnically Concentrated Area of Poverty (R/ECAP)	Disability Concentration	Indian Community	Shared with Casa Grande
2.19	No	No		No	No	No
2.20	No	No		No	No	No
2.21	No	No		No	No	No
2.22	No	No		Yes	No	No
2.23	Yes	No		No	No	No
2.24	No	No		No	No	No
2.25	No	No		No	No	No
2.26	No	No		No	No	No
2.27	No	No		Yes	No	No
2.28	No	No		No	No	No
2.29	No	No		No	No	No
3.07	No	No		No	No	No
3.09	No	No		Yes	No	No
3.10	No	Yes		Yes	No	No
3.11	No	No		No	No	No
3.12	No	Yes		No	No	No
3.13	No	Yes		Yes	No	No
3.15	No	Yes		Yes	No	No
3.16	No	No		No	No	No
3.17	No	No		Yes	No	No
3.19	No	No		High	No	No
3.20	No	High		Yes	No	No
3.21	No	Yes		Yes	No	No
3.22	No	No		Yes	No	No
3.23	No	No		Yes	No	No



PINAL COUNTY ARIZONA 2024 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Table 1 – Areas of Minority, Poverty and Disability Concentration (Pinal County 2020)

2020 Census Tract Number	Minority Concentration	Poverty Concentration	Racially/Ethnically Concentrated Area of Poverty (R/ECAP)	Disability Concentration	Indian Community	Shared with Casa Grande
3.24	No	No		Yes	No	No
3.25	No	No		No	No	No
4	High	Yes		Yes	No	No
6.03	No	No		No	No	No
6.04	No	No		No	No	No
7	High	Yes		Yes	No	No
8.02	No	No		No	No	No
8.04	No	High		Very High	No	No
8.05	No	No		No	No	No
8.06	No	Yes		No	No	No
8.07	Very High	No		No	No	No
8.08	High	Very High	R/ECAP	Yes	No	No
9.02	Yes	Yes		No	No	No
9.03	Very High	No		No	No	No
9.04	Yes	Yes		No	No	No
10	Very High	Very High	R/ECAP	Yes	No	No
11	High	No		No	No	No
12	No	Yes		Yes	No	Yes
13.03	No	Yes		No	No	Yes
13.05	Yes	No		Yes	No	Yes
13.06	High	Yes		No	No	Yes
13.07	Yes	No		Yes	No	No
13.08	Very High	Yes		Yes	No	No
13.09	Yes	No		No	No	No
13.1	Yes	No		No	No	No



PINAL COUNTY ARIZONA 2024 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Table 1 – Areas of Minority, Poverty and Disability Concentration (Pinal County 2020)

2020 Census Tract Number	Minority Concentration	Poverty Concentration	Racially/Ethnically Concentrated Area of Poverty (R/ECAP)	Disability Concentration	Indian Community	Shared with Casa Grande
14.03	Very High	Yes		Yes	No	Yes
14.04	High	No		No	No	Yes
14.05	No	No		No	No	Yes
14.06	Very High	High	R/ECAP	Yes	No	Yes
14.07	Yes	Yes		Yes	No	Yes
14.08	No	No		Yes	No	Yes
15	Very High	High	R/ECAP	No	No	Yes
16	High	Yes		No	No	Yes
17.01	Yes	No		No	No	No
17.04	Yes	No		No	No	No
17.05	Yes	No		No	No	No
17.06	No	No		No	No	No
17.07	High	No		No	No	No
17.09	Yes	No		No	No	No
17.12	Yes	No		No	No	No
17.13	High	No		No	No	No
17.14	Very High	No		No	No	No
17.15	Yes	No		No	No	No
17.16	Yes	No		No	No	No
17.17	No	No		No	No	No
19	Very High	Yes		Yes	No	No
20.01	Yes	Yes		Yes	No	Yes
20.04	Very High	High	R/ECAP	Yes	No	No
20.05	Very High	Yes		No	No	No
21.04	No	Yes		High	No	No



Table 1 – Areas of Minority, Poverty and Disability Concentration (Pinal County 2020)

2020 Census Tract Number	Minority Concentration	Poverty Concentration	Racially/Ethnically Concentrated Area of Poverty (R/ECAP)	Disability Concentration	Indian Community	Shared with Casa Grande
21.05	Yes	No		Yes	No	No
21.06	Yes	High		Yes	No	No
21.07	No	No		No	No	No
22	No	No		High	No	No
23	No	No		Yes	No	No
24	High	High	R/ECAP	Yes	No	Yes
9412	Very High	Very High	R/ECAP	No	Yes	No
9413	Very High	Very High	R/ECAP	No	Yes	No
9414.01	No	Yes		Yes	Yes	No
9414.02	Very High	High	R/ECAP	No	Yes	No

Areas of Minority Concentration

According to the 2020 US Census Bureau 2020 5-year American Community Survey data, 44.6% of the Pinal County population identifies as a racial or ethnic minority. There are 41 Pinal County census tracts that are considered areas of minority concentration based on 2020 US Census American Community Survey data, including:

- Seventeen (17) census tracts that are areas of minority concentration where the percentage of people who are racial or ethnic minorities is between 49.0% and 58.9%;
- Ten (10) census tracts that are areas of high minority concentration where the percentage of people who are racial or ethnic minorities is between 59.0% and 68.9%; and
- Fourteen (14) census tracts that are areas of very high minority concentration where the percentage of people who are racial or ethnic minorities is 69.0% or more.

As highlighted in Table 1 nine (9) of the minority concentration census tracts are also census tracts with a concentration of people living in poverty, three are Indian communities, and three include parts of Casa Grande, which is a separate CDBG entitlement jurisdiction. A map identifying areas of minority concentration is included as Appendix 2.



A history of institutionalized race-based housing policies, patterns of in-migration, and historic lending practices that negatively impacted minority homebuyers have all contributed to minority concentration areas. Recent research into the history of housing segregation provides insight into how government policies influenced development patterns and access to capital and credit. These policies have had a lasting impact on housing patterns, neighborhood vitality, and individual wealth accumulation.

According to a study by the National Community Reinvestment Coalition (NCRC), from 1935 to 1939, government surveyors interviewed local officials and bankers in 239 cities to document what local lenders considered credit risks in different neighborhoods. The surveyors considered a variety of factors, including access to transportation and the quality of housing. But a primary driver of the grading system was the racial and ethnic makeup of the neighborhood's residents¹⁰. The Homeowners Loan Corporation (HOLC) marked entire communities in red ink where they deemed the influx of racial and ethnic minorities as credit risks. The maps are still known for those red lines and "redlining" is now a modern term for discrimination in housing and lending.

The HOLC maps demonstrated how local banks defined credit risks based on neighborhoods rather than on an individual's ability to repay a loan. In short, they documented institutionalized discrimination. Today, they graphically display how racism was embedded into the structure of American cities from at least the 1930s until 1968, when the Fair Housing Act abolished redlining and banned racial discrimination in housing.

Because Pinal County was sparsely populated, the Homeowners Loan Corporation did not develop redlining maps. Still there was de facto segregation of the White, Black, and Mexican population as migrant networks most often channeled new arrivals to neighborhoods where migrants and immigrants were already settled.

While redlining is no longer a government-sanctioned practice, reverse redlining was heavily practiced during the housing market boom of the early 2000s and continued during the market recovery. Researchers point to aggressive high-cost lending in minority markets¹¹, which increased borrowers' exposure to pricier loans, decreased potential wealth accumulation, and increased the risk of future foreclosure. A 2011 report using data collected by the Pew Research Center notes that accumulated wealth of blacks and Hispanics was disproportionately affected by the 2006 collapse of the housing

¹⁰ HOLC "redlining" maps: The persistent structure of segregation and economic inequality. Bruce Mitchell Phd and Juan Franco, National Community Reinvestment Coalition. March 20, 2018.

¹¹ What Drives Racial and Ethnic Differences in High Cost Mortgages? The Role of High Risk Lenders. Patrick Bayer, Fernando Ferreira, Stephen L. Ross Working Paper. National Bureau of Economic Research February 2016

market and the recession that followed. In 2009, 25% of blacks and Hispanics had no assets other than a car, compared to 6% of whites¹².

In *The Color of Law: A Forgotten History of How our Government Segregated America*, Richard Rothstein explains how the housing programs begun under the New Deal provided housing to white, middle- and lower-middle class families in suburban communities and effectively pushed people of color into urban housing projects. Initially, public housing was developed for whites only in cities across the country, with some separate projects built for African Americans. While there were long waiting lists for African American projects, white projects had higher vacancies and were eventually opened to African Americans. The vacancies in white projects were mostly created by the Federal Housing Administration (FHA) program to suburbanize America, with the FHA subsidizing builders to create “white-only” subdivisions. As industry left the cities for the suburbs, African Americans became poorer and public housing became subsidized housing for poor people, rather than housing for working-class people.

In October 2021, the US Department of Justice (DOJ) launched the Combatting Redlining Initiative. This Initiative seeks to make mortgage credit and homeownership accessible to applicants regardless of the neighborhood in which they hope to purchase a home. Since the Initiative launched, the DOJ announced its sixth redlining settlement. Common complaints filed under the Initiative include avoiding providing mortgage lending services to minority concentration tracts, employing mostly White staff, and failing to market loan products to a broad audience and make services available to people with Limited English Proficiency.

Areas of Poverty Concentration

Poor neighborhoods come with an array of challenges that impact the people who live in the neighborhoods and the regions in which they are located. Residents of poor neighborhoods often face financial insecurity, higher crime rates, limited access to healthy fresh foods, and may have weak job-seeking networks that limit their ability to move out of poverty. Areas with a concentration of people living in poverty may also be areas of minority and/or disability concentration.

According to the 2020 US Census Bureau 2020 5-year American Community Survey data, 13.2% of the Pinal County population lives in poverty. There are 34 Pinal County census tracts that are considered areas of poverty concentration based on 2020 US Census American Community Survey data, including:

- Twenty-two (22) census tracts that are areas of poverty concentration where the percentage of people who live in poverty is between 13.3% and 23.2%;

¹² Kochhar R, Fyr R, Taylor P. Wealth Gaps Rise to Record Highs Between Whites, Blacks, and Hispanics. Washington, DC: Pew Research Center, Pew Social & Demographic Trends; July 26, 2011.



- Twelve (12) census tracts that are areas of high poverty concentration where the percentage of people who live in poverty is between 23.3% and 33.2%; and
- Four (4) census tracts that are areas of very high poverty concentration where the percentage of people who live in poverty is 33.3% or more.

As highlighted in Table 1, four of the poverty concentration census tracts include Indian Communities, and five of the poverty concentration census tracts include parts of the City of Casa Grande, which is a separate CDBG entitlement jurisdiction. A map identifying areas of poverty concentration is included as Appendix 3.

Racially/Ethnically-Concentrated Areas of Poverty (R/ECAPs)

Of the census tracts identified as minority concentration areas, nine are also areas of poverty concentration. All five census tracts encompassing Indian communities are areas of both minority and poverty concentration. Four additional tracts that are concentrated minority and poverty areas are located east of the Town of Florence, in the City of Eloy, and West and South of Casa Grande; three of the R/ECAP tracts include parts of Casa Grande, which is a separate CDBG entitlement jurisdiction. A map identifying R/ECAPs is included as Appendix 4.

Areas of Disability Concentration

According to the 2020 US Census Bureau 2020 5-year American Community Survey data, 16.1% of the Pinal County population has one or more disabilities. There are 36 Pinal County census tracts that are considered areas of disability concentration based on 2020 US Census American Community Survey data, including:

- Thirty-one (31) census tracts that are areas of disability concentration where the percentage of people with disabilities is between 17.6% and 27.5%;
- Four (4) census tracts that are areas of high disability concentration where the percentage of people with disabilities is between 27.6% and 37.5%; and
- One (1) census tract that is an area of very high disability concentration where the percentage of people with disabilities is 37.6% or more.

As highlighted in Table 1, twenty (20) of the disability concentration census tracts are also census tracts with a concentration of people living in poverty. The areas of higher concentration are also areas with a larger population of people age 65 and older. Eight of the disability concentration census tracts include parts of Casa Grande, which is a separate CDBG entitlement jurisdiction. A map identifying areas of disability concentration is included as Appendix 1.

Justice40 Disadvantaged Communities

The Justice40 Initiative provides a tool that identifies disadvantaged communities. Disadvantaged communities are 2010 census tracts where the percent of the census tract’s population in households is at or above the 65th percentile for low income (as measured by being at or below 200% of the Federal poverty level based on the US Census Bureau 2019 American Community Survey data), and that have one or more of the following burdens:

- Climate change - at or above the 90th percentile for expected agriculture loss, expected building loss, expected population loss, or projected flood or wildfire risk.
- Energy - at or above the 90th percentile for energy cost or PM2.5 in the air.
- Health - at or above the 90th percentile for asthma, diabetes, heart disease, or low life expectancy.
- Housing - experienced historic underinvestment or are at or above the 90th percentile for: housing cost, lack green space, lack of indoor plumbing, or lead paint.
- Legacy pollution - has at least one abandoned mine land, formerly used defense site, or are at or above the 90th percentile for proximity to hazardous waste facilities, superfund sites (national priorities list), or risk management plan facilities.
- Transportation – at or above the 90th percentile for diesel particulate matter exposure, transportation barriers, or traffic proximity and volume.
- Water and wastewater – at or above the 90th percentile for underground storage tanks and releases or wastewater discharge.
- Workforce development – at or above the 90th percentile for linguistic isolation, low median income, poverty or unemployment, and more than 10% of people age 25 or older have a high school education. Low-income percentiles are not applied to workforce development burdens.

The Justice40 Initiative identified thirty-two (32) 2010 low-income census tracts as disadvantaged. The primary contributors to disadvantaged designation were agriculture loss, wildfire risk, unemployment, and DOT Transit barriers. A map and list of Justice40 Disadvantaged Communities (census tracts) and contributing factors is included in Appendix 5.

Justice40 Contributing Factor	2010 Low-income Census Tracts Impacted
Agriculture Loss	22
Wildfire Risk	13
Unemployment	12
DOT Transit Barriers	11
Diabetes	9
Heart Disease	7
Low HS Attainment	6
Energy	4
Asthma	4
Low Life Expectancy	4
Former Defense Site	3
Flood Risk	2
RMP Facilities	2
Linguistic Isolation	2
Housing Burden	1
Wastewater Discharge	1
Building Loss	0
Population Loss	0
PM2.5 Exposure	0
Lead Paint	0
Historic Underinvestment	0
Abandoned Mine	0
Hazardous Waste	0
Superfund Sites	0
Diesel Particulate	0
Traffic Proximity and Volume	0
Leaky Underground Storage Tank	0



Subsidized Rental Housing and Voucher Holder Concentrations

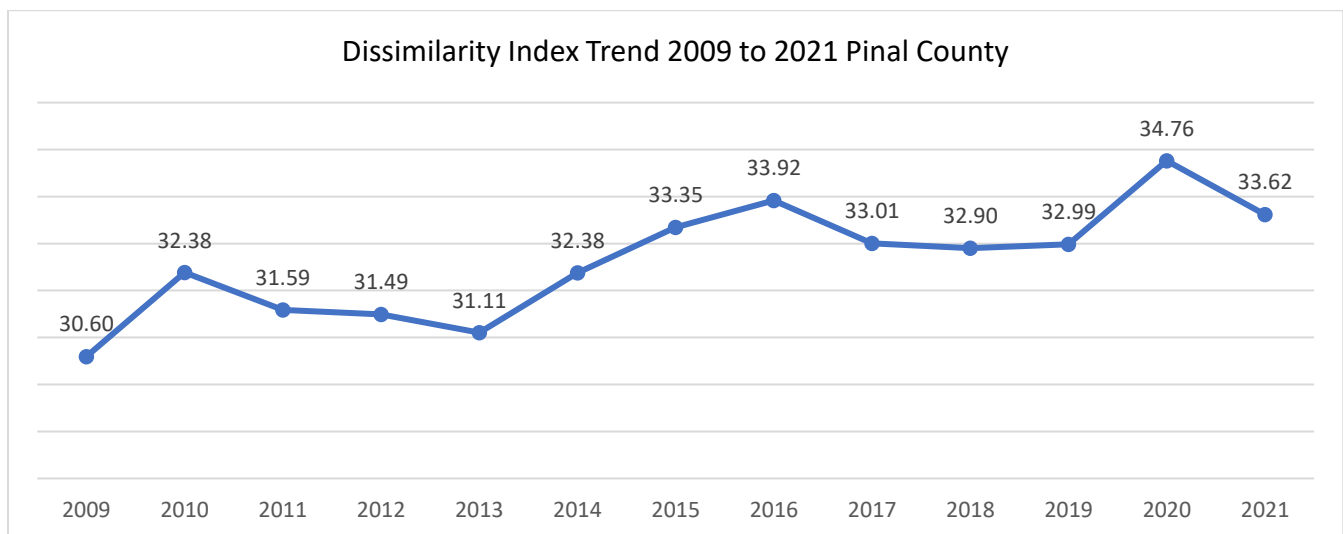
The maps in Appendix 6 show the locations of subsidized multi-family housing in Pinal County, which are primarily Low-income Housing Tax Credit properties. There is one assisted multi-family property in the City of Eloy. The map demonstrates the clustering of multi-family housing in and around the City of Casa Grande, with properties also located in or near Eloy, Maricopa, and Coolidge. Voucher holders are generally clustered in and around Casa Grande.

Dissimilarity Index

The Racial Dissimilarity Index is another measure of racial segregation. It measures the percentage of the non-Hispanic White population in a county that would have to change the census tract in which they live to equalize the white and non-white population across all census tracts in the county. Ranging from 0 to 100, a high value indicates that the two groups live in different tracts. 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 low¹³.

As demonstrated in the following chart drawn from the Federal Reserve Board of St. Louis¹⁴, the 2021 dissimilarity index in Pinal County is generally low, although the index has increased over the past decade.



Fair Housing Enforcement Activity

Complaint and complaint outcome data, along with the results of fair housing testing provide insight into housing discrimination or fair housing violations that may be occurring. The HUD Enforcement Management System (HEMS) automates the monitoring and compliance review business processes for multiple enforcement activities including Office of Fair Housing and Equal Opportunity (FHEO) and Fair Housing Assistance Program (FHAP) grantees. HUD contracts with the Arizona Attorney General’s Office (AGO) through their Fair Housing Assistance Program (FHAP) to process complaints alleging violations of the Fair Housing Act in Arizona.

HUD Enforcement Management System (HEMS) Data

The HUD Fair Housing and Equal Opportunity Office reported 18 complaints in Pinal County between January 1, 2019 and December 31, 2022. Of complaints filed, 39% were on the basis of disability, 28% were on the basis of race or sex. Complaint data closely mirrors other data analyzed for this assessment. Two complaints included retaliation, or punishing or otherwise striking out against someone for filing a complaint.

Table 2 - Fair Housing Complaints Originating in Pinal County from January 1, 2019 to December 31, 2022					
	2019	2020	2021	2022	Total
Total	5	4	4	5	18
Race	0	2	2	1	5
National Origin	0	1	1	0	2
Religion	0	0	0	1	1
Sex	0	0	2	3	5
Disability	4	1	0	2	7
Familial Status	1	1	0	0	2
Retaliation	1	0	0	1	2
Note: A complaint may include more than one basis					
Source: US Department of Housing and Urban Development Region IX Fair Housing and Equal Opportunity Office					



Fair Housing Issues

There were 34 issues identified in the 18 filed complaints, reflecting the complexity of Fair Housing laws and the multiple ways in which people might be discriminated against. Four of ten (41%) filed cases included discriminatory terms, conditions, privileges, or services and facilities. Eighteen percent (18%) of cases included either discriminatory refusal to rent or failure to permit or make a reasonable accommodation.

Four of ten fair housing complaints filed by Pinal County residents identified discriminatory terms, conditions, privileges, or services and facilities as an issue.

Table 3 - Issues in Fair Housing Complaints Originating in Pinal County January 1, 2019 to December 31, 2022					
	2019	2020	2021	2022	Total
Total Cases Filed	5	4	4	5	18
Total Issues Included in Cases	13	6	5	10	34
Discriminatory refusal to sell	0	0	1	0	1
Discriminatory refusal to rent	3	0	1	2	6
Discriminatory advertising, statements, and notices	1	0	0	0	1
Discriminatory financing (includes real estate transactions)	0	0	1	0	1
Discriminatory terms, conditions, privileges, or services and facilities	4	4	2	4	14
Other discriminatory acts	0	1	0	2	3
Discriminatory acts under Section 818 (coercion, Etc.)	1	0	0	1	2
Failure to permit reasonable modification	2	1	0	0	3
Failure to make reasonable accommodation	2	0	0	1	3
Note: A complaint may include more than one basis and more than one issue.					
Source: US Department of Housing and Urban Development Region IX Fair Housing and Equal Opportunity Office					



Discriminatory terms, conditions, privileges, or services and facilities may include:

- Using different provisions in leases or contracts of sale, such as those relating to rental charges, security deposits and the terms of a lease and those relating to down payment and closing requirements.
- Failing or delaying maintenance or repairs of sale or rental dwellings based on the protected class of a resident or prospective purchaser.
- Failing to process an offer for the sale or rental of a dwelling or to communicate an offer accurately because of the protected class of the prospective renter or purchaser.
- Limiting the use of privileges, services or facilities associated with a dwelling because of the protected class of an owner, tenant, or person associated with an owner or tenant.
- Denying or limiting services or facilities in connection with the sale or rental of a dwelling because a person failed or refused to provide sexual favors.
- Conditioning the terms, conditions, or privileges relating to the sale or rental of a dwelling, or denying or limiting the services or facilities in connection with a dwelling based on a person's response to harassment.
- Subjecting a person to harassment because of their protected class that has the effect of imposing different terms, conditions, or privileges relating to the sale or rental of a dwelling or denying or limiting services or facilities in connection with the sale or rental of a dwelling.

Discriminatory refusal to rent or sell includes:

- Failing to accept or consider a *bona fide* offer because of protected class status.
- Refusing to sell or rent a dwelling to, or to negotiate for the sale or rental of a dwelling with any person because of protected class status.
- Imposing different sales prices or rental charges for the sale or rental of a dwelling upon any person because of protected class status.
- Using different qualification criteria or applications, or sale or rental standards or procedures, such as income standards, application requirements, application fees, credit analysis or sale or rental approval procedures or other requirements, because of protected class status.
- Evicting tenants because of protected class status of tenant or a tenant's guest.
- Conditioning the availability of a dwelling, including the price, qualification criteria, or standards or procedures for securing the dwelling on a person's response to harassment because of protected class status.
- Subjecting a person to harassment because of protected class status that causes the person to vacate a dwelling or abandon efforts to secure the dwelling.

Failure to permit or make a reasonable accommodation includes:

- Refusing to make a change, exception, or adjustment to a rule, policy, practice, or service to accommodate a person with a disability, when the accommodations may be necessary to afford persons with disabilities an equal opportunity to use and enjoy a dwelling unit and public and common use areas.
- Refusing to permit, at the expense of the person with a disability, reasonable modifications of existing premises occupied or to be occupied by a person with a disability if such modifications may be necessary to afford the person full enjoyment of the premises.

Complaint Disposition

Fair Housing complaints may take a lengthy time to process and are often not closed in the same year they are received. HUD's records show 16 fair housing complaints were resolved or disposed of between January 1, 2019 and December 31, 2022. Complaints may be resolved and closed for one of three reasons:

1. Conciliation/settlement occurs when a complainant and respondent agree to the relief sought for the complainant, and the agreement will adequately vindicate the public interest.
2. No cause closure occurs when, after investigation, there is no reasonable cause to believe that discrimination occurred. No cause closures may be reconsidered at the request of the complainant.
3. Withdrawal after resolution occurs when the complainant and respondent resolve a complaint without the intervention and the complainant requests the complaint be withdrawn.

Of the complaints processed, one was conciliated and settled, four were withdrawn after resolution, and eleven were found to have no cause. The high number of complaints that result in a no cause finding may indicate a low number of meritorious complaints or the need for assistance from Fair Housing Initiative Programs that can help complainants navigate the complaint filing process and communicate the nature of their complaint with investigators.

A high number of complaints resulting in a no cause finding may indicate a need for assistance that can help complainants navigate the complaint filing process.

Table 4 - Disposition of Fair Housing Complaints in Pinal County from January 1, 2019 to December 31, 2022					
	2019	2020	2021	2022	Total
Total	4	2	7	2	16
Conciliation/Settlement	0	0	0	1	1
No Cause	1	2	6	2	11
Withdrawn after Resolution	3	0	1	0	4
Note: Disposition of complaints may occur in a year other than when filed. Source: US Department of Housing and Urban Development Region IX Fair Housing and Equal Opportunity Office					

Southwest Fair Housing Council Inquiries

The Southwest Fair Housing Council (SWFHC) is a Tucson-based Fair Housing organization that provides services throughout Arizona. In addition to advocating for and facilitating enforcement of Federal and State Fair Housing Acts, SWFHC provides fair housing and other housing referrals to housing providers and the public free of charge. If an inquiry is fair housing based, SWFHC first counsels the complainant or housing professional on how to resolve their issue according to the Fair Housing Act. This is especially common when resolving disputes concerning reasonable accommodations and modifications for persons with disabilities in a rental setting. If the inquiry is an Arizona Landlord and Tenant Act dispute or any other type of housing question, SWFHC refers individuals to various agencies and to nonprofit legal assistance.

In 2022, SWHFC received sixteen (16) inquiries from residents of Pinal County and municipalities within Pinal County. Of the inquiries received:

- Four (4) were from residents of unincorporated Pinal County;
- Eleven (11) were initiated by a person identifying as female;
- Ten (10) were from households that include a person with a disability; and
- Nine (9) were from households that include a person who identifies as a racial or ethnic minority.



Public Policies and Practices

To examine public policies and practices that may create regulatory barriers to affordable housing development, access to opportunity, and to fair housing, the Pinal County Community Development Department completed HUD’s Regulatory Barriers and Fair Housing Assessment checklists. Based on these checklists and the regulatory barriers assessment conducted for Pinal County’s upcoming HUD Consolidated Plan, the county is in the process of updating its zoning ordinance and is considering an update of the Comprehensive Plan Housing Element to take a more proactive approach to eliminating barriers to affordable housing development and to fair housing.

Pinal County identified nine regulatory actions that could potentially have a positive impact on housing affordability, housing choice and access to opportunity for a range of households. Further analysis is underway!

Policies and procedures to implement HUD programs were also examined to identify any practices that could serve as impediments to fair housing choice.

Community Development Policies

Pinal County identified multiple factors and potential solutions to each identified factor that require further exploration to determine their potential positive impact on housing affordability, housing choice, and access to opportunity for a range of households. As funding allows, the following actions may be conducted by Pinal County Community Development:

1. Conducting additional assessment of the current and future estimated demand for housing by low-, moderate-, and middle-income households, including the type and density of housing needed, recommended locations for needed housing, and how current zoning will address the estimated demand.
2. Examining how tools currently available under Arizona law, such as Redevelopment Districts and Infill Incentive Districts, could address challenges with density, infrastructure standards (road widths, sidewalks, etc.), setback requirements, and parking requirements.
3. Continually assessing the availability and diversity of housing opportunities through review of rules, regulations, development standards and processes in relation to housing affordability and access to housing opportunities.
4. Examining development impact fee reimbursement, as governed by Arizona law, as a mechanism to encourage higher-density and affordable housing opportunities.
5. Assessing how permitting HUD-code manufactured housing in all residential districts and zoning classifications in which similar site-built housing is permitted, subject only to requirements of

other housing deemed realty could expand housing choice. Specifically, facilitating the use of park model units as accessory dwellings, consistent with Arizona law.

6. Assessing how special districts, such as Community Facilities Districts or Improvement Districts, could provide alternate funding options for infrastructure that will be necessary to develop land zoned for higher-density development.
7. Endeavoring to consolidate the application, review, permitting, and approval processes under a One-Stop Shop concept by combining multiple departments to have building safety, zoning, planning, engineering, and environmental and related permits in one department.
8. Facilitating on-site supportive services for housing occupied by people with disabilities to improve access to housing through the Special Density Permit (SDP) process.
9. Educating developers and stakeholders on inclusive design standards to increase housing choice for persons with disabilities.

HUD Program Policies and Procedures

Examination of policies and practices in HUD Housing and Community Development Programs revealed efforts to promote and expand housing choice:

1. The Public Housing Authority maintains a Fair Housing Plan that includes specific actions and policies that prohibit discrimination and discriminatory practices based on race, color, creed, sex, religion, age, disability, national origin, actual or perceived sexual orientation, gender identity, marital status, or familial status.
2. The Public Housing Authority provides for reasonable accommodation and modification requests at any time.
3. The County makes available resources for housing rehabilitation, including disability accessibility improvements, to remove barriers to safe access, allow a greater level of independent living, and reduce institutionalization.
4. Developer applicants for projects containing five (5) or more HOME-assisted units are required to comply with affirmative marketing procedures. Applicants must include a description of how the project plans to inform the public, owners, and potential tenants about their affirmative marketing policy and the Federal fair housing laws and a statement of procedures used by owners to inform and solicit applications from persons in the housing market areas who are least likely to apply for the housing without special outreach.

Additional collection and sharing of local fair housing information and data is needed to guide future fair housing activities.

Home Mortgage Disclosure Act (HMDA) Data

Home Mortgage Disclosure Act (HMDA) data is the largest source of publicly available data on mortgage lending in the United States. HMDA was originally enacted by Congress in 1975. Over the years, amendments to HMDA and agency rulemakings have changed the data that is required to be reported under HMDA, and the financial institutions that are required to report.

Collectively, the Board of Governors of the Federal Reserve System (FRB), the Federal Deposit Insurance Corporation (FDIC), the National Credit Union Administration (NCUA), the Office of the Comptroller of the Currency (OCC), and the CFPB comprise the Federal Financial Institutions Examination Council (FFIEC), a governmental interagency body that facilitates public access to HMDA data. HMDA data can be used to assist:

- In determining whether financial institutions are serving the housing needs of their communities;
- Public officials in distributing public-sector investments to attract private investment to areas where it is needed; and
- In identifying possible discriminatory lending patterns.

Home Mortgage Disclosure Act (HMDA) Loan Applications and Outcomes

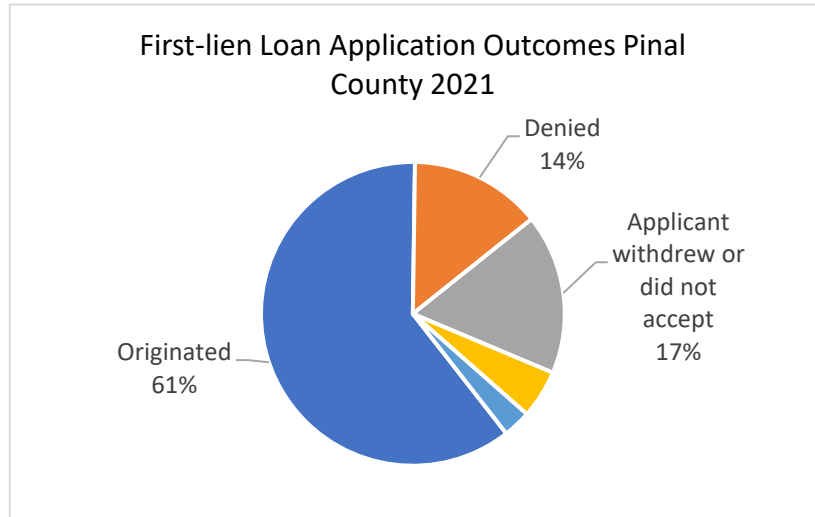
An analysis of Home Mortgage Disclosure Act (HMDA) data for 2021 (the latest year for which complete information was available) was conducted to identify any disparities based on borrower race, ethnicity, income, the census tract of the unit in which the loan applicant was seeking financing, the type of financing, and the type of housing. The analysis included first lien applications made, and loans originated, denied, withdrawn, or not originated for other reasons, and the reasons for loan denial.

Given the current volume of loan applications and originations, the homeownership rate among White non-Hispanic households will continue to grow disproportionate to the homeownership rate of households of other races and ethnicities.

All Loan Application Outcomes

Of the 3,609 total loan applications reported, 2,338 contained data on race and ethnicity and were included in the analysis of loan applications. Of the 2,338 loan applications that included data on race and ethnicity:

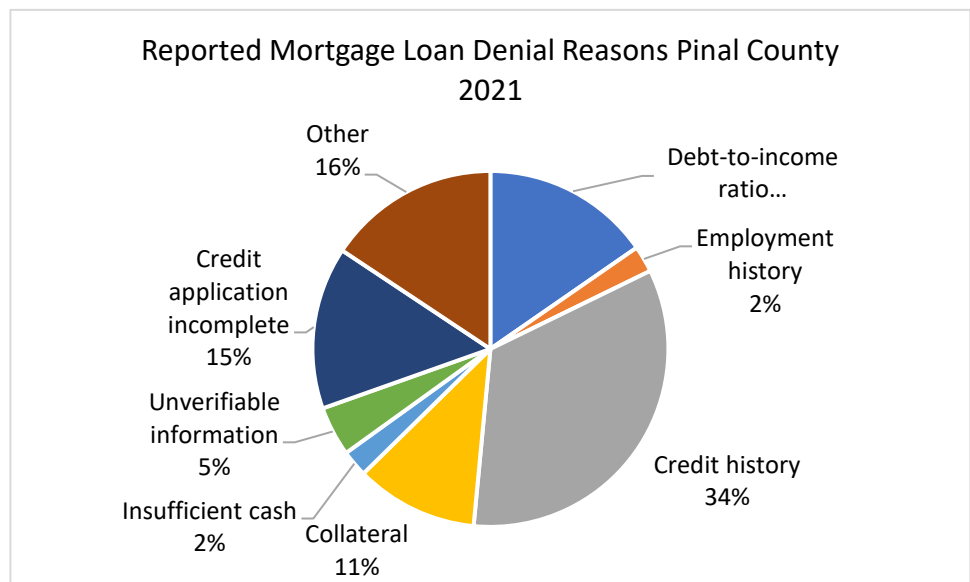
- 1,418 (61%) were originated;
- 328 (14%) were denied, including 4 denied at preapproval request;
- 63 (3%) were approved but not accepted by the applicant;
- 335 (14%) were withdrawn by the applicant; and
- 120 (5%) were closed by the lender for incompleteness.



Loan Denial Reasons

Loan denials can occur for many reasons. When reporting HMDA data, lenders provide a primary reason for loan denial, which may include: collateral, incomplete credit application, credit history, debt-to-income ratio, insufficient cash (down payment, closing costs), “other”, employment history and unverifiable information.

One third (34%) of all loan applications were denied for credit history, followed by other unspecified reasons (16%), debt-to-income ratio (15%), and incomplete credit application (15%).



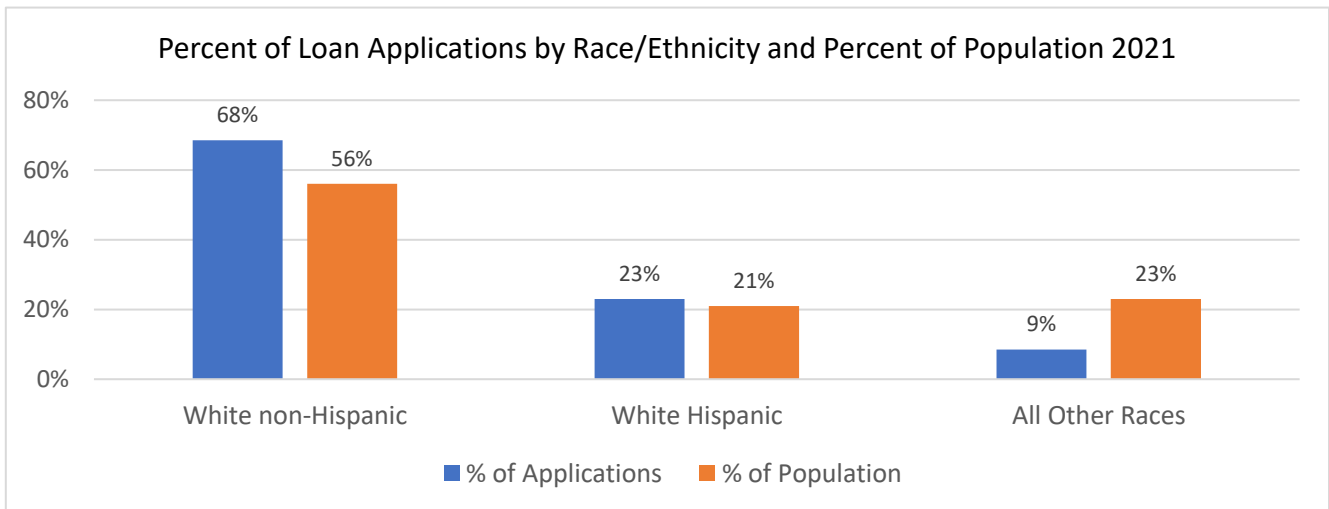
Loan Applications and Outcomes by Applicant Race and Ethnicity

Of loan applications made in 2021:

- Sixty-eight percent were made by people who identified as White non-Hispanic;
- Twenty-three percent were made by people who identified as White Hispanic; and
- Nine percent were made by people who identified as a race other than White.

White non-Hispanic borrowers apply for home mortgage loans at higher rates than borrowers of other races and ethnicities.

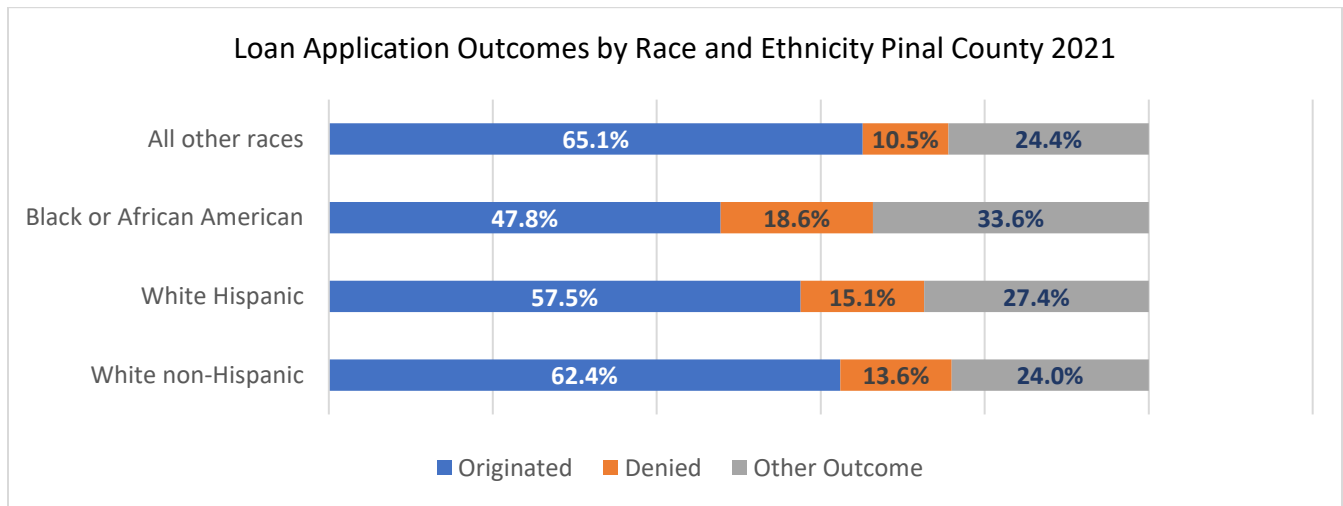
Proportionate to population, White non-Hispanic households apply for mortgage loans at much higher rate than do borrowers of other races and ethnicities and are also more likely to have a long originated.



White non-Hispanic loan applicants are also more likely to have a loan originated than are White Hispanic or Black/African American loan applicants. Among all loan applicants:

- Black/African American applicants had the highest rates of loan denial (18.6%) followed by White Hispanic applicants (15.1%), applicants of 2 or more races (14.3%), and White non-Hispanic applicants (13.6%).
- Loan applications not originated for other reasons were highest among Black/African American applicants (33.6%), followed by White Hispanic (27.4%), Native Hawaiian/Pacific Islander (30.0%) and Native American (27.6%) applicants. Loan applications not originated for other reasons are sometimes referred to as “soft denials” because the transaction is not completed for unstated reasons.

Black/African American mortgage loan applicants had the highest rates of loan denial and loans not originated for specified reasons in 2021.

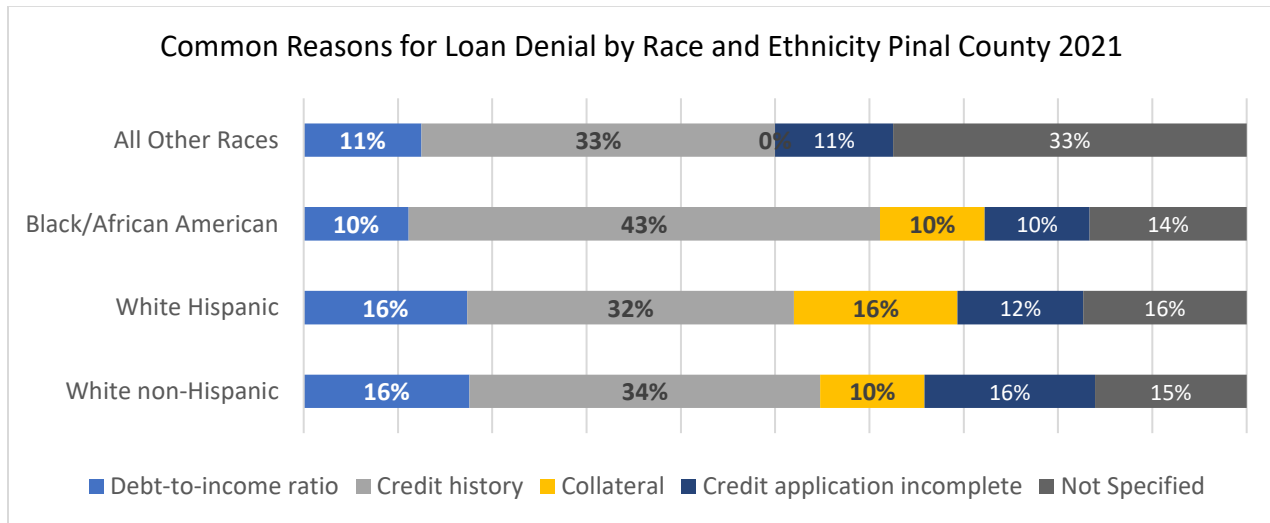


Loan Denial Reasons by Race and Ethnicity

Loan denial reasons were examined by race and ethnicity. This analysis indicated that:

- Black/African American loan applicants were 1.27 times more likely than White non-Hispanic loan applicants to be denied due to credit history;
- White Hispanic loan applicants were 1.6 times more likely than White non-Hispanic loan applicants to be denied due to collateral; and
- Loan applicants of all other races and ethnicities were 2.3 times more likely than White non-Hispanic loan applicants to be denied for unspecified reasons. Denial for unspecified reasons creates challenges in helping loan applicants overcome barriers to homeownership.

“Soft loan denials” or loans that are not originated for specific reasons are 2.3 times more likely among minority home loan applicants.



Loan Applications and Outcomes by Gender

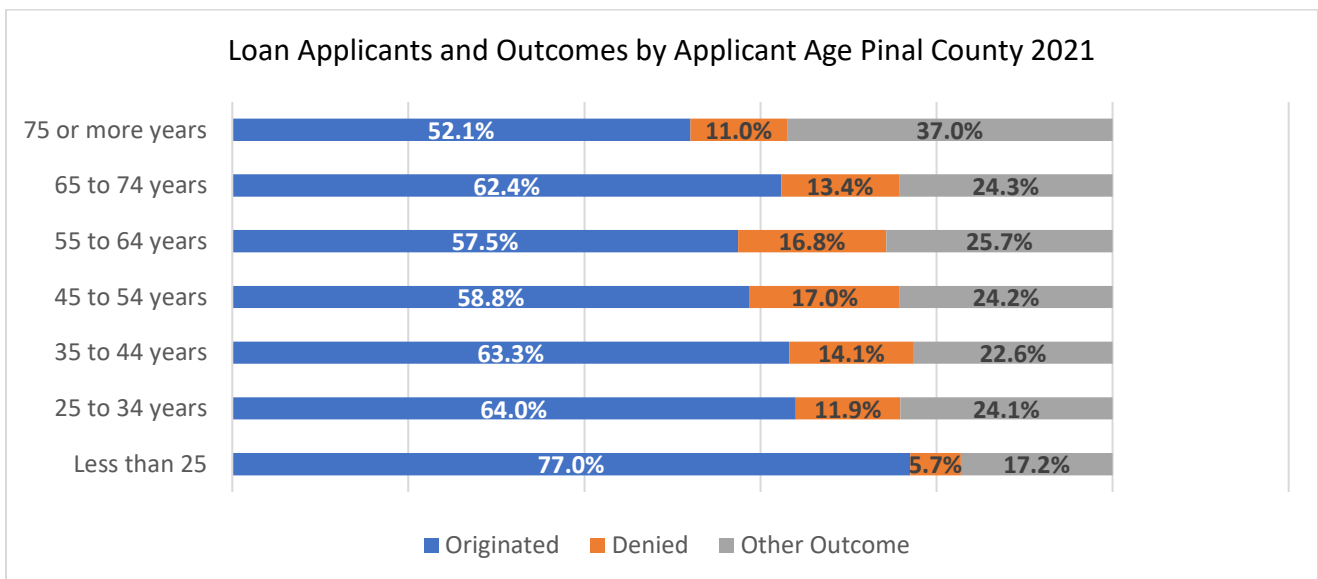
In 2020, 41% of loan applications were made by males, 22% were made by females and 37% were joint applications. Loan originations were highest for joint applicants, with 63.2% of loan applications resulting in originated loans. Male and female loan applicants were equally likely (60.5%) to have their loan application result in an origination; however, the rate of loan denial was higher for female applicants (16.6%) than for male applicants (14.9%); male applicants were more likely to be denied for other reasons.

Female home loan applicants experienced higher rates of loan denial for unverifiable information, insufficient cash, and debt-to-income ratio.

- Female loan applicants were four times more likely than joint or male applicants to be denied for unverifiable information, 2.3 times more likely than joint or male applicants to be denied for insufficient cash, and 1.9 times more likely than joint or male applicants to be denied for debt-to-income ratio.

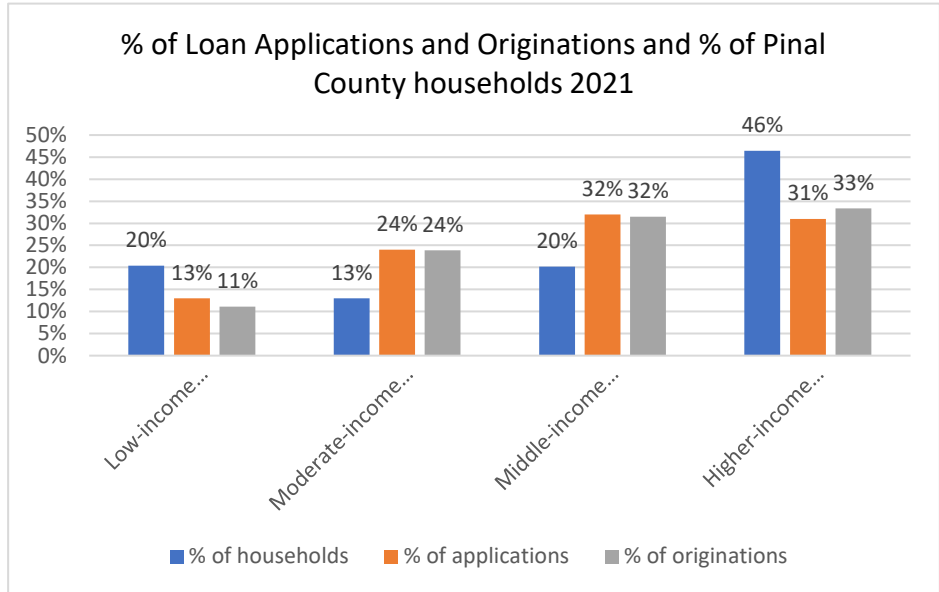
Loan Applications and Outcomes by Age

In 2021, fifty-five percent of loan applications were made by applicants age 55 or older. The volume of applications from households over age 55 reflects the movement of older householders into and within Pinal County. Denial rates were highest among applicants age 45 to 64 (17%) and lowest among applicants under age 25 years (6%). Among applicants age 45 to 64 whose applications were denied, the most common reasons were credit history (36%), followed by debt-to-income ratio (19%).



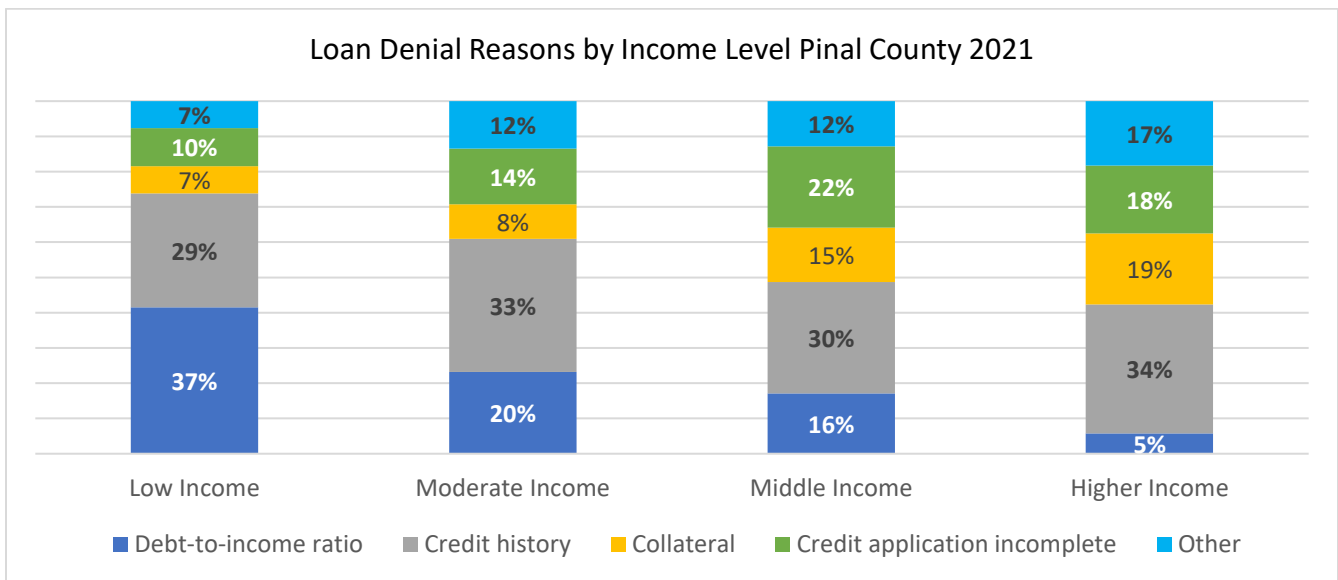
Loan Applications and Outcomes by Income

As household income increases so does the likelihood of being able to afford a home purchase. Proportionate to their share of Pinal County households, low-income and higher-income households were less likely to apply for a home mortgage loan in 2021 than were moderate- and middle-income households. Lower-income loan applicants were less likely to have their loan originated than were moderate- and middle-income loan applicants, while higher-income households had higher origination rates.



Loan Denial Reasons by Income

While credit history is a consistent reason for loan denial at all income levels, the rate of denial for debt-to-income ratio is as much as 7 times higher for lower-income loan applicants than for loan applicants at higher income levels. Conversely, middle- and higher-income loan applicants were more likely to have a loan denied for collateral reasons.

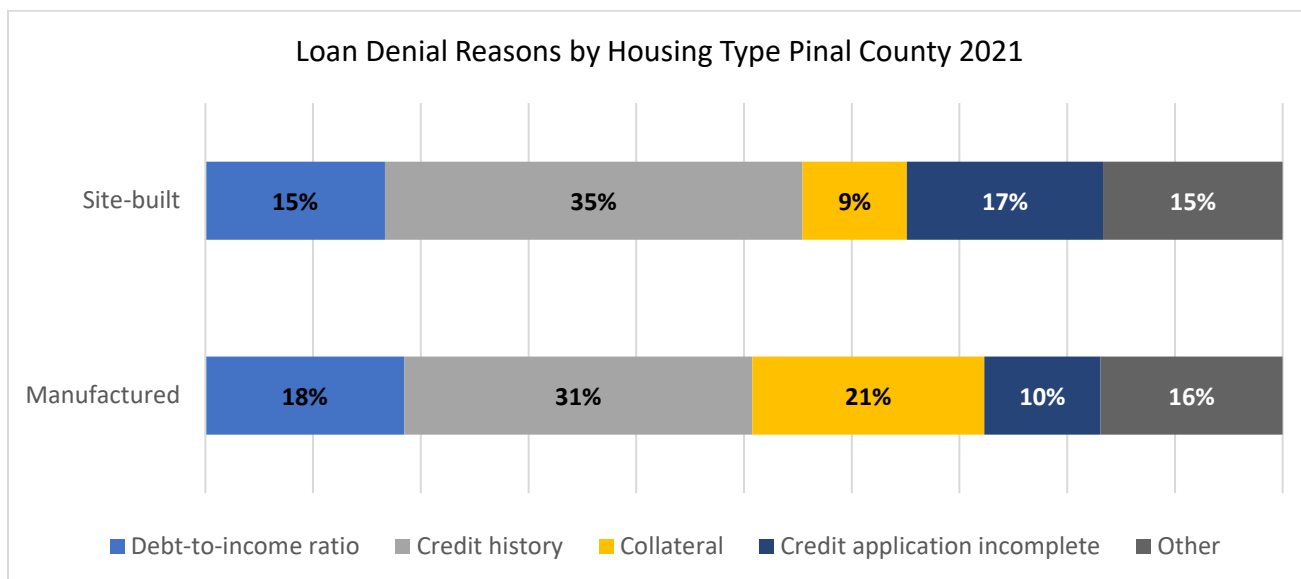


Loan Applications and Outcomes by Housing Type

In 2021, 14.2% of loan applications were for manufactured housing. Of applications for manufactured housing 53% were originated, 19% were denied and 28% were not originated due to withdrawal by the applicant or closure for incompleteness by the lender. Comparatively, of applications for site-built housing 62% were originated, 13% were denied and 25% were not originated for other reasons. While this data suggests that applicants for manufactured housing loans were twice as likely to be denied for collateral reasons than were applicants for site-built housing, nearly one-quarter (27%) of manufactured housing loan application denials were made by one lender. The same lender reported 39% of manufactured housing loan applications not originated for other reasons.

When controlling for the one lender reporting data outside of the norm, 70% of manufactured housing loan applications were originated, 11% were denied, and 18% were not originated for other reasons. Additional detail regarding manufactured housing lending is included in the Higher-volume Lenders discussion in this analysis.

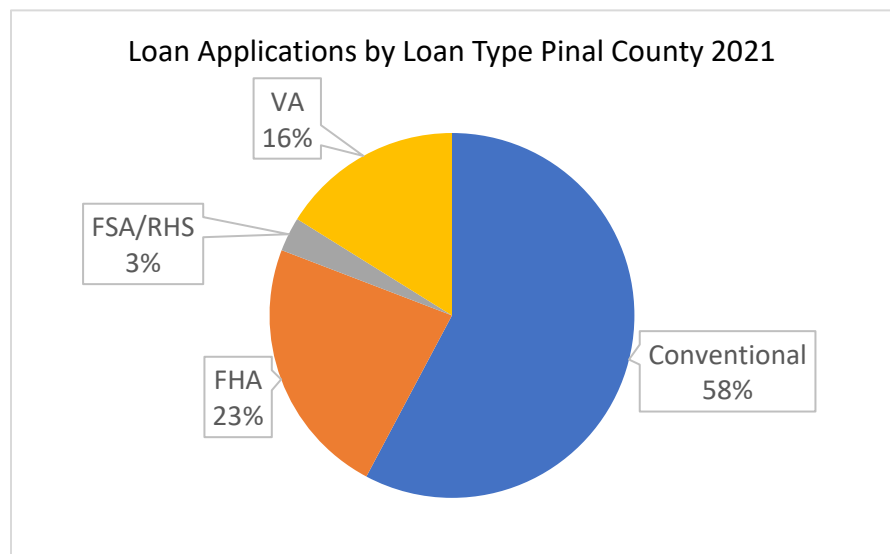
Applications for manufactured housing mortgage loans are 2.3 times more likely to be denied for collateral reasons than are mortgage loan applications for site-built housing. Applicants for manufactured housing mortgage loans are slightly more likely to be denied for credit history or debt-to-income ratio, while applicants for site-built housing mortgage loans are 1.5 times more likely to be denied for an incomplete credit application.



Loan Applications and Outcomes by Loan Type

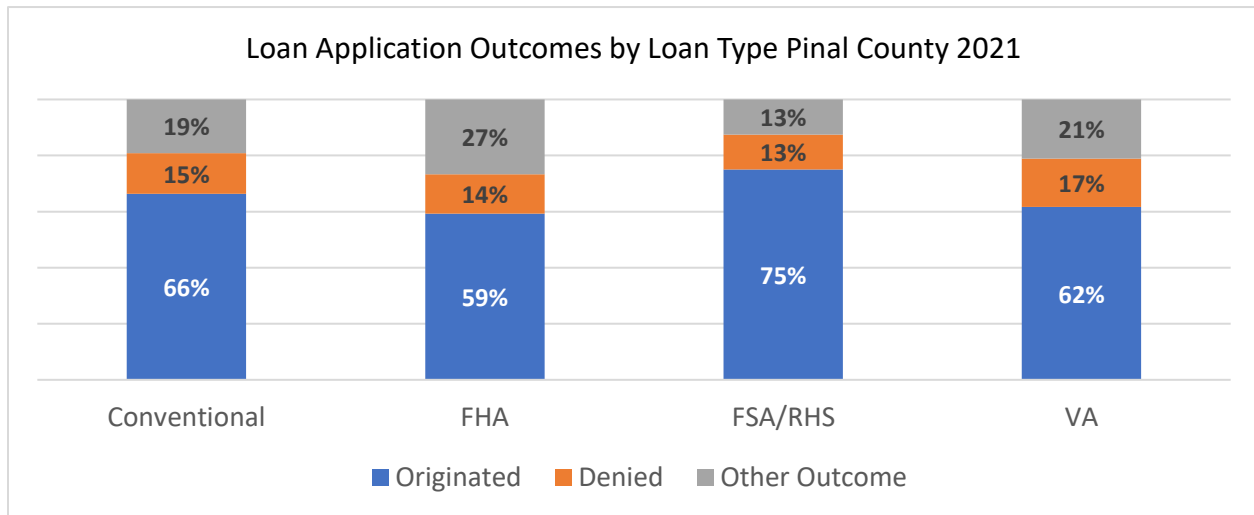
There are four primary loan types reported in HMDA. Each loan type has distinct characteristics that borrowers must meet to qualify.

1. Conventional loans are the most widely used loan type. Lenders establish qualifying criteria based on Fannie Mae, Freddie Mac or other secondary market purchaser requirements. Conventional loans require a higher credit score than other types of mortgages and with a large enough down payment do not require mortgage insurance, which can add significantly to the overall cost of borrowing.
2. Federal Housing Administration (FHA) loans are government backed, allow lower credit scores than conventional loans, may allow for higher debt-to-income ratios, have lower loan limits and often lower down payment requirements, have more stringent property standards requirements, require FHA mortgage insurance even with a higher down payment, yet are generally easier to refinance than conventional loans.
3. US Department of Agriculture Rural Housing Services (FSA/RHS) loans are government backed and available to borrowers in designated rural areas. Like FHA loans, they allow lower credit scores than conventional loans; however, unlike FHA loans up to 100% of the property value plus any closing costs may be financed. FSA/RHS loans generally take longer to process than other loan types because they are underwritten twice – first by the lender and then by USDA.
4. Veteran’s Administration (VA) loans are government backed and available to active duty servicemembers, National Guard and Reserve members, Veterans, and some surviving spouses. The biggest difference between VA loans and other government-backed loans is that no mortgage insurance premium is required, which can significantly reduce the cost of borrowing over time.

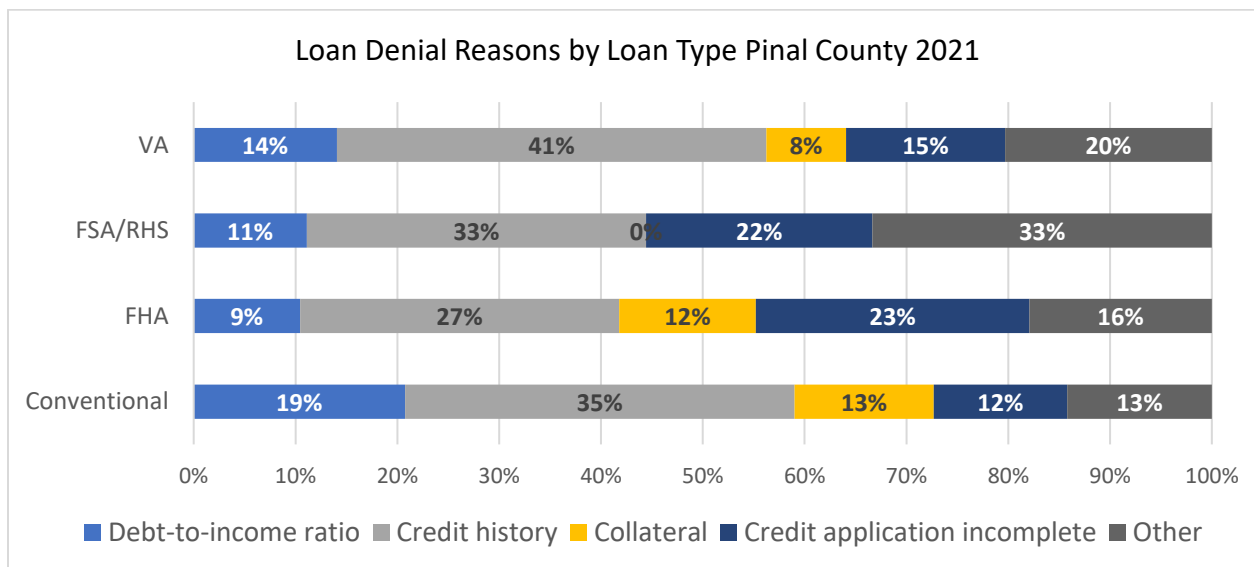


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FSA/RHS loan applications had the highest origination rate and lowest denial or other-outcome rate. Conventional loan applications were more likely to be originated than were VA loan applications or FHA loan applications. VA loan applications were the most likely to be denied, while FHA loan applications were more likely to not be originated for other reasons.



Debt-to-income ratio was more likely to factor into loan denial for conventional loan applicants, while credit history was a more prevalent loan denial reason for VA loan applicants. FHA and Conventional loan applications were more likely to be denied for collateral reason than other types of loan applications.



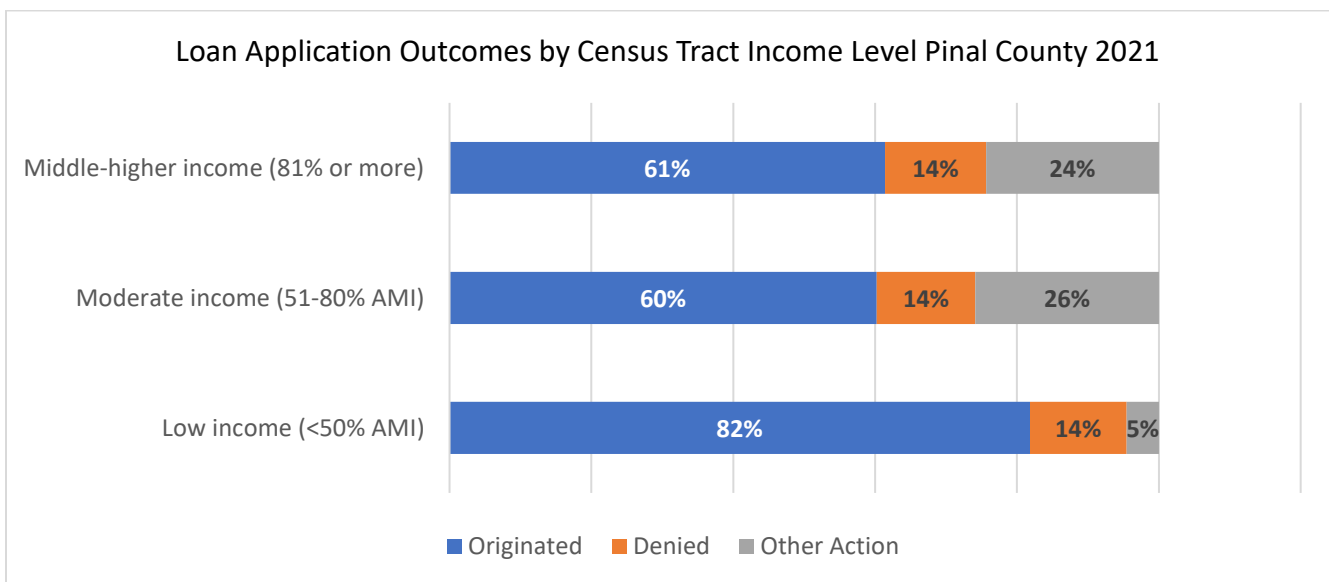
Loan Applications and Outcomes by Census Tract

Examining loan origination data through the lens of income and minority concentration tracts can help to identify whether redlining may be a concern in Pinal County.

Loan Applications and Outcomes by Census Tract Income Level

HMDA data was examined by census tract income compared to median income. Tracts were categorized based on the tract income level percentage of the Pinal County area median income (AMI). Of the 2,500 loans analyzed by census tract income level, 1% were in low-income census tracts, 53% were in middle-income census tracts, and 46% were in middle-higher income census tracts.

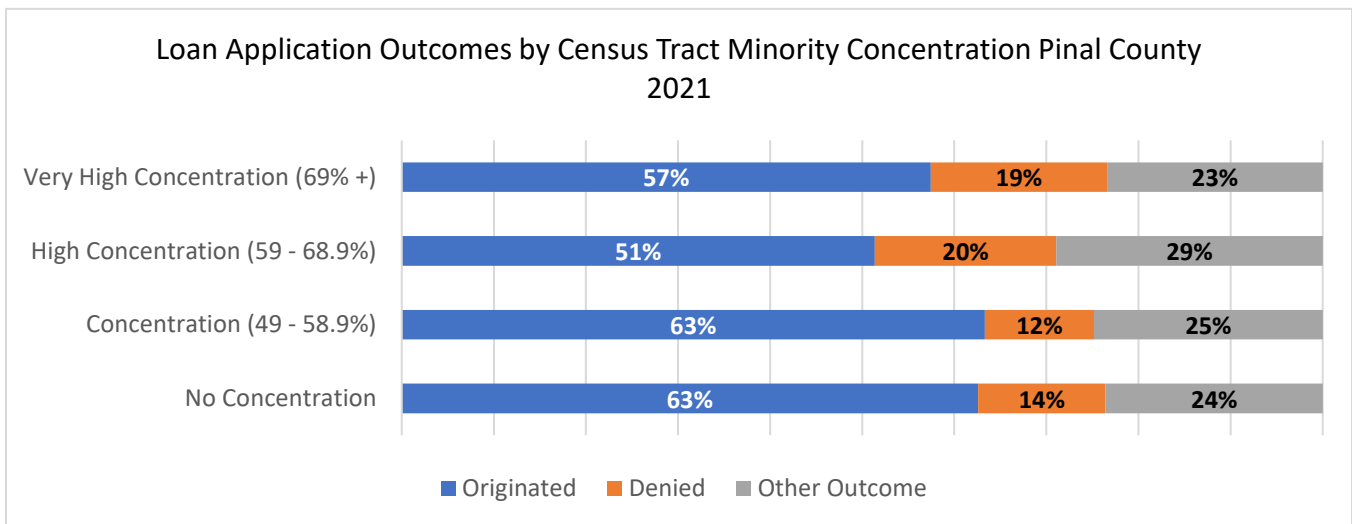
Analysis of loan applications by census tract income level revealed that loan origination rates were higher in low-income census tracts. No additional analysis of loan denials based on census tract income level was conducted.



Loan Applications and Outcomes by Census Tract Minority Level

HMDA data was examined by the percentage of minority households by census tract. Of the 2,500 loan applications analyzed by census tract, only 1.9% were in very-high minority concentration tracts, while 16.1% were in high concentration tracts, 41.6% were in concentration tracts and 40.4% were in tracts with no minority concentration. Analysis of loan applications by census tract minority

concentration revealed that loan denial rates were 1.4 times higher in high and very-high concentration tracts than in tracts with no concentration. The lowest rates of denial were in minority concentration tracts. HMDA data was then further analyzed to assess denial reasons and the influence of housing and loan type on loan origination or denial.



While credit history is the primary reason for loan denials in all census tracts, loan applicants in high and very-high concentration tracts were 2.9 times more likely to be denied for collateral reasons. While this suggests that appraisal bias may exist in census tracts with a higher concentration of minorities, manufactured housing loan applications were 5.7 times more

prevalent in high minority concentration tracts. Manufactured housing loan applications are also more likely to be denied than are loan applications for site-built housing. Further analysis indicates that the higher rate of denial is related to manufactured housing and not to minority concentrations.

Higher-priced Mortgage Loan Originations

The Average Prime Offer Rate (APOR) is an annual percentage rate that is based on average interest rates, fees, and other terms on mortgages offered to highly qualified borrowers. First-lien mortgages are considered higher-priced if the annual percentage rate is 1.5 percentage points higher than the APOR. Higher-priced loans are more common for borrowers with credit imperfections, for FHA-guaranteed loans due to the higher risk associated with lower down-payment requirements, and for manufactured housing.

Responsible higher-priced lending is an essential part of the mortgage market. It serves legitimate credit needs and provides homeownership opportunities and the potential for wealth generation. Higher-cost

loans were common during the housing boom of the early 2000s and are much less common in today's market, yet it is important to assess whether higher-priced loans are disproportionately taken by certain groups of borrowers.

In 2021, there were 188 higher-priced loans originated in Pinal County. Higher-priced loans represented 8% of all loans originated. Nearly all the higher-priced loans were made to White borrowers (95%). Borrowers purchasing manufactured homes were more likely to receive a higher-priced loan than purchasers of site-built housing - one third (32.5%) of higher-priced loans were made for manufactured housing.

Higher-Volume Lenders

Mortgage lenders often market themselves through a particular feature that becomes identified with their brand. Some mortgage lenders become expert in different types of mortgage loans. This expertise, combined with targeted marketing creates niches for some lenders in working with low-income and minority borrowers, with government loan products, or with manufactured housing.

For the purposes of this analysis, a higher-volume lender is a lender that reported more than 55 loan applications in 2021. Eleven lenders met the criteria. Thirty-seven percent (37%) of loans applications were made to these higher-volume lenders, and higher-volume lenders originated 64% of loans made.

Lender	Applications	Originated	Denied	Withdrawn	Closed for Incompleteness
Rocket Mortgage	219	170	31	17	1
Nova Financial & Investment Corp	161	120	9	24	11
United Wholesale Mortgage	132	103	13	12	4
Fairway Independent Mortgage Corp	147	106	17	21	0
21st Mortgage Corp	128	11	66	10	41
Freedom Mortgage Corp	123	65	8	25	25
Loandepot.com	110	82	16	12	0
Academy Mortgage Corp	95	72	4	20	2
Wells Fargo Bank, NA	68	43	14	9	2
Pennymac Loan Services	66	34	12	7	13
Mortgage Research Center	61	27	14	14	6

Higher-volume lender data was analyzed to identify those who are outliers or fall at least one and one-half standard deviations above or below the norm regarding three areas of concern - loan denials to Female, Black/African American, and White Hispanic loan applicants. A separate analysis was then conducted for higher-volume manufactured housing lenders.

No outliers were identified regarding loan denials to Black/ African American or White Hispanic loan applicants. Outliers were identified for loan denials to Female loan applicants as described in the following table.

	All Higher-volume Lenders	Outlier(s)
Originated	52.7%	Pennymac – 18.2%
Denied	21.0%	Wells Fargo – 38.5%
Other Outcome	17.2%	Pennymac – 54.5%



Higher-Volume Manufactured Housing Lenders

Lenders with a higher volume of manufactured housing loan applications were analyzed separately from all higher-volume lenders. For the purposes of this analysis, a higher-volume manufactured housing lender is a lender that reported ten or more manufactured housing

loan applications in 2021. In 2021, 83% of manufactured housing loans applications were made to eleven higher-volume manufactured housing lenders, with those lenders originating 55% of manufactured housing loans made.

Table 7 - Higher-volume Manufactured Housing Lenders – Pinal County 2021

Lender	Applications	Originated	Denied	Withdrawn	Closed for Incompleteness
21st Mortgage Corp	128	11	66	10	41
Fairway Independent Mortgage Corp	30	17	5	6	0
Nova Financial & Investment Corp	28	20	1	5	2
Academy Mortgage Corp	20	16	0	3	1
Vanderbilt Mortgage and Finance	14	0	6	0	8
Guild Mortgage Company	14	10	2	2	0
United Wholesale Mortgage	14	8	5	0	1
American Financial Resources	12	4	1	7	0
Home Point Financial Corp	12	9	1	2	0
Wells Fargo Bank, NA	11	6	3	0	2
NEWREZ, LLC	10	2	2	5	1



Higher-volume manufactured housing lender data was then analyzed to identify those who are outliers or fall at least one and one-half standard deviations above the norm in loan originations, denials, withdrawals, or closed applications. Three higher-volume manufactured housing loan lenders were identified as outliers in loan denials, one in loan withdrawals and two in closing applications for incompleteness. Further analysis of loan denial reasons did not identify any outliers; however, the HMDA data suggests lack of preparedness for home purchase by manufactured housing loan applicants with poor credit or a bad credit history.

HMDA data suggests lack of preparedness for home purchase by manufactured housing loan applicants with poor credit or a bad credit history.

Table 8 - Higher-volume Lenders Manufactured Housing Loan Outliers		
	All Higher-volume Lenders	Outlier(s)
Originated	48.0%	Academy Mortgage Corp – 80.0% Home Point Financial Corp – 75.0%
Denied	20.8%	21 st Mortgage Corp – 51.6% Vanderbilt Mortgage & Finance – 42.9% United Wholesale Mortgage – 35.7%
Withdrawn	50.0%	American Financial Resources – 58.3%
Closed for Incompleteness	12.4%	Vanderbilt Mortgage & Finance – 57.1% 21 st Mortgage Corp – 32.0%



The Role of the Secondary Market

While lenders make loans in person or through online processes, the secondary market heavily influences the terms and conditions of mortgage loans. A secondary market for residential mortgages emerged in the 1930s when local and regional demand for mortgage credit did not match the supply of bank depository funds available to make mortgages, leading to surplus mortgage credit in some areas and shortfalls in other areas. Higher interest rates and limited access to financing in some markets led the federal government to purchase mortgages originated by banks. Today, the secondary market relies primarily on securitization (the packaging of individual mortgages into mortgage-backed securities), which frees up capital for new mortgage lending.

FHA, VA, and RHS-insured loans are guaranteed by Ginnie Mae and have underwriting criteria specified by the respective federal agencies. In addition to guaranteed loans, Government

Sponsored Enterprises (GSE) Fannie Mae and Freddie Mac, influence loan originations and mortgage terms and conditions by imposing loan limits, credit scores and other types of credit criteria on the conventional loans they purchase through approved participating mortgage lenders. Life insurance companies, credit unions, commercial mortgage and savings banks, and finance companies are also major players in the secondary market.

When an individual applies for a conventional mortgage subject to GSE requirements, the lender feeds application information (credit score, income, liquid reserves, debt-to-income ratio, loan-to-value ratio, property value, etc.), into the GSE automated underwriter system. The GSE underwriter system produces the accept/reject decision. Generally, if the GSE accepts the loan, and the lender and borrower issue the loan, the lender sells the mortgage to the GSE.

Recent research suggests that automated underwriting systems have not removed discrimination but have shifted the mode. Both face-to-face and fintech (online and automated) lenders charge Latin / African American borrowers 6-9 basis points higher interest rates. This research indicates that automated underwriting may result in pricing disparities based on algorithms that use machine learning to target applicants based on the likelihood they will not shop around for another loan and other demographic factors¹⁵. And, while researchers and advocacy groups have made immense strides in recent years studying discrimination, limited public data availability is considered too narrow for artificial intelligence and machine learning models to discern how current underwriting and pricing practices could be fairer or more inclusive.

¹⁵ Consumer-Lending Discrimination in the Era of FinTech* Robert Bartlett School of Law UC, Adair Morse Haas School of Business UC Berkeley, Richard Stanton Haas School of Business UC, and Nancy Wallace Haas School of Business UC Berkeley. October 2018.



Community and Stakeholder Engagement

To better understand the perspective of community members and stakeholders regarding fair housing, housing choice, and improving access to areas of higher opportunity, an online survey and small group discussions were conducted.

Survey

A survey was created to gather information from community members and stakeholders about fair housing, housing choice and access to opportunity, including what could be done to prevent housing discrimination, and how best to raise awareness of fair housing. The survey was distributed in English and Spanish online through the County website and advertising was conducted to broaden participation. The survey received 275 responses.

More than one quarter of respondents lived in San Tan Valley and another quarter lived in Casa Grande. The remaining respondents lived throughout Pinal County, although there were no responses from residents of Cactus Forest, Kearny, Picacho, Randolph, Superior, Top of the World, or Winkelman. Six of ten respondents were female, and six of ten were between the ages of 18 and 65. Eight of ten respondents identified as White and non-Hispanic. Nearly half (48.1%) of respondents had a household income above \$63,200, while 11% had household income \$26,500 or less. Just under half (47%) of respondents had a household size of 2 people and 24% of respondents were persons with disabilities. Reflecting Pinal County demographics, 82% of respondents owned their home.

Survey responses revealed people struggling to access services and housing in more remote areas of the county, with 35% of respondents answering they did not feel they had equal access to services and 23% answering they did not have adequate resources to sustain housing. Of the 51 respondents who did not feel they had adequate access to housing, 37 answered they did not have access to housing due to low income, 2 due to housing that does not meet their disability needs, and 2 because they do not have transportation.

Of the 156 respondents who believe some type of housing discrimination is occurring, 105 cited refusing, discouraging or charging more to rent or buy a home, 59 cited predatory lending or unfair, misleading, deceptive or fraudulent loan practices, 58 cited refusing or making it hard to buy or refinance a house by charging more or offering a worse deal than someone might get shopping around, 37 cited discrimination based on disability, 34 cited refusing, discouraging to charging more for home insurance, and 35 cited steering people to another apartment, complex or neighborhood.

105 survey respondents cited refusing, discouraging, or charging more to rent or buy a home as the most likely form of housing discrimination in Pinal County.

One respondent spoke to open hostility and refusing to rent to LGBTQ+ people, while another identified the lack of affordable housing as income discrimination.

The vast majority (63%) of respondents indicated they would report housing discrimination if they encountered it, yet 30% of respondents are unsure where to report discrimination. One respondent indicated they had called the Arizona Attorney General’s Office and were told an investigation would not take place with only one complaint.

Survey respondents cited social media, government & nonprofit websites, and literature made in available in public libraries and facilities as the most effective means of providing fair housing information to the community.

When asked if their housing choices were limited by their or their family’s characteristics, 15% cited race or color as a limiting factor, 7% cited religion, 11% cited national origin, 9% cited sex or gender identity, 17% cited disability, 14% cited familial status, 19% cited age, 6% cited ancestry, 45% cited income, 24% cited source of income/receipt of public benefits, 8% cited Veteran status, and 22% cited criminal background.

30% of survey respondents are unsure of where to report housing discrimination if they felt they encountered it.

Income, source of income/receipt of public benefits, and criminal background were cited by survey respondents as the most common barriers to housing choice.

When asked about the adequacy of the affordable housing supply in their community, 65% responded that it was inadequate overall, with 45% responding it was adequate for families with children, 37% for elderly, 32% for people with disabilities, and 39% for people with criminal records.

Half of survey respondents had seen or heard information about fair housing programs, laws, or enforcement. Of those who reported seeing or hearing fair housing information, 24% had seen a fair housing flyer or pamphlet, 15% had seen or heard it at a public event, 13% had seen or heard a public service announcement on the television, 11% had heard a public service announcement on the radio, and 7% had received a fair housing handbook.

When asked about the most effective ways to inform residents about fair housing rights or discrimination, 69% cited social media, 52% cited government and nonprofit websites, 48% cited literature in public libraries and facilities, 46% cited television advertisements or announcements, and 32% cited radio. Other ideas for reaching people with fair housing information included posting in retail locations, direct contact through mail or email, providing information to people exiting prison, community events, and having a national fair housing hotline. One respondent indicated how challenging it is for individuals to fight the system to get what they need.

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Small Group Discussions

The second mode of community engagement was small group discussions. Participants in the small groups were diverse, yet there were five common and inter-related themes:

1. Housing availability;
2. Employee attraction and retention;
3. Access to health care, child care and other essential services;
4. Transportation; and
5. Limited infrastructure over a vast geography.

Housing availability was one common theme. In-migration into Pinal County and all of Arizona has placed significant pressure on the housing market. This has led to increased evictions and homelessness, and decreased affordability. People with disabilities, people experiencing homelessness, people who are medically fragile, seniors and others on fixed incomes, large families, and households with annual income less than \$55,000 are the most challenged.

Participants in small group discussions identified the availability of affordable, safe, and quality housing as the primary barrier to housing choice for Pinal County residents.

Insufficient housing stock has led to significant increases in rents and housing prices. The limited availability of housing means that people are being discharged from medical and penal institutions into homelessness. The limited availability of housing is in turn negatively impacting businesses of all sizes in attracting and retaining employees. Housing development is further hampered by no or limited infrastructure outside of municipal boundaries.

Infrastructure limitations include water, sewer, streets and sidewalks, transit, broadband and other utilities. The cost of housing development that includes the necessary infrastructure means that solutions to housing availability are years, if not decades away in the less populated and more remote areas of the county. Much of the housing development that is occurring is geared towards retirees and others who are in-migrating, and is not close to employment centers.

Employee attraction and retention concerns were discussed in the context of housing availability, proximity to the larger metro-Phoenix job market, and workforce development. Challenges cross all sectors, with education, health care, manufacturing, nonprofit, and government most often discussed. Efforts need to focus on growing soft skills among K-12 youth so they are prepared to fill local employment opportunities. Wages in Pinal County are generally lower than in the Phoenix-metro area. There are also fewer affordable housing



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options in Pinal County, including duplexes, condominiums and townhomes that could provide affordable home purchase options. Coupled with long commutes, employees often do not stay in positions for very long. While a common problem for nonprofit organizations in many locations across the U.S., lower-paying employment stymies hiring especially “when fast food pays better and offers better benefits”.

Employee attraction and retention concerns create limitations for health, education, and other essential services providers in Pinal County. Limitations exist throughout the county in both urban and rural areas, with rural areas in the eastern county experiencing the greatest challenges. Service provider challenges translate into service availability challenges for Pinal County’s most vulnerable residents. People with disabilities and their families encounter services challenges in all areas of the county, as do elderly and other people on fixed incomes. Concerns were also expressed about the potential that migrants with limited English proficiency may be reluctant to seek needed services.

While transit systems serve the more populated municipalities and connect people between those communities, service hours are limited. Some transportation options are available for seniors and people with disabilities, yet these services do not help people get to and from employment or services. The large geographic area of the county, isolation of populated areas from other populated areas, and distances between populated areas cannot generate sufficient demand to support expanded transportation services and improve access to opportunity.

Area Association of Realtors Meeting

To refine understanding of public policies and practices that may limit housing choice, Pinal County met with representatives of the WeSERV Association of Realtors, which serves the Phoenix West and Southeast Valleys, and Pinal, Cochise, and Santa Cruz Chapters. The conversation focused on removing or reducing barriers to development while providing capital for development and potential homebuyers.

WeSERV meeting participants spoke to the renewed “drive until you qualify” stance of many buyers and the emerging issue of military housing in western Pinal County as military personnel are squeezed out of the metro-Phoenix housing market. The need for move-up housing options, entry-level housing for households with income \$45,000 to \$95,000, and medium-scale development were discussed. The participants acknowledged the challenges of limited infrastructure, unpaved or absent roads, and water, while welcoming the presence of Charter Schools that

Pinal County and the municipalities within Pinal County have differing development requirements. Not all concerns raised by meeting participants nor the potential solutions are applicable to Pinal County planning, zoning, or building requirements.

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provide high quality education choices. A follow-up email also shared concerns about the many owners of single-family rental housing forced into foreclosure or sale during the COVID-19 eviction moratorium.

Tiny home communities were discussed by WeSERV as a potential solution, particularly for younger households who wish to own their homes and not share walls with another home. Other potential solutions included sprung structures to provide temporary housing for employees of new businesses while permanent structures can be built, and the need to remove restrictions on tiny homes, accessory dwelling units, and design standards such as garages and landscaping that unnecessarily add to the cost of housing. Programs that provide 20% down payment assistance, community land trusts, and land leases were discussed as potential solutions to expanding housing choice.

WeSERV also commissioned a housing study that is the centerpiece of their discussions with local government regarding how they might work with the private sector to increase housing opportunities with a variety of rental and purchase housing.

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2019 Fair Housing Action Plan Review

The 2019 Fair Housing Action Plan identified four impediments to fair housing choice in Pinal County:

1. Training and fair housing education and information are needed to increase understanding of fair housing and the likelihood that discrimination in housing will be identified and reported.
2. Living conditions and housing affordability limit opportunities for housing sustainability.
3. Limited transportation options contribute to limited housing sustainability for individuals and families.
4. Lending practices may result in predatory lending or high-cost loans for consumers.

2019-2023 Activities to Address Fair Housing Impediments

Pinal County took action to address all four impediments identified in the 2019 AI, including:

- Conducting an assessment of lending patterns to determine whether predatory lending exists against Black/African American populations or the types of loan products are limited to specific groups.
- Sponsoring annual training with the City of Casa Grande and the Southwest Fair Housing Council (SWFHC). Central Arizona Governments (the regional council of governments) also hosts a training with SWFHC that is open to all jurisdictions and organizations in Pinal County.
- Including fair housing education in Public Housing Authority briefings and orientation meetings. In addition, residents and program participants receive information about reasonable accommodations for persons with disabilities during their initial briefing and with each annual recertification packet.
- Annually providing reasonable accommodation information to owners and landlords who participate in the Housing Choice Voucher program.
- Mailing Fair Housing flyers to public housing residents, program participants, and county agencies during the month of April.
- Displaying Fair Housing posters and making available Fair Housing materials and brochures in program offices.

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- Actively supporting owner-occupied housing rehabilitation, code compliance clean-ups, tenant-based rental assistance, and emergency housing assistance, as funds are available.
- Regularly holding clean-up days sponsored by the County Board of Supervisors in cooperation with the code compliance division. A fund is also available to help elderly and disabled homeowners to address cleanup costs where needed.
- Supporting affordable housing development by offering HOME funds for rental development and meeting with housing developers and discussing potential monetary support.
- Maintaining a working relationship with Central Arizona Regional Transit to examine ways to expand transit service in unserved areas.
- Engaging in discussions with Valley Metro to develop a partnership that may provide future regional bus, light rail, and paratransit service.

Continuous Fair Housing Activities

Pinal County also takes the following ongoing actions to further fair housing:

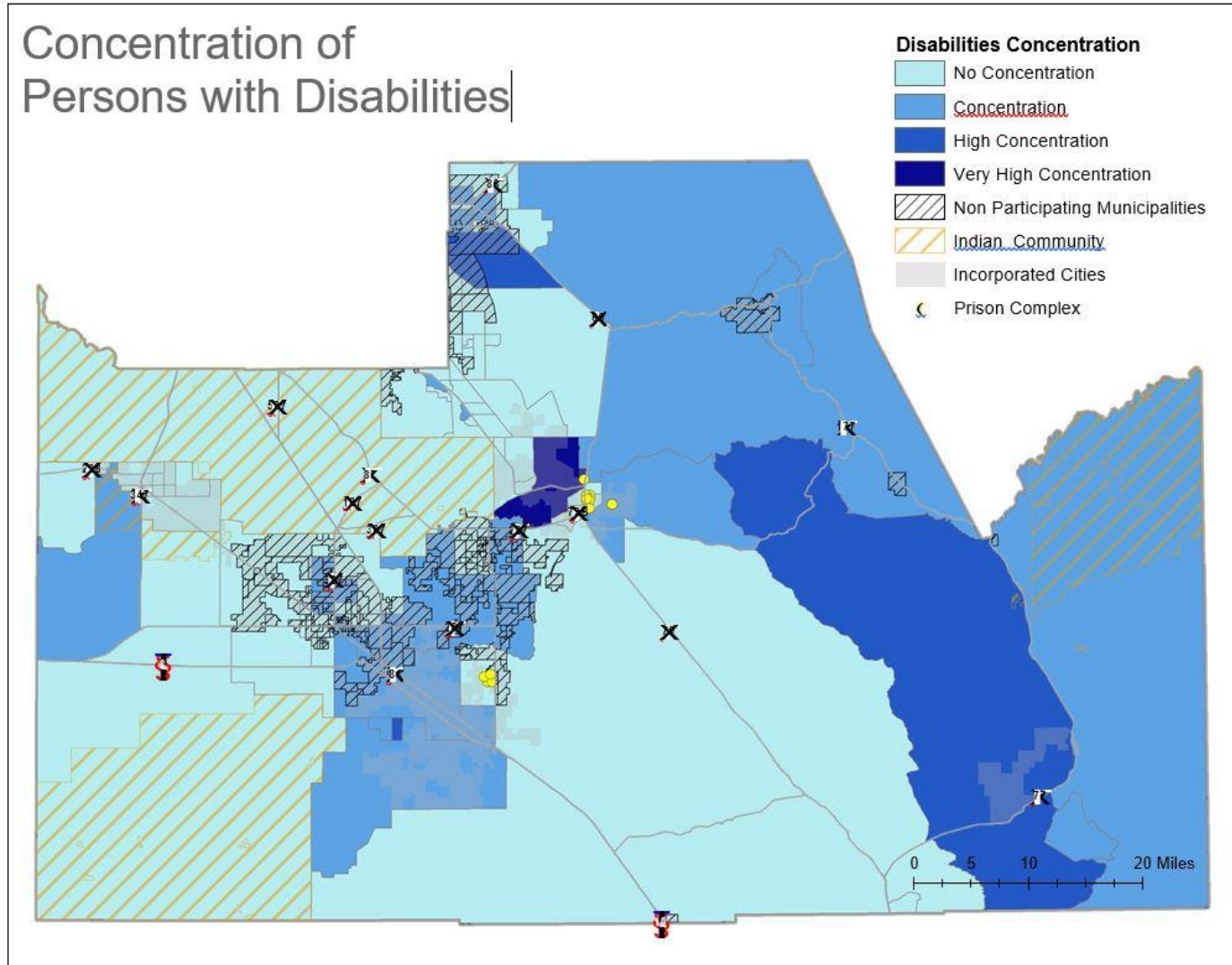
- Holding public meetings, including those related directly to the use of HUD CPD funds, in facilities accessible to persons with disabilities.
- Implementing the Limited English Proficiency plan.
- Including TDD numbers and information on how to request an accommodation in advertisements encouraging public input or announcing public meetings.
- Annually attending Fair Housing training.
- Preparing and submitting to the Pinal County Board of Supervisors a resolution and proclamation declaring April as Fair Housing Month.
- Providing Fair Housing posters to the Pinal County Library district, Community Action Human Resources Agency (CAHRA), and the Western Pinal Association of Realtors for posting.
- Community Development Block Grant (CDBG) funding supports community development, infrastructure, affordable housing, human services, and other activities. In the context of limited CDBG and leverage funding, the County made significant progress towards investing in housing and making public improvements.

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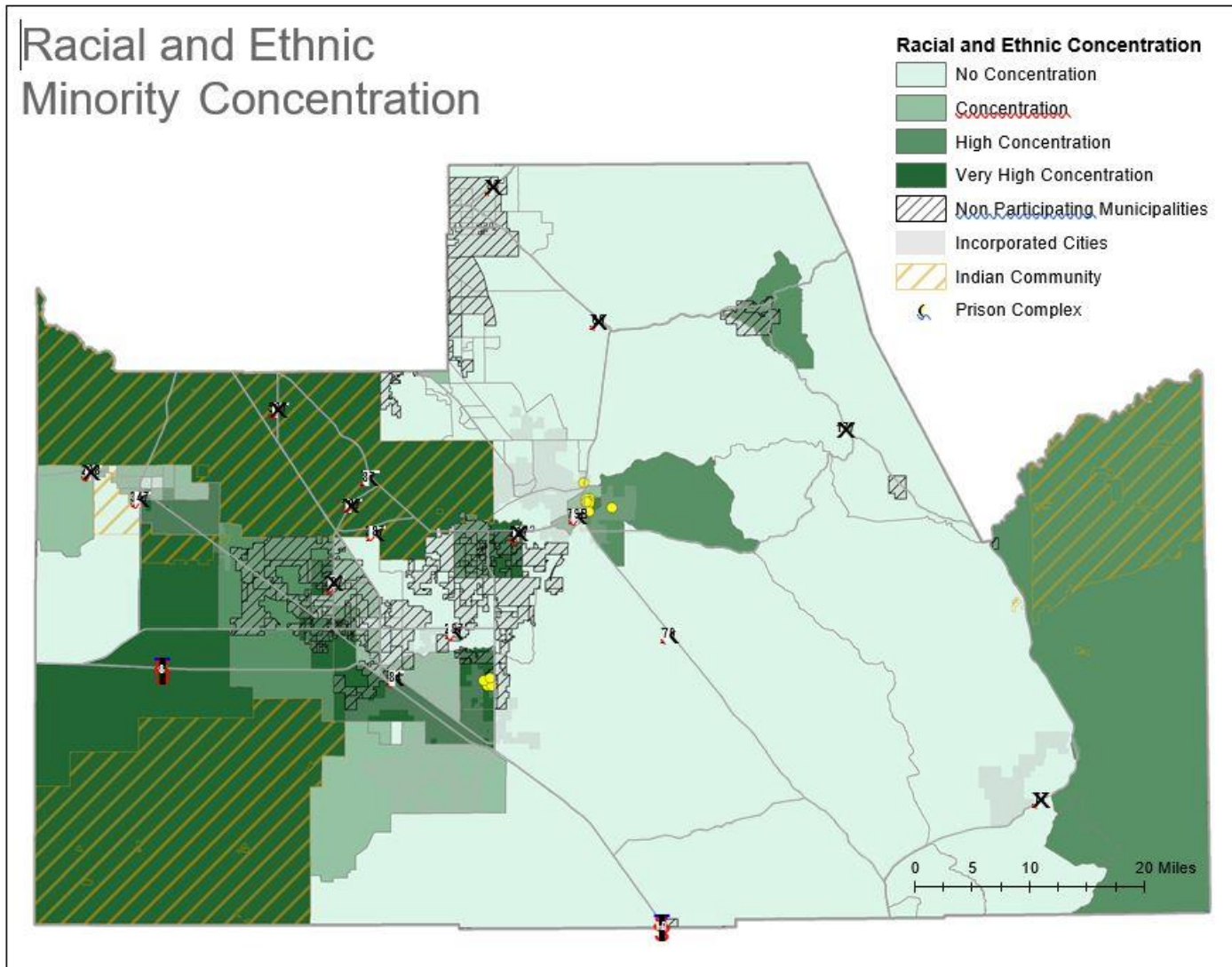
Community Development Block Grant Funding

Details regarding the historic expenditure of CDBG funding by the County are found in Consolidated Annual Performance and Evaluation Reports (CAPER). The CAPERs are produced annually and describe affordable housing and community development resources, methods of distribution, geographic funding objectives, and the actions that were taken during the program year.

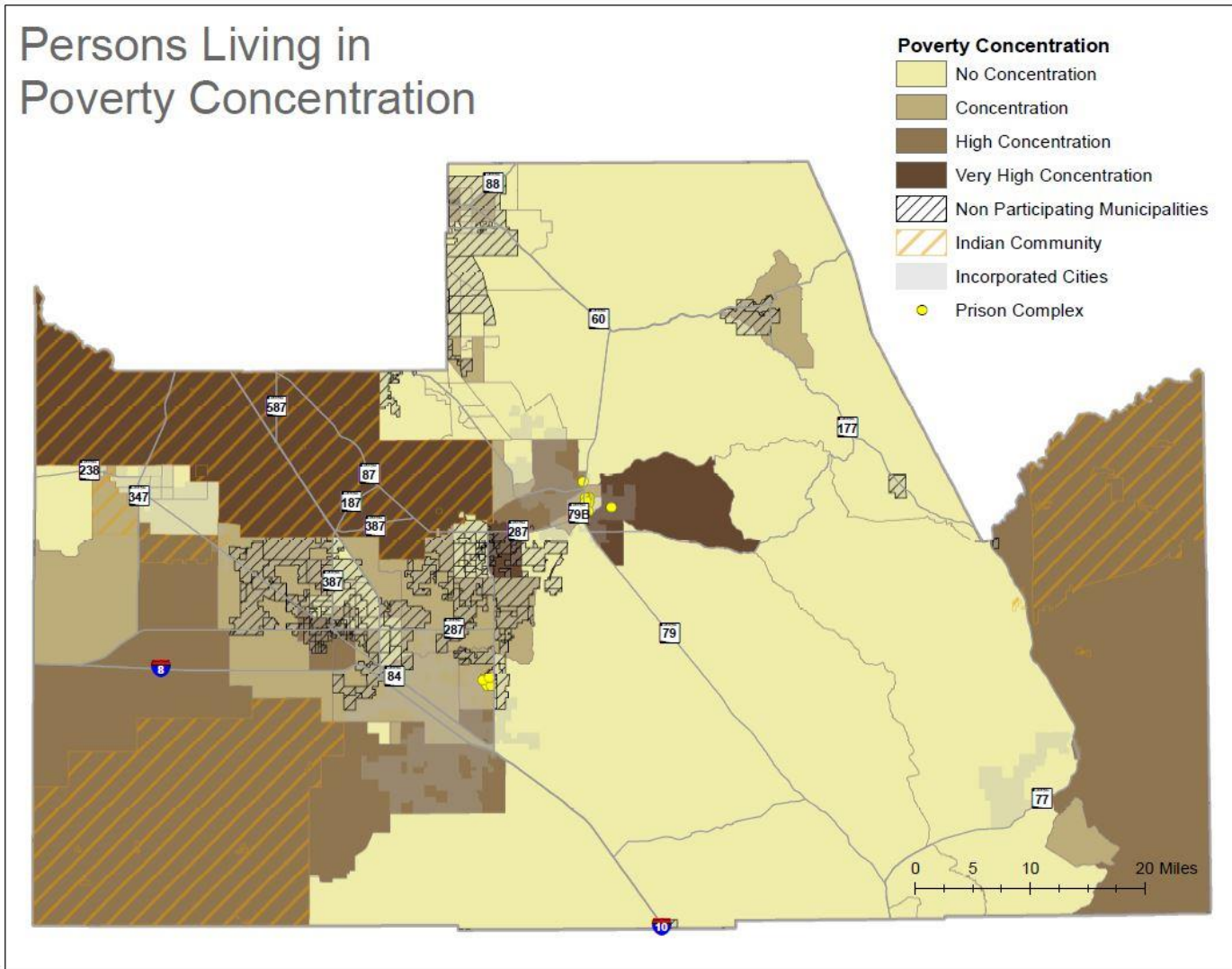
Appendix 1 - Areas of Disability Concentration Map



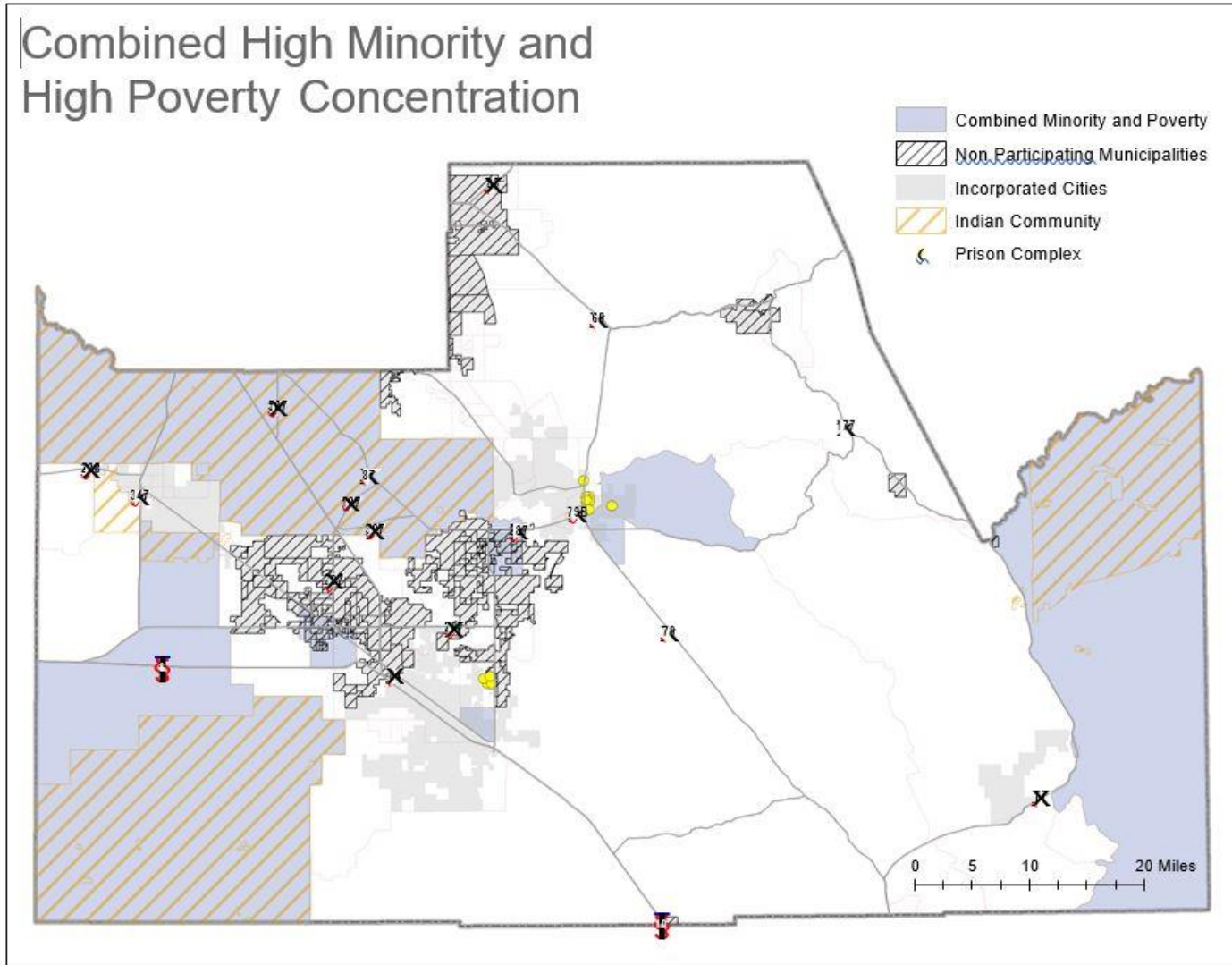
Appendix 2 - Areas of Minority Concentration Map



Appendix 3 - Areas of Poverty Concentration Map



Appendix 4 - Racially/Ethnically-Concentrated Areas of Poverty (R/ECAPs) Map



Appendix 5 – Justice40 Disadvantaged Communities List and Map

2010 Low-Income Census Tract	Climate Change	Energy	Health	Housing	Legacy Pollution	Transportation	Water & Wastewater	Workforce Development
3.08	None	None	Heart Disease, Low Life Expectancy	None	None	DOT Transit Barriers	None	Low HS Attainment
3.09	Wildfire Risk	None	Heart Disease	None	None	None	None	None
3.12	None	None	None	None	None	DOT Transit Barriers	None	None
3.13	None	None	Heart Disease	None	None	None	None	None
3.15	Wildfire Risk	None	None	None	None	DOT Transit Barriers	None	None
4	Agriculture Loss, Wildfire Risk	None	Diabetes, Low Life Expectancy	None	None	None	Wastewater Discharge	Low HS Attainment
7	Wildfire Risk	None	Diabetes, Heart Disease	None	None	DOT Transit Barriers	None	Unemployment
8.01	None	None	None	None	None	None	None	Unemployment
8.03	Agriculture Loss	None	None	None	Former Defense Site	DOT Transit Barriers	None	None
9.01	Agriculture Loss, Wildfire Risk	None	None	None	None	None	None	Unemployment



PINAL COUNTY ARIZONA 2024 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

2010 Low-Income Census Tract	Climate Change	Energy	Health	Housing	Legacy Pollution	Transportation	Water & Wastewater	Workforce Development
9.02	Agriculture Loss, Wildfire Risk	None	None	None	None	None	None	None
10	Agriculture Loss	None	Diabetes	None	None	None	None	Unemployment
11	None	None	None	None	None	None	None	Unemployment
12	Agriculture Loss	None	None	None	None	DOT Transit Barriers	None	None
12	Agriculture Loss	Cost	Asthma, Diabetes, Heart Disease, Low Life Expectancy	None	None	DOT Transit Barriers	None	Low HS Attainment, Unemployment
13	Agriculture Loss	Cost	Asthma, Diabetes, Heart Disease, Low Life Expectancy	None	None	None	None	Low HS Attainment, Unemployment
13.06	Agriculture Loss, Wildfire Risk	None	None	None	None	None	None	None
14	Agriculture Loss	None	Asthma	None	Former Defense Site	DOT Transit Barriers	None	None
14.03	None	None	None	None	RMP Facility	None	None	None
14.06	Agriculture Loss, Wildfire Risk	None	Low Life Expectancy	None	None	None	None	Unemployment



PINAL COUNTY ARIZONA 2024 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

2010 Low-Income Census Tract	Climate Change	Energy	Health	Housing	Legacy Pollution	Transportation	Water & Wastewater	Workforce Development
14.07	Agriculture Loss, Wildfire Risk	None	None	None	None	None	None	Unemployment
15	Agriculture Loss, Flood Risk	Cost	Asthma, Diabetes, Low Life Expectancy	Cost	RMP Facility	None	None	Low HS Attainment, Linguistic Isolation
16	Agriculture Loss	None	None	None	Former Defense Site	DOT Transit Barriers	None	None
17.03	Agriculture Loss, Wildfire Risk	None	None	None	None	None	None	None
19	Agriculture Loss	None	Diabetes	None	None	None	None	None
20.01	Agriculture Loss	None	None	None	None	DOT Transit Barriers	None	None
20.02	Agriculture Loss	None	None	None	None	None	None	Unemployment
20.03	Agriculture Loss, Wildfire Risk	Cost	Diabetes	None	None	None	None	Low HS Attainment, Linguistic Isolation
21.01	Agriculture Loss, Wildfire Risk	None	None	None	None	None	None	Unemployment

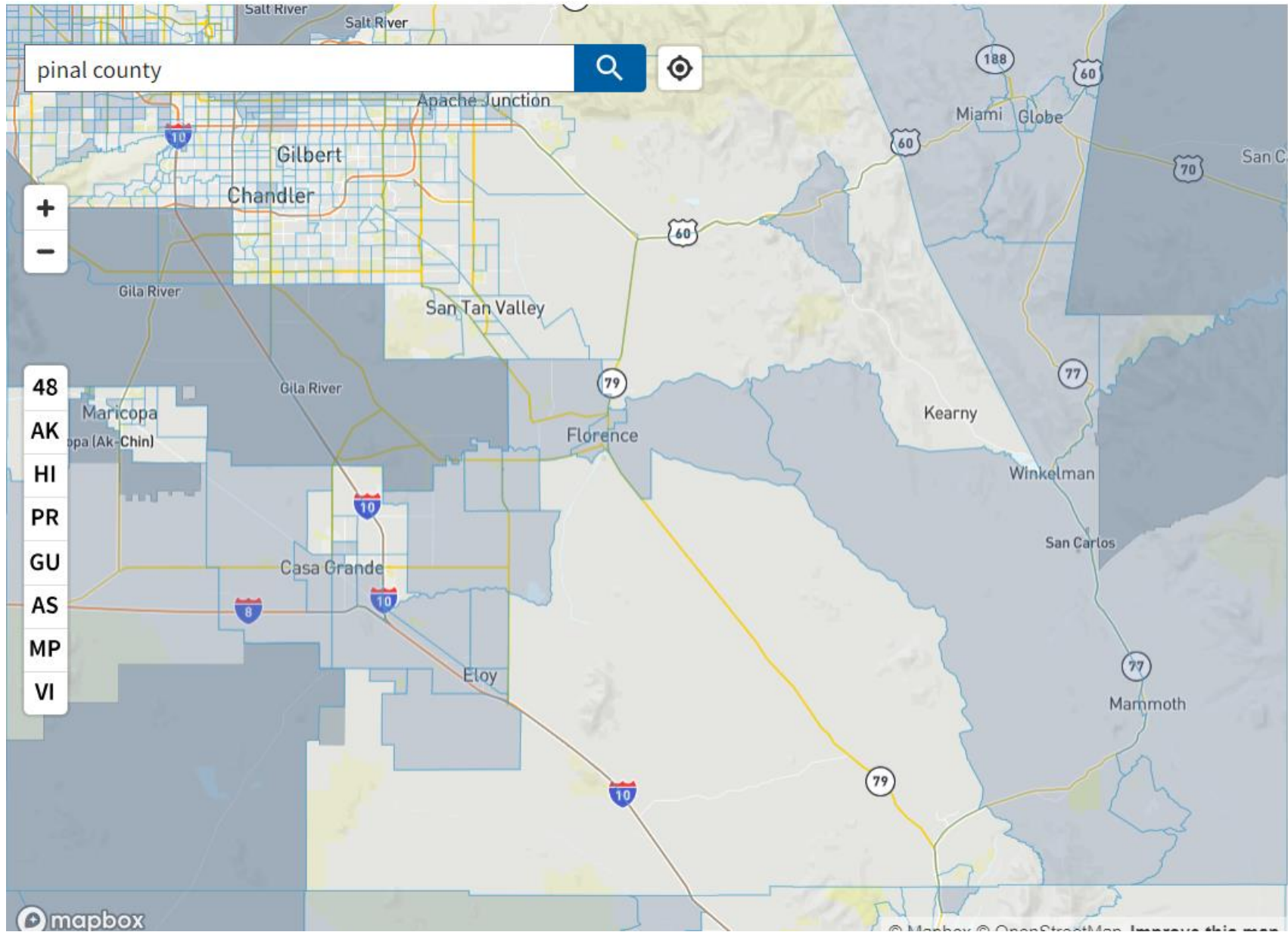


PINAL COUNTY ARIZONA 2024 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

2010 Low-Income Census Tract	Climate Change	Energy	Health	Housing	Legacy Pollution	Transportation	Water & Wastewater	Workforce Development
21.02	Agriculture Loss, Flood Risk	None	None	None	None	None	None	None
22	None	None	None	None	None	None	None	Unemployment
24	Agriculture Loss, Wildfire Risk	None	Diabetes, Heart Disease	None	None	DOT Transit Barriers	None	None

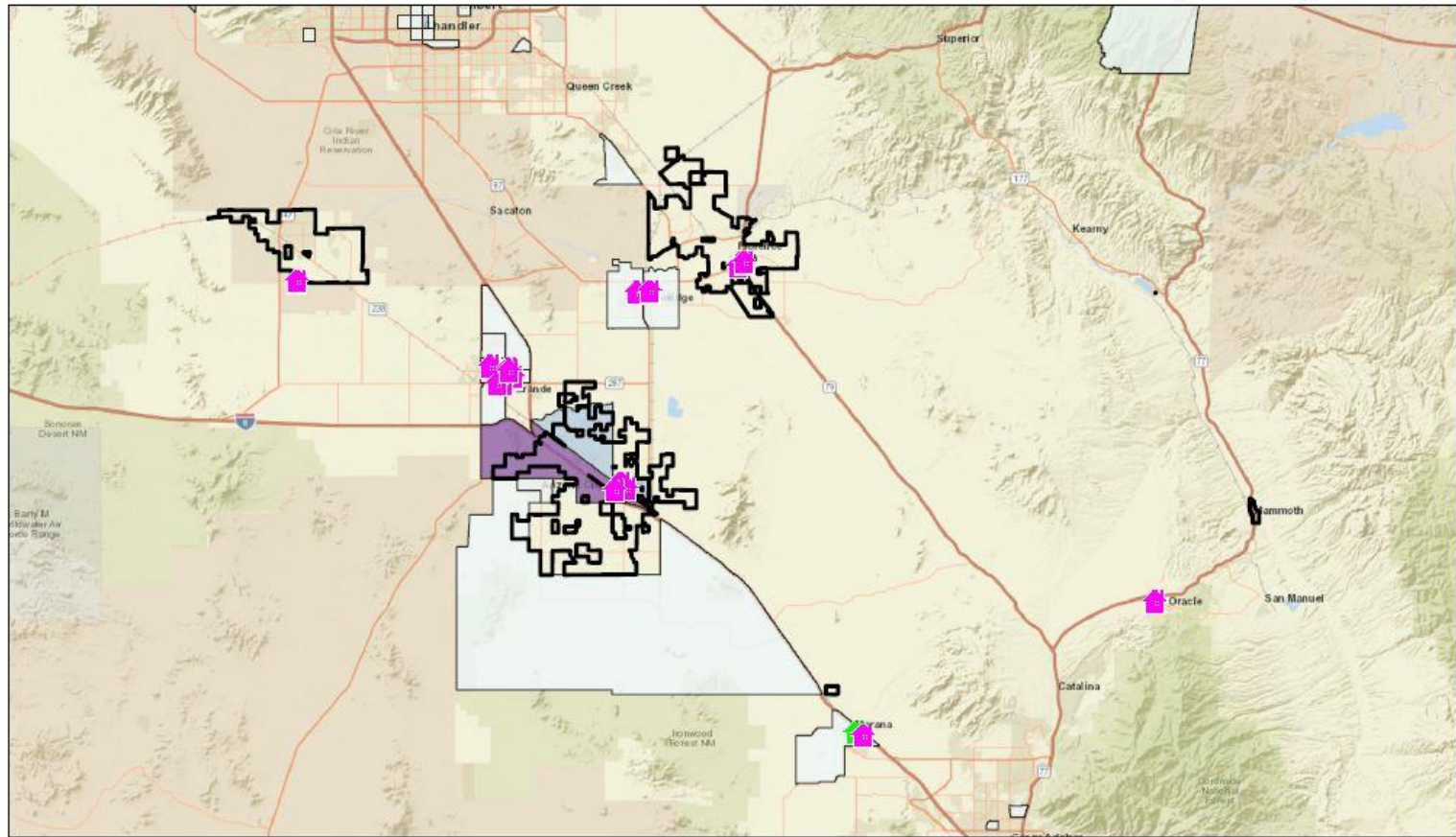


PINAL COUNTY ARIZONA 2024 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



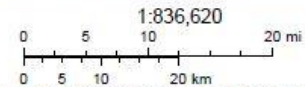
Appendix 6 – Voucher Holders and Location of Subsidized Multi-Family Housing Maps

Concentration of Voucher Holders and Location of Subsidized Multi-family Housing -



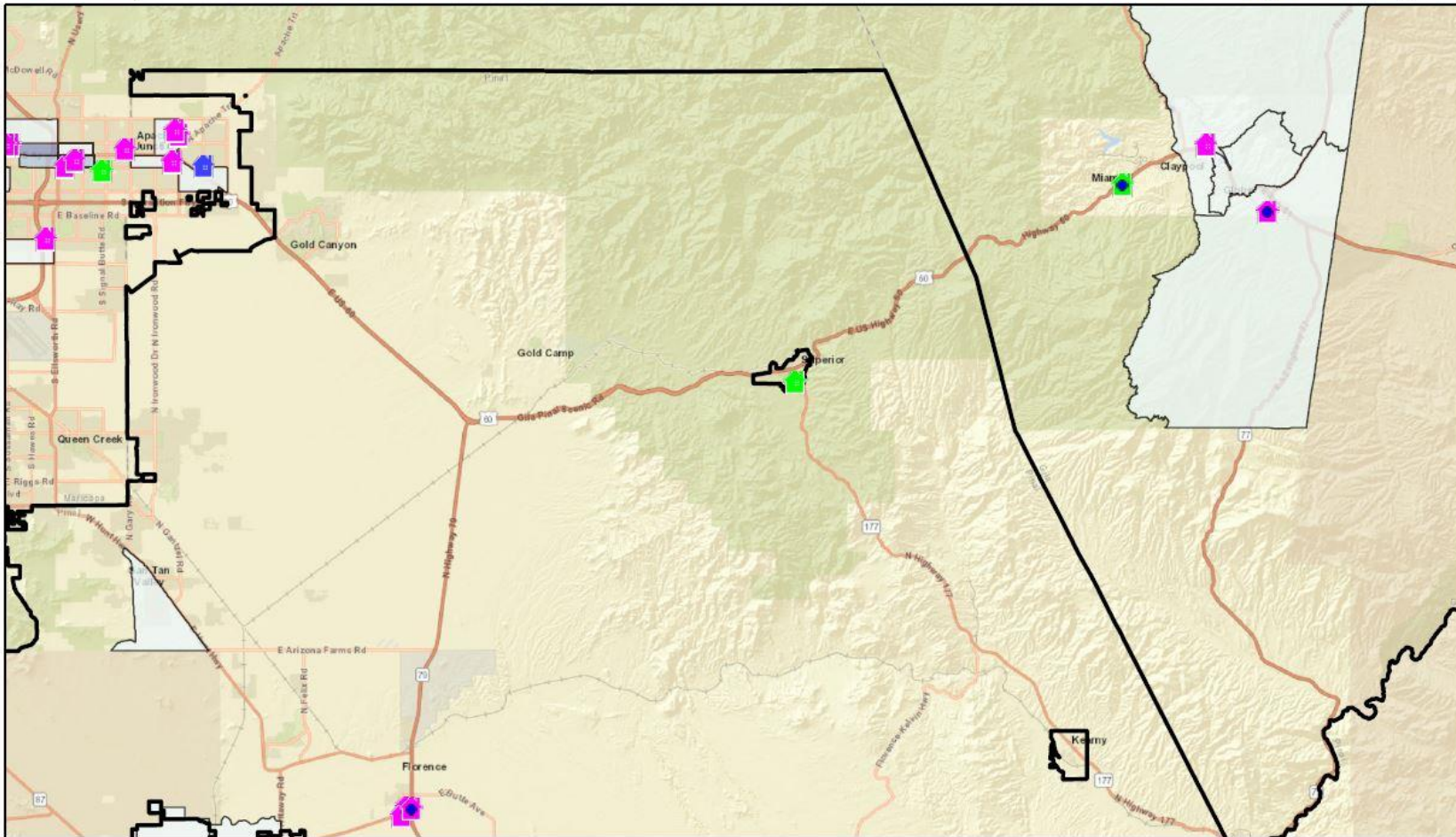
May 21, 2023

- LIHTC Property
- Multifamily Properties - Assisted
- Override 1
- 7.26-15.58%
- 29.12-56.76%
- 0-7.26%



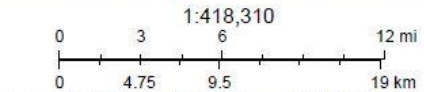
Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

CPD Maps - Concentration of Voucher Holders and Location of Subsidized Multi-family Housing 1



June 27, 2023

- USDA Rural Housing
 ■ Multifamily Properties - Assisted
 - Public Housing Development
 Override 1
 - LIHTC Property
 Voucher Concentration
- | | |
|--|--------------|
| | 0-7.26% |
| | 7.26-15.58% |
| | 15.58-29.12% |

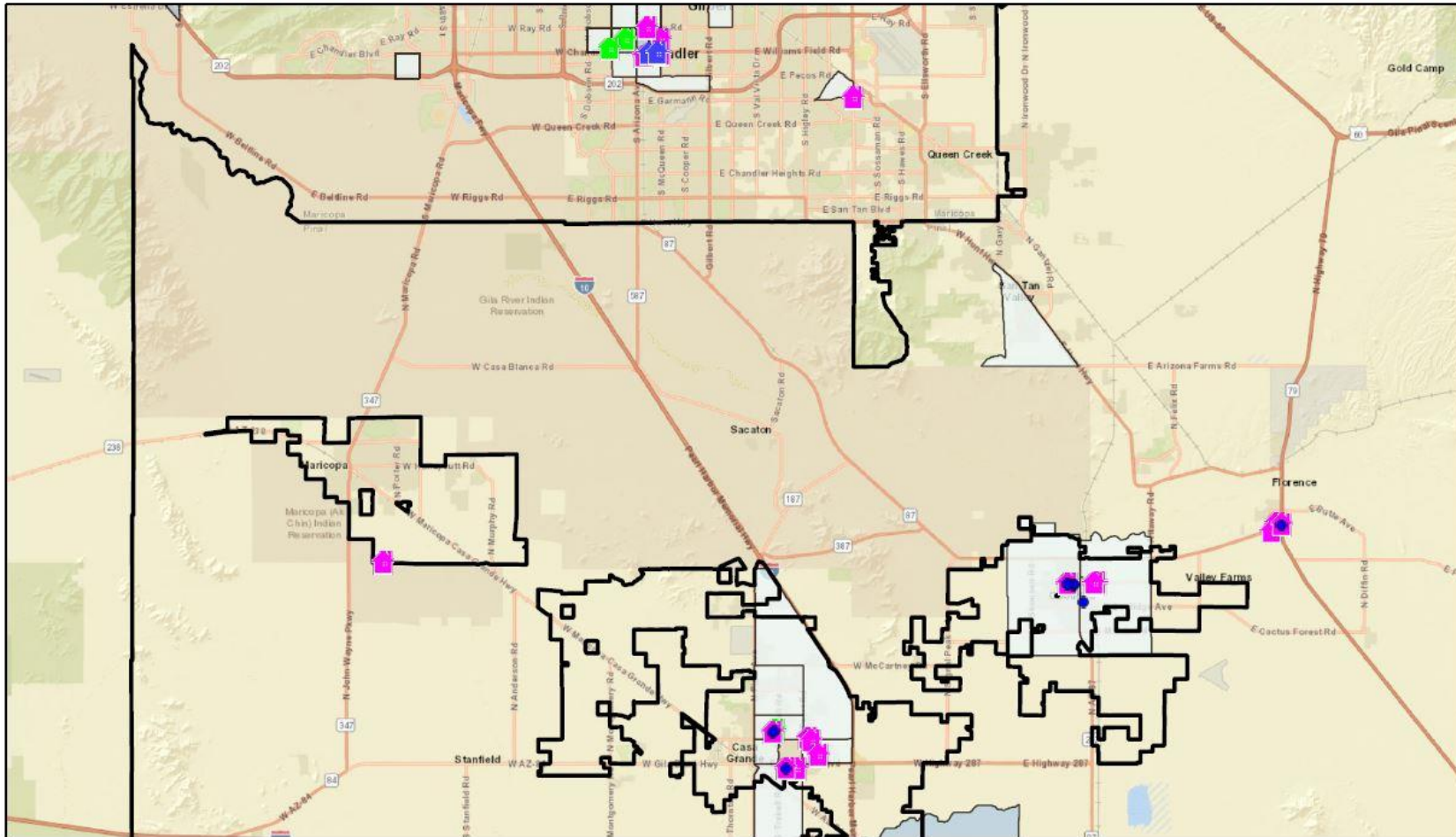


Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community



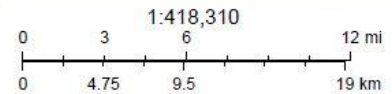
PINAL COUNTY ARIZONA 2024 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

CPD Maps - Concentration of Voucher Holders and Location of Subsidized Multi-family Housing 2



June 27, 2023

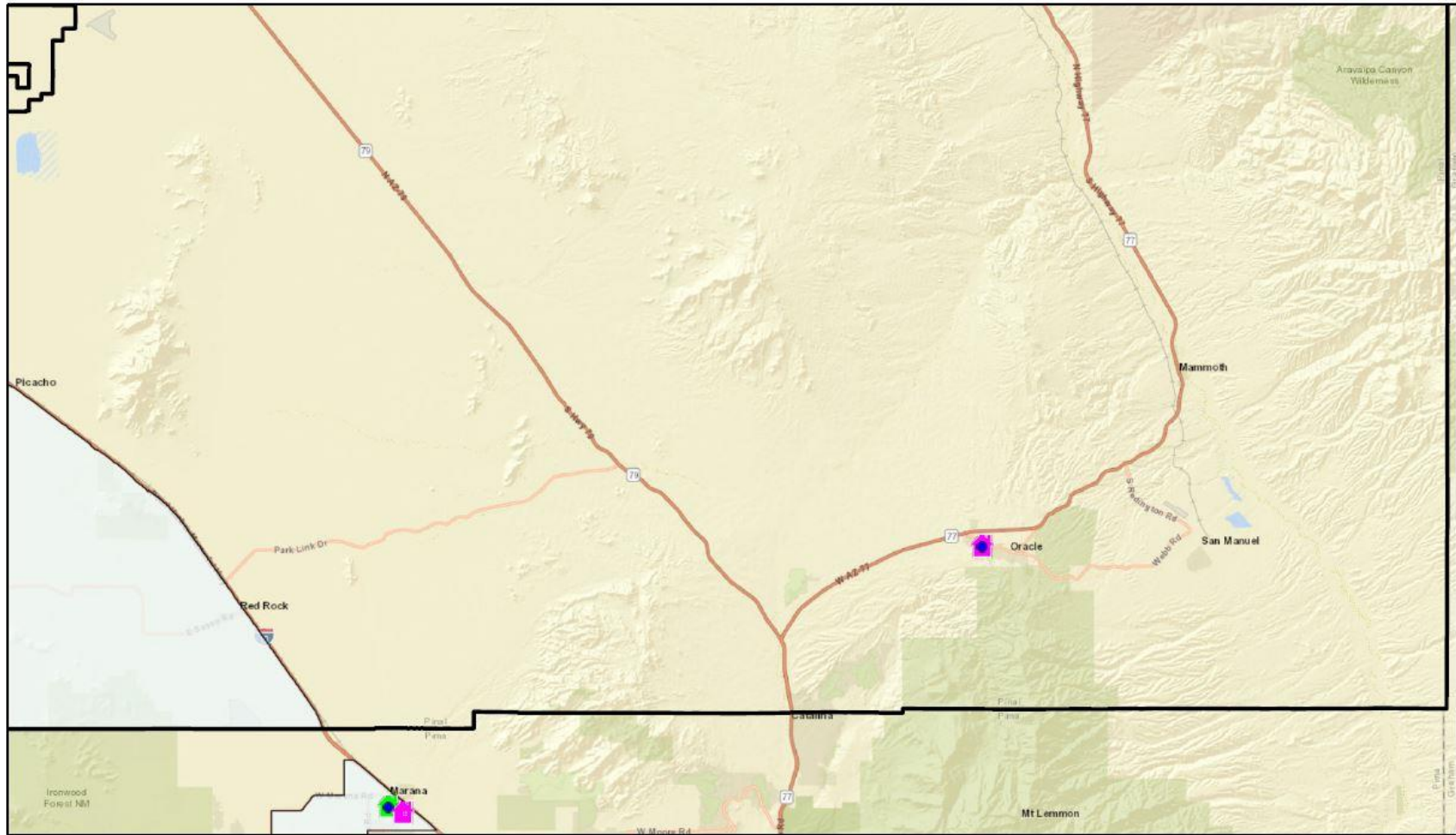
- ◆ USDA Rural Housing
 - Public Housing Development
 - LIHTC Property
 - Multifamily Properties - Assisted
 - ▭ Override 1
- Voucher Concentration
- 0-7.26%
 - 7.26-15.58%
 - 29.12-56.76%



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

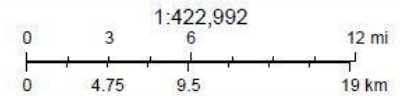


CPD Maps - Concentration of Voucher Holders and Location of Subsidized Multi-family Housing 4



June 27, 2023

- USDA Rural Housing
- LIHTC Property
- Multifamily Properties - Assisted
- Override 1
- VoucherConcentration
- 0-7.26%

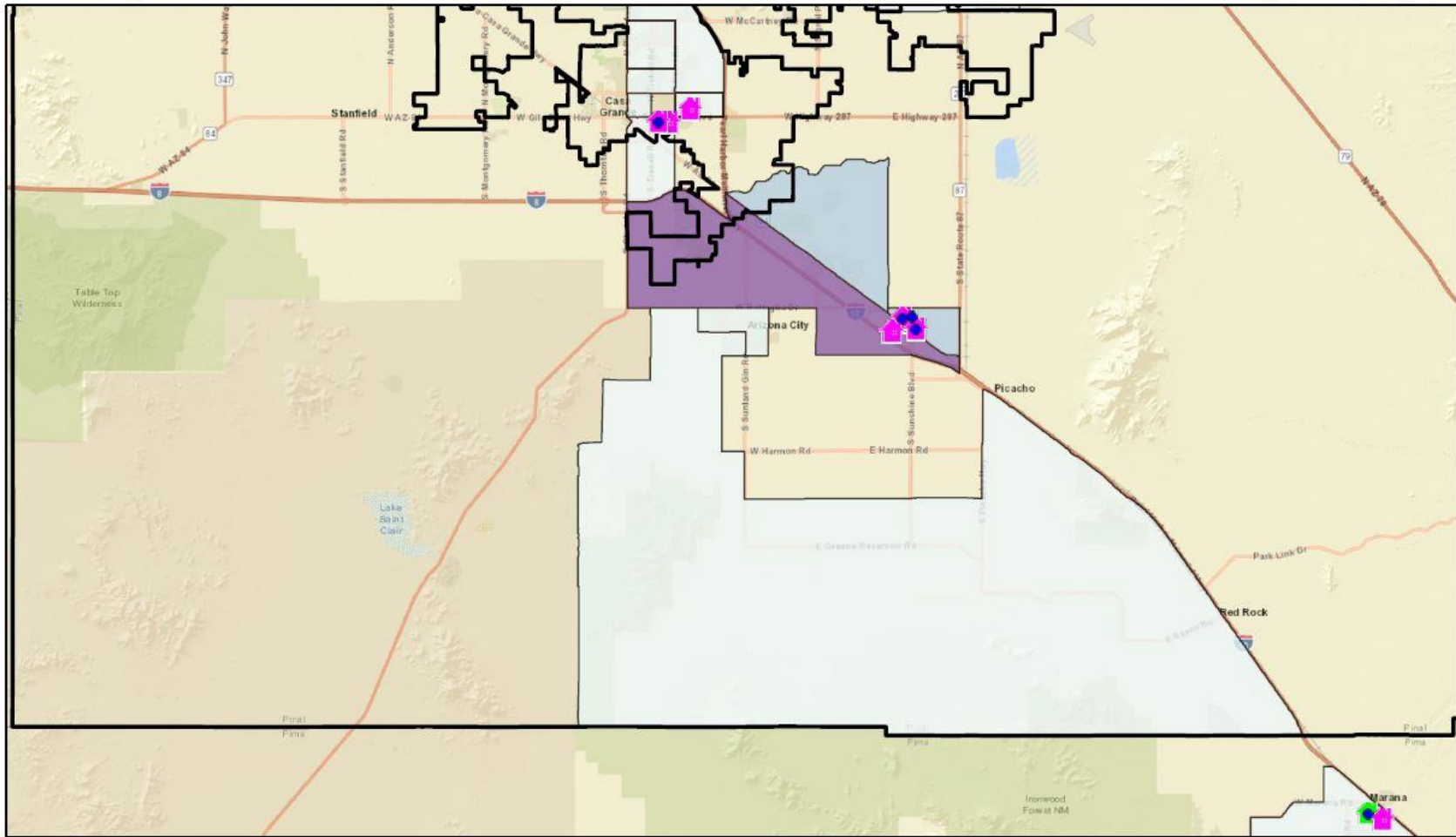


Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community



PINAL COUNTY ARIZONA 2024 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

CPD Maps - Concentration of Voucher Holders and Location of Subsidized Multi-family Housing 3



June 27, 2023

- USDA Rural Housing
- LIHTC Property
- Multifamily Properties - Assisted
- ▭ Override 1
- VoucherConcentration
- ▭ 0-7.26%
- ▭ 7.26-15.58%
- ▭ 29.12-56.76%

1:422,992
 0 3 6 12 mi
 0 4.75 9.5 19 km
 Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

